

BEFORE THE
OHIO ENVIRONMENTAL PROTECTION AGENCY

OHIO E.P.A.

JUN 13 2014

ENTERED DIRECTOR'S JOURNAL

In the matter of:

City of Mansfield
30 North Diamond Street
Mansfield, OH 44902

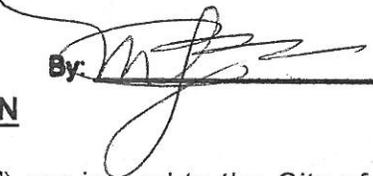
: Director's Final Findings
: and Orders
:

Respondent

I certify this to be a true and accurate copy of the
official documents as filed in the records of the Ohio
Environmental Protection Agency.

PREAMBLE

It is agreed by the parties hereto as follows:

By: 

Date: 6-13-2014

I. JURISDICTION

These Director's Final Finding and Orders ("Orders") are issued to the City of Mansfield ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") §§ 6111.03, and 3745.01.

II. PARTIES BOUND

These orders shall apply to and be binding upon Respondent and its successors in interest liable under Ohio law.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 6111 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Respondent is located in Richland County, Ohio, and has a population of approximately 47,483 people.
2. Respondent owns and operates a wastewater treatment plant (WWTP) located at 385 South Illinois Avenue, Mansfield, Ohio. The Mansfield WWTP is an advanced treatment facility with an average daily design flow of 12.0 MGD and a peak hydraulic capacity of 25 MGD through secondary treatment. The entity has been inspected 11 times since 2004.
3. Respondent holds a National Pollutant Discharge Elimination System (NPDES)

permit, number 2PE00001*KD, effective February 1, 2010, which authorizes Respondent to discharge effluent from the WWTP to Rocky Fork Mohican River. Rocky Fork Mohican River is defined as "waters of the state" pursuant to R.C. § 6111.01.

4. In accordance with USEPA policy in the Construction Grants Program in 1986, Respondent constructed a 5 million gallon (MG) equalization basin (EQ) at the WWTP to help reduce bypasses of the WWTP during high flow events. The EQ basin is constructed with an overflow that activates when the basin is full, and flows exceeding secondary treatment capacity continue. The overflow (outfall 602) combines with the fully treated effluent from the WWTP (outfall 001) before being discharged to the receiving stream via outfall 002. The fully treated effluent is considered outfall 001. The combined flow from the EQ basin, wastewater treatment plant storm water drain, and fully treated effluent make up outfall 002.
5. In 1995 Respondent's NPDES permit was renewed and included a compliance schedule to install disinfection at the EQ basin overflow and an effluent table with secondary treatment limits for TSS and CBOD for the EQ basin.
6. In 2002, Respondent submitted a secondary treatment capacity study that investigated alternatives to treat the high peak flows at the WWTP. This resulted in Respondent constructing a fourth final clarifier which Respondent initially believed would increase the peak wet weather flow to 25 MGD. It was believed that this would reduce overflow events from the EQ basin to 6.3 events per year or less. As currently operated, Respondent demonstrated an ability to treat up to 19 MGD and meet concentration limits at outfall 001.
7. As set forth in the table, the EQ basin has overflowed more significantly than anticipated

Year	Overflow MG Total	# Days Overflows	# of Events
2003	75.46	7	3
2004	251.8	19	9
2005	359.14	28	9
2006	137.69	18	10
2007	318.28	28	17
2008	486.96	46	15
2009	333.26	31	12
2010	153.61	27	11
2011	271.05	39	18
2012	70.88	18	12

8. Respondent has investigated and taken measures with the goal of eliminating inflow and infiltration (I/I) in its sewer collection system. Most of the I/I work began in 1996 and 1997 with the completion of system wide flow monitoring and

a report submittal. The report concluded that southern portions of the system receive the most inflow. In 1996, Respondent conducted field monitoring of their collection system using flow meters and rain gauges. This monitoring identified a system wide I/I problem that causes high flows at the WWTP. This report estimated that during a 10 year storm event the collection system receives 6.4 MG of infiltration and 35.5 MG of inflow.

