STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:	*	**Settlement Tracking No. SA-MM-12-0024**
SUN DRILLING PRODUCTS CORPORATION	*	
AI # 6415	*	**Enforcement Tracking No. MM-CN-09-0072**
PROCEEDINGS UNDER THE LOUISIANA ENVIRONMENTAL QUALITY ACT LA. R.S. 30:2001, ET SEQ.	*	**Docket No. 2009-10065-EQ**

SETTLEMENT

The following Settlement is hereby agreed to between Sun Drilling Products Corporation ("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 facility that manufactures and blends drilling fluid specialty products located in Belle Chasse, Plaquemines Parish, Louisiana ("the Facility").

II

On September 9, 2009, the Department issued to Respondent a Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. MM-CN-09-0072, which was based upon the following findings of fact:

The Respondent owns and/or operates a facility located at 503 Main Street, Belle Chasse, Plaquemines Parish, Louisiana (the Site) known to the Department as Sun Drilling Products Corporation. The facility manufactures and blends drilling fluid specialty products such as drilling fluid lubricants, shale stabilizers, and degreasers. The facility initially notified the

Department as a conditionally exempt small quantity generator of hazardous waste (CESQG) on or about April 1, 2002, and operates under the EPA Identification Number LAD065471112. The facility generates hazardous waste as a result of disposing of unused and/or contaminated raw materials and spent xylene solvent utilized to flush/clean onsite process equipment.

The Respondent was issued Louisiana Pollutant Discharge Elimination System (LPDES) permit LA0087327 on June 11, 2004, which became effective on July 1, 2004, and expired on June 30, 2009. A renewal application was received by the Department on or about January 30, 2009. The permit renewal application was determined to be administratively complete on or about February 4, 2009, and LPDES permit LA0087327 has been administratively continued. Under the terms and conditions of LPDES permit LA0087327, the Respondent is authorized to discharge storm water runoff, equipment wash water, cooling tower blowdown, and manufactured styrene divinylbenzene copolymer bead wash water through Outfall 001 into the Mississippi River; and storm water runoff through Outfalls 002, 003, 004, 005, 006, and 007 into an unnamed parish drainage system ditches, thence into Hero's Canal, thence into the Intracoastal Waterway, thence into the Mississippi River, all waters of the state.

In December of 2007, the Respondent generated seven (7) 55-gallon containers (approximately 3,207 lbs. or 1450 kg) of spent xylene solvent (D001 and F003) as a result of the cleanout of onsite process equipment. The volume of hazardous waste generated by the Respondent in December 2007 resulted in the Respondent becoming a large quantity generator (LQG) of hazardous waste and was thus subject to compliance with the regulations applicable to large quantity generators during the month of December 2007. The seven (7) containers of spent xylene hazardous waste were shipped offsite on December 17, 2007, for treatment at an authorized treatment facility.

The Respondent submitted an updated HW-1 form revising its hazardous waste generator status from CESQG to LQG and which was received by the Department on or about June 6,

2008. According to a statement provided by the Respondent's Health, Safety, & Environmental Manager ("HSE Manager") to the Environmental Scientist-Staff of the Department's Waste Enforcement Section on July 28, 2009, the Respondent has maintained its LQG status since its submittal of its latest HW-1 form in June 2008 and intends to maintain its LQG status at the present time. According to Respondent's HSE Manager, the Respondent intends to maintain its LQG status because various intermittently conducted facility activities (e.g., facility turnarounds or equipment clean out following failed production batches, etc.) may result in the generation of large quantity volumes of hazardous waste in the future. Respondent's HSE Manager also stated that Respondent would comply with all applicable LQG rules and regulations until such time that it notifies the Department of a change in generator status by submittal of a revised HW-1 form.

1. Solid and Hazardous Waste

On or about May 16, 2008, an inspection of the Site was conducted in order to assess compliance with Solid, Hazardous, and Water Quality Regulations. The inspection and a file review conducted on July 28, 2009, revealed the following Solid and Hazardous Waste violations:

A. The Respondent failed to perform a proper and accurate hazardous waste determination for the spent solvent waste generated at the facility, in violation of LAC 33:V.1103. Specifically, the Respondent failed to perform a proper and accurate hazardous waste determination for the spent xylene solvent referenced in Findings of Fact Paragraph III. The initial waste manifest, signed by a representative of the Respondent on December 17, 2007, mischaracterized the seven (7) 55-gallon containers of hazardous waste as styrene rather than xylene. The Respondent corrected this violation by amending the manifest on May 21, 2008.

B. The Respondent failed to notify the Office of Environmental Services within seven (7) days of changes in the information submitted in its application for an EPA identification number, in violation of LAC 33:V.1105.B. Specifically, the Respondent failed to notify the Department of a change in its hazardous waste

generator status from CESGQ to LQG, and it failed to include all applicable waste codes (i.e., F003) on its HW-1 form. The Respondent corrected this violation by submitting a revised HW-1 form that was received by the Department on or about June 6, 2008.

C. The Respondent failed to include all applicable hazardous waste codes on a hazardous waste manifest, in violation of LAC 33:V.1107.B.1.d. Specifically, the Respondent failed to include the hazardous waste code F003 on the manifest utilized for the transportation of seven (7) 55-gallon containers of spent xylene solvent. The Respondent corrected this violation by amending the manifest on May 21, 2008.

D. The Respondent failed to conduct weekly inspections of the less than ninety (90) day hazardous waste container storage area and the containers of hazardous waste stored therein in accordance with LAC 33:V.2109.A, in violation of LAC 33:V.1109.E.1.a.i. Specifically, the Respondent failed to conduct weekly inspections of the seven (7) containers of spent xylene hazardous waste stored onsite for a period exceeding two (2) weeks. The Respondent addressed this violation by sending the seven (7) containers of hazardous waste xylene for offsite treatment on December 17, 2007.

E. The Respondent failed to develop and retain a waste minimization plan onsite in accordance with LAC 33:V.2245.K, in violation of LAC 33:V.1109.E.1.e.

F. The Respondent failed to develop and maintain a site specific contingency plan meeting the content requirements specified in LAC 33:V.1513.B, in violation of LAC 33:V.1109.E.1.e.

G. The Respondent failed to develop and implement a personnel training program instructing personnel on hazardous waste management procedures relevant to their jobs as specified in LAC 33:V.1515, in violation of LAC 33:V.1109.E.1.e.

H. The Respondent failed to make arrangements with local authorities (e.g., police department, fire department, local hospitals, etc.) to familiarize them with the properties of the hazardous waste handled at the facility, as specified in LAC 33:V.1511.G, in violation of LAC 33:V.1109.E.1.e.

I. The Respondent failed to prepare and submit a copy of a 2007 Hazardous Waste Annual Report to the Office of Environmental Services detailing the

transportation and treatment of the seven (7) containers of hazardous waste xylene, in violation of LAC 33:V.1111.B.1. The Respondent corrected this violation by submitting a 2007 Hazardous Waste Annual Report that was received by the Department on June 9, 2008.

J. The Respondent failed to store used oil in a closed container, as specified in LAC 33:V.2107.A, in violation of LAC 33:V.4013.B. Specifically, one (1) 55-gallon container labeled as "Waste Oil" and which did not have its bung in place was observed during the inspection. The Respondent corrected this violation by closing the container by inserting the drum bung during the May 16, 2008, inspection.

K. The Respondent failed to clearly mark or label containers storing used oil with the words "Used Oil," in violation of LAC 33:V.4013.C. Specifically, two (2) 55-gallon containers of used oil were labeled as "Waste Oil" rather than "Used Oil" as required. The Respondent corrected this violation by properly labeling the two (2) containers of used oil with the words "Used Oil" during the May 16, 2008, inspection.

L. The Respondent caused and/or allowed the deposit of regulated solid waste at the facility without a permit or other authorization, in violation of La. R.S. 30:2155 and LAC 33:VII.315.C. Specifically, four (4) areas of spilled/released hydrocarbons were observed adjacent to the southeast corner and south of the raw materials warehouse. The spill/release areas contained dark stained soils and were oily in appearance.

2. Water Quality

An inspection conducted on or about May 16, 2008, and a subsequent file review conducted on or about August 3, 2009, revealed the following violations:

A. The Respondent was not sampling Outfall 001 per discharge event as required by LPDES permit LA0087327. The facility generated a worksheet estimating the number of discharges that occurred at the facility for Outfall 001, by using monthly rainfall and process water data and then dividing this number by the capacity of the waste treatment tank. Based on this information, the Department determined that the facility failed to sample 240 discharges that occurred at Outfall 001 during the period of April 2004 through November 2007. The facility

began maintaining a discharge log beginning with the discharge that occurred on December 7, 2008. The Department used the facility maintained discharge log to determine that the facility failed to sample 90 discharges from Outfall 001 for the period of December 7, 2007, through April 9, 2008.[1] Each failure to sample Outfall 001 is a violation of LPDES permit LA0087327 (Part I, Page 2 of 8, and Part III, Section A.2), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, and LAC 33:IX.2701.A. Additionally, the Respondent was not sampling Outfall 001 in accordance with LPDES permit LA0087327. Specifically, LPDES permit LA0087327 requires the Respondent to take a sample from Outfall 001 once per discharge event and immediately after exiting the treatment mechanism. The facility was not discharging when samples were collected from the wastewater treatment tank overflow.[2] The failure to sample Outfall 001 in accordance with the LPDES permit LA0087327 is a violation of LPDES permit LA0087327 (Part I, Page 2 of 8, and Part III, Sections A.2 and C.2), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, and LAC 33:IX.2701.A.

