OhioEPA
State of Ohio Environmental Protection Agency
Northeast District Office

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Ted Strickland, Governor
Lee Fisher, Lieutenant Governor
Chris Korleski, Director

March 26, 2010

RE: CITY OF SALEM
COMPLIANCE EVALUATION INSPECTION
NPDES PERMIT NO. 3PD00027

NOTICE OF VIOLATION

Mayor and Council
City of Salem
231 South Broadway Avenue
Salem, OH 44460

Dear Ladies and Gentlemen:

On October 27, 2009, this writer conducted an inspection of the Salem wastewater treatment plant located at 1600 Pennsylvania Avenue. Mr. Jeff Zimmerman, Superintendent, was present for the City. This inspection was to evaluate operation and maintenance at the plant and to evaluate compliance with its National Pollutant Discharge Elimination System (NPDES) permit (3PD00027). Based on the inspection and a review of monthly operating reports, the City of Salem is considered to be in significant noncompliance. The inspection report was delayed due to the resolution of the City appeal and coordination with attorneys. This correspondence will also incorporate information provided by the City during a meeting at the district office.

The following is a summary of Agency observations and permit issues:

Wastewater Treatment Plant Inspection

The treatment system includes processes for grit removal, primary settling, roughing filtration, conventional activated sludge treatment, secondary clarification, and chlorination/de-chlorination. An off-line equalization basin is used to divert and store excess wastewater during rain events. Primary sludge is diverted to a two stage anaerobic digestion process and secondary sludge is diverted to a two stage aerobic digestion process. Both primary and secondary sludge is stored in a common sludge holding tank to land application through the approved sludge rules.

During the inspection it was noted that two primary clarifiers on the north side of the administration building were off-line. The city has maintained these are currently redundant units. However, it must be noted that as the plant approaches its design loading of 4.0 mgd, and peak loading of 8.0 mgd, without these additional units, the surface overflow rate provided by the online unit will exceed Ten State Standards design criteria. During the course of the last 12 months the average daily flow was 2.43 mgd with a peak flow of 6.007 mgd. Since the City has removed parts from the redundant units to keep the active tanks in service, these units are not operational if the

City needed to put them into service. The City must make provisions to have these units in good working order as required in Part III, 3, A., of the city's current NPDES permit.

All other remaining units appeared to be in operation. There were some support units that were out of service. A piston pump from the thickener to the digester was being repaired. This unit has been out approximately 2-3 years. A gas detection system for the digester building was just repaired and returned to operation. This system had been inoperable for approximately 10 years. A methane tank for the boiler to heat the sludge had been leaking and patched numerous times. This unit has also been replaced and returned to operation. The treatment plant staff appears competent and resourceful doing the most with the limited amount of staff. The staffing issue will be discussed again below.

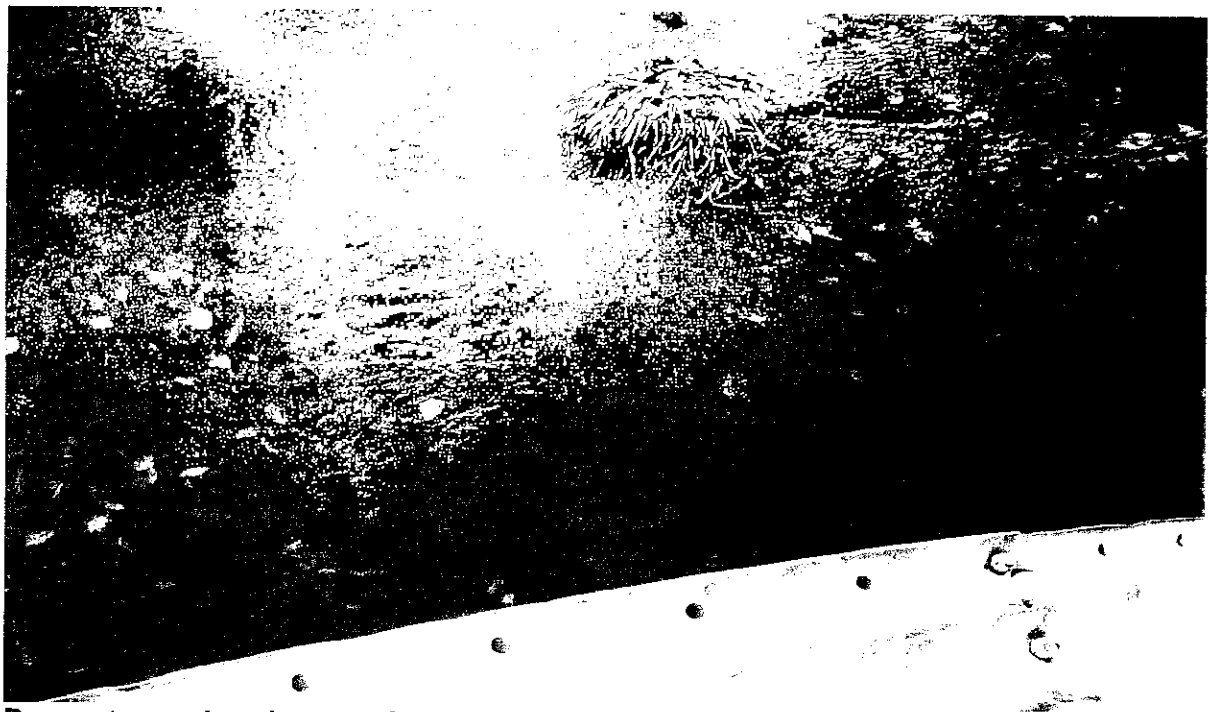
At the time of the inspection the final clarifiers had some pin floc that was going over the weirs to the stream. The effluent entering the stream appeared typical of a secondary plant.

