

STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

TOWN & COUNTRY SERVICE COMPANY  
INC.

AI # 43586

PROCEEDINGS UNDER THE LOUISIANA  
ENVIRONMENTAL QUALITY ACT  
LA. R.S. 30:2001, ET SEQ.

\* Settlement Tracking No.  
\* SA-WE-20-0071  
\*  
\*  
\* Enforcement Tracking No.  
\* WE-CN-18-00250  
\*  
\*  
\*  
\*  
\*

SETTLEMENT

The following Settlement is hereby agreed to between Town & Country Service Company Inc. (“Respondent”) and the Department of Environmental Quality (“DEQ” or “the Department”), under authority granted by the Louisiana Environmental Quality Act, La. R.S. 30:2001, et seq. (“the Act”).

I

Respondent is a corporation that owns and/or operates a wastewater treatment facility located in Monroe, Ouachita Parish, Louisiana (“the Facility”).

II

On October 12, 2018, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. WE-CN-18-00250 (Exhibit 1).

III

Respondent denies it committed any violations or that it is liable for any fines, forfeitures and/or penalties.

IV

Nonetheless, Respondent, without making any admission of liability under state or federal statute or regulation, agrees to pay, and the Department agrees to accept, a payment in the amount of ELEVEN THOUSAND AND NO/100 DOLLARS (\$11,000.00), of which Five Hundred Thirty-Five and 84/100 Dollars (\$535.84) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The total amount of money expended by Respondent on cash payments to the Department as described above, shall be considered a civil penalty for tax purposes, as required by La. R.S. 30:2050.7(E)(1).

V

Respondent further agrees that the Department may consider the inspection report(s), permit record(s), the Consolidated Compliance Order & Notice of Potential Penalty and this Settlement for the purpose of determining compliance history in connection with any future enforcement or permitting action by the Department against Respondent, and in any such action Respondent shall be estopped from objecting to the above-referenced documents being considered as proving the violations alleged herein for the sole purpose of determining Respondent's compliance history.

VI

This agreement shall be considered a final order of the Secretary for all purposes, including, but not limited to, enforcement under La. R.S. 30:2025(G)(2), and Respondent hereby waives any right to administrative or judicial review of the terms of this agreement, except such review as may be required for interpretation of this agreement in any action by the Department to enforce this agreement.

VII

This settlement is being made in the interest of settling the state's claims and avoiding for

both parties the expense and effort involved in litigation or an adjudicatory hearing. In agreeing to the compromise and settlement, the Department considered the factors for issuing civil penalties set forth in La. R. S. 30:2025(E) of the Act.

### VIII

As required by law, the Department has submitted this Settlement Agreement to the Louisiana Attorney General for approval or rejection. The Attorney General's concurrence is appended to this Settlement Agreement.

### IX

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Ouachita Parish, Louisiana. The advertisement, in form and wording approved by the Department, announced the availability of this settlement for public view and comment and the opportunity for a public hearing. Respondent has submitted an original proof-of-publication affidavit and an original public notice to the Department and, as of the date this Settlement is executed on behalf of the Department, more than forty-five (45) days have elapsed since publication of the notice.

### X

Payment is to be made within ten (10) days from notice of the Secretary's signature. If payment is not received within that time, this Agreement is voidable at the option of the Department. Payments are to be made by check, payable to the Department of Environmental Quality, and mailed or delivered to the attention of Accountant Administrator, Financial Services Division, Department of Environmental Quality, Post Office Box 4303, Baton Rouge, Louisiana, 70821-4303. Each payment shall be accompanied by a completed Settlement Payment Form (Exhibit A).

XI

In consideration of the above, any claims for penalties are hereby compromised and settled in accordance with the terms of this Settlement.

XII

Each undersigned representative of the parties certifies that he or she is fully authorized to execute this Settlement Agreement on behalf of his or her respective party, and to legally bind such party to its terms and conditions.

TOWN & COUNTRY SERVICE  
COMPANY INC.

BY: Judith DeMers  
(Signature)

Judith DeMers  
(Printed)

TITLE: President

THUS DONE AND SIGNED in duplicate original before me this 23<sup>rd</sup> day of November, 20 20, at Monroe, LA.