B. The Respondent exceeded the permit effluent limitations contained in LPDES permit LA0087327, as reported on the Discharge Monitoring Reports (DMRs) and/or Non-Compliance Reports (NCRs):

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
4/29/2005	001	Oil & Grease (daily maximum)	15 mg/L	237 mg/L (2)
		COD (daily maximum)	300 mg/L	866 mg/L(2)
		TSS (daily maximum)	183 mg/L	244 mg/L(2)
5/25/2005	001	Oil & Grease (daily maximum)	15 mg/L	120 mg/L(2)
		COD (daily maximum)	300 mg/L	532 mg/L(2)
7/28/2005	001	Oil & Grease (daily maximum)	15 mg/L	47 mg/L(2)
10/26/2005	001	Oil & Grease (daily maximum)	15 mg/L	16.5 mg/L(2)
		COD (daily maximum)	300 mg/L	377 mg/L(2)

[1] The Respondent stated that the facility began sampling correctly during April 2008, before the May 16, 2008 LDEQ inspection.

[2] According to the May 16, 2008 inspection report issued by the LDEQ, the facility collected samples at the wrong location on January 31, 2008, February 29, 2008 and March 31, 2008.

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
11/30/2005	001	BOD_5 (daily maximum)	120 mg/L	126 mg/L[(2)]
		COD (daily maximum)	300 mg/L	589 mg/L[(2)]
10/30/2006	001	Ethylbenzene (daily maximum)	108 µg/L	183 µg/L[(2),(4)]
12/29/2006	001	BOD_5 (daily maximum)	120 mg/L	184 mg/L[(2)]
		COD (daily maximum)	300 mg/L	510 mg/L[(2)]
07/01/2007-09/30/2007	004	TOC (daily maximum)	50 mg/L	75.8 mg/L
11/16/2007	001	COD (daily maximum)	300 mg/L	356 mg/L[(2)]
01/2008	001	COD (monthly average)	200 mg/L	412 mg/L[(1)]
		Benzene (monthly average)	37 µg/L	<50 µg/L[(1)]
		Ethylbenzene (monthly average)	32 µg/L	<50 µg/L[(1)]
		Toluene (monthly average)	26 µg/L	250 µg/L[(1)]
1/31/2008	001	COD (daily maximum)	300 mg/L	412 mg/L[(2)]
02/2008	001	COD(monthly average)	200 mg/L	284 mg/L[(1)]
		BOD_5 (monthly average)	45 mg/L	155 mg/L[(1)]
		Ethylbenzene (monthly average)	32 µg/L	85.7 µg/L[(1)]
2/29/2008	001	BOD_5 (daily maximum)	120 mg/L	569 mg/L[(2)]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
04/2008	001	COD(monthly average)	200 mg/L	2,567 mg/L
		COD(daily maximum)	300 mg/L	4,670 mg/L
		Oil & Grease (daily maximum)	15 mg/L	53 mg/L
		TSS (monthly average)	57 mg/L	484 mg/L
		TSS (daily maximum)	183 mg/L	872 mg/L
		BOD_5 (monthly average)	45 mg/L	569 mg/L
		BOD_5 (daily maximum)	120 mg/L	1,610 mg/L
		Benzene (monthly average)	37 µg/L	39 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	528 µg/L[5]
		Ethylbenzene (monthly average)	32 µg/L	185 µg/L
4/10/2008	001	COD (daily maximum)	300 mg/L	1,140 mg/L[3]
		TSS (daily maximum)	183 mg/L	220 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	599 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	173 µg/L[3]
4/11/2008	001	COD (daily maximum)	300 mg/L	2,060 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	29.5 mg/L[3]
		TSS (daily maximum)	183 mg/L	408 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	708 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	280 µg/L[3]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
4/17/2008	001	COD (daily maximum)	300 mg/L	1,790 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	53.3 mg/L[3]
		TSS (daily maximum)	183 mg/L	276 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	134 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	293 µg/L[3],[5]
4/21/2008	001	COD (daily maximum)	300 mg/L	4,000 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	15.6 mg/L[3]
		TSS (daily maximum)	183 mg/L	818 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	1,050 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	128 µg/L[3],[5]
4/23/2008	001	TSS (daily maximum)	183 mg/L	650 mg/L[3]
4/25/2008	001	COD (daily maximum)	300 mg/L	1,890 mg/L[3]
		TSS (daily maximum)	183 mg/L	269 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	261 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	140 µg/L[3],[5]
4/26/2008	001	COD (daily maximum)	300 mg/L	3,460 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	928 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	138 µg/L[3],[5]
4/28/2008	001	COD (daily maximum)	300 mg/L	1,130 mg/L(3)
		TSS (daily maximum)	183 mg/L	292 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	303 mg/L(3)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
4/29/2008	001	COD (daily maximum)	300 mg/L	4,110 mg/L(3)
		Oil & Grease (daily maximum)	15 mg/L	27.1 mg/L(3)
		TSS (daily maximum)	183 mg/L	800 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	785 mg/L(3)
4/30/2008	001	COD (daily maximum)	300 mg/L	1,420 mg/L(3)
		TSS (daily maximum)	183 mg/L	234 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	353 mg/L(3)
05/2008	001	COD(monthly average)	200 mg/L	1,442 mg/L(1)
		COD(daily maximum)	300 mg/L	2,520 mg/L
		TSS (monthly average)	57 mg/L	756 mg/L
		TSS (daily maximum)	183 mg/L	4,940 mg/L
		BOD_5 (monthly average)	45 mg/L	279 mg/L
		BOD_5 (daily maximum)	120 mg/L	753 mg/L
		Benzene (monthly average)	37 µg/L	38.9 µg/L
		Ethylbenzene (monthly average)	32 µg/L	217.9 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	843 µg/L
		Oil & Grease (daily maximum)	15 mg/L	34.3 mg/L
5/1/2008	001	COD (daily maximum)	300 mg/L	1,090 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	187 mg/L(3)
5/2/2008	001	COD (daily maximum)	300 mg/L	2,220 mg/L(3)
		TSS (daily maximum)	183 mg/L	653 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	132 µg/L(3),(5)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
5/3/2008	001	COD (daily maximum)	300 mg/L	1,850 mg/L(3)
		TSS (daily maximum)	183 mg/L	383 mg/L(3)
		BOD5 (daily maximum)	120 mg/L	637 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	123 µg/L(3),(5)
5/5/2008	001	COD (daily maximum)	300 mg/L	818 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	231 mg/L(3)
5/6/2008	001	COD (daily maximum)	300 mg/L	1,090 mg/L(3)
		TSS (daily maximum)	183 mg/L	221 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	263 mg/L(3)
5/7/2008	001	COD (daily maximum)	300 mg/L	1,670 mg/L(3)
		TSS (daily maximum)	183 mg/L	252 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	353 mg/L(3)
5/8/2008	001	COD (daily maximum)	300 mg/L	1,650 mg/L(3)
		Oil & Grease (daily maximum)	15 mg/L	15.1 mg/L(3)
		TSS (daily maximum)	183 mg/L	810 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	307 mg/L(3)
5/9/2008	001	COD (daily maximum)	300 mg/L	1,310 mg/L(3)
		TSS (daily maximum)	183 mg/L	1,600 mg/L(3)
5/10/2008	001	COD (daily maximum)	300 mg/L	1,290 mg/L(3)
		TSS (daily maximum)	183 mg/L	485 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	274 mg/L(3)
5/13/2008	001	COD (daily maximum)	300 mg/L	1,230 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	204 mg/L(3)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
5/15/2008	001	COD (daily maximum)	300 mg/L	1,660 mg/L(3)
		TSS (daily maximum)	183 mg/L	918 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	720 µg/L(3),(5)
5/16/2008	001	COD (daily maximum)	300 mg/L	2,010 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	650 µg/L(3),(5)
5/20/2008	001	COD (daily maximum)	300 mg/L	1,510 mg/L(3)
		TSS (daily maximum)	183 mg/L	350 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	166 mg/L(3)
5/22/2008	001	BOD_5 (daily maximum)	120 mg/L	207 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	208 µg/L(3),(5)
5/23/2008	001	COD (daily maximum)	300 mg/L	932 mg/L(3)
		TSS (daily maximum)	183 mg/L	926 mg/L(3),(5)
		COD (daily maximum)	300 mg/L	744 mg/L(3)
		TSS (daily maximum)	183 mg/L	616 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	396 µg/L(3),(5)
5/29/2008	001	COD (daily maximum)	300 mg/L	922 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	174 mg/L(3)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
06/2008	001	COD(monthly average)	200 mg/L	2,640 mg/L
		COD(daily maximum)	300 mg/L	9,610 mg/L
		Oil & Grease(daily maximum)	15 mg/L	319 mg/L
		TSS (monthly average)	57 mg/L	652 mg/L
		TSS (daily maximum)	183 mg/L	2,400 mg/L
		BOD_5 (monthly average)	45 mg/L	433 mg/L
		BOD_5 (daily maximum)	120 mg/L	2,154 mg/L
		Ethylbenzene (monthly average)	32 µg/L	229 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	1,960 µg/L(5)
6/3/2008	001	COD(daily maximum)	300 mg/L	1,470 mg/L(3)
6/6/2008	001	BOD_5 (daily maximum)	120 mg/L	183 mg/L(3)
		TSS (daily maximum)	183 mg/L	247 mg/L(3)
		Oil & Grease(daily maximum)	15 mg/L	26.2 mg/L(3)
		COD(daily maximum)	300 mg/L	1,650 mg/L(3)
6/9/2008	001	BOD_5 (daily maximum)	120 mg/L	2,085 mg/L(3)
		TSS (daily maximum)	183 mg/L	498 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	587 µg/L(3),(5)
6/10/2008	001	TSS (daily maximum)	183 mg/L	328 mg/L(3)
		Oil & Grease(daily maximum)	15 mg/L	152 mg/L(3)
		COD(daily maximum)	300 mg/L	7,720 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	320µg/L(3),(5)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
6/12/2008	001	BOD_5 (daily maximum)	120 mg/L	1,940 mg/L(3)
		TSS (daily maximum)	183 mg/L	406 mg/L(3)
		Oil & Grease(daily maximum)	15 mg/L	38 mg/L(3)
		COD(daily maximum)	300 mg/L	5,470 mg/L(3)
6/13/2008	001	BOD_5 (daily maximum)	120 mg/L	806 mg/L(3)
		TSS (daily maximum)	183 mg/L	312 mg/L(3)
		Oil & Grease(daily maximum)	15 mg/L	17.2 mg/L(3)
		COD(daily maximum)	300 mg/L	2,610 mg/L(3)
6/15/2008	001	BOD_5 (daily maximum)	120 mg/L	506 mg/L(3)
		TSS (daily maximum)	183 mg/L	700 mg/L(3)
		COD(daily maximum)	300 mg/L	1,930 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	119 µg/L(3),(5)
6/16/2008	001	BOD_5 (daily maximum)	120 mg/L	351 mg/L(3)
		TSS (daily maximum)	183 mg/L	302 mg/L(3)
		Oil & Grease(daily maximum)	15 mg/L	30.6 mg/L(3)
		COD(daily maximum)	300 mg/L	825 mg/L(3)
6/17/2008	001	BOD_5 (daily maximum)	120 mg/L	581 mg/L(3)
		TSS (daily maximum)	183 mg/L	220 mg/L(3)
		COD(daily maximum)	300 mg/L	1,420 mg/L(3)
6/20/2008	001	BOD_5 (daily maximum)	120 mg/L	329 mg/L(3)
		COD(daily maximum)	300 mg/L	1,500 mg/L(3)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
6/23/2008	001	BOD_5 (daily maximum)	120 mg/L	510 mg/L(3)
		Oil & Grease(daily maximum)	15 mg/L	18.3 mg/L(3)
		COD(daily maximum)	300 mg/L	2,590 mg/L(3)
6/25/2008	001	BOD_5 (daily maximum)	120 mg/L	133 mg/L(3)
		TSS (daily maximum)	183 mg/L	372 mg/L(3)
		COD(daily maximum)	300 mg/L	1,720 mg/L(3)
6/26/2008	001	BOD_5 (daily maximum)	120 mg/L	245 mg/L(3)
		TSS (daily maximum)	183 mg/L	260 mg/L(3)
		COD(daily maximum)	300 mg/L	959 mg/L(3)
6/27/2008	001	BOD_5 (daily maximum)	120 mg/L	136 mg/L(3)
		COD(daily maximum)	300 mg/L	575 mg/L(3)
6/29/2008	001	BOD_5 (daily maximum)	120 mg/L	199 mg/L(3)
		TSS (daily maximum)	183 mg/L	3,760 mg/L(3)
		COD(daily maximum)	300 mg/L	1,810 mg/L(3)
6/30/2008	001	TSS (daily maximum)	183 mg/L	192 mg/L(3)
		COD(daily maximum)	300 mg/L	380 mg/L(3)
04/01/2008-06/30/2008	003	TOC	50 mg/L	55.3 mg/L(6)
04/01/2008-06/30/2008	004	pH	6-9 S.U.	5.6 S.U.
04/01/2008-06/30/2008	005	pH	6-9 S.U.	5.6 S.U.