Phosphorus Removal System

The installation of the phosphorus removal system has not been completed. The City of Salem still has not installed a polymer tank or feed pumps. No polymer to aid the removal of phosphorus has ever been added to the wastewater treatment plant. The City has not fed any alum since April of 2009. The City is not supplying the necessary chemicals or equipment to comply with the phosphorus limit.

During the inspection with the City it was documented that the ongoing algae problems in stream are still present. The stream had signs of algae downstream of where the effluent pipe enters the stream. The algae in the stream (as shown in the pictures below from previous inspections) are indicative of the pass through of phosphorus being created by FreshMark. This company is the major contributor of phosphorus in the collection system with more than fifty percent of the phosphorus loading at the head of the plant. This pass through is creating a nuisance in the stream. This is a violation of Part III, 2, A & E, of the city's NPDES permit. The permit requires that at all times the effluent shall be free of substances that will adversely affect aquatic life or water fowl, and substances in amounts that are conducive to the growth of aquatic weeds or algae to the extent that such growths become inimical to more desirable forms of aquatic life, or create conditions that are unsightly, or constitute a nuisance in any other fashion. The City must address this problem through the pretreatment program.

Downstream in mix zone from wastewater treatment plant has algae growth.



Downstream in mix zone from wastewater treatment plant has algae growth.

This facility has been in significant noncompliance with its final phosphorus limit since **December, 10, 2007**. Correspondence submitted by the City of Salem on December 10, 2007, to the Ohio EPA states that the City appealed this limit, however, the courts

have granted no relief from compliance with this parameter. The renewal limit in the City's next NPDES permit will be in accordance with the "Total Maximum Daily Loads for the Little Beaver Creek Watershed" (approved by U.S. EPA), and reduce this limit even lower (approximately 0.5 mg/l). The TMDLs are established in streams that are not complying with water quality standards. All wastewater treatment plants in this watershed are receiving the appropriate phosphorus limit and several are already complying with the requirements. Tertiary filters will be necessary to consistently comply with the phosphorus limit.

A review of the stream data collected by the City of Salem for the last 22 months reveal exceedances of the in-stream target for Phosphorus. The TMDL requires an in stream target phosphorus limit of 0.10 mg/l. The data collected upstream by the City indicated phosphorus values ranging from 0.015-0.65 mg/l. The target failed to be reached only four times during the time period reviewed. The data collected downstream of the City's outfall indicated phosphorus values ranging from 0.65-19.75 mg/l. The City is increasing the in-stream concentration of phosphorus by more than two orders of magnitude.

pH Violations:

The plant has been experiencing periodic pH violations during the last year or so. A summary of these violations is attached. The superintendent gave a couple of reasons for these occurrences. The City generally only process sludge with Synagrow once per month. The superintendent has had to place the filtrate from the sludge press into the flow equalization tank and slowly pump it back to the head of the plant to prevent pH violations. This is a result of the high ammonia levels in the filtrate causing the alkalinity to drop. Another contributing factor is FreshMark operating at peak production during various times of the year. During these times City personnel has observed the pH leaving the company at 4.0. Treatment plant staff has observed the pH entering the wastewater treatment plant during low flow at night at levels of 4.0. The low pH at the head of the plant is creating additional loading at the back end of the plant as a result of poor settling in the sludge thickener. These limits are below the City's sewer use ordinance. Discharges by FreshMark at levels below a pH of 5.0 are violations of State (OAC 3745-3-04(B)(2)) and Federal (40 CFR 403.5(b)(2)) laws. The City must resolve these two issues and eliminate the pH violations.