Diane Miletello Mulhearn  
NOTARY PUBLIC (ID # 52240)

Diane Miletello Mulhearn  
(stamped or printed)

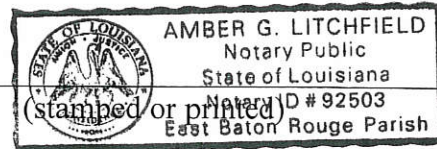
LOUISIANA DEPARTMENT OF  
ENVIRONMENTAL QUALITY  
Chuck Carr Brown, Ph.D., Secretary

BY: [Signature]

Lourdes Iturralde, Assistant Secretary  
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this 17<sup>th</sup> day of March, 20 21, at Baton Rouge, Louisiana.

[Signature]  
NOTARY PUBLIC (ID # 92503)



Approved: [Signature]  
Lourdes Iturralde, Assistant Secretary



III.	To immediately cease, upon receipt of this <b>COMPLIANCE ORDER</b> , any unauthorized discharges from the Respondent's facility to waters of the state.
IV.	To submit to the Enforcement Division, within thirty (30) days after receipt of this <b>COMPLIANCE ORDER</b> , a comprehensive plan for the expeditious elimination and prevention of such noncomplying discharges. Such plan shall provide for specific corrective actions taken and shall include a critical path schedule for the achievement of compliance within the shortest time possible.
V.	To submit to the Enforcement Division, within thirty (30) days after receipt of this <b>COMPLIANCE ORDER</b> , annual sewage sludge reports as outlined in LAJ650094 Section II for the past five (5) years.

**RIGHT TO APPEAL**

I.	The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this <b>COMPLIANCE ORDER</b> . This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt of this <b>COMPLIANCE ORDER</b> .
II.	The request for an adjudicatory hearing shall specify the provisions of the <b>COMPLIANCE ORDER</b> on which the hearing is requested and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and Agency Interest Number, which are located in the upper left-hand corner of the first page of this document and should be directed to the address specified in this document.
III.	Upon the Respondent's timely filing a request for a hearing, a hearing on the disputed issue of material fact or of law regarding this <b>COMPLIANCE ORDER</b> may be scheduled by the Secretary of the Department. The hearing shall be governed by the Act, the Administrative Procedure Act (La. R.S. 49:950, et seq.), and the Division of Administrative Law's (DAL) Procedural Rules. The Department may amend or supplement this <b>COMPLIANCE ORDER</b> prior to the hearing, after providing sufficient notice and an opportunity for the preparation of a defense for the hearing.
IV.	This <b>COMPLIANCE ORDER</b> shall become a final enforcement action unless the request for hearing is timely filed. Failure to timely request a hearing constitutes a waiver of the Respondent's right to a hearing on a disputed issue of material fact or of law under Section 2050.4 of the Act for the violation(s) described herein.
V.	The Respondent's failure to request a hearing or to file an appeal or the Respondent's withdrawal of a request for hearing on this <b>COMPLIANCE ORDER</b> shall not preclude the Respondent from contesting the findings of facts in any subsequent penalty action addressing the same violation(s), although the Respondent is estopped from objecting to this <b>COMPLIANCE ORDER</b> becoming a permanent part of its compliance history.
VI.	Civil penalties of not more than thirty-two thousand five hundred dollars (\$32,500) may be assessed for each day of violation. The Respondent's failure or refusal to comply with this <b>COMPLIANCE ORDER</b> and the provisions herein will subject the Respondent to possible enforcement procedures under La. R.S. 30:2025, which could result in the assessment of a civil penalty in an amount of not more than fifty thousand dollars (\$50,000) for each day of continued violation or noncompliance.
VII.	For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and nothing herein shall be construed to preclude the right to seek such penalties.

**NOTICE OF POTENTIAL PENALTY**

I.	Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for the violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. If you elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice.
II.	Prior to the issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present any mitigating circumstances concerning the violation(s). If you would like to have such a meeting, please contact Kevin Foy at (225) 219-3485 within ten (10) days of receipt of this <b>NOTICE OF POTENTIAL PENALTY</b> .
III.	The Department is required by La. R.S. 30:2025(E)(3)(a) to consider the gross revenues of the Respondent and the monetary benefits of noncompliance to determine whether a penalty will be assessed and the amount of such penalty. Please forward the Respondent's most current annual gross revenue statement along with a statement of the monetary benefits of noncompliance for the cited violation(s) to the above named contact person within ten (10) days of receipt of this <b>NOTICE OF POTENTIAL PENALTY</b> . Include with your statement of monetary benefits the method(s) you utilized to arrive at the sum. If you assert that no monetary benefits have been gained, you are to fully justify that statement. If the Respondent chooses not to submit the requested most-current annual gross revenues statement within ten (10) days, it will be viewed by the Department as an admission that the Respondent has the ability to pay the statutory maximum penalty as outlined in La. R.S. 30:2025.
IV.	This <b>CONSOLIDATED COMPLIANCE ORDER &amp; NOTICE OF POTENTIAL PENALTY</b> is effective upon receipt.

