STATE OF LOUISIANA

DEPARTMENT OF ENVIRONMENTAL QUALITY

IN THE MATTER OF:

* Settlement Tracking No.

* SA-WE-20-0071

TOWN & COUNTRY SERVICE COMPANY *

INC.

* Enforcement Tracking No.

AI # 43586 * WE-CN-18-00250

*

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

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").

Ι

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).

Ш

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

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).

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: Much DeMers (Signature)
Judith De Mers (Printed)
TITLE: President
THUS DONE AND SIGNED in duplicate original before me this 23rd day of, 20, at
NOTARY PUBLIC (ID # 52240)
<u>Diane Miletello Mulhearn</u> (stamped or printed)
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY Chuck Carr Brown, Ph.D., Secretary
BY:
Lourdes Iturralde, Assistant Secretary Office of Environmental Compliance
THUS DONE AND SIGNED in duplicate original before me this day of, at Baton Rouge, Louisiana.
NOTARY PUBLIC (ID #) AMBER G. LITCHFIELD
Notary Public State of Louisiana (Stamped or printed)D#92503 East Baton Rouge Parish
Approved: Lourdes Iturralde, Assistant Secretary

LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY

OFFICE OF ENVIRONMENTAL COMPLIANCE

ENFORCEMENT DIVISION
POST OFFICE BOX 4312

I.

CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY



BATON ROUGE, LOUISIANA 70821-4312

	COLL TOIL		
Enforcement Tracking No.	WE-CN-18-00250	Certified Mail No.	7017 0530 0000 5978 7278
Agency Interest (AI) No.	43586	Contact Name	Kevin Foy
Alternate ID No.	LA0052078; LAJ650094	Contact Phone No.	(225) 219-3485
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		
	4315 Sterlington Rd.	City, State, Zip:	Monroe, LA 71203
	Monroe, LA 71203	Parish:	Ouachita Parish

This CONSOLIDATED COMPLIANCE ORDER & NOTICE OF POTENTIAL PENALTY is issued by the Louisiana Department of Environmental Quality (the Department), under the authority granted by the Louisiana Environmental Quality Act (the Act), La. R.S. 30:2001, et seq., and particularly by La. R.S. 30:2025(C), 30:2050.2 and 30:2050.3(B).

FINDINGS OF FACT

An authorized representative of the Department inspected the abovementioned facility or conducted a file review of the facility to determine the degree of compliance with regulations promulgated in the Louisiana Administrative Code, Title 33. The State regulatory citations for the violation(s) identified during the inspection and/or file review are indicated below.

The Respondent owns and/or operates a wastewater treatment facility serving residential subdivisions and three schools located at 2800 Old Sterlington Rd, Monroe, Ouachita Parish, Louisiana. The Respondent was issued Louisiana Pollutant Discharge Elimination System (LPDES) Permit LA0052078 on March 22, 2011, with an effective date of May 1, 2011 and an expiration date of April 30, 2016. The Respondent submitted a permit renewal application to the Department dated October 21, 2015. LPDES Permit LA0052078 was administratively continued until it was reissued on September 29, 2016, with an effective date of December 1, 2016. LPDES Permit LA0052078 will expire on November 30, 2021. Under the terms and conditions of LPDES Permit LA0052078, the Respondent is permitted to discharge treated sanitary wastewater into Bayou Chauvin, thence into the Ouachita River (Subsegment 080102), all waters of the state.

The Respondent was granted authorization under Louisiana Sewage Sludge and Biosolids Use and Disposal General Permit LAJ650094 on March 5, 2013. Louisiana Sewage Sludge and Biosolids Use and Disposal General Permit LAJ650094 expired on January 31, 2015, but was administratively continued until it was reissued effective on September 1, 2015. Under the terms and conditions of Louisiana Sewage Sludge and Biosolids Use and Disposal General Permit LAJ650094, the Respondent is permitted to process and dispose of sewage sludge in a permitted landfill.