Sludge Pressing and Removal:

During the inspection it was noted that filtrate from the sludge presses is held in the flow equalization tank. While this helps mitigate the pH violations it prevents the plant from having its full equalization capacity during wet weather flow. The plant has experienced overflows and by-pass from this unit recently and these are not permitted. A more

regular pressing frequency would generate smaller filtrate volume that could be handled through the regular treatment system. The City must address this issue.

Be advised that all violations are subject to appropriate enforcement action per ORC 6111.99.

In addition to the above violations, a review of the monitoring records for the City between January 2008 and October 2009 was conducted. Identified violations for outfall 001 are listed in attachment 1: City of Salem Violations 1/08-10/09.

201 Update

Item F of your schedule of compliance required that an evaluation of the City's current planning documents be completed and an updated Facilities Plan be submitted to this office by October 1, 2003. To date this document has not been submitted. The city of Salem is currently in significant noncompliance with failing to submit this document.

Plant Staffing Requirements

During this inspection it was noted that only one operator was present at the facility. Only one day a week is additional staff available to help the operator with maintenance. The City's continued response has indicated that the staffing levels at the plant have been in place since 1985. The City will have to provide documentation as to how one person can run a four million gallon a day plant by him/her self. The district would like to reiterate the safety and liability issues with an operator maintaining the plant by him/her self. The age of the plant and equipment will require more man hours to maintain and there appears to be less staff available on a routine basis. The City must utilize U.S. EPA guidance documents to verify staffing levels are appropriate and safe. The City has recently started some automation improvements which can help the superintendent balance his work force.

Action Items

Representatives from the City and Ohio EPA met on December 10, 2009 to discuss the outstanding issues at the wastewater plant. It is our understanding that the City will be developing a dated schedule of specific milestones to attain compliance with the NPDES permit. This schedule will include

1) Develop a local limit for phosphorous.
2) Complete discussions with FreshMark to pretreat their wastewater stream and provide Ohio EPA with the proposed construction schedule for their necessary improvements to meet the local limit for phosphorous.

3) Identify interim measures to implement immediately to reduce the impacts resulting in the algae growths in the stream.
4) Enter into contracts to make improvements at the wastewater treatment plant to address phosphorous, sludge handling, and restoration of idled treatment plant equipment to operational status.
5) Review and update the City's 201Facilities Plan.

Additional areas of concern to be addressed:

1. The City must take all necessary steps to prevent overflows and unauthorized discharges at the wastewater treatment plant and collection system. The last two inspections by this office have documented unauthorized discharges at the plant or in the collection system. The City must provide an update to the improvements that have been completed to prevent by-pass's and overflows

2. Complete an evaluation of the plant staffing levels in accordance with U.S. EPA guidance documents. This evaluation must demonstrate how the current staffing levels comply with the City of Salem approved operation and maintenance plan as well as the U.S. EPA guidance.

By April 16, 2010, please address the action items with a letter to NEDO and AGO. Should you have any comments or questions, feel free to contact me at (330) 963-1193.

Respectfully,

Joseph E. Trocchio

Joseph E. Trocchio
Environmental Engineer
Division of Surface Water

JET/mt

cc: Don Weingart, Utilities Superintendent
Jeff Zimmerman, Plant Manager
Dean Stoll, P.E., Enforcement Coordinator, Ohio EPA, DSW, NEDO
Bridget Carty Coontz, Assistant Attorney General
Virginia Wilson, Environmental Supervisor, Ohio EPA, DSW, NEDO