9. Since 2002, Respondent has spent approximately \$3.3 million on I/I removal. Ohio EPA received an I/I reduction plan in 2010, 2012, and 2013. No plan was received for 2009 or 2011. Respondent continues to implement an I/I removal program which, to date, primarily involves slip lining and manhole rehabilitation in designated areas.
10. Respondent's NPDES permit, No. 2PE00001*KD, contains a compliance schedule to submit an Inflow and Infiltration Reduction plan by no later than January 31 of each year. Respondent's failure to submit an acceptable plan in years 2009 and 2011 is a violation of NPDES permit No. 2PE00001*KD and therefore a violation of R.C. § 6111.07.
11. High flows to the WWTP have caused or contributed to violations of Respondent's NPDES permit. These violations, which are detailed in Attachment I, have caused Respondent to be in Significant Non Compliance (SNC) with its NPDES permit. Attachment I is incorporated by reference as if fully rewritten herein. The facility has been in significant non-compliance (SNC) for 13 of the last 15 quarters.
12. The discharge of pollutants into waters of the state in excess of the permissible limits of an NPDES permit is a violation of R.C. §§ 6111.04 and 6111.07.
13. Respondent held a sludge management plan that allowed surface disposal at the WWTP. In 2003, Ohio EPA received delegation of the sewage sludge program from U.S. EPA. In April, 2002, Ohio EPA's rules were promulgated to prohibit surface disposal. Respondent was made aware of this rule.
14. In 2006, Respondent ceased surface disposal and began hauling all sludge to a landfill. A dry sludge storage pad was constructed and the land application program began.
15. The 2007 NPDES permit renewal required Respondent to close the surface disposal area in accordance with the published guidance. Ohio EPA asked that the monofill be closed in a manner consistent with pertinent U.S. EPA guidance for design, operation, and closure of sludge monofills. A compliance schedule was included in the NPDES permit requiring the submittal of a closure plan.
16. A NPDES permit modification took effect on February 1, 2010. In March 2010, Respondent submitted a Closure Plan for Biosolids Surface Disposal Area to

address the need for closure of the former sludge monofill. Ohio EPA responded to this submittal on July 19, 2010. The plan was found to be inadequate and Ohio EPA requested a revised resubmittal including a PTI application no later than August 30, 2010. Ohio EPA and Respondent attempted to resolve the deficiencies through discussions but the matter was never brought to a final resolution.

17. Respondent's NPDES permit, No. 2PE00001*KD, contains a compliance schedule to submit a Closure of Biosolids Surface Disposal Area plan.
18. Respondent's failure to submit an acceptable closure plan is a violation of NPDES permit No. 2PE00001*KD and therefore a violation of R.C. § 6111.07.
19. On October 9, 2008, Ohio EPA conducted a compliance inspection of Respondent's wastewater treatment facilities. At the time of the inspection, the floating cover anaerobic digester was in service as a secondary digester. It was noted that the digester cover had been leaking, at that time, for a period of at least one and a half years. Respondent indicated that the cover will need to be replaced; Ohio EPA indicated that replacement of the cover should be a priority item for future upgrades. Subsequent inspections on September 18, 2009, August 17, 2010, March 15, 2010, November 4, 2010, and April 17, 2012 have documented that the floating cover anaerobic digester has continued to leak and has not been replaced to date. Ohio EPA is of the opinion that the potential worsening of the leak or complete cover failure will prohibit Respondent from meeting the conditions of its NPDES permit. In order to maintain the digester in good working order, repair or replacement is necessary.
20. On January 9, 2013, a meeting was held between Respondent and Ohio EPA. Several items were included on the agenda including the sludge monofill closure, I/I issues and equalization basin overflows, and other outstanding equipment maintenance items at the WWTP.
21. Compliance with R.C. Chapter 6111 is not contingent upon the availability or receipt of financial assistance.
22. This document does not modify NPDES Permit No. 2PE00001*KD. The purpose of this document is to correct a condition of noncompliance with NPDES Permit No. 2PE00001*KD and not to alter said permit.
23. The following Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sanitary sewerage system. Any such construction or modification is subject to the permit to install (PTI) requirements of R.C. §§ 6111.44 and 6111.45 and Ohio Administrative Code (OAC) Chapter 3745-42.
24. Compliance with ORC Chapter 6111 is not contingent upon the availability or receipt of financial assistance.

25. The Director has given consideration to the factors set forth in ORC Sections 6111.03 and 6111.60, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of ORC Chapter 6111.

V. ORDERS

The Director hereby issues the following Orders:

1. Within six months of the effective date of these Orders, Respondent shall submit a general plan for Ohio EPA's review and approval. The performance goal of the general plan shall be to increase peak treatment capacity, reduce Inflow and Infiltration (I/I), treat for phosphorus and eliminate overflows from the equalization basin. The plan shall include an implementation schedule which will not exceed 10 years. The plan shall include:
 - a. Implementation of the step feed activated sludge process within the first five years of the schedule;
 - b. Yearly work efforts to reduce Inflow and Infiltration (I/I) elimination with priority given to areas experiencing Water in Basements (WIBs). The I/I work shall, at a minimum, consider the cost effectiveness of addressing I/I from private lateral lines;
 - c. An evaluation of chemical addition of either ferric chloride or aluminum sulfate and polymer to the equalization basin to improve settling of solids.