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
07/2008	001 001	COD(monthly average)	200 mg/L	3,211 mg/L
		COD(daily maximum)	300 mg/L	9,440 mg/L
		TSS (monthly average)	57 mg/L	1,688 mg/L
		TSS (daily maximum)	183 mg/L	5,050 mg/L
		BOD_5 (monthly average)	45 mg/L	338 mg/L
		BOD_5 (daily maximum)	120 mg/L	738 mg/L
		Benzene (monthly average)	37 µg/L	127 µg/L
		Benzene (daily maximum)	136 µg/L	364 µg/L(5)
		Ethylbenzene (monthly average)	32 µg/L	2,773 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	11, 600 µg/L(5)
7/1/2008	001	COD(daily maximum)	300 mg/L	1,400 mg/L(3)
		TSS (daily maximum)	183 mg/L	484 mg/L(3)
7/3/2008	001	COD(daily maximum)	300 mg/L	4,000 mg/L(3)
		TSS (daily maximum)	183 mg/L	3,980 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	374 mg/L(3)
7/7/2008	001	COD(daily maximum)	300 mg/L	666 mg/L(3)
		TSS (daily maximum)	183 mg/L	208 mg/L(3)
7/9/2008	001	COD(daily maximum)	300 mg/L	2,810 mg/L(3)
		TSS (daily maximum)	183 mg/L	760 mg/L(3)
		Benzene (daily maximum)	136 µg/L	140 µg/L(3), (5)
		Ethylbenzene (daily maximum)	108 µg/L	381 µg/L(3), (5)
7/10/2008	001	TSS (daily maximum)	183 mg/L	4,750 mg/L(3)
		Benzene (daily maximum)	136 µg/L	349 µg/L(3), (5)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
7/11/2008	001	COD(daily maximum)	300 mg/L	3,800 mg/L(3)
		TSS (daily maximum)	183 mg/L	1,070 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	512 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	147 µg/L(3), (5)
7/18/2008	001	COD(daily maximum)	300 mg/L	1,790 mg/L(3)
		TSS (daily maximum)	183 mg/L	336 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	170 mg/L(3)
7/22/2008	001	COD(daily maximum)	300 mg/L	1,190 mg/L(3)
		TSS (daily maximum)	183 mg/L	560 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	300 µg/L(3), (4)
7/25/2008	001	COD(daily maximum)	300 mg/L	3,370 mg/L(3)
		TSS (daily maximum)	183mg/L	747 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	695 mg/L(3)
		Ethylbenzene (daily maximum)	108 µg/L	4,180 µg/L(3), (5)
7/28/2008	001	COD (daily maximum)	300 mg/L	2,370 mg/L(3)
		TSS (daily maximum)	183mg/L	800 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	377 mg/L(3)
		Benzene (daily maximum)	136 µg/L	227 µg/L(3),(4)
		Ethylbenzene (daily maximum)	108 µg/L	1,260 µg/L(3),(4)
7/29/2008	001	COD (daily maximum)	300 mg/L	3,740 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	303 mg/L(3)
		Benzene (daily maximum)	136 µg/L	196 µg/L(3),(4)
		Ethylbenzene (daily maximum)	108 µg/L	9,150 µg/L(3),(4)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
7/30/2008	001	COD (daily maximum)	300 mg/L	3,740 mg/L(3)
		TSS (daily maximum)	183mg/L	1,510 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	653 mg/L(3)
		Benzene (daily maximum)	136 µg/L	214 µg/L(3),(4)
		Ethylbenzene (daily maximum)	108 µg/L	6,040 µg/L(3),(4)
08/2008	001	COD (monthly average)	200 mg/L	3,083 mg/L
		COD (daily maximum)	300 mg/L	6,980 mg/L
		Oil & Grease (daily maximum)	15 mg/L	18 mg/L
		TSS (monthly average)	57 mg/L	734 mg/L
		TSS (daily maximum)	183 mg/L	1,230 mg/L
		BOD_5 (monthly average)	45 mg/L	508 mg/L
		BOD_5 (daily maximum)	120 mg/L	1,360 mg/L
		Benzene (monthly average)	37 µg/L	204 µg/L
		Benzene (daily maximum)	136 µg/L	663 µg/L(5)
		Ethylbenzene (monthly average)	32 µg/L	2,412 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	16,000 µg/L(5)
		Toulene (monthly average)	26 µg/L	31 µg/L
		Toulene (daily maximum)	80 µg/L	175 µg/L(5)
8/1/2008	001	COD (daily maximum)	300 mg/L	2,800 mg/L(3)
		TSS (daily maximum)	183 mg/L	840 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	228 mg/L(3)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
8/3/2008	001	COD (daily maximum)	300 mg/L	2,590 mg/L(3)
		TSS (daily maximum)	183 mg/L	567 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	828 mg/L(3)
		Benzene (daily maximum)	136 µg/L	394 µg/L(3),(5)
		Ethylbenzene (daily maximum)	108 µg/L	5,170 µg/L(3),(5)
8/4/2008	001	COD (daily maximum)	300 mg/L	1,850 mg/L[3]
		TSS (daily maximum)	183 mg/L	388 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	519 mg/L[3]
		Benzene (daily maximum)	136 µg/L	307 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	1,570 µg/L[3],[5]
8/5/2008	001	COD (daily maximum)	300 mg/L	4,830 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,170 mg/L[3]
		Benzene (daily maximum)	136 µg/L	596 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	3,360 µg/L[3],[5]
		Toulene (daily maximum)	80 µg/L	109 µg/L[3],[5]
8/7/2008	001	COD(daily maximum)	300 mg/L	1,500 mg/L[3]
		TSS (daily maximum)	183 mg/L	453 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	123 mg/L[3]
8/8/2008	001	COD (daily maximum)	300 mg/L	3,030 mg/L[3]
		TSS (daily maximum)	183 mg/L	860 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	434 mg/L[3]
		Benzene (daily maximum)	136 µg/L	405 µg/L[3],[4]
		Ethylbenzene (daily maximum)	108 µg/L	648 µg/L[3],[4]
8/11/2008	001	COD (daily maximum)	300 mg/L	2,630 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	453 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	4,320 µg/L[3],[5]
8/12/2008	001	TSS (daily maximum)	183 mg/L	1,100 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	1,010 mg/L[3]
		Benzene (daily maximum)	136 µg/L	544 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	3,490 µg/L[3],[5]
		Toulene (daily maximum)	80 µg/L	141 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
8/13/2008	001	COD (daily maximum)	300 mg/L	3,960 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,150 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	692 mg/L[3]
		Benzene (daily maximum)	136 µg/L	300 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	1,780 µg/L[3],[5]
8/15/2008	001	COD(daily maximum)	300 mg/L	2,030 mg/L[3]
		TSS (daily maximum)	183 mg/L	620 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	189 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	167 µg/L[3],[5]
8/18/2008	001	TSS (daily maximum)	183 mg/L	413 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	1,110 mg/L[3]
8/19/2008	001	COD (daily maximum)	300 mg/L	4,150 mg/L(3)
		TSS (daily maximum)	183 mg/L	760 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	814 mg/L(3)
8/20/2008	001	COD(daily maximum)	300 mg/L	2,300 mg/L(3)
		TSS (daily maximum)	183 mg/L	493 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	254 mg/L(3)
8/22/2008	001	COD(daily maximum)	300 mg/L	1,520 mg/L(3)
		TSS (daily maximum)	183 mg/L	320 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	126 mg/L(3)
8/24/2008	001	COD (daily maximum)	300 mg/L	1,490 mg/L(3)
		TSS (daily maximum)	183 mg/L	380 mg/L(3)
8/25/2008	001	COD (daily maximum)	300 mg/L	2,330 mg/L(3)
		TSS (daily maximum)	183 mg/L	787 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	391 mg/L(3)
8/27/2008	001	COD (daily maximum)	300 mg/L	3,240 mg/L(3)
		TSS (daily maximum)	183 mg/L	960 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	323 mg/L(3)
8/28/2008	001	COD (daily maximum)	300 mg/L	3,790 mg/L(3)
		COD (daily maximum)	300 mg/L	3,020 mg/L(3)
		TSS (daily maximum)	183 mg/L	767 mg/L(3)
		TSS (daily maximum)	183 mg/L	680 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	203 mg/L(3)
		BOD_5 (daily maximum)	120 mg/L	515 mg/L(3)
		Benzene (daily maximum)	136 µg/L	251 µg/L(3),(5)
		Ethylbenzene (daily maximum)	108 µg/L	3,730 µg/L(3),(5)
		Toulene (daily maximum)	80 µg/L	80.5 µg/L(3),(5)