File: Public/Permit Compliance/City of Salem

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	January 2008	Phosphorus, Total (P)	30D Conc	1.0	10.78	1/1/2008
3PD00027*JD	January 2008	Phosphorus, Total (P)	7D Conc	1.5	9.	1/1/2008
3PD00027*JD	January 2008	Phosphorus, Total (P)	30D Qty	15	116.126	1/1/2008
3PD00027*JD	January 2008	Phosphorus, Total (P)	7D Qty	23	83.8680	1/1/2008
3PD00027*JD	January 2008	Phosphorus, Total (P)	7D Conc	1.5	13.	1/8/2008
3PD00027*JD	January 2008	Phosphorus, Total (P)	7D Qty	23	144.810	1/8/2008
3PD00027*JD	January 2008	Phosphorus, Total (P)	7D Conc	1.5	8.8	1/15/2008
3PD00027*JD	January 2008	Phosphorus, Total (P)	7D Qty	23	122.306	1/15/2008
3PD00027*JD	January 2008	Phosphorus, Total (P)	7D Conc	1.5	11.8	1/22/2008
3PD00027*JD	January 2008	Phosphorus, Total (P)	7D Qty	23	115.319	1/22/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	30D Conc	1.0	8.4375	2/1/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	7D Conc	1.5	10.25	2/1/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	30D Qty	15	140.101	2/1/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	7D Qty	23	229.479	2/1/2008
3PD00027*JD	February 2008	Copper, Total Recovera	30D Conc	20	22.	2/1/2008
3PD00027*JD	February 2008	Copper, Total Recovera	30D Qty	0.30	.49254	2/1/2008
3PD00027*JD	February 2008	Copper, Total Recovera	1D Qty	0.48	.49254	2/5/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	7D Conc	1.5	8.5	2/8/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	7D Qty	23	111.638	2/8/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	7D Conc	1.5	6.	2/15/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	7D Qty	23	108.508	2/15/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	7D Conc	1.5	9.	2/22/2008
3PD00027*JD	February 2008	Phosphorus, Total (P)	7D Qty	23	110.779	2/22/2008
3PD00027*JD	March 2008	Total Suspended Solids	30D Conc	20	21.2222	3/1/2008
3PD00027*JD	March 2008	Total Suspended Solids	30D Qty	303	394.301	3/1/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	30D Conc	1.0	7.5	3/1/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	7D Conc	1.5	6.25	3/1/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	30D Qty	15	134.735	3/1/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	7D Qty	23	153.954	3/1/2008
3PD00027*JD	March 2008	pH, Minimum	1D Conc	6.5	6.46	3/5/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	7D Conc	1.5	7.5	3/8/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	7D Qty	23	120.306	3/8/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	7D Conc	1.5	8.75	3/15/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	7D Qty	23	158.738	3/15/2008
3PD00027*JD	March 2008	pH, Minimum	1D Conc	6.5	6.46	3/15/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	7D Conc	1.5	7.5	3/22/2008
3PD00027*JD	March 2008	Phosphorus, Total (P)	7D Qty	23	105.942	3/22/2008
3PD00027*JD	April 2008	Phosphorus, Total (P)	30D Conc	1.0	7.4375	4/1/2008
3PD00027*JD	April 2008	Phosphorus, Total (P)	7D Conc	1.5	7.25	4/1/2008
3PD00027*JD	April 2008	Phosphorus, Total (P)	30D Qty	15	94.8156	4/1/2008
3PD00027*JD	April 2008	Phosphorus, Total (P)	7D Qty	23	117.558	4/1/2008
3PD00027*JD	April 2008	Phosphorus, Total (P)	7D Conc	1.5	8.75	4/8/2008
3PD00027*JD	April 2008	Phosphorus, Total (P)	7D Qty	23	106.940	4/8/2008