**CONTACTS AND SUBMITTAL OF INFORMATION**

<b>Enforcement Division:</b> Louisiana Department of Environmental Quality Office of Environmental Compliance Water Enforcement Division Post Office Box 4312 Baton Rouge, LA 70821 Attn: Kevin Foy	<b>Hearing Requests:</b> Department of Environmental Quality Office of the Secretary Post Office Box 4302 Baton Rouge, Louisiana 70821-4302 Attn: Hearings Clerk, Legal Division Re: Enforcement Tracking No. WE-CN-18-00250 Agency Interest No. 43586
<b>Water Permits Division (if necessary):</b> Department of Environmental Quality Office of Environmental Services Post Office Box 4313 Baton Rouge, LA 70821-4313 Attn: Water Permits Division	<b>Physical Address (if hand delivered):</b> Department of Environmental Quality 602 N Fifth Street Baton Rouge, LA 70802

**HOW TO REQUEST CLOSURE OF THIS CONSOLIDATED COMPLIANCE ORDER**

**& NOTICE OF POTENTIAL PENALTY**

- To appeal the **CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY**, the Respondent must follow the guidelines set forth in the "Right to Appeal" portion of this **CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY**.
- To request closure of the **COMPLIANCE ORDER** portion, the Respondent must demonstrate compliance with the "Order" portion of this **COMPLIANCE ORDER** by completing the attached "**CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form and returning it to the address specified.
  - Before requesting closure of the **COMPLIANCE ORDER** portion, please contact the Financial Services Division at 225-219-3865 or email them at [\\_DEQ-WWWFinancialServices@la.gov](mailto:_DEQ-WWWFinancialServices@la.gov) to determine if you owe outstanding fees.
- To expedite closure of the **NOTICE OF POTENTIAL PENALTY** portion, the Respondent may offer a settlement amount to resolve any claim for civil penalties for the violation(s) described herein.
  - The Department assesses civil penalties based on LAC 33:i.Subpart1.Chapter7.
  - The Respondent may offer a settlement amount but the Department is under no obligation to enter into settlement negotiations. It is decided upon on a discretionary basis.
  - The settlement offer amount may be entered on the attached "**CONSOLIDATED COMPLIANCE ORDER AND NOTICE OF POTENTIAL PENALTY REQUEST TO CLOSE**" form. The Respondent must include a justification of the offer.
  - **DO NOT** submit payment of the offer amount with the form. The Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.
  - Before requesting closure of the **NOTICE OF POTENTIAL PENALTY** portion, please contact the Financial Services Division at 225-219-3865 or email them at [\\_DEQ-WWWFinancialServices@la.gov](mailto:_DEQ-WWWFinancialServices@la.gov) to determine if you owe outstanding fees.

If you have questions or need more information, you may contact Kevin Foy at (225) 219-3485 or [Kevin.Foy@la.gov](mailto:Kevin.Foy@la.gov).




Lourdes Iturralde  
Assistant Secretary  
Office of Environmental Compliance

Date: 10-12-15

Attachment(s)

- Request to Close
- Table 1: Permit Limit Exceedances
- Table 2: Unauthorized Discharges



LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE ENFORCEMENT DIVISION <b>CONSOLIDATED COMPLIANCE ORDER &amp;</b> POST OFFICE BOX 4312 <b>NOTICE OF POTENTIAL PENALTY</b> BATON ROUGE, LOUISIANA 70821-4312 <b>REQUEST TO CLOSE</b>					
Enforcement Tracking No.	WE-CN-18-00250	Contact Name	Kevin Foy		
Agency Interest (AI) No.	43586	Contact Phone No.	(225) 219-3485		
Alternate ID No.	LA0052078; LAJ650094				
Respondent:	Town & Country Service Company Inc.	Facility Name:	Oakwood Regional WWTF		
	c/o C.J. Ledoux	Physical Location:	2800 Old Sterlington Road		
	Agent for Service of Process	City, State, Zip:	Monroe, LA 71203		
	4315 Sterlington Rd. Monroe, LA 71203	Parish:	Ouachita Parish		
<b>STATEMENT OF COMPLIANCE</b>					
<b>STATEMENT OF COMPLIANCE</b>		<b>Date Completed</b>	<b>Copy Attached?</b>		
A written report was submitted in accordance with Paragraph II of the "Order" portion of the <b>COMPLIANCE ORDER</b> .					
All necessary documents were submitted to the Department within 30 days of receipt of the <b>COMPLIANCE ORDER</b> in accordance with Paragraphs IV and V of the "Order" portion of the <b>COMPLIANCE ORDER</b> .					
All items in the "Findings of Fact" portion of the <b>COMPLIANCE ORDER</b> were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the <b>COMPLIANCE ORDER</b> . Final compliance was achieved as of:					
<b>SETTLEMENT OFFER (OPTIONAL)</b>					
<i>(check the applicable option)</i>					
_____	The Respondent is not interested in entering into settlement negotiations with the Department with the understanding that the Department has the right to assess civil penalties based on LAC 33:1.Subpart1.Chapter7.				
_____	In order to resolve any claim for civil penalties for the violations in <b>NOTICE OF POTENTIAL PENALTY (WE-CN-18-00250)</b> , the Respondent is interested in entering into settlement negotiations with the Department and would like to set up a meeting to discuss settlement procedures.				
_____	In order to resolve any claim for civil penalties for the violations in <b>NOTICE OF POTENTIAL PENALTY (WE-CN-18-00250)</b> , the Respondent is interested in entering into settlement negotiations with the Department and offers to pay \$ _____ which shall include LDEQ enforcement costs and any monetary benefit of non-compliance. <ul style="list-style-type: none"> <li>• Monetary component = \$ _____</li> <li>• Beneficial Environmental Project (BEP) component (optional)= \$ _____</li> <li>• <b>DO NOT SUBMIT PAYMENT OF THE OFFER WITH THIS FORM- the Department will review the settlement offer and notify the Respondent as to whether the offer is or is not accepted.</b></li> </ul> The Respondent has reviewed the violations noted in <b>NOTICE OF POTENTIAL PENALTY (WE-CN-18-00250)</b> and has attached a justification of its offer and a description of any BEPs if included in settlement offer.				
<b>CERTIFICATION STATEMENT</b>					
I certify, under provisions in Louisiana and United States law that provide criminal penalties for false statements, that based on information and belief formed after reasonable inquiry, the statements and information attached and the compliance statement above, are true, accurate, and complete. I also certify that I do not owe outstanding fees or penalties to the Department for this facility or any other facility I own or operate. I further certify that I am either the Respondent or an authorized representative of the Respondent.					
Respondent's Signature		Respondent's Printed Name			
		Respondent's Title			
Respondent's Physical Address		Respondent's Phone #	Date		
<b>MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:</b>					
Louisiana Department of Environmental Quality Office of Environmental Compliance Enforcement Division Post Office Box 4312 Baton Rouge, LA 70821 Attn: Kevin Foy					

If you have questions or need more information, you may contact Kevin Foy at (225) 219-3485 or Kevin.Foy@la.gov.