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
09/2008	001	COD (monthly average)	200 mg/L	1,985 mg/L
		COD(daily maximum)	300 mg/L	4,030 mg/L
		TSS (monthly average)	57 mg/L	457 mg/L
		TSS (daily maximum)	183 mg/L	1,170 mg/L
		BOD_5 (monthly average)	45 mg/L	455 mg/L
		BOD_5 (daily maximum)	120 mg/L	780 mg/L
		Benzene (monthly average)	37 µg/L	177 µg/L
		Benzene (daily maximum)	136 µg/L	587 µg/L
		Ethylbenzene (monthly average)	32 µg/L	6,547 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	29,500 µg/L(5)
9/5/2008	001	COD(daily maximum)	300 mg/L	1,350 mg/L[3]
		TSS (daily maximum)	183 mg/L	484 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	359 mg/L[3]
		Benzene (daily maximum)	136 µg/L	315 µg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	27,500 µg/L[3]
9/6/2008	001	COD (daily maximum)	300 mg/L	662 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	208 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	296 µg/L[3],[5]
9/8/2008	001	COD (daily maximum)	300 mg/L	542 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	128 mg/L[3]
9/10/2008	001	COD (daily maximum)	300 mg/L	1,140 mg/L[3]
		TSS (daily maximum)	183 mg/L	208 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	205 mg/L[3]
9/11/2008	001	COD (daily maximum)	300 mg/L	3,240 mg/L[3]
		TSS (daily maximum)	183 mg/L	600 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	500 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,360 µg/L[3],[5]
9/13/2008	001	COD (daily maximum)	300 mg/L	3,060 mg/L[3]
		TSS (daily maximum)	183 mg/L	500 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	515 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	9,490 µg/L[3], [5]
9/16/2008	001	COD (daily maximum)	300 mg/L	1,990 mg/L[3]
		TSS (daily maximum)	183 mg/L	444 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	480 mg/L[3]
		Benzene (daily maximum)	136 µg/L	402 µg/L[3], [5]
		Ethylbenzene (daily maximum)	108 µg/L	5,030 µg/L[3], [5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
9/17/2008	001	COD(daily maximum)	300 mg/L	2,330 mg/L[3]
		TSS (daily maximum)	183 mg/L	440 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	472 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	1,790 µg/L[3],[5]
9/18/2008	001	Benzene (daily maximum)	136 µg/L	470 µg/L[3],[5]
9/19/2008	001	COD(daily maximum)	300 mg/L	2,900 mg/L[3]
		TSS (daily maximum)	183 mg/L	600 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	477 mg/L[3]
		Benzene (daily maximum)	136 µg/L	300 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	13,500 µg/L[3],[5]
9/22/2008	001	COD(daily maximum)	300 mg/L	1,760 mg/L[3]
		COD(daily maximum)	300 mg/L	3,160 mg/L[3]
		TSS (daily maximum)	183 mg/L	490 mg/L[3]
		TSS (daily maximum)	183 mg/L	665 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	216 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	701 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,730 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	5,950 µg/L[3],[5]
9/23/2008	001	COD(daily maximum)	300 mg/L	1,980 mg/L[3]
		COD(daily maximum)	300 mg/L	583 mg/L[3]
		TSS (daily maximum)	183 mg/L	325 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	677 mg/L[3]
		Benzene (daily maximum)	136 µg/L	229 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	1,740 µg/L[3],[5]
9/24/2008	001	TSS (daily maximum)	183 mg/L	390 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	603 mg/L[3]
		Benzene (daily maximum)	136 µg/L	165 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	1,420 µg/L[3],[5]
9/25/2008	001	COD(daily maximum)	300 mg/L	2,740 mg/L[3]
		TSS (daily maximum)	183 mg/L	560 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	617 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	6,010 µg/L[3],[5]
9/26/2008	001	COD(daily maximum)	300 mg/L	1,840 mg/L[3]
		TSS (daily maximum)	183 mg/L	408 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	465 mg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	1,270 µg/L[3]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
9/28/2008	001	COD(daily maximum)	300 mg/L	1,730 mg/L[3]
		TSS (daily maximum)	183 mg/L	425 mg/L[3]
		TSS (daily maximum)	183 mg/L	555 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	468 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	578 mg/L[3]
		Benzene (daily maximum)	136 µg/L	345 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	13,600 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	3,700 µg/L[3],[5]
9/30/2008	001	COD(daily maximum)	300 mg/L	1,220 mg/L[3]
		TSS (daily maximum)	183 mg/L	254 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	203 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	1,150 µg/L[3],[5]
10/2008	001	COD(monthly average)	200 mg/L	2,761 mg/L
		COD(daily maximum)	300 mg/L	5,300 mg/L
		TSS (monthly average)	57 mg/L	512 mg/L
		TSS (daily maximum)	183 mg/L	1,090 mg/L
		BOD_5 (monthly average)	45 mg/L	766 mg/L
		BOD_5 (daily maximum)	120 mg/L	2,060 mg/L
		Oil & Grease (daily maximum)	15 mg/L	32.3 mg/L
		Ethylbenzene (monthly average)	32 µg/L	3,893 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	8,960 µg/L[5]
10/1/2008	001	COD (daily maximum)	300 mg/L	1,860 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	572 mg/L[3]
		TSS (daily maximum)	183 mg/L	325 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,050 µg/L[3],[5]
10/3/2008	001	COD (daily maximum)	300 mg/L	1,610 mg/L[3]
		COD (daily maximum)	300 mg/L	2,705 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	518 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	771 mg/L[3]
		TSS (daily maximum)	183 mg/L	508 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,580 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	3,761 µg/L[3],[5]
10/8/2008	001	COD (daily maximum)	300 mg/L	2,730 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	677 mg/L[3]
		TSS (daily maximum)	183 mg/L	540 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	8,060 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
10/9/2008	001	COD (daily maximum)	300 mg/L	1,550 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	355 mg/L[3]
		TSS (daily maximum)	183 mg/L	408 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,030 µg/L[3],[5]
10/14/2008	001	COD (daily maximum)	300 mg/L	1,110 mg/L[3]
		TSS (daily maximum)	183 mg/L	270 mg/L[3]
10/20/2008	001	COD (daily maximum)	300 mg/L	1,410 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	124 mg/L[3]
		TSS (daily maximum)	183 mg/L	456 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	733 µg/L[3],[5]
10/21/2008	001	COD (daily maximum)	300 mg/L	1,830 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	318 mg/L[3]
		TSS (daily maximum)	183 mg/L	452 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	6,770 µg/L[3],[5]
10/22/2008	001	COD (daily maximum)	300 mg/L	2,730 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	614 mg/L[3]
		TSS (daily maximum)	183 mg/L	440 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,610 µg/L[3],[5]
10/23/2008	001	COD (daily maximum)	300 mg/L	2,980 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	616 mg/L[3]
		TSS (daily maximum)	183 mg/L	690 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	824 µg/L[3],[5]
10/27/2008	001	COD (daily maximum)	300 mg/L	4,890 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	1,210 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,350 µg/L[3],[5]
10/28/2008	001	Oil & Grease (daily maximum)	15 mg/L	28.3 mg/L[3]
		COD (daily maximum)	300 mg/L	5,190 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	2,060 mg/L[3]
		TSS (daily maximum)	183 mg/L	725 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	7,780 µg/L[3],[5]
10/31/2008	001	BOD_5 (daily maximum)	120 mg/L	2,030 mg/L[3]
		TSS (daily maximum)	183 mg/L	484 mg/L[3]
		COD(monthly average)	200 mg/L	19,976 mg/L