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	April 2008	Phosphorus, Total (P)	7D Conc	1.5	7.5	4/15/2008
3PD00027*JD	April 2008	Phosphorus, Total (P)	7D Qty	23	86.1844	4/15/2008
3PD00027*JD	April 2008	Phosphorus, Total (P)	7D Conc	1.5	6.25	4/22/2008
3PD00027*JD	April 2008	Phosphorus, Total (P)	7D Qty	23	68.5794	4/22/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	30D Conc	1.0	6.4375	5/1/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	7D Conc	1.5	7.	5/1/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	30D Qty	15	69.7667	5/1/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	7D Qty	23	76.1731	5/1/2008
3PD00027*JD	May 2008	Chlorine, Total Residu	1D Conc	.02	.07	5/3/2008
3PD00027*JD	May 2008	pH, Minimum	1D Conc	6.5	6.4	5/5/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	7D Conc	1.5	7.25	5/8/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	7D Qty	23	85.9734	5/8/2008
3PD00027*JD	May 2008	pH, Minimum	1D Conc	6.5	5.97	5/11/2008
3PD00027*JD	May 2008	pH, Minimum	1D Conc	6.5	6.43	5/12/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	7D Conc	1.5	6.5	5/15/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	7D Qty	23	68.0751	5/15/2008
3PD00027*JD	May 2008	Chlorine, Total Residu	1D Conc	.02	.07	5/17/2008
3PD00027*JD	May 2008	Chlorine, Total Residu	1D Conc	.02	.06	5/18/2008
3PD00027*JD	May 2008	pH, Minimum	1D Conc	6.5	6.28	5/18/2008
3PD00027*JD	May 2008	Chlorine, Total Residu	1D Conc	.02	.07	5/19/2008
3PD00027*JD	May 2008	pH, Minimum	1D Conc	6.5	6.2	5/19/2008
3PD00027*JD	May 2008	Chlorine, Total Residu	1D Conc	.02	.08	5/22/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	7D Conc	1.5	5.	5/22/2008
3PD00027*JD	May 2008	Phosphorus, Total (P)	7D Qty	23	48.8454	5/22/2008
3PD00027*JD	May 2008	pH, Minimum	1D Conc	6.5	6.35	5/26/2008
3PD00027*JD	May 2008	pH, Minimum	1D Conc	6.5	6.31	5/27/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	30D Conc	1.0	10.25	6/1/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	7D Conc	1.5	8.75	6/1/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	30D Qty	15	85.2670	6/1/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	7D Qty	23	85.0489	6/1/2008
3PD00027*JD	June 2008	Chlorine, Total Residu	1D Conc	.02	.055	6/8/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	7D Conc	1.5	10.	6/8/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	7D Qty	23	83.4592	6/8/2008
3PD00027*JD	June 2008	pH, Minimum	1D Conc	6.5	6.48	6/9/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	7D Conc	1.5	11.25	6/15/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	7D Qty	23	83.5444	6/15/2008
3PD00027*JD	June 2008	pH, Minimum	1D Conc	6.5	6.06	6/16/2008
3PD00027*JD	June 2008	pH, Minimum	1D Conc	6.5	6.07	6/17/2008
3PD00027*JD	June 2008	pH, Minimum	1D Conc	6.5	6.44	6/18/2008
3PD00027*JD	June 2008	pH, Minimum	1D Conc	6.5	6.45	6/21/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	7D Conc	1.5	11.	6/22/2008
3PD00027*JD	June 2008	Phosphorus, Total (P)	7D Qty	23	89.0156	6/22/2008
3PD00027*JD	June 2008	pH, Minimum	1D Conc	6.5	6.08	6/22/2008

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	June 2008	pH, Minimum	1D Conc	6.5	5.59	6/23/2008
3PD00027*JD	June 2008	pH, Minimum	1D Conc	6.5	6.07	6/24/2008
3PD00027*JD	July 2008	Total Suspended Solids	30D Conc	20	20.4615	7/1/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	30D Conc	1.0	9.	7/1/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	7D Conc	1.5	8.5	7/1/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	30D Qty	15	78.5851	7/1/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	7D Qty	23	74.9297	7/1/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	7D Conc	1.5	9.	7/8/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	7D Qty	23	80.0186	7/8/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	7D Conc	1.5	7.	7/15/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	7D Qty	23	59.9316	7/15/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	7D Conc	1.5	11.5	7/22/2008
3PD00027*JD	July 2008	Phosphorus, Total (P)	7D Qty	23	99.4603	7/22/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	30D Conc	1.0	9.5625	8/1/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	7D Conc	1.5	11.	8/1/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	30D Qty	15	69.0857	8/1/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	7D Qty	23	77.9823	8/1/2008
3PD00027*JD	August 2008	pH, Minimum	1D Conc	6.5	5.91	8/4/2008
3PD00027*JD	August 2008	pH, Minimum	1D Conc	6.5	5.96	8/5/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	7D Conc	1.5	7.75	8/8/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	7D Qty	23	54.4727	8/8/2008
3PD00027*JD	August 2008	pH, Minimum	1D Conc	6.5	6.32	8/11/2008
3PD00027*JD	August 2008	Chlorine, Total Residu	1D Conc	.02	.056	8/14/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	7D Conc	1.5	9.75	8/15/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	7D Qty	23	74.0658	8/15/2008
3PD00027*JD	August 2008	pH, Minimum	1D Conc	6.5	6.39	8/18/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	7D Conc	1.5	9.75	8/22/2008
3PD00027*JD	August 2008	Phosphorus, Total (P)	7D Qty	23	69.8219	8/22/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	30D Conc	1.0	12.125	9/1/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	7D Conc	1.5	7.25	9/1/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	30D Qty	15	101.562	9/1/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	7D Qty	23	46.2933	9/1/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	7D Conc	1.5	16.75	9/8/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	7D Qty	23	153.932	9/8/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	7D Conc	1.5	11.5	9/15/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	7D Qty	23	104.466	9/15/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	7D Conc	1.5	13.	9/22/2008
3PD00027*JD	September 2008	Phosphorus, Total (P)	7D Qty	23	101.559	9/22/2008
3PD00027*JD	September 2008	pH, Minimum	1D Conc	6.5	6.4	9/22/2008
3PD00027*JD	October 2008	Phosphorus, Total (P)	30D Conc	1.0	14.4	10/1/2008
3PD00027*JD	October 2008	Phosphorus, Total (P)	7D Conc	1.5	14.5	10/1/2008
3PD00027*JD	October 2008	Phosphorus, Total (P)	30D Qty	15	103.066	10/1/2008
3PD00027*JD	October 2008	Phosphorus, Total (P)	7D Qty	23	99.1353	10/1/2008