	permitted to process and dispose of sewage sludge in a permitted landfill.			
	Date of Violation	Description of Violation		
11.	Inspection(s) 2/20/13 11/15/17	The Respondent failed to properly operate and maintain its wastewater treatment facility. Specifically, a bypass of the sand filtration unit was occurring; it was inoperable/unutilized and there was excessive flocculation of polymer and algae solids at the primary device/outfall. Failure to operate and maintain the facility is in violation of LA0052078 (Standard Conditions, Section A.2 and B.3.a), La. R.S. 30:2076(A)(3), and LAC 33:IX.2701.E. The unauthorized bypass of the treatment system is in violation of LA0052078 (Standard Conditions, Section A.2 and B.4.d), La. R.S. 30:2076(A)(3), and LAC 33:IX.2701.M.4.a.		
ш.	Inspection(s) 11/15/17	The Respondent failed to document pH calibration, dissolved oxygen calibration, and pH analysis times as required by LPDES permit LA0052078. (LA0052078 (Standard Conditions, Section A.2, B.3, and C.3 and 4), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A and 2701.J.3)		
IV.	inspection(s) & File Review 11/15/17 8/28/18	The Respondent failed to comply with LPDES permit LA0052078. Specifically, between November 2014 and July 2018, the Respondent reported exceedances of permit effluent limitations for TSS and Ammonia-Nitrogen as summarized in Table 1. (LA0052078 (before December 1, 2016: Part I, Effluent Limitations and Monitoring Requirements, Page 2 of 2, after December 1, 2016: Effluent Limitations and Monitoring Requirements, Page 1 of 3, and Standard Conditions, Section A.2), La. R.S. 30:2076(A)(3), and LAC 33:IX.501.A)		
v.	Inspection(s) & File Review 2/20/13 11/15/17 8/28/18	Between November 2014 and July 2018, the Respondent caused and/or allowed the discharge of wastewater from a source or location not authorized by the permit as summarized in Table 2. Each unauthorized discharge to waters of the state is in violation of La. R.S. 30:2076(A)(1)(a) and LAC 33:IX.501.D. The failure to properly operate and maintain all systems of treatment and control is in violation of LPDES Permit LA0052078(Part III, Sections A.2 and B.3.a), La. R.S. 30:2076(A)(3), and LAC 33:IX.2701.E.		
VI.	Inspection(s) 8/28/18	The Respondent failed to comply with Sewage Sludge and Biosolids Use or Disposal permit LAI650094. Specifically, the Respondent failed to submit annual sewage sludge reports detailing the disposal of sewage sludge from the facility for the years of 2013, 2014, 2015, 2016, and 2017. (LAI6500940 (Part II, Section E and Part III, Section A.1), La. R.S. 30:2076(A)(3), and LAC 33:IX.7301.E.3 and 7313.A.2)		

ORDER

Based on the foregoing, the Respondent is hereby ordered to comply with the requirements that are indicated below:

To take, immediately upon receipt of this **COMPLIANCE ORDER**, any and all steps necessary to meet and maintain compliance with the Water Quality Regulations. This shall include, **but not be limited to**; correcting <u>all</u> of the violations described in the "Findings of Fact" portion.

To submit to the Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, a written report that includes a detailed description of the circumstances surrounding the cited violation(s) and actions taken or to be taken to achieve compliance with the "Order" portion of this COMPLIANCE ORDER. This report and all other reports or information required to be submitted to the Enforcement Division by this COMPLIANCE ORDER shall be submitted to the Department at the address specified in this document.

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II.

Page 1

CONOPP FORM 1

EXHIBIT 1

III. To submit to the Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, a comprehensive for the expeditious elimination and prevention of such noncomplying discharges. Such plan shall provide or specific corrections taken and shall include a critical path schedule for the achievement of compliance within the shortest time position of the posit						
IV., I for the expeditious elimination and prevention of such noncomplying discharges. Such plan shall provide for specific corr actions taken and shall-include a critical pash schedule for the achievement of compliance within the sortest time position. I a submit to the Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, annual sewage i reports as outlined in LAJ650094 Section II for the past five (5) years. RIGHT TO APPEAL In Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this COMPLIANCE ORDER. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt. COMPLIANCE ORDER. In request for an adjudicatory hearing shall specify the provisions of the COMPLIANCE ORDER on which the hearing is request and shall briefly describe the basis for the request. This request should reference the Enforcement Tracking Number and A interest Number, which are located in the upper left-hand corner of the first page of this document. Upon the Respondent's full record of the provisions of the COMPLIANCE ORDER may be scheduled by the Secretary of the Department. The hearing shall be governed by the Ac Administrative Procedure ACL (a. R.S. 4950)c. et seal, and the Division of Administrative Law's Collay Procedural Risk. Department may amend or supplement this COMPLIANCE ORDER prior to the hearing, after providing sufficient notice a opportunity for the preparation of a defense for the hearing. This COMPLIANCE ORDER shall become a final enforcement action unless the request for hearing is timely filed. Prior the hearing and adjuded is the service of the hearing of the providing sufficient notice a opportunity for the preparation of a defense for the hearing. This COMPLIANCE ORDER shall become a final enforcement action unless the request for hearing is fluency filed. The service of the hearing of the service of material fact or of law section 2004 and service the abering o	10.	To immediately cease, upon receipt of this COMPLIANCE ORDER , any unauthorized discharges from the Respondent's facilit to waters of the state.				
RIGHT TO APPEAL The Respondent has a right to an adjudicatory hearing on a disputed issue of material fact or of law arising from this COMPLA I. ORDER. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt COMPLANCE ORDER. This right may be exercised by filing a written request with the Secretary no later than thirty (30) days after receipt COMPLANCE ORDER on which the hearing is request the COMPLANCE ORDER on which the hearing is request than the company of	IV.	To submit to the Enforcement Division, within thirty (30) days after receipt of this COMPLIANCE ORDER, 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.				
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NOTICE OF POTENTIAL PENALTY	VII.	For each violation described herein, the Department reserves the right to seek civil penalties in any manner allowed by law, and				
Pursuant to La. R.S. 30:2050.3(B), you are hereby notified that the issuance of a penalty assessment is being considered for violation(s) described herein. Written comments may be filed regarding the violation(s) and the contemplated penalty. elect to submit comments, it is requested that they be submitted within ten (10) days of receipt of this notice. Prior to the Issuance of additional appropriate enforcement action(s), you may request a meeting with the Department to present and its propriate enforcement action(s), you may request a meeting, please contact Kevin (225) 219-3485 within ten (10) days of receipt of this NOTICE OF POTENTIAL PENALTY. III.						
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HOW TO REQUEST CLOSURE OF THIS CONSOLIDATED COMPLIANCE ORDER		HOW TO REQUEST OF OSTIBE OF THE	S 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.
 - o 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 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.
 - o 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 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.