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
11/2008	001	COD(daily maximum)	300 mg/L	79,000 mg/L
		Oil & Grease (daily maximum)	15 mg/L	76.7 mg/L
		TSS (monthly average)	57 mg/L	3,479 mg/L
		TSS (daily maximum)	183 mg/L	17,600 mg/L
		BOD_5 (monthly average)	45 mg/L	8,081 mg/L
		BOD_5 (daily maximum)	120 mg/L	34,600 mg/L
		Ethylbenzene (monthly average)	32 µg/L	16,223 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	54,500 µg/L[5]
		COD (daily maximum)	300 mg/L	25,900 mg/L[3]
11/2/2008	001	BOD_5 (daily maximum)	120 mg/L	12,700 mg/L[3]
		TSS (daily maximum)	183 mg/L	4,600 mg/L[3]
		COD (daily maximum)	300 mg/L	11,700 mg/L[3]
11/5/2008	001	BOD_5 (daily maximum)	120 mg/L	9,180 mg/L[3]
		TSS (daily maximum)	183 mg/L	2,050 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	21,200 µg/L[3],[5]
		COD (daily maximum)	300 mg/L	27,500 mg/L[3]
11/6/2008	001	BOD_5 (daily maximum)	120 mg/L	1,880 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,120 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,950 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	52,300 µg/L[3],[5]
11/7/2008	001	COD (daily maximum)	300 mg/L	47,000 mg/L[3]
11/11/2008	001	BOD_5 (daily maximum)	120 mg/L	23,600 mg/L[3]
		TSS (daily maximum)	183 mg/L	6,350 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	13,700 µg/L[3],[5]
		COD (daily maximum)	300 mg/L	20,600 mg/L[3]
11/12/2008	001	BOD_5 (daily maximum)	120 mg/L	9,500 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	39.3 mg/L[3]
		TSS (daily maximum)	183 mg/L	2,590 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	17,900 µg/L[3],[5]
		COD (daily maximum)	300 mg/L	3,950 mg/L[3]
11/14/2008	001	BOD_5 (daily maximum)	120 mg/L	1,190 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,170 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	4,230 µg/L[3],[5]
		COD (daily maximum)	300 mg/L	2,920 mg/L[3]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
11/17/2008	001	BOD_5 (daily maximum)	120 mg/L	1,100 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	56.1 mg/L[3]
		TSS (daily maximum)	183 mg/L	238 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,550 µg/L[3],[5]
		COD (daily maximum)	300 mg/L	5,500 mg/L[3]
11/20/2008	001	BOD_5 (daily maximum)	120 mg/L	770 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,750 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,920 µg/L[3],[5]
		COD (daily maximum)	300 mg/L	5,480 mg/L[3]
11/23/2008	001	BOD_5 (daily maximum)	120 mg/L	1,110 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,350 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	6,890 µg/L[3],[5]
		COD (daily maximum)	300 mg/L	4,500 mg/L[3]
11/24/2008	001	BOD_5 (daily maximum)	120 mg/L	763 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,120 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	4,340 µg/L[3],[5]
11/26/2008	001	COD (daily maximum)	300 mg/L	5,660 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	573 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,810 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	8,220 µg/L[3],[5]
12/2008	001	COD(monthly average)	200 mg/L	2,814 mg/L
		COD(daily maximum)	300 mg/L	5,440 mg/L
		TSS (monthly average)	57 mg/L	708 mg/L
		TSS (daily maximum)	183 mg/L	1,530 mg/L
		BOD_5 (monthly average)	45 mg/L	444 mg/L
		BOD_5 (daily maximum)	120 mg/L	970 mg/L
		Ethylbenzene (monthly average)	32 µg/L	4,958.3 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	11,500 µg/L[5]
12/1/2008	001	COD (daily maximum)	300 mg/L	25,900 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,350 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	7,850 µg/L[3],[5]
12/2/2008	001	COD (daily maximum)	300 mg/L	11,700 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	224 mg/L[3]
		TSS (daily maximum)	183 mg/L	520 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,100 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
12/3/2008	001	COD (daily maximum)	300 mg/L	27,500 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	590 mg/L[3]
		TSS (daily maximum)	183 mg/L	433 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	1,900 µg/L[3],[4]
12/4/2008	001	COD (daily maximum)	300 mg/L	79,000 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	548 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	4,210 µg/L[3],[5]
12/5/2008	001	COD (daily maximum)	300 mg/L	47,000 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	433 mg/L[3]
		TSS (daily maximum)	183 mg/L	980 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,820 µg/L[3],[5]
12/8/2008	001	COD (daily maximum)	300 mg/L	20,600 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	365 mg/L[3]
12/8/2008	001	TSS (daily maximum)	183 mg/L	833 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,820 µg/L[3],[5]
12/9/2008	001	COD (daily maximum)	300 mg/L	2,810 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	407 mg/L[3]
		TSS (daily maximum)	183 mg/L	740 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,030 µg/L[3],[5]
12/12/2008	001	COD (daily maximum)	300 mg/L	1,640 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	287 mg/L[3]
		TSS (daily maximum)	183 mg/L	340 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,310 µg/L[3],[5]
12/14/2008	001	COD (daily maximum)	300 mg/L	2,770 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	492 mg/L[3]
		TSS (daily maximum)	183 mg/L	620 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	6,700 µg/L[3],[5]
12/15/2008	001	COD (daily maximum)	300 mg/L	4,410 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	600 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,110 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	6,030 µg/L[3],[5]
12/17/2008	001	COD (daily maximum)	300 mg/L	2,250 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	322 mg/L[3]
		TSS (daily maximum)	183 mg/L	607 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	7,840 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
12/19/2008	001	COD (daily maximum)	300 mg/L	1,880 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	179 mg/L[3]
		TSS (daily maximum)	183 mg/L	500 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	1,660 µg/L[3],[5]
12/21/2008	001	COD (daily maximum)	300 mg/L	2,710 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	558 mg/L[3]
		TSS (daily maximum)	183 mg/L	515 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	4,930 µg/L[3],[5]
12/22/2008	001	COD (daily maximum)	300 mg/L	2,380 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	305 mg/L[3]
		TSS (daily maximum)	183 mg/L	525 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	4,770 µg/L[3],[5]
12/24/2008	001	COD (daily maximum)	300 mg/L	3,120 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	585 mg/L[3]
		TSS (daily maximum)	183 mg/L	700 mg/L[3]
12/26/2008	001	COD (daily maximum)	300 mg/L	3,410 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	635 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	9,530 µg/L[3],[5]
12/29/2008	001	COD (daily maximum)	300 mg/L	2,920 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	146 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,040 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,830 µg/L[3],[5]
12/31/2008	001	COD (daily maximum)	300 mg/L	1,630 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	346 mg/L[3]
		TSS (daily maximum)	183 mg/L	390 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	5,420 µg/L[3],[5]
01/2009	001	COD(monthly average)	200 mg/L	3,155 mg/L
		COD(daily maximum)	300 mg/L	7,300 mg/L
		TSS (monthly average)	57 mg/L	832 mg/L
		TSS (daily maximum)	183 mg/L	2,100 mg/L
		BOD_5 (monthly average)	45 mg/L	562 mg/L
		BOD_5 (daily maximum)	120 mg/L	1,790 mg/L
		Ethylbenzene (monthly average)	32 µg/L	6,151 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	18,400 µg/L