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	October 2008	Phosphorus, Total (P)	7D Conc	1.5	14.25	10/8/2008
3PD00027*JD	October 2008	Phosphorus, Total (P)	7D Qty	23	96.5458	10/8/2008
3PD00027*JD	October 2008	Phosphorus, Total (P)	7D Conc	1.5	16.5	10/15/2008
3PD00027*JD	October 2008	Phosphorus, Total (P)	7D Qty	23	102.422	10/15/2008
3PD00027*JD	October 2008	Phosphorus, Total (P)	7D Conc	1.5	12.25	10/22/2008
3PD00027*JD	October 2008	Phosphorus, Total (P)	7D Qty	23	118.094	10/22/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	30D Conc	1.0	15.9375	11/1/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	7D Conc	1.5	17.5	11/1/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	30D Qty	15	119.507	11/1/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	7D Qty	23	123.797	11/1/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	7D Conc	1.5	18.25	11/8/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	7D Qty	23	118.603	11/8/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	7D Conc	1.5	12.75	11/15/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	7D Qty	23	94.7319	11/15/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	7D Conc	1.5	15.25	11/22/2008
3PD00027*JD	November 2008	Phosphorus, Total (P)	7D Qty	23	140.897	11/22/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	30D Conc	1.0	15.0625	12/1/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	7D Conc	1.5	13.75	12/1/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	30D Qty	15	126.817	12/1/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	7D Qty	23	113.871	12/1/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	7D Conc	1.5	16.75	12/8/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	7D Qty	23	137.575	12/8/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	7D Conc	1.5	21.	12/15/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	7D Qty	23	176.933	12/15/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	7D Conc	1.5	8.75	12/22/2008
3PD00027*JD	December 2008	Phosphorus, Total (P)	7D Qty	23	78.8888	12/22/2008
3PD00027*JD	January 2009	Phosphorus, Total (P)	30D Conc	1.0	8.125	1/1/2009
3PD00027*JD	January 2009	Phosphorus, Total (P)	7D Conc	1.5	11.	1/1/2009
3PD00027*JD	January 2009	Phosphorus, Total (P)	30D Qty	15	79.2240	1/1/2009
3PD00027*JD	January 2009	Phosphorus, Total (P)	7D Qty	23	116.328	1/1/2009
3PD00027*JD	January 2009	Phosphorus, Total (P)	7D Conc	1.5	10.25	1/8/2009
3PD00027*JD	January 2009	Phosphorus, Total (P)	7D Qty	23	108.745	1/8/2009
3PD00027*JD	January 2009	Phosphorus, Total (P)	7D Conc	1.5	9.	1/15/2009
3PD00027*JD	January 2009	Phosphorus, Total (P)	7D Qty	23	72.1837	1/15/2009
3PD00027*JD	January 2009	Phosphorus, Total (P)	7D Conc	1.5	2.25	1/22/2009
3PD00027*JD	February 2009	Total Suspended Solids	30D Conc	20	20.8666	2/1/2009
3PD00027*JD	February 2009	Total Suspended Solids	30D Qty	303	313.295	2/1/2009
3PD00027*JD	February 2009	Phosphorus, Total (P)	30D Conc	1.0	4.41235	2/1/2009
3PD00027*JD	February 2009	Phosphorus, Total (P)	7D Conc	1.5	6.81	2/1/2009
3PD00027*JD	February 2009	Phosphorus, Total (P)	30D Qty	15	58.2929	2/1/2009
3PD00027*JD	February 2009	Phosphorus, Total (P)	7D Qty	23	74.9763	2/1/2009
3PD00027*JD	February 2009	Total Suspended Solids	7D Qty	454	570.744	2/8/2009
3PD00027*JD	February 2009	Phosphorus, Total (P)	7D Conc	1.5	5.4125	2/8/2009

