



State of Ohio Environmental Protection Agency

Northeast District Office

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

November 6, 2007

RE: ALPINE CHEESE
U.S. ROUTE 62
NPDES PERMIT NO 3IH00100

Mr. Brian Barbie
Alpine Cheese
P.O. Box 181
Winesburg, OH 44690

Dear Mr. Barbie:

On October 24, 2007, this writer along with John Januska and Rich Blasick conducted an unannounced Compliance Evaluation Inspection (CEI) of the Alpine Cheese wastewater treatment system. The intent of the inspection was to evaluate the operations and maintenance of the wastewater treatment system. Mr. Stephen Hall of the consulting firm AquaBlue represented Alpine Cheese during the inspection. It was the understanding of this writer that AquaBlue maintains a presence at the treatment system approximately 8 hours per day.

Treatment Plant Observations

Though the condition of the treatment plant has improved, the overall evaluation of the treatment system was unsatisfactory at the time of the inspection. Following are the observations made during the inspection.

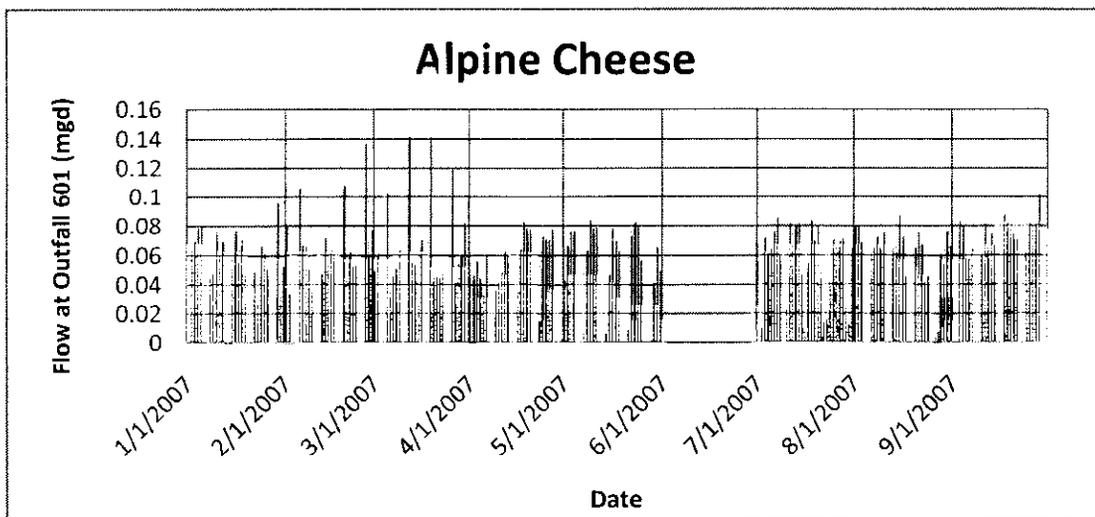
- The color in the vertical loop reactors was good at the time of the inspection. The color had a beige to light orange appearance. The west sludge tank was full of sludge.
- The clarifier had clumps of black, floating sludge at the effluent weir. The sludge had the appearance of being an old sludge that had accumulated in dead areas of the tank. It is recommended that the tank be taken out of service for cleaning. Periodically cleaning old sludge from the tank will prevent sludge solids from floating to the surface and overflowing the weir. Solids that leave the clarifier place an unnecessary burden on the phosphorus removal system which requires additional chemicals to remove.
- The pump station used to transfer wastewater from the aeration system to the phosphorus removal system was operational at the time of the inspection.
- The SAF system used to remove phosphorus from the wastewater was operational at the time of the inspection. The effluent being discharged from the system was relatively clear. Operation of the chemical addition and SAF system has improved since the previous CEI in February 2007.
- According to Mr. Hall, the sand filters require alterations to enable them to operate consistently. It appears that the current layout of the system prohibits even distribution of wastewater across the three filters. Mr. Hall indicated that the system was improperly plumbed when the filter skid was received at Alpine Cheese. As a result, Mr. Hall indicated

that of the total wastewater volume delivered to the system, approximately 2/3 of the volume is delivered to one filter, 1/3 of the volume is delivered to a second filter, and very little wastewater is delivered to the third filter. Mr. Hall indicated that the uneven hydraulic load to the filters has disrupted the media in the filters, and that the media in the filters would be inspected and replaced if necessary.

Rather than re-plumb the system, Mr. Hall indicated that flow restrictors will be installed to enable the flow to be evenly distributed across the filters. One question that was not able to be answered during the inspection was how wastewater flow to the three individual filters would be monitored to ensure even distribution. Please provide a response indicating how flow to each filter will be monitored.