Table 1: Permit Limit Exceedances

Monitoring Period	Parameter	Permit Limit	Measured Value
November 2014	Ammonia Nitrogen	10 mg/L Monthly Avg	15.05 mg/L
		30 lbs/day Loading Avg	51.74 lbs/day
December 2014	Ammonia Nitrogen	20 mg/L Daily Max	21.6 mg/L
		10 mg/L Monthly Avg	17.9 mg/L
		30 lbs/day Loading Avg	65.99 lbs/day
January 2015	Ammonia Nitrogen	10 mg/L Monthly Avg	14.81 mg/L
		76 lbs/day Loading Avg	77.14 lbs/day
March 2015	Ammonia Nitrogen	10 mg/L Monthly Avg	10.99 mg/L
May 2015	Ammonia Nitrogen	8 mg/L Daily Max	9.58 mg/L
		4 mg/L Monthly Avg	5.15 m/L
	TSS	15 mg/L Monthly Avg	19 mg/L
		114 lbs/day Loading Avg	115.29 lbs/day
June 2015	Ammonia Nitrogen	8 mg/L Daily Max	9.62 mg/L
		4 mg/L Monthly Avg	5.42 mg/L
		30 lbs/day Loading Avg	31.07 lbs/day
	TSS	23 mg/L Daily Max	24 mg/L
		15 mg/L Monthly Avg	21.80 mg/L
		114 lbs/day Loading Avg	128.10 lbs/day
July 2015	Ammonia Nitrogen	8 mg/L Daily Max	11.48 mg/L
		4 mg/L Monthly Avg	8.40 mg/L
		30 lbs/day Loading Avg	30.54 lbs/day
August 2015	Ammonia Nitrogen	8 mg/L Daily Max	8.78 mg/L
		4 mg/L Monthly Avg	5.77 mg/L
September 2015	Ammonia Nitrogen	8 mg/L Daily Max	17.10 mg/L*
			22.84 mg/L*
			24.20 mg/L*
			24.52 mg/L*
			31.76 mg/L
		4 mg/L Monthly Avg	24.08 mg/L
		30 lbs/day Loading Avg	90.70 lbs/day
October 2015	Ammonia Nitrogen	8 mg/L Daily Max	36.36 mg/L
		4 mg/L Monthly Avg	25.08 mg/L
		30 lbs/day Loading Avg	106.77 lbs/day
November 2015	Ammonia Nitrogen	10 mg/L Monthly Avg	15.21 mg/L
		30 lbs/day Loading Avg	66.20 lbs/day
December 2015	Ammonia Nitrogen	20 mg/L Daily Max	22.5 mg/L
		10 mg/L Monthly Avg	17.88 mg/L
		30 lbs/day Loading Avg	77.36 lbs/day
January 2016	Ammonia Nitrogen	20 mg/L Daily Max	23.02 mg/L
		10 mg/L Monthly Avg	19.90 mg/L
		76 lbs/day Loading Avg	84.24 lbs/day

\* : reported on Non-Compliance Report

Table 1: Permit Limit Exceedances (Continued)

Monitoring Period	Parameter	Permit Limit	Measured Value
February 2016	Ammonia Nitrogen	20 mg/L Daily Max	21.44 mg/L
		10 mg/L Monthly Avg	19.62 mg/L
		76 lbs/day Loading Avg	83.79 lbs/day
March 2016	Ammonia Nitrogen	20 mg/L Daily Max	20.32 mg/L
		10 mg/L Monthly Avg	12.27 mg/L
	TSS	23 mg/L Daily Max	31.00 mg/L
		15 mg/L Monthly Avg	19.33 mg/L
April 2016	Ammonia Nitrogen	8 mg/L Daily Max	8.59 mg/L
		4 mg/L Monthly Avg	5.68 mg/L
	TSS	23 mg/L Daily Max	27.00 mg/L
May 2016	Ammonia Nitrogen	8 mg/L Daily Max	20.04 mg/L
		4 mg/L Monthly Avg	14.03 mg/L
		30 lbs/day Loading Avg	61.26 lbs/day
	TSS	15 mg/L Monthly Avg	15.2 mg/L
June 2016	Ammonia Nitrogen	8 mg/L Daily Max	19.62 mg/L
		4 mg/L Monthly Avg	17.78 mg/L
		30 lbs/day Loading Avg	68.33 lbs/day
July 2016	Ammonia Nitrogen	8 mg/L Daily Max	13.54 mg/L
		4 mg/L Monthly Avg	11.80 mg/L
		30 lbs/day Loading Avg	49.58 lbs/day
August 2016	Ammonia Nitrogen	8 mg/L Daily Max	20.64 mg/L
		4 mg/L Monthly Avg	12.63 mg/L
		30 lbs/day Loading Avg	41.28 lbs/day
	TSS	23 mg/L Daily Max	32.0 mg/L
		15 mg/L Monthly Avg	17.8 mg/L
September 2016	Ammonia Nitrogen	8 mg/L Daily Max	12.08 mg/L
		4 mg/L Monthly Avg	7.67 mg/L
	TSS	23 mg/L Daily Max	25.00 mg/L
October 2016	Ammonia Nitrogen	8 mg/L Daily Max	9.33 mg/L
		4 mg/L Monthly Avg	7.64 mg/L
December 2016	Ammonia Nitrogen	10 mg/L Monthly Avg	16.33 mg/L
		31 lbs/day Loading Avg	70.33 lbs/day
January 2017	TSS	23 mg/L Daily Max	28.00 mg/L
		15 mg/L Monthly Avg	24.40 mg/L
February 2017	TSS	23 mg/L Daily Max	25 mg/L
		15 mg/L Monthly Avg	21.33 mg/L
March 2017	Ammonia Nitrogen	20 mg/L Daily Max	35.78 mg/L
		10 mg/L Monthly Avg	25.45 mg/L
		74 lbs/day Loading Avg	94.71 lbs/day
	TSS	23 mg/L Daily Max	24.00 mg/L
15 mg/L Monthly Avg		20.00 mg/L	
April 2017	Ammonia Nitrogen	10 mg/L Monthly Avg	10.8 mg/L
	TSS	23 mg/L Daily Max	24 mg/L