Upon Ohio EPA's approval of the plan, Respondent shall implement the plan in accordance with the approved schedule.

2. Respondent shall close the sludge monofill by land applying the sludge monofill contents in accordance with Ohio's current biosolids regulations found in OAC 3745-40. Respondent shall accomplish closure in accordance with the following:
 - a. Beginning in calendar year 2014, Respondent shall commence with the land application of the monofill contents. A minimum of 1000 dry tons of material shall be removed from the monofill each calendar year. The dry ton quantity shall be a rolling five-year average to allow for the uncertainties of farm field availability for land application. If Ohio EPA land application requirements or limits change during the time that this order is

effective, either party may request a meeting to discuss any changes needed to this order.

- b. No later than April 1 of each calendar year in which sludge is to be removed for land application, identify the portion of the monofill to be removed to meet the annual dry ton requirement. This portion shall be tested to assure compliance with Ohio EPA's sludge regulations for land application and the results submitted to Ohio Northwest District Office prior to any of the material being hauled for application.
3. Respondent shall repair or replace the floating cover over the anaerobic digester and any other necessary upgrades to eliminate uncontrolled emissions from the digester in accordance with the following Order:
 - a. Unless the requirements of 3b are triggered, Respondent shall submit, by no later than January 31, 2016, a Permit to Install (PTI) for review and approval for the upgrades required by this Order. Upon Ohio EPA's issuance of a PTI, Respondent shall initiate construction no later than June 1, 2017 and complete construction by no later than December 31, 2018.
 - b. If Respondent or Ohio EPA determine that the anaerobic digester cover is posing an unacceptable risk to human health, Respondent shall immediately take corrective action to abate risk and within 60 days of the determination, submit a PTI for review and approval for the upgrades required by this Order. Upon Ohio EPA's issuance of a PTI, Respondent shall initiate construction no later than 120 days after Ohio EPA's issuance of the PTI and complete construction by no later than eighteen months from the initiation of construction.
4. Respondent shall maintain in good working order and operate as efficiently as possible the WWTP to achieve compliance with the terms and conditions of the NPDES permit.
5. Respondent shall pay forty five thousand, two hundred and twenty-one dollars (\$45,221.00) in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 6111. Within thirty (30) days after the effective date of these Orders, payment to Ohio EPA shall be made by an official check made payable to "Treasurer, State of Ohio" for \$10,000.00 of the total amount. The official check shall be submitted to Carol Butler, or her successor, together with a letter identifying the Respondent, to:

Office of Fiscal Administration
Ohio Environmental Protection Agency
P.O. Box 1049

Columbus, Ohio 43216-1049

A copy of the check shall be sent to Mark Mann, Environmental Manager, Storm Water and Enforcement Section, or his successor, at the following address:

Ohio EPA
Division of Surface Water
P.O. Box 1049
Columbus, Ohio 43216-1049

6. In lieu of paying \$35,221.00 of the civil penalty, Respondent shall, within thirty (30) days of the effective date of these Orders, begin implementing a supplemental environmental project (SEP) that involves removal of four underground storage tanks located at 128 Lexington Avenue, Mansfield, Ohio and associated remedial actions necessary to address impacted soils. Respondent shall complete all actions required under this SEP within eighteen months of the effective date of these Orders. Respondent shall conduct the removal in accordance with all applicable laws. Respondent shall submit a final report summarizing the work within 14 days of completion.
7. Should Respondent fail to complete the SEP within the required time frame set forth in Order No. 6, Respondent shall immediately pay to Ohio EPA the remaining \$35,221.00 of the civil penalty in accordance with the procedures in Order No. 5.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's Division of Surface Water acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete."

This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of the Respondent. For purposes of these Orders, a responsible official is defined in OAC Rule 3745-33-03(F)(1) for a corporation, OAC Rule 3745-33-03(F)(2) for a partnership, OAC Rule 3745-33-03(F)(3) for a sole proprietorship, and OAC Rule 3745-33-03(F)(4) for a municipal, state, or other public facility.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to activities occurring on or at the site.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. UNAVOIDABLE DELAYS

The Respondent shall cause all work to be performed in accordance with applicable schedules and time frames unless any such performance is prevented or delayed by an event which constitutes an unavoidable delay. For purposes of these Orders, an "unavoidable delay" shall mean an event beyond the control of the Respondent which prevents or delays performance of any obligation required by these Orders and which could not be overcome by due diligence on the part of the Respondent. Increased cost of compliance shall not be considered an event beyond the control of the Respondent.