- Mr. Hall indicated that based on an industry standard of 3 gpm per cubic feet, the capacity of each filter is 60 gpm. With three filters in service, the system provides the capacity to treat 86,400 gpd distributed over 24 hours. This is sufficient to treat the 80,000 gpd for which the system was approved. However, the system appears to have no redundancy which will limit the system to operate properly only under ideal design conditions.

It also appears from Monthly Operating Reports (MORs) that the flow through the system many times exceeds the design average daily flow. Below is a graph that presents the flow trend at Outfall 601



Routinely delivering a hydraulic load that exceeds the design of the system will compound the problems associated with the filters. In addition, exceeding the design average daily flow of other components of the treatment system will cause violations of the NPDES permit. This was apparent at Alpine Cheese prior to the recent expansion of the treatment system. Alpine Cheese must ensure that adequate capacity exists in the treatment system for compliance with the NPDES permit.

- The effluent at the step aerator was cloudy and contained large pieces of sludge. The effluent at the step aerator was unsatisfactory at the time of the inspection. Mr. Hall indicated that the solids at the step aerator may be originating from residue in the effluent pipe. It was recommended by this writer that the line be cleaned immediately to remove the solids, and if necessary, the line should be cleaned again once the filter system is operating properly.
- Inspection of the receiving stream identified discolored water and sludge accumulated on the sediment. The condition of the stream was unsatisfactory at the time of the inspection. The accumulated sludge and the discolored water in the receiving stream represent violations of Ohio Administrative Code 3745-01-04 (A) and (C), respectively. In addition, observed impacts on the stream are also violations of the NPDES permit and Ohio Revised Code 6111.07.
- The conductivity meter at the reverse osmosis system was installed as required by the permit-to-install. The meter was required by Ohio EPA to provide a conductivity display for plant personnel who are responsible for the system. Since the filtrate from the reverse osmosis system may be directly discharged, this office required the conductivity meter to ensure that the reverse osmosis system was consistently and adequately removing Total Dissolved Solids (TDS) from the wastewater prior to discharge.

However, upon inspection it was found that the conductivity meter was placed approximately 10 feet above the floor. It is unclear how the meter is monitored to ensure that the reverse osmosis system is controlling conductivity in the filtrate. Please provide a response stating how the conductivity monitoring system is supervised. Also indicate if alarms were integrated with the conductivity meter to provide a warning to plant personnel in the event the reverse osmosis system fails. Finally, the response must indicate how and where conductivity in the effluent from the reverse osmosis system is recorded. Your response should include the alarm setting for conductivity used to provide the warning.

Compliance Review

In addition to the observations stated above, this writer has reviewed the compliance record for Alpine Cheese. The period of review was January through September 2007. The NPDES permit violations identified over the review period are listed in Attachment 1. In addition, frequency violations for failure to properly report analytical results are also listed in the second table in Attachment 1.

According to the Ohio EPA compliance monitoring system, the violations stated in Attachment 1 place Alpine Cheese in Significant Noncompliance with the NPDES permit.

Conclusions

The condition of the treatment system has improved since the previous inspection of February 2007. However, as indicated by the ongoing violations identified in Attachment 1, the system is currently unable to consistently comply with the NPDES permit.

The actions proposed by Mr. Hall to address permit violations are as follows.

1. Alpine Cheese intends to modify the filtration system to include flow restrictors on the filter influent lines. The restrictors are expected to evenly distribute the flow across the three filters. The modification of the tertiary filter system also includes using the reverse osmosis filtrate stored in the 25,000-gallon below-grade tanks for backwash of the system. As discussed with Mr. Hall, it may be necessary to modify the backwash delivery system in order to provide adequate volume and pressure to the filters.

Be advised that Alpine Cheese must provide sufficient capacity in the filtration system to consistently treat wastewater to the levels required by the NPDES permit, even if the system requires expansion to provide additional and redundant capacity.

2. Alpine Cheese may install a new water softening system to address the TDS violations. The new softening system is intended to reduce the TDS load on the treatment system. In the event the new softening system is not installed, or in the event TDS violations continue after installation of the system, Alpine Cheese must take further actions to comply with the TDS limit.

In addition to the actions stated above, Alpine Cheese must not exceed the design average daily flow to the treatment system. From the monitoring data reported during the review period, it appears that Alpine Cheese exceeded 0.08 mgd approximately 25 times at outfall 601. Failure to maintain the average daily flow within the design of the system will potentially result in violations of the NPDES permit.