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3PD00027*JD	February 2009	Phosphorus, Total (P)	7D Qty	23	98.8632	2/8/2009
3PD00027*JD	February 2009	Phosphorus, Total (P)	7D Conc	1.5	4.9125	2/15/2009
3PD00027*JD	February 2009	Phosphorus, Total (P)	7D Qty	23	54.2875	2/15/2009
3PD00027*JD	February 2009	Nitrogen, Ammonia (NH3	7D Conc	10.6	12.9066	2/22/2009
3PD00027*JD	February 2009	Phosphorus, Total (P)	7D Conc	1.5	2.21333	2/22/2009
3PD00027*JD	February 2009	Phosphorus, Total (P)	7D Qty	23	25.5745	2/22/2009
3PD00027*JD	March 2009	Total Suspended Solids	30D Conc	20	41.7647	3/1/2009
3PD00027*JD	March 2009	Total Suspended Solids	7D Conc	30	73.	3/1/2009
3PD00027*JD	March 2009	Total Suspended Solids	30D Qty	303	587.997	3/1/2009
3PD00027*JD	March 2009	Total Suspended Solids	7D Qty	454	791.015	3/1/2009
3PD00027*JD	March 2009	Nitrogen, Ammonia (NH3	30D Conc	7.1	7.22444	3/1/2009
3PD00027*JD	March 2009	Nitrogen, Ammonia (NH3	7D Conc	10.6	12.2333	3/1/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	30D Conc	1.0	3.125	3/1/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	7D Conc	1.5	3.9	3/1/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	30D Qty	15	37.7818	3/1/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	7D Qty	23	43.5259	3/1/2009
3PD00027*JD	March 2009	Total Suspended Solids	7D Conc	30	70.6	3/8/2009
3PD00027*JD	March 2009	Total Suspended Solids	7D Qty	454	1237.73	3/8/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	7D Conc	1.5	4.175	3/8/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	7D Qty	23	65.8473	3/8/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	7D Conc	1.5	3.36	3/15/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	7D Qty	23	35.279	3/15/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	7D Conc	1.5	2.27	3/22/2009
3PD00027*JD	March 2009	Phosphorus, Total (P)	7D Qty	23	24.4501	3/22/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	30D Conc	1.0	5.33824	4/1/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	7D Conc	1.5	3.43333	4/1/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	30D Qty	15	61.1561	4/1/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	7D Qty	23	39.1882	4/1/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	7D Conc	1.5	4.55	4/8/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	7D Qty	23	47.5399	4/8/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	7D Conc	1.5	4.35	4/15/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	7D Qty	23	65.7536	4/15/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	7D Conc	1.5	11.45	4/22/2009
3PD00027*JD	April 2009	Phosphorus, Total (P)	7D Qty	23	123.188	4/22/2009
3PD00027*JD	May 2009	Phosphorus, Total (P)	30D Conc	1.0	8.09643	5/1/2009
3PD00027*JD	May 2009	Phosphorus, Total (P)	7D Conc	1.5	4.7	5/1/2009
3PD00027*JD	May 2009	Phosphorus, Total (P)	30D Qty	15	68.4440	5/1/2009
3PD00027*JD	May 2009	Phosphorus, Total (P)	7D Qty	23	53.4836	5/1/2009
3PD00027*JD	May 2009	Phosphorus, Total (P)	7D Conc	1.5	3.27	5/8/2009
3PD00027*JD	May 2009	Phosphorus, Total (P)	7D Qty	23	33.5422	5/8/2009
3PD00027*JD	May 2009	Phosphorus, Total (P)	7D Conc	1.5	5.03333	5/15/2009
3PD00027*JD	May 2009	Phosphorus, Total (P)	7D Qty	23	41.2599	5/15/2009
3PD00027*JD	May 2009	Phosphorus, Total (P)	7D Conc	1.5	22.6	5/22/2009