The Respondent shall notify Ohio EPA in writing within ten (10) days after the occurrence of an event which the Respondent contends is an unavoidable delay. (Ohio EPA may waive the 10 day notification.) Such written notification shall describe the anticipated length of the delay, the cause or causes of the delay, the measures taken and to be taken by the Respondent to minimize the delay, and the timetable under which these measures will be implemented. The Respondent shall have the burden of demonstrating that the event constitutes an unavoidable delay.

If Ohio EPA does not agree that the delay has been caused by an unavoidable delay, Ohio EPA will notify the Respondent in writing. If Ohio EPA agrees that the delay is attributable to an unavoidable delay, Ohio EPA will notify the Respondent in writing of the length of the extension for the performance of the obligations affected by the unavoidable delay.

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein or revealed in DMRs, reports, or other submissions to Ohio EPA.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

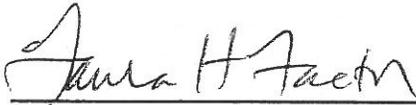
The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency



Craig W. Butler
Director

JUN 13 2014

Date

IT IS SO AGREED:

City of Mansfield

 5-22-14

Signature (signing in representative capacity only)

5-22-14

Date



Printed or Typed Name



Title

Attachment I

Get New Data		Mansfield WWTP NPDES permit limit violations April 2008 through February 2014						
Permit No	Reporting Period	Station	Reporting Code	Parameter	Limit Type	Limit	Reported Value	Violation Date
2PE00001*ID	April 2008	001	00982	Thallium, Total Recove	30D Conc	20	31.	4/1/2008
2PE00001*ID	April 2008	001	00982	Thallium, Total Recove	30D Qty	0.91	1.2132	4/1/2008
2PE00001*ID	June 2008	602	80082	CBOD 5 day	30D Conc	25	28.	6/1/2008
2PE00001*ID	June 2008	602	00530	Total Suspended Solids	7D Conc	45	46.	6/1/2008
2PE00001*ID	June 2008	602	00530	Total Suspended Solids	30D Conc	30	46.	6/1/2008
2PE00001*JD	September 2008	001	00550	Oil and Grease, Total	1D Conc	10	14.	9/25/2008
2PE00001*JD	October 2008	001	00530	Total Suspended Solids	7D Conc	18	26.	10/8/2008
2PE00001*JD	October 2008	001	00530	Total Suspended Solids	7D Conc	18	33.2	10/15/2008
2PE00001*JD	October 2008	001	00530	Total Suspended Solids	30D Conc	12	17.0476	10/1/2008
2PE00001*JD	October 2008	002	00530	Total Suspended Solids	7D Conc	18	25.	10/8/2008
2PE00001*JD	October 2008	002	00530	Total Suspended Solids	7D Conc	18	31.6	10/15/2008
2PE00001*JD	October 2008	002	00530	Total Suspended Solids	30D Conc	12	16.4761	10/1/2008
2PE00001*JD	November 2008	001	00530	Total Suspended Solids	7D Conc	40	49.25	11/8/2008
2PE00001*JD	November 2008	002	00552	Oil and Grease, Hexane	1D Conc	10	14.	11/26/2008
2PE00001*JD	November 2008	602	00530	Total Suspended Solids	30D Conc	30	54.	11/1/2008
2PE00001*JD	November 2008	602	00530	Total Suspended Solids	7D Conc	45	54.	11/15/2008