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
1/2/2009	001	COD (daily maximum)	300 mg/L	3,140 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	419 mg/L[3]
		TSS (daily maximum)	183 mg/L	685 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	8,940 µg/L[3],[5]
1/4/2009	001	COD (daily maximum)	300 mg/L	2,200 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	124 mg/L[3]
		TSS (daily maximum)	183 mg/L	765 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	5,140 µg/L[3],[5]
1/5/2009	001	COD (daily maximum)	300 mg/L	1,940 mg/L[3]
		COD (daily maximum)	300 mg/L	1,640 mg/L[3]
		TSS (daily maximum)	183 mg/L	705 mg/L[3]
		TSS (daily maximum)	183 mg/L	430 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	190 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	226 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	821 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	2,880 µg/L[3],[5]
1/6/2009	001	COD (daily maximum)	300 mg/L	1,220 mg/L[3]
		COD (daily maximum)	300 mg/L	2,130 mg/L[3]
		TSS (daily maximum)	183 mg/L	400 mg/L[3]
		TSS (daily maximum)	183 mg/L	560 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	122 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	325 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	445 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	2,490 µg/L[3],[5]
1/8/2009	001	COD (daily maximum)	300 mg/L	1,710 mg/L[3]
		TSS (daily maximum)	183 mg/L	667 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	1,200 µg/L[3],[5]
1/9/2009	001	COD (daily maximum)	300 mg/L	1,900 mg/L[3]
		COD (daily maximum)	300 mg/L	1,450 mg/L[3]
		TSS (daily maximum)	183 mg/L	773 mg/L[3]
		TSS (daily maximum)	183 mg/L	420 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	137 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	148 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,030 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
1/12/2009	001	COD (daily maximum)	300 mg/L	1,990 mg/L[3]
		TSS (daily maximum)	183 mg/L	536 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	256 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	5,550 µg/L[3],[5]
1/13/2009	001	COD (daily maximum)	300 mg/L	1,070 mg/L[3]
		TSS (daily maximum)	183 mg/L	253 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	1,990 µg/L[3],[5]
1/14/2009	001	COD (daily maximum)	300 mg/L	1,720 mg/L[3]
		TSS (daily maximum)	183 mg/L	385 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	291 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,090 µg/L[3],[5]
1/16/2009	001	COD (daily maximum)	300 mg/L	1,810 mg/L[3]
		COD (daily maximum)	300 mg/L	3,480 mg/L[3]
		TSS (daily maximum)	183 mg/L	420 mg/L[3]
		TSS (daily maximum)	183 mg/L	873 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	273 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	450 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	5,950 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	1,830 µg/L[3],[5]
1/18/2009	001	COD (daily maximum)	300 mg/L	2,860 mg/L[3]
		TSS (daily maximum)	183 mg/L	627 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	463 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	9,110 µg/L[3],[5]
1/21/2009	001	COD (daily maximum)	300 mg/L	3,630 mg/L[3]
		TSS (daily maximum)	183 mg/L	953 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	794 mg/L[3]
1/23/2009	001	COD (daily maximum)	300 mg/L	4,230 mg/L[3]
		TSS (daily maximum)	183 mg/L	950 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	905 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	8,170 µg/L[3],[5]
1/25/2009	001	COD (daily maximum)	300 mg/L	5,300 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,700 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	414 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	11,200 µg/L[3],[5]
1/26/2009	001	COD (daily maximum)	300 mg/L	6,600 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,100 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	4,990 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
1/28/2009	001	COD (daily maximum)	300 mg/L	6,100 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,300 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	1,340 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	8,620 µg/L[3],[5]
1/29/2009	001	BOD_5 (daily maximum)	120 mg/L	1,430 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	17,600 µg/L[3],[5]
1/30/2009	001	COD (daily maximum)	300 mg/L	6,000 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,700 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	1,100 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	14,800 µg/L[3],[5]
02/2009	001	COD(monthly average)	200 mg/L	6,755 mg/L
		COD(daily maximum)	300 mg/L	12,000 mg/L
		Oil & Grease (daily maximum)	15 mg/L	136 mg/L
		TSS (monthly average)	57 mg/L	1,009.6 mg/L
		TSS (daily maximum)	183 mg/L	3,000 mg/L
		BOD_5 (monthly average)	45 mg/L	1,162 mg/L
		BOD_5 (daily maximum)	120 mg/L	2,930 mg/L
		Ethylbenzene (monthly average)	32 µg/L	1,484 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	9,360 µg/L
2/1/2009	001	BOD_5 (daily maximum)	120 mg/L	1,080 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,200 mg/L[3]
		COD(daily maximum)	300 mg/L	5,100 mg/L[3]
2/2/2009	001	BOD_5 (daily maximum)	120 mg/L	960 mg/L[3]
		COD(daily maximum)	300 mg/L	4,500 mg/L[3]
		TSS (daily maximum)	183 mg/L	720 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	3,370 µg/L[3],[5]
2/4/2009	001	BOD_5 (daily maximum)	120 mg/L	608 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	184 mg/L[3]
		TSS (daily maximum)	183 mg/L	520 mg/L[3]
		TSS (daily maximum)	183 mg/L	510 mg/L[3]
		COD(daily maximum)	300 mg/L	3,700 mg/L[3]
		COD(daily maximum)	300 mg/L	3,100 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	1,610 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	891 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
2/5/2009	001	BOD_5 (daily maximum)	120 mg/L	315 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	1,360 mg/L[3]
		TSS (daily maximum)	183 mg/L	270 mg/L[3]
		TSS (daily maximum)	183 mg/L	600 mg/L[3]
		COD(daily maximum)	300 mg/L	1,600 mg/L[3]
		COD(daily maximum)	300 mg/L	4,400 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	19.1 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	383 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	573 µg/L[3],[5]
2/6/2009	001	BOD_5 (daily maximum)	120 mg/L	1,740 mg/L[3]
		TSS (daily maximum)	183 mg/L	530 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	31.6 mg/L[3]
		COD(daily maximum)	300 mg/L	5,700 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	557 µg/L[3],[5]
2/8/2009	001	BOD_5 (daily maximum)	120 mg/L	1,959 mg/L[3]
		TSS (daily maximum)	183 mg/L	750 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	896 µg/L[3],[5]
2/9/2009	001	BOD_5 (daily maximum)	120 mg/L	1,580 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,400 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	21.3 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	29.3 mg/L[3]
		COD(daily maximum)	300 mg/L	9,200 mg/L[3]
		COD(daily maximum)	300 mg/L	12,000 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	917 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	5,570 µg/L[3],[5]
2/11/2009	001	BOD_5 (daily maximum)	120 mg/L	921 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,200 mg/L[3]
		COD(daily maximum)	300 mg/L	5,300 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	266 µg/L[3],[5]
2/13/2009	001	BOD_5 (daily maximum)	120 mg/L	1,090 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	1,540 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,200 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,700 mg/L[3]
		COD(daily maximum)	300 mg/L	7,000 mg/L[3]
		COD(daily maximum)	300 mg/L	8,300 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	519 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	709 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
2/14/2009	001	BOD_5 (daily maximum)	120 mg/L	1,370 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,000 mg/L[3]
		COD(daily maximum)	300 mg/L	8,000 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	2,130 µg/L[3],[5]
2/16/2009	001	BOD_5 (daily maximum)	120 mg/L	663 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,300 mg/L[3]
		COD(daily maximum)	300 mg/L	4,800 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	146 µg/L[3],[5]
2/17/2009	001	BOD_5 (daily maximum)	120 mg/L	619 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,200 mg/L[3]
		COD(daily maximum)	300 mg/L	4,900 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	147 µg/L[3],[5]
2/18/2009	001	BOD_5 (daily maximum)	120 mg/L	503 mg/L[3]
		TSS (daily maximum)	183 mg/L	950 mg/L[3]
		COD(daily maximum)	300 mg/L	6,200 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	655 µg/L[3],[5]
2/19/2009	001	BOD_5 (daily maximum)	120 mg/L	2,820 mg/L[3]
		TSS (daily maximum)	183 mg/L	550 mg/L[3]
		COD(daily maximum)	300 mg/L	9,900 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	21.3 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	712 µg/L[3],[5]
2/20/2009	001	BOD_5 (daily maximum)	120 mg/L	2,740 mg/L[3]
		TSS (daily maximum)	183 mg/L	770 mg/L[3]
		COD(daily maximum)	300 mg/L	10,000 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	723 µg/L[3],[5]
2/25/2009	001	BOD_5 (daily maximum)	120 mg/L	1,400 mg/L[3]
		TSS (daily maximum)	183 mg/L	690 mg/L[3]
		COD(daily maximum)	300 mg/L	7,900 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	1,400 µg/L[3],[5]
2/26/2009	001	BOD_5 (daily maximum)	120 mg/L	978 mg/L[3]
		TSS (daily maximum)	183 mg/L	750 mg/L[3]
		COD(daily maximum)	300 mg/L	6,700 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	30 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	631 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
2/28/2009	001	BOD_5 (daily maximum)	120 mg/L	633 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,400 mg/L[3]
		COD (daily maximum)	300 mg/L	8,300 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	475 µg/L[3],[5]
03/2009	001	COD(monthly average)	200 mg/L	4,517 mg/L
		COD(daily maximum)	300 mg/L	8,800 mg/L
		Oil & Grease (daily maximum)	15 mg/L	80 mg/L
		TSS (monthly average)	57 mg/L	776 mg/L
		TSS (daily maximum)	183 mg/L	1,500 mg/L
		BOD_5 (monthly average)	45 mg/L	363.3 mg/L
		BOD_5 (daily maximum)	120 mg/L	900 mg/L
		Ethylbenzene (monthly average)	32 µg/L	1,037.2 µg/L
		Ethylbenzene (daily maximum)	108 µg/L	4,760 µg/L
3/3/20009	001	BOD_5 (daily maximum)	120 mg/L	396 mg/L[3]
		TSS (daily maximum)	183 mg/L	1,500 mg/L[3]
		COD(daily maximum)	300 mg/L	7,600 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	341 µg/L[3],[5]
3/5/2009	001	BOD_5 (daily maximum)	120 mg/L	812 mg/L[3]
		TSS (daily maximum)	183 mg/L	910 mg/L[3]
		COD(daily maximum)	300 mg/L	7,000 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	39.9 mg/L[3]
3/6/2009	001	BOD_5 (daily maximum)	120 mg/L	604 mg/L[3]
		COD(daily maximum)	300 mg/L	5,900 mg/L[3]
		TSS (daily maximum)	183 mg/L	670 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	989 µg/L[3],[5]
3/9/2009	001	BOD_5 (daily maximum)	120 mg/L	218 mg/L[3]
		COD(daily maximum)	300 mg/L	5,300 mg/L[3]
		TSS (daily maximum)	183 mg/L	960 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	32.6 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	166 µg/L[3],[5]
		Ethylbenzene (daily maximum)	108 µg/L	2,480 µg/L[3],[5]
3/10/2009	001	TSS (daily maximum)	183 mg/L	1,500 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	18.3 mg/L[3]
3/16/2009	001	BOD_5 (daily maximum)	120 mg/L	222 mg/L[3]
		COD(daily maximum)	300 mg/L	3,800 mg/L[3]
		TSS (daily maximum)	183 mg/L	900 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	203 µg/L[3],[5]