Table 1: Permit Limit Exceedances (Continued)

Monitoring Period	Parameter	Permit Limit	Measured Value
May 2017	Ammonia Nitrogen	8 mg/L Daily Max	12 mg/L
		4 mg/L Monthly Avg	8.9 mg/L
		31 lbs/day Loading Avg	33 lbs/day
June 2017	Ammonia Nitrogen	8 mg/L Daily Max	16 mg/L
		4 mg/L Monthly Avg	9 mg/L
		31 lbs/day Loading Avg	38 lbs/day
	TSS	23 mg/L Daily Max	26 mg/L
		15 mg/L Monthly Avg	19 mg/L
July 2017	Ammonia Nitrogen	8 mg/L Daily Max	18.9 mg/L
		4 mg/L Monthly Avg	12.7 mg/L
		31 lbs/day Loading Avg	47.2 lbs/day
August 2017	Ammonia Nitrogen	8 mg/L Daily Max	20.9 mg/L
		4 mg/L Monthly Avg	14.2 mg/L
		31 lbs/day Loading Avg	60 lbs/day
	TSS	15 mg/L Monthly Avg	15.6 mg/L
September 2017	Ammonia Nitrogen	8 mg/L Daily Max	20 mg/L
		4 mg/L Monthly Avg	16.95 mg/L
		31 lbs/day Loading Avg	62 lbs/day
	TSS	23 mg/L Daily Max	30 mg/L
		15 mg/L Monthly Avg	20.5 mg/L
October 2017	Ammonia Nitrogen	8 mg/L Daily Max	17.1 mg/L
		4 mg/L Monthly Avg	15.3 mg/L
		31 lbs/day Loading Avg	57 lbs/day
December 2017	Ammonia Nitrogen	10 mg/L Monthly Avg	11 mg/L
	TSS	23 mg/L Daily Max	24 mg/L
January 2018	Ammonia Nitrogen	10 mg/L Monthly Avg	19 mg/L
	TSS	15 mg/L Monthly Avg	16 mg/L
February 2018	Ammonia Nitrogen	20 mg/L Daily Max	28.7 mg/L
		10 mg/L Monthly Avg	20 mg/L
	TSS	23 mg/L Daily Max	27 mg/L
		15 mg/L Monthly Avg	19 mg/L
March 2018	Ammonia Nitrogen	20 mg/L Daily Max	28 mg/L
		10 mg/L Monthly Avg	20.2 mg/L
April 2018	Ammonia Nitrogen	10 mg/L Monthly Avg	11 mg/L
	TSS	15 mg/L Monthly Avg	16 mg/L
May 2018	Ammonia Nitrogen	8 mg/L Daily Max	24.9 mg/L
		4 mg/L Monthly Avg	10.8 mg/L
		31 lbs/day Loading Avg	41 lbs/day
June 2018	Ammonia Nitrogen	8 mg/L Daily Max	25.4 mg/L
		4 mg/L Monthly Avg	13.6 mg/L
		31 lbs/day Loading Avg	51 lbs/day

**Table 2: Unauthorized Discharges**

<b>Incident #</b>	<b>Date</b>	<b>Media Affected</b>	<b>Description</b>
160132	11/19/14	Soil	~100 gallons of sewage overflowed from manhole due to line blockage.
163650	5/13/15	Soil	~100 gallons of sewage overflowed from manhole due to line blockage.
166856	10/21/15	Soil	~20 gallons of sewage overflowed from manhole due to line blockage.
167690	12/7/15	Soil	~100 gallons of sewage overflowed from manhole due to line blockage.
168522	2/1/16	Soil	~800 gallons of sewage overflowed from manhole due to line blockage.
172197	8/12/16	Soil/Water	~100 gallons of sewage overflowed from manhole due to electrical short at lift station.
172658	8/31/16	Soil	~300 gallons of sewage overflowed from manhole due to line blockage.
175827	2/10/17	Soil	~100 gallons of sewage overflowed from manhole due to blockage at lift station.
178903	7/17/17	Soil/Water	~100 gallons of sewage overflowed from manhole into street storm drain due to line blockage.