2PE00001*JD	December 2008	602	00530	Total Suspended Solids	7D Conc	45	62.	12/8/2008
2PE00001*JD	December 2008	602	00530	Total Suspended Solids	30D Conc	30	39.5	12/1/2008
2PE00001*JD	December 2008	602	80082	CBOD 5 day	7D Conc	40	50.	12/8/2008
2PE00001*JD	December 2008	602	80082	CBOD 5 day	30D Conc	25	40.5	12/1/2008
2PE00001*JD	January 2009	001	01119	Copper, Total Recovers	1D Conc	40	47.	1/5/2009
2PE00001*JD	January 2009	001	01119	Copper, Total Recovers	30D Conc	24	26.0222	1/1/2009
2PE00001*JD	January 2009	002	01119	Copper, Total Recovers	1D Conc	40	45.	1/5/2009
2PE00001*JD	January 2009	002	01119	Copper, Total Recovers	30D Conc	24	24.5444	1/1/2009
2PE00001*JD	February 2009	602	00530	Total Suspended Solids	30D Conc	30	38.8	2/1/2009
2PE00001*JD	March 2009	602	00530	Total Suspended Solids	30D Conc	30	68.5	3/1/2009
2PE00001*JD	March 2009	602	00530	Total Suspended Solids	7D Conc	45	68.5	3/8/2009
2PE00001*JD	March 2009	602	80082	CBOD 5 day	30D Conc	25	34.	3/1/2009
2PE00001*JD	April 2009	602	00530	Total Suspended Solids	30D Conc	30	70.	4/1/2009
2PE00001*JD	April 2009	602	00530	Total Suspended Solids	7D Conc	45	70.	4/15/2009
2PE00001*JD	April 2009	602	80082	CBOD 5 day	30D Conc	25	36.	4/1/2009
2PE00001*JD	May 2009	001	61941	pH, Maximum	1D Conc	9.0	9.1	5/26/2009
2PE00001*JD	May 2009	001	61941	pH, Maximum	1D Conc	9.0	9.9	5/27/2009
2PE00001*JD	May 2009	001	61941	pH, Maximum	1D Conc	9.0	9.12	5/30/2009
2PE00001*JD	May 2009	001	61941	pH, Maximum	1D Conc	9.0	9.1	5/31/2009
2PE00001*JD	July 2009	602	80082	CBOD 5 day	30D Conc	25	32.4	7/1/2009
2PE00001*JD	August 2009	602	00530	Total Suspended Solids	7D Conc	45	50.	8/15/2009
2PE00001*JD	August 2009	602	00530	Total Suspended Solids	30D Conc	30	50.	8/1/2009
2PE00001*JD	September 2009	001	50060	Chlorine, Total Residu	1D Conc	0.027	.05	9/9/2009
2PE00001*JD	September 2009	001	50060	Chlorine, Total Residu	1D Conc	0.027	.13	9/15/2009
2PE00001*JD	September 2009	001	50060	Chlorine, Total Residu	1D Conc	0.027	.17	9/17/2009
2PE00001*JD	September 2009	001	50060	Chlorine, Total Residu	1D Conc	0.027	.1	9/18/2009
2PE00001*JD	September 2009	002	50060	Chlorine, Total Residu	1D Conc	0.027	.13	9/15/2009
2PE00001*JD	October 2009	001	50060	Chlorine, Total Residu	1D Conc	0.027	.08	10/21/2009
2PE00001*JD	October 2009	001	50060	Chlorine, Total Residu	1D Conc	0.027	.13	10/23/2009
2PE00001*JD	October 2009	002	50060	Chlorine, Total Residu	1D Conc	0.027	.065	10/21/2009
2PE00001*JD	October 2009	002	50060	Chlorine, Total Residu	1D Conc	0.027	.052	10/23/2009
2PE00001*JD	October 2009	602	80082	CBOD 5 day	30D Conc	25	26.	10/1/2009
2PE00001*JD	January 2010	602	00530	Total Suspended Solids	30D Conc	30	42.6666	1/1/2010
2PE00001*JD	January 2010	602	80082	CBOD 5 day	30D Conc	25	33.6666	1/1/2010
2PE00001*KD	March 2010	602	00530	Total Suspended Solids	30D Conc	30	35.6	3/1/2010
2PE00001*KD	April 2010	001	00530	Total Suspended Solids	7D Conc	40	101.2	4/22/2010
2PE00001*KD	April 2010	001	00530	Total Suspended Solids	7D Qty	1816	5109.02	4/22/2010