Monitoring Period	Outfall	Parameter	Permitted Limit	Reported Value
3/17/2009	001	COD(daily maximum)	300 mg/L	2,500 mg/L[3]
		TSS (daily maximum)	183 mg/L	520 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	148 µg/L[3],[5]
3/18/2009	001	COD(daily maximum)	300 mg/L	1,800 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	188 mg/L[3]
		TSS (daily maximum)	183 mg/L	430 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	29.4 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	257 µg/L[3],[5]
3/20/2009	001	COD(daily maximum)	300 mg/L	2,700 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	199 mg/L[3]
		TSS (daily maximum)	183 mg/L	700 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	245 µg/L[3],[5]
3/24/2009	001	COD(daily maximum)	300 mg/L	4,600 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	249 mg/L[3]
		TSS (daily maximum)	183 mg/L	300 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	68.9 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	220 µg/L[3],[5]
3/25/2009	001	COD(daily maximum)	300 mg/L	2,900 mg/L[3]
		TSS (daily maximum)	183 mg/L	300 mg/L[3]
		BOD_5 (daily maximum)	120 mg/L	333 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	37 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	1,950 µg/L[3],[5]
3/27/2009	001	COD(daily maximum)	300 mg/L	1,300 mg/L[3]
		TSS (daily maximum)	183 mg/L	620 mg/L[3]
		Oil & Grease (daily maximum)	15 mg/L	61.7 mg/L[3]
		Ethylbenzene (daily maximum)	108 µg/L	687 µg/L[3],[5]

[1] --Noncompliance Reports (NCRs) were not submitted by the Respondent.
[2] --- Exceedances from lab results maintained on site.
[3] ----Exceedances from NCRs submitted to the Department.
[4] ----- The Department did not receive 24 hour oral notification followed by a written report in five (5) days from the time the permittee became aware of exceedances of maximum daily discharge limitations for Ethylbenzene, Benzene, Toluene.
[5] ------ The Department did not receive a written report in five (5) days from the time the permittee became aware of exceedances of maximum daily discharge limitations for Ethylbenzene, Benzene, Toluene.
[6] ------- The Respondent submitted an inaccurate Noncompliance Report (NCR)

Each effluent exceedance is a violation of LPDES permit LA0087327 (Part I, Pages 2 through 8 of 8; and Part III, Section A.2), La. R.S. 30:2076 (A) (1), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, LAC 33:IX.501.D, and LAC 33:IX.2701.A. The Respondent failed to submit noncompliance reports (NCRs) to the Department for the above noted effluent exceedances. On December 4, 2008, the Respondent reported 300 mg/L as the daily maximum permit limit. Each failure to submit and/or properly

submit NCRs to the Department is a violation of LPDES permit LA0087327 (Part III, Sections A.2 and D.7), La. R.S. 30:2076 (A)(3), LAC 33:33:IX.501.A, LAC 33:IX.2701.A and LAC 33:IX.2701.L.7. Additionally, the Respondent is required to provide oral notification for violations of the maximum daily limitations for Ethylbenzene, Benzene, and Toulene, followed by a subsequent written notification within five (5) days. The Respondent's failure to notify and/or properly notify the Department for violations of the daily maximum limitations for Ethylbenzene, Benzene, and Toulene as noted above at Outfall 001 is a violation of LPDES permit LA0087327 (Part II, Section E, and Part III, Sections A.2 and D.6.e.3), La. R.S. 30:2076 (A) (1), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, LAC 33:IX.501.D, LAC 33:IX.2701.A, LAC 33:IX.2701.L.6.a, and LAC 33:IX.2707.G.

C. The Respondent failed to submit Discharge Monitoring Reports (DMRs) as required by LPDES permit LA0087327 for the fourth quarter of 2005, first quarter of 2006, and fourth quarter of 2007 for Outfalls 002, 003, 004, 005, 006, and 007; and the third quarter of 2007 for Outfall 007. Additionally, the Respondent failed to submit DMRs for the monthly monitoring periods of November and December of 2005; January, February, and March 2006; and October, November, and December of 2007 for Outfall 001. Each failure to submit DMRs is a violation of LPDES permit LA0087327 (Part II, Section K), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, LAC33:IX.2701.A, and LAC33:IX.2701.L.4.a.

D. The Respondent failed to submit monthly DMRs in a timely manner for Outfall 001 from April through September of 2005, April through December of 2006, and January through September of 2007. Additionally, the Respondent failed to submit quarterly DMRs in a timely manner for Outfalls 002, 003, 004, 005, 006, and 007 for the second and third quarters of 2005; second, third, and fourth quarters of 2006; and first, second, and third quarters of 2007. Specifically, the Respondent is required to submit DMRs by the twenty-eighth (28^{th}) of the month following the end of each calendar quarter. The Respondent's failure to submit DMRs in a timely manner is a violation of LPDES permit LA0087327 (Part II, Section K, and Part III, Section A.2), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, and LAC 33:IX.2701.A.

E. The Respondent submitted DMRs signed by an unauthorized signatory authority for the monthly monitoring periods of January, February, and March of 2008 for Outfall 001; and the first quarter of 2008 for Outfalls 002, 003, 004, 005, 006, and 007. The

failure to submit properly signed DMRs is a violation of LPDES permit LA0087327 (Part III, Sections A.2 and D.10.b), La. R.S. 30:2076 (A) (1), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, LAC 33:IX.501.D, and LAC 33:IX.2701.K.1 The Respondent submitted a letter to EPA on or about June 2, 2008, authorizing a new signatory authority.

F. The Respondent submitted incomplete and/or inaccurate Discharge Monitoring Reports (DMRs) for the following monitoring periods:

Sample Date	Outfall	Parameter	Analysis Result	Reported on the DMR
4/29/2005	001	Oil & Grease (daily maximum)	237 mg/L	7 mg/L
		BOD (daily maximum)	105 mg/L	15 mg/L
		COD (daily maximum)	866 mg/L	166 mg/L
		TSS (daily maximum)	244 mg/L	140 mg/L
5/25/2005	001	Oil & Grease (daily maximum)	120 mg/L	12 mg/L
		COD (daily maximum)	532 mg/L	132 mg/L
6/29/2005	001	COD (daily maximum)	249 mg/L	200 mg/L
7/28/2005	001	Oil & Grease (daily maximum)	47 mg/L	<5 mg/L
4/30/2006	001	Toulene (daily maximum)	<.005 mg/L	<.005µg/L
		Benzene (daily maximum)	<.001 mg/L	<.001µg/L
		Ethylbenzene (daily maximum)	.00414 mg/L	.004 µg/L
5/31/2006	001	Toulene (daily maximum)	<.005mg/L	<.005 µg/L
		Benzene (daily maximum)	.001 mg/L	.001µg/L
		Ethylbenzene (daily maximum)	.0567 mg/L	.056 µg/L
07/31/2006	001	Toulene (daily maximum)	<.005 mg/L	<.005 µg/L
		Ethybenzene (daily maximum)	.0029 mg/L	<1µg/L
10/30/2006	001	TSS (daily maximum)	22 mg/L	44mg/L
		Ethylbenzene (daily maximum)	183 ug/L	<1µg/L
11/30/2006	001	Oil & Grease (daily maximum)	6.5 mg/L	6.9 mg/L
		BOD (daily maximum)	81 mg/L	15 mg/L
		COD (daily maximum)	160 mg/L	64 mg/l
		pH	8.4 su	7.6 su
		TSS (daily maximum)	24 mg/L	33 mg/L
		Ethylbenzene (daily maximum)	41.4 ug/L	13 µg/L