Lourdes Iturraide
Assistant Secretary

Office of Environmental Compliance

Attachment(s)

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

LDEQ-EDMS Document 11355716, Page 4 of 8 LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY OFFICE OF ENVIRONMENTAL COMPLIANCE **ENFORCEMENT DIVISION** CONSOLIDATED COMPLIANCE ORDER & POST OFFICE BOX 4312 NOTICE OF POTENTIAL PENALTY BATON ROUGE, LOUISIANA 70821-4312 **REQUEST TO CLOSE Enforcement Tracking No.** W.E-CN-18-00250 Kevin Foy Contact Name Agency Interest (AI) No. 43586 Contact Phone No. (225) 219-3485 Alternate ID No. LA0052078; LAJ650094 Respondent: **Town & Country Service Company Facility Name:** Oakwood Regional WWTF Inc. c/o C.J. Ledoux 2800 Old Sterlington Road Physical Location: Agent for Service of Process 4315 Sterlington Rd. City, State, Zip: Monroe, LA 71203 Monroe, LA 71203 Parish: Ouachita Parish STATEMENT OF COMPLIANCE STATEMENT OF COMPLIANCE **Date Completed** Copy Attached? A written report was submitted in accordance with Paragraph II of the "Order" portion of the COMPLIANCE ORDER. All necessary documents were submitted to the Department within 30 days of receipt of the COMPLIANCE ORDER in accordance with Paragraphs IV and V of the "Order" portion of the COMPLIANCE ORDER. All items in the "Findings of Fact" portion of the COMPLIANCE ORDER were addressed and the facility is being operated to meet and maintain the requirements of the "Order" portion of the COMPLIANCE ORDER. Final compliance was achieved as of: SETTLEMENT OFFER (OPTIONAL) (check the applicable option) 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 NOTICE OF POTENTIAL PENALTY (WE-CN-18-00250), 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 NOTICE OF POTENTIAL PENALTY (WE-CN-18-00250), 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. Monetary component = Beneficial Environmental Project (BEP)component (optional)= 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. The Respondent has reviewed the violations noted in NOTICE OF POTENTIAL PENALTY (WE-CN-18-00250) and has attached a justification of its offer and a description of any BEPs if included in settlement offer. **CERTIFICATION STATEMENT** 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 # MAIL COMPLETED DOCUMENT TO THE ADDRESS BELOW:

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.