2PE00001*KD	April 2010	001	00530	Total Suspended Solids	30D Conc	25	27.3181	4/1/2010
2PE00001*KD	April 2010	001	00530	Total Suspended Solids	30D Qty	1135	1318.16	4/1/2010
2PE00001*KD	April 2010	001	00550	Oil and Grease, Total	1D Conc	10	18.	4/22/2010
2PE00001*KD	May 2010	001	50060	Chlorine, Total Residu	1D Conc	0.027	.381	5/3/2010
2PE00001*KD	May 2010	602	00530	Total Suspended Solids	30D Conc	30	38.3333	5/1/2010
2PE00001*KD	May 2010	602	80082	CBOD 5 day	30D Conc	25	27.3333	5/1/2010
2PE00001*KD	June 2010	602	00530	Total Suspended Solids	7D Conc	45	52.	6/8/2010
2PE00001*KD	June 2010	602	00530	Total Suspended Solids	30D Conc	30	82.25	6/1/2010
2PE00001*KD	June 2010	602	00530	Total Suspended Solids	7D Conc	45	182.	6/22/2010
2PE00001*KD	June 2010	602	80082	CBOD 5 day	30D Conc	25	28.5	6/1/2010
2PE00001*KD	September 2010	001	00530	Total Suspended Solids	7D Conc	18	30.	9/1/2010
2PE00001*KD	September 2010	001	00530	Total Suspended Solids	30D Conc	12	15.2381	9/1/2010
2PE00001*KD	September 2010	002	00530	Total Suspended Solids	7D Conc	18	29.75	9/1/2010
2PE00001*KD	September 2010	002	00530	Total Suspended Solids	30D Conc	12	13.2381	9/1/2010
2PE00001*KD	November 2010	602	00530	Total Suspended Solids	30D Conc	30	52.	11/1/2010
2PE00001*KD	December 2010	602	00530	Total Suspended Solids	30D Conc	30	33.	12/1/2010
2PE00001*KD	February 2011	602	00530	Total Suspended Solids	7D Conc	45	49.	2/15/2011
2PE00001*KD	February 2011	602	00530	Total Suspended Solids	30D Conc	30	61.	2/1/2011
2PE00001*KD	February 2011	602	00530	Total Suspended Solids	7D Conc	45	73.	2/22/2011
2PE00001*KD	February 2011	602	80082	CBOD 5 day	7D Conc	40	50.	2/15/2011
2PE00001*KD	February 2011	602	80082	CBOD 5 day	30D Conc	25	49.5	2/1/2011
2PE00001*KD	February 2011	602	80082	CBOD 5 day	7D Conc	40	49.	2/22/2011
2PE00001*KD	March 2011	001	00530	Total Suspended Solids	7D Qty	1816	2166.79	3/1/2011
2PE00001*KD	March 2011	002	00300	Dissolved Oxygen	1D Conc	5.0	2.5	3/19/2011
2PE00001*KD	March 2011	002	00300	Dissolved Oxygen	1D Conc	5.0	4.1	3/26/2011
2PE00001*KD	March 2011	602	80082	CBOD 5 day	7D Conc	40	63.5	3/1/2011
2PE00001*KD	March 2011	602	80082	CBOD 5 day	30D Conc	25	38.8181	3/1/2011
2PE00001*KD	April 2011	602	00530	Total Suspended Solids	7D Conc	45	56.6666	4/1/2011
2PE00001*KD	April 2011	602	00530	Total Suspended Solids	7D Conc	45	60.	4/15/2011
2PE00001*KD	April 2011	602	00530	Total Suspended Solids	30D Conc	30	51.	4/1/2011
2PE00001*KD	April 2011	602	80082	CBOD 5 day	30D Conc	25	42.1111	4/1/2011
2PE00001*KD	April 2011	602	80082	CBOD 5 day	7D Conc	40	49.75	4/22/2011
2PE00001*KD	May 2011	001	50060	Chlorine, Total Residu	1D Conc	0.027	.435	5/5/2011
2PE00001*KD	May 2011	001	50060	Chlorine, Total Residu	1D Conc	0.027	.167	5/17/2011
2PE00001*KD	May 2011	001	80082	CBOD 5 day	7D Qty	1681	729.331	5/15/2011
2PE00001*KD	May 2011	001	80082	CBOD 5 day	30D Qty	454	480.061	5/1/2011
2PE00001*KD	May 2011	001	00530	Total Suspended Solids	7D Qty	1817	864.562	5/15/2011