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3PD00027*JD	May 2009	Phosphorus, Total (P)	7D Qty	23	168.758	5/22/2009
3PD00027*JD	May 2009	pH, Minimum	1D Conc	6.5	6.37	5/25/2009
3PD00027*JD	May 2009	pH, Minimum	1D Conc	6.5	6.06	5/26/2009
3PD00027*JD	May 2009	pH, Minimum	1D Conc	6.5	6.33	5/27/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	30D Conc	1.0	15.15	6/1/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	7D Conc	1.5	16.9166	6/1/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	30D Qty	15	127.991	6/1/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	7D Qty	23	138.202	6/1/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	7D Conc	1.5	15.0833	6/8/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	7D Qty	23	130.457	6/8/2009
3PD00027*JD	June 2009	pH, Minimum	1D Conc	6.5	6.44	6/8/2009
3PD00027*JD	June 2009	Chlorine, Total Residu	1D Conc	.02	.053	6/15/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	7D Conc	1.5	6.35	6/15/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	7D Qty	23	45.0170	6/15/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	7D Conc	1.5	20.5	6/22/2009
3PD00027*JD	June 2009	Phosphorus, Total (P)	7D Qty	23	197.860	6/22/2009
3PD00027*JD	June 2009	pH, Minimum	1D Conc	6.5	6.39	6/22/2009
3PD00027*JD	June 2009	pH, Minimum	1D Conc	6.5	6.37	6/23/2009
3PD00027*JD	June 2009	pH, Minimum	1D Conc	6.5	6.21	6/25/2009
3PD00027*JD	June 2009	pH, Minimum	1D Conc	6.5	6.22	6/26/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	30D Conc	1.0	20.125	7/1/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	7D Conc	1.5	16.25	7/1/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	30D Qty	15	162.057	7/1/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	7D Qty	23	122.274	7/1/2009
3PD00027*JD	July 2009	pH, Minimum	1D Conc	6.5	6.35	7/5/2009
3PD00027*JD	July 2009	pH, Minimum	1D Conc	6.5	6.13	7/6/2009
3PD00027*JD	July 2009	pH, Minimum	1D Conc	6.5	6.37	7/7/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	7D Conc	1.5	17.	7/8/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	7D Qty	23	124.957	7/8/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	7D Conc	1.5	30.5	7/15/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	7D Qty	23	271.982	7/15/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	7D Conc	1.5	16.75	7/22/2009
3PD00027*JD	July 2009	Phosphorus, Total (P)	7D Qty	23	129.016	7/22/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	30D Conc	1.0	20.8	8/1/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	7D Conc	1.5	18.625	8/1/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	30D Qty	15	173.931	8/1/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	7D Qty	23	167.735	8/1/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	7D Conc	1.5	20.25	8/8/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	7D Qty	23	178.125	8/8/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	7D Conc	1.5	24.5	8/15/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	7D Qty	23	195.016	8/15/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	7D Conc	1.5	22.	8/22/2009
3PD00027*JD	August 2009	Phosphorus, Total (P)	7D Qty	23	161.044	8/22/2009

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3PD00027*JD	September 2009	Phosphorus, Total (P)	30D Conc	1.0	19.95	9/1/2009
3PD00027*JD	September 2009	Phosphorus, Total (P)	7D Conc	1.5	25.75	9/1/2009
3PD00027*JD	September 2009	Phosphorus, Total (P)	30D Qty	15	142.056	9/1/2009
3PD00027*JD	September 2009	Phosphorus, Total (P)	7D Qty	23	186.740	9/1/2009
3PD00027*JD	September 2009	Phosphorus, Total (P)	7D Conc	1.5	21.5	9/8/2009
3PD00027*JD	September 2009	Phosphorus, Total (P)	7D Qty	23	155.431	9/8/2009
3PD00027*JD	September 2009	pH, Minimum	1D Conc	6.5	6.28	9/8/2009
3PD00027*JD	September 2009	pH, Minimum	1D Conc	6.5	6.37	9/9/2009
3PD00027*JD	September 2009	Phosphorus, Total (P)	7D Conc	1.5	13.	9/15/2009
3PD00027*JD	September 2009	Phosphorus, Total (P)	7D Qty	23	86.3055	9/15/2009
3PD00027*JD	September 2009	Phosphorus, Total (P)	7D Conc	1.5	23.5	9/22/2009
3PD00027*JD	September 2009	Phosphorus, Total (P)	7D Qty	23	158.504	9/22/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	30D Conc	1.0	23.6	10/1/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	7D Conc	1.5	28.25	10/1/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	30D Qty	15	165.925	10/1/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	7D Qty	23	191.611	10/1/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	7D Conc	1.5	23.	10/8/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	7D Qty	23	165.784	10/8/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	7D Conc	1.5	23.75	10/15/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	7D Qty	23	165.494	10/15/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	7D Conc	1.5	20.	10/22/2009
3PD00027*JD	October 2009	Phosphorus, Total (P)	7D Qty	23	140.953	10/22/2009