Date

Table 1: Permit Limit Exceedances

Parameter	Permit Limit	Measured Value
Ammonia Nitrogen	10 mg/L Monthly Avg	15.05 mg/L
	30 lbs/day Loading Avg	51.74 lbs/day
	20 mg/L Daily Max	21.6 mg/L
Ammonia Nitrogen	10 mg/L Monthly Avg	17.9 mg/L
		65.99 lbs/day
Ammonia Nitrogen		14.81 mg/L
		77.14 lbs/day
Ammonia Nitrogen		10.99 mg/L
Ammonia Nitrogen	8 mg/L Daily Max	9.58 mg/L
		5.15 m/L
TSS		19 mg/L
		115.29 lbs/day
		9.62 mg/L
Ammonia Nitrogen		5.42 mg/L
		31.07 lbs/day
		24 mg/L
TSS		21.80 mg/L
		128.10 lbs/day
Ammonia Nitrogen Ammonia Nitrogen		11.48 mg/L
		8.40 mg/L
		30.54 lbs/day
		8.78 mg/L
		5.77 mg/L
	8 mg/L Daily Max	17.10 mg/L*
		22.84 mg/L*
Ammonia Nitrogen Ammonia Nitrogen		24.20 mg/L*
		24.52 mg/L*
		31.76 mg/L
	4 mg/L Monthly Avg	24.08 mg/L
		90.70 lbs/day
		36.36 mg/L
		25.08 mg/L
		106.77 lbs/day
Ammonia Nitrogen		15.21 mg/L
		66.20 lbs/day
Ammonia Nitrogen		
		22.5 mg/L
		17.88 mg/L
		77.36 lbs/day
Ammonia Nitrogo-		23.02 mg/L
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^{* :} reported on Non-Compliance Report

Table 1: Permit Limit Exceedances (Continued)

Monitoring Period	Parameter	Permit Limit	Measured Value
		20 mg/L Daily Max	21.44 mg/L
February 2016	Ammonia Nitrogen	10 mg/L Monthly Avg	19.62 mg/L
		76 lbs/day Loading Avg	83.79 lbs/day
	Ammonia Nitrogen	20 mg/L Daily Max	20.32 mg/L
March 2016		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
	Ammonia Nitrogen	8 mg/L Daily Max	8.59 mg/L
April 2016		4 mg/L Monthly Avg	5.68 mg/L
	TSS	23 mg/L Daily Max	27.00 mg/L
		8 mg/L Daily Max	20.04 mg/L
May 2016	Ammonia Nitrogen	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
		8 mg/L Daily Max	19.62 mg/L
June 2016	Ammonia Nitrogen	4 mg/L Monthly Avg	17.78 mg/L
		30 lbs/day Loading Avg	68.33 lbs/day
	-	8 mg/L Daily Max	13.54 mg/L
July 2016	Ammonia Nitrogen	4 mg/L Monthly Avg	11.80 mg/L
9		30 lbs/day Loading Avg	49.58 lbs/day
	Ammonia Nitrogen	8 mg/L Daily Max	20.64 mg/L
*		4 mg/L Monthly Avg	12.63 mg/L
August 2016		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
	Ammonia Nitrogen	8 mg/L Daily Max	12.08 mg/L
September 2016		4 mg/L Monthly Avg	7.67 mg/L
5090	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
85		15 mg/L Monthly Avg	21.33 mg/L
		20 mg/L Daily Max	35.78 mg/L
	Ammonia Nitrogen	10 mg/L Monthly Avg	25.45 mg/L
March 2017		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		8 mg/L Daily Max	12 mg/L
	Ammonia Nitrogen	4 mg/L Monthly Avg	8.9 mg/L
		31 lbs/day Loading Avg	33 lbs/day
		8 mg/L Daily Max	16 mg/L
	Ammonia Nitrogen	4 mg/L Monthly Avg	9 mg/L
June 2017		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
	I R	8 mg/L Daily Max	18.9 mg/L
July 2017	Ammonia Nitrogen	4 mg/L Monthly Avg	12.7 mg/L
		31 lbs/day Loading Avg	47.2 lbs/day
8		8 mg/L Daily Max	20.9 mg/L
August 2017	Ammonia Nitrogen	4 mg/L Monthly Avg	14.2 mg/L
	120	31 lbs/day Loading Avg	60 lbs/day
	TSS	15 mg/L Monthly Avg	15.6 mg/L
		8 mg/L Daily Max	20 mg/L
	Ammonia Nitrogen	4 mg/L Monthly Avg	16.95 mg/L
September 2017		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
		8 mg/L Daily Max	17.1 mg/L
October 2017	Ammonia Nitrogen	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
9///	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
	Ammonia Nitrogen	20 mg/L Daily Max	28.7 mg/L
February 2018	ŭ	10 mg/L Monthly Avg	20 mg/L
	TSS	23 mg/L Daily Max	27 mg/L
	5900.0000	15 mg/L Monthly Avg	19 mg/L
March 2018	Ammonia Nitrogen	20 mg/L Daily Max	28 mg/L
	ŭ	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/	
	Ammonia Nitrogen	8 mg/L Daily Max	24.9 mg/L
May 2018		4 mg/L Monthly Avg	10.8 mg/L
		31 lbs/day Loading Avg	41 lbs/day
		8 mg/L Daily Max	25.4 mg/L
June 2018	Ammonia Nitrogen	4 mg/L Monthly Avg	13.6 mg/L
		31 lbs/day Loading Avg	51 lbs/day

Table 2: Unauthorized Discharges

Incident #	Date	Media Affected	Description
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.