2PE00001*KD	May 2011	001	00530	Total Suspended Solids	30D Qty	1545	573.576	5/1/2011
2PE00001*KD	May 2011	002	50060	Chlorine, Total Residu	1D Conc	0.027	.188	5/5/2011
2PE00001*KD	May 2011	002	80082	CBOD 5 day	7D Conc	15	20.6	5/15/2011
2PE00001*KD	May 2011	002	80082	CBOD 5 day	30D Conc	10	12.7142	5/1/2011
2PE00001*KD	May 2011	002	00530	Total Suspended Solids	30D Conc	12	13.2857	5/1/2011
2PE00001*KD	May 2011	002	00530	Total Suspended Solids	7D Conc	18	18.4	5/1/2011
2PE00001*KD	May 2011	602	00530	Total Suspended Solids	7D Conc	45	47.6666	5/1/2011
2PE00001*KD	May 2011	602	00530	Total Suspended Solids	7D Conc	45	65.	5/15/2011
2PE00001*KD	May 2011	602	00530	Total Suspended Solids	30D Conc	30	54.6	5/1/2011
2PE00001*KD	May 2011	602	80082	CBOD 5 day	7D Conc	40	41.	5/1/2011
2PE00001*KD	May 2011	602	80082	CBOD 5 day	7D Conc	40	91.	5/15/2011
2PE00001*KD	May 2011	602	80082	CBOD 5 day	30D Conc	25	53.5	5/1/2011
2PE00001*KD	June 2011	002	50060	Chlorine, Total Residu	1D Conc	0.027	.051	6/8/2011
2PE00001*KD	July 2011	001	00530	Total Suspended Solids	7D Conc	18	19.6	7/8/2011
2PE00001*KD	July 2011	001	80082	CBOD 5 day	7D Conc	15	16.6	7/8/2011
2PE00001*KD	November 2011	602	00530	Total Suspended Solids	7D Conc	45	86.	11/8/2011
2PE00001*KD	November 2011	602	00530	Total Suspended Solids	30D Conc	30	38.6666	11/1/2011
2PE00001*KD	November 2011	602	80082	CBOD 5 day	7D Conc	40	48.	11/8/2011
2PE00001*KD	November 2011	602	80082	CBOD 5 day	30D Conc	25	36.	11/1/2011
2PE00001*KD	December 2011	602	00530	Total Suspended Solids	7D Conc	45	48.5	12/1/2011
2PE00001*KD	December 2011	602	00530	Total Suspended Solids	30D Conc	30	34.5	12/1/2011
2PE00001*KD	December 2011	602	80082	CBOD 5 day	7D Conc	40	44.	12/1/2011
2PE00001*KD	January 2012	602	00530	Total Suspended Solids	30D Conc	30	40.6666	1/1/2012
2PE00001*KD	January 2012	602	80082	CBOD 5 day	30D Conc	25	32.3333	1/1/2012
2PE00001*KD	February 2012	001	00552	Oil and Grease, Hexane	1D Conc	10	24.1	2/9/2012
2PE00001*KD	February 2012	602	00530	Total Suspended Solids	30D Conc	30	74.	2/1/2012
2PE00001*KD	February 2012	602	80082	CBOD 5 day	30D Conc	25	118.	2/1/2012
2PE00001*KD	March 2012	001	01119	Copper, Total Recovers	30D Qty	1.09	1.12241	3/1/2012
2PE00001*KD	May 2012	602	00530	Total Suspended Solids	30D Conc	30	75.	5/1/2012
2PE00001*KD	May 2012	602	00530	Total Suspended Solids	7D Conc	45	75.	5/8/2012
2PE00001*KD	May 2012	602	80082	CBOD 5 day	30D Conc	25	62.	5/1/2012
2PE00001*KD	May 2012	602	80082	CBOD 5 day	7D Conc	40	62.	5/8/2012
2PE00001*KD	June 2012	002	50092	Mercury, Total (Low Le	30D Conc	15.1	182.	6/1/2012
2PE00001*KD	August 2012	001	50060	Chlorine, Total Residu	1D Conc	0.027	.08	8/29/2012
2PE00001*KD	August 2012	001	01119	Copper, Total Recovers	1D Conc	40	40.9	8/6/2012
2PE00001*KD	August 2012	001	01119	Copper, Total Recovers	30D Conc	24	26.1666	8/1/2012
2PE00001*KD	September 2012	001	50060	Chlorine, Total Residu	1D Conc	0.027	.641	9/1/2012
2PE00001*KD	September 2012	001	50060	Chlorine, Total Residu	1D Conc	0.027	.36	9/12/2012
2PE00001*KD	September 2012	001	50060	Chlorine, Total Residu	1D Conc	0.027	.19	9/17/2012
2PE00001*KD	September 2012	001	00530	Total Suspended Solids	30D Conc	12	12.3684	9/1/2012
2PE00001*KD	September 2012	002	50060	Chlorine, Total Residu	1D Conc	0.027	.32	9/11/2012
2PE00001*KD	September 2012	602	00530	Total Suspended Solids	30D Conc	30	41.	9/1/2012
2PE00001*KD	September 2012	602	80082	CBOD 5 day	30D Conc	25	38.	9/1/2012
2PE00001*KD	October 2012	001	01119	Copper, Total Recovers	30D Conc	24	25.	10/1/2012
2PE00001*KD	October 2012	001	01119	Copper, Total Recovers	1D Qty	1.82	2.35109	10/29/2012
2PE00001*KD	October 2012	001	01119	Copper, Total Recovers	30D Qty	1.09	1.24274	10/1/2012