Sample Date	Outfall	Parameter	Analysis Result	Reported on the DMR
12/29/2006	001	Oil & Grease (daily maximum)	13 mg/L	5.5 mg/L
		BOD (daily maximum)	184 mg/L	12 mg/L
		COD (daily maximum)	510 mg/L	53 mg/L
		pH	7.8 su	7.5 su
		TSS (daily maximum)	17 mg/L	27 mg/L
		Ethylbenzene (daily maximum)	46.5 ug/L	<1µg/L
5/31/2007	001	Oil & Grease (daily maximum)	10.7 mg/L	<5 mg/L
		BOD (daily maximum)	14 mg/L	19 mg/L
		COD (daily maximum)	43 mg/L	45 mg/L
		pH	7.7 su	7.5 su
		TSS (daily maximum)	9 mg/L	10 mg/L
08/29/2007	001	Ethylbenzene (daily maximum)	0.104 mg/L	0.104 µg/L

In addition, the Respondent reported 5,440 mg/L as the daily maximum value for COD for December of 2008. According to NCR submitted by the Respondent, 79,000 mg/L was the highest daily maximum value for December of 2008. Also, monthly averages for Outfall 001 were not reported for the monthly monitoring periods of April through July of 2005, April through December of 2006, and February through November of 2007 daily maximums were not reported for Outfall 001 for January through March of 2008; and daily maximum results were reported in the monthly average column for Outfalls 002, 003, 004, 005, 006, 007 for the first quarter of 2008. Furthermore, the column used to designate the number of exceedances was not completed for Outfall 004 on the third quarter of 2007 DMR and for Outfall 001 on the November of 2007 DMR. Each submittal of incomplete and/or inaccurate DMRs is a violation of LPDES permit LA0087327 (Part I, Pages 2 through 8 of 8, and Part III, Section A.2), La R.S. 30:2076 (A) (3), LAC 33:IX.501.A, and LAC 33:IX.2701.A.

G. The Respondent failed to monitor in accordance with test procedures approved under 40 CFR Part 136. Specifically, the Respondent exceeded sample holding times at Outfall 001 for BOD_5 as follows:

Sample date	Sample time	Analysis date	Analysis time	Holding time
09/30/2006	08:00 A.M.	10/3/2006	10.30 A.M.	74.5 hrs.
04/26/2008	7:22 A.M.	04/28/2008	11:45 A.M.	52.2 hrs.
05/03/2008	10:15 A.M.	05/05/2008	1:45 P.M.	51.3 hrs.

Sample date	Sample time	Analysis date	Analysis time	Holding time
05/10/2008	10:07 A.M.	05/12/2008	2:35 P.M.	52.3 hrs.
09/05/2008*	11:04 A.M.	09/08/2008	9:15 A.M.	70.5 hrs.
09/10/2008*	2:06 P.M.	09/15/2008	2:23 P.M.	120.2 hrs.
09/11/2008*	4:04 P.M.	09/15/2008	2:23 P.M.	94.19 hrs.

*-Exceedances of sample holding times for B OD_5 due to Hurricane Gustav.

The maximum holding time for BOD_5 is forty-eight (48) hours. In addition, for the period of April 11, 2008, through April 28, 2008, the Respondent failed to use a two point calibration, bracket the expected effluent pH range, and meet pH precision requirements. Furthermore, the Respondent failed to follow required sampling protocols when taking a BTEX sample on April 29, 2005, as both sample vials contained large air bubbles. The Respondent's failure to use approved test procedures approved under 40 CFR Part 136 is a violation of LPDES permit LA0087327 (Part III, Sections A.2 and C.5.a), La. R.S. 30:2076 (A) (1), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, LAC 33:IX.2701.A, LAC 33:IX.2701.J.4, and 40 CFR Part 136.

H. The Respondent failed to implement a Spill Prevention and Control (SPC) Plan. Specifically, the Respondent did not conduct annual SPC training and monthly facility inspections required by the SPC Plan for years 2005, 2006, and 2007. Additionally, the facility did not have adequate secondary containment around the two 6,200-gallon styrene bulk storage tanks. Specifically, a styrene tank was overfilled at the facility on or about June 14, 2008, and approximately 257 gallons of styrene spilled into the reactor room of the manufacturing building. Styrene leaked through two holes in the cement floor of the building and drained onto the soil underneath the building and thence into a reservoir at the base of the loading dock. The Respondent's failure to implement an SPC plan is a violation of LPDES permit LA0087327 (Part III, Section A.2), La. R.S. 30:2076 (A) (1), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, and LAC 33:IX.905.B. The two holes were closed after the spill by filling them with concrete.

I. The Respondent failed to implement a Storm Water Pollution Prevention Plan (SWPPP). Specifically, the facility failed to conduct annual SWPPP inspections for 2005, 2006, and 2007. Furthermore, the inspection conducted on or about May 16, 2008, revealed that two areas of stained soil were next to the outer wall of the Raw

Materials Warehouse, directly outside and to the left of the door at the southeast corner. Stains were also observed on the soil south of the Raw Materials Warehouse adjacent to recovery units that were stored there. Water on the soil at the time of the inspection exhibited a sheen.[3] Additionally, drums of waste oil were observed on the Respondent's process slab. Oil had spilled down the side of a drum and onto the facility's process slab. The process slab drains into the facility's sump and is then discharged through Outfall 001. LPDES permit LA0087327 authorizes the Respondent to discharge process area storm water through Outfall 001. The Respondent's failure to implement a SWPPP is a violation of LPDES permit LA0087327 (Part II, Sections J.4.a and J.5.b, and Part III, Section A.2), La. R.S. 30:2076 (A) (1), La. R.S. 30:2076 (A) (3), LAC 33:IX.501.A, and LAC 33:IX.2701.A.

J. The Respondent did cause or allow the unauthorized discharge of non-contact cooling water through Outfall 001. Specifically, water from the onsite fire hydrant was used as non-contact cooling water from February to September 2007. The water passed through the jacket around the dryer once then discharge onto the process slab. The process slab drains into a sump which is pumped into the facility's wastewater treatment plant then discharged through Outfall 001. The unauthorized discharge of non-contact cooling water through Outfall 001 from February through September of 2007 is a violation of LPDES permit LA0087327 La. R.S. 30:2075, La. R.S. 30:2076 (A)(1)(a), La. R.S. 30:2076 (A)(3), LAC 33:IX.501.A, LAC 33:IX.501.C, LAC 33:IX.501.D, and LAC 33:IX.2701.A.

III

Respondent has taken proactive steps to evaluate and address compliance issues and to notify the Department of such issues and its efforts to address same (e.g. Sun's July 30, 2009 self-compliance evaluation to the Department, EDMS # 6524056).

IV

In response to the Penalty Assessment (CO/NOPP), Respondent made a timely request for a hearing.

[3]Later sampling confirmed that the soil was nonhazardous and all of the soil was removed and shipped for proper disposal.

V

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

VI

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 FOUR HUNDRED FIVE THOUSAND AND NO/100 DOLLARS ($405,000.00), paid over a three year period, of which Three Thousand four Hundred Twenty-Nine and No/100 Dollars ($3,429.00) represents the Department's enforcement costs, in settlement of the claims set forth in this agreement. The payment of $405,000.00 shall be made in three payments over time. The first payment of $135,000.00 shall be paid within ten (10) days of receipt of notice of the Secretary's signature. The second and third payments of $135,000.00 shall be due on the first and second yearly anniversary of the first payment. 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).

VII

Respondent further agrees that the Department may consider the inspection report(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.

VIII

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.

IX

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.

X

The Respondent has caused a public notice advertisement to be placed in the official journal of the parish governing authority in Plaquemines Parish, Louisiana. The advertisement, in form, wording, and size 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 from the newspaper of the affected parish 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.

XI

The first of the three payments 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).

XII

In consideration of the above, any claims for penalties arising from the findings of fact in Consolidated Compliance Order & Notice of Potential Penalty, Enforcement No. MM-CN-09-0072, including any underlying investigations and/or inspection reports, are hereby compromised and settled in accordance with the terms of this Settlement.

XIII

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.

SUN DRILLING PRODUCTS CORPORATION

BY: _____
(Signature)

_____
(Printed)

TITLE: _____

THUS DONE AND SIGNED in duplicate original before me this _____ day of _____, 20 _____, at _____.

_____
NOTARY PUBLIC (ID #_____)

_____
(stamped or printed)

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY
Peggy M. Hatch Secretary

BY: _____
Cheryl Sonnier Nolan, Assistant Secretary
Office of Environmental Compliance

THUS DONE AND SIGNED in duplicate original before me this _____ day of _____, 20_____, at Baton Rouge, Louisiana.

_____
NOTARY PUBLIC (ID # _____)

_____
(stamped or printed)

Approved: _____
Cheryl Sonnier Nolan, Assistant Secretary