2PE00001*KD	December 2012	002	01119	Copper, Total Recovers	30D Conc	24	24.2	12/1/2012
2PE00001*KD	December 2012	602	00530	Total Suspended Solids	7D Conc	45	47.	12/15/2012
2PE00001*KD	December 2012	602	00530	Total Suspended Solids	30D Conc	30	47.	12/1/2012
2PE00001*KD	December 2012	602	80082	CBOD 5 day	7D Conc	40	49.	12/15/2012
2PE00001*KD	December 2012	602	80082	CBOD 5 day	30D Conc	25	49.	12/1/2012
2PE00001*KD	January 2013	602	00530	Total Suspended Solids	30D Conc	30	37.75	1/1/2013
2PE00001*KD	January 2013	602	80082	CBOD 5 day	30D Conc	25	36.	1/1/2013
2PE00001*KD	February 2013	602	00530	Total Suspended Solids	30D Conc	30	44.25	2/1/2013
2PE00001*KD	February 2013	602	00530	Total Suspended Solids	7D Conc	45	47.	2/22/2013
2PE00001*KD	February 2013	602	80082	CBOD 5 day	30D Conc	25	45.25	2/1/2013
2PE00001*KD	February 2013	602	80082	CBOD 5 day	7D Conc	40	47.3333	2/22/2013
2PE00001*KD	April 2013	602	00530	Total Suspended Solids	30D Conc	30	31.	4/1/2013
2PE00001*KD	April 2013	602	80082	CBOD 5 day	7D Conc	40	44.	4/8/2013
2PE00001*KD	April 2013	602	80082	CBOD 5 day	30D Conc	25	48.	4/1/2013
2PE00001*KD	April 2013	602	80082	CBOD 5 day	7D Conc	40	52.	4/22/2013
2PE00001*KD	May 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.776	5/1/2013
2PE00001*KD	June 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.177	6/13/2013
2PE00001*KD	June 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.154	6/14/2013
2PE00001*KD	June 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.154	6/18/2013
2PE00001*KD	June 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.205	6/28/2013
2PE00001*KD	June 2013	002	00530	Total Suspended Solids	7D Conc	18	23.2	6/8/2013
2PE00001*KD	June 2013	602	80082	CBOD 5 day	7D Conc	40	52.	6/8/2013
2PE00001*KD	June 2013	602	80082	CBOD 5 day	30D Conc	25	48.5	6/1/2013
2PE00001*KD	July 2013	001	00530	Total Suspended Solids	7D Qty	817	928.505	7/8/2013
2PE00001*KD	July 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.181	7/17/2013
2PE00001*KD	July 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.129	7/19/2013
2PE00001*KD	July 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.065	7/25/2013
2PE00001*KD	July 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.32	7/29/2013
2PE00001*KD	July 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.096	7/30/2013
2PE00001*KD	July 2013	002	00530	Total Suspended Solids	7D Conc	18	19.8	7/8/2013
2PE00001*KD	July 2013	602	00530	Total Suspended Solids	30D Conc	30	33.3333	7/1/2013
2PE00001*KD	July 2013	602	80082	CBOD 5 day	30D Conc	25	37.	7/1/2013
2PE00001*KD	October 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.8	10/7/2013
2PE00001*KD	October 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.4	10/31/2013
2PE00001*KD	October 2013	001	50060	Chlorine, Total Residu	1D Conc	0.027	.187	10/28/2013
2PE00001*KD	November 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.3	11/1/2013
2PE00001*KD	November 2013	001	00300	Dissolved Oxygen	1D Conc	5.0	4.9	11/17/2013
2PE00001*KD	November 2013	001	01119	Copper, Total Recovers	1D Qty	1.82	1.87548	11/18/2013
2PE00001*KD	November 2013	001	01119	Copper, Total Recovers	30D Qty	1.09	1.34978	11/1/2013
2PE00001*KD	November 2013	002	00300	Dissolved Oxygen	1D Conc	5.0	4.3	11/1/2013
2PE00001*KD	November 2013	602	00530	Total Suspended Solids	30D Conc	30	62.	11/1/2013
2PE00001*KD	November 2013	602	00530	Total Suspended Solids	7D Conc	45	62.	11/15/2013
2PE00001*KD	February 2014	602	00530	Total Suspended Solids	7D Conc	45	52.	2/15/2014
2PE00001*KD	February 2014	602	00530	Total Suspended Solids	30D Conc	30	48.	2/1/2014
2PE00001*KD	February 2014	602	80082	CBOD 5 day	7D Conc	40	56.	2/15/2014
2PE00001*KD	February 2014	602	80082	CBOD 5 day	30D Conc	25	56.	2/1/2014