Be advised that per Ohio Revised Code (ORC) 6111.45, expansion of the manufacturing processes or increasing the amount of wastewater from the manufacturing process may not occur until plans for the treatment of the increased volume have been approved by Ohio EPA. ORC 6111.45 states:

"No municipal corporation, county, public institution, corporation, or officer or employee thereof or other person shall establish as proprietor, agent, employee, lessee, or tenant, any garbage disposal plant, shop, factory, mill, industrial establishment, process, trade, or business in the operation of which an industrial waste is produced, or make a change in or enlargement of a garbage disposal plant, shop, factory, mill, industrial establishment, process, trade, or business whereby an industrial waste is produced or materially increased or changed in character, or install works for the treatment or disposal of any such waste until the plans for the disposal of the waste have been submitted to and approved by the director of environmental protection. As used in sections 6111.44 to 6111.46 of the Revised Code, "industrial waste" means sludge or sludge materials or a water-carried or liquid waste resulting from any process of industry, manufacture, trade, or business or development of any natural resource, but does not include storm water from any animal feeding facility, as defined in section 903.01 of the Revised Code, or manure, as defined in that section..."

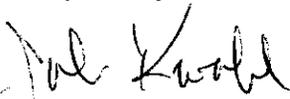
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Response Requested

A written response to this inspection report must be submitted to this office no later than November 30, 2007. The response must provide the requested information regarding flow monitors for the sand filters, the conductivity monitoring system for the reverse osmosis system, and to outline your course of action to address the ongoing NPDES permit violations.

You may contact this office at (330) 963-1251 to discuss any questions you may have.

Respectfully,



John Kwolek
District Engineer
Division of Surface Water

cc: Bob Ramseyer, Alpine Cheese
Larry Reeder, Ohio EPA, Enforcement, CO

File: Industrial/Alpine Cheese/Permit and Compliance

Attachment 1

NPDES Permit Limit Violations for January through September 2007

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
January 2007	002	CBOD 5 day	30D Conc	10.0	13.	1/1/2007
January 2007	002	Phosphorus, Total (P)	30D Conc	3.2	5.16667	1/1/2007
January 2007	002	Residue, Tot. Dissolved	30D Conc	1785	3511.44	1/1/2007
January 2007	002	Residue, Tot. Dissolved	30D Qty	812.01	970.907	1/1/2007
January 2007	601	CBOD 5 day	30D Conc	10	19.4	1/1/2007
January 2007	601	CBOD 5 day	30D Qty	3.0327	3.07334	1/1/2007
January 2007	601	Phosphorus, Total (P)	30D Conc	5.6	5.776	1/1/2007
January 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	5100.	1/2/2007
January 2007	002	Dissolved Oxygen	1D Conc	6.0	5.76	1/4/2007
January 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	5640.	1/4/2007
January 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.93	1/9/2007
January 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.93	1/9/2007
January 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	4740.	1/9/2007
January 2007	002	Phosphorus, Total (P)	1D Conc	4.8	4.87	1/11/2007
January 2007	002	Phosphorus, Total (P)	1D Conc	4.8	4.87	1/11/2007
January 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3420.	1/16/2007
January 2007	002	Total Suspended Solids	1D Conc	18.0	67.	1/18/2007
January 2007	002	Total Suspended Solids	1D Qty	9.55	21.8497	1/18/2007
January 2007	002	CBOD 5 day	1D Conc	15.0	26.	1/18/2007
January 2007	002	CBOD 5 day	1D Qty	7.9609	8.47901	1/18/2007
January 2007	002	Phosphorus, Total (P)	1D Conc	4.8	14.2	1/18/2007
January 2007	002	Phosphorus, Total (P)	1D Conc	4.8	14.2	1/18/2007
January 2007	002	Phosphorus, Total (P)	1D Qty	2.5	4.63084	1/18/2007
January 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3140.	1/18/2007
January 2007	601	CBOD 5 day	1D Conc	15	25.	1/23/2007
January 2007	601	Phosphorus, Total (P)	1D Conc	8.4	14.8	1/23/2007
January 2007	002	CBOD 5 day	1D Conc	15.0	23.	1/25/2007
January 2007	002	Phosphorus, Total (P)	1D Conc	4.8	7.85	1/25/2007
January 2007	002	Phosphorus, Total (P)	1D Conc	4.8	7.85	1/25/2007
January 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3710.	1/25/2007
January 2007	002	CBOD 5 day	1D Conc	15.0	31.	1/30/2007
January 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2800.	1/30/2007
January 2007	601	CBOD 5 day	1D Conc	15	37.	1/30/2007
February 2007	002	Total Suspended Solids	30D Conc	12.0	39.875	2/1/2007
February 2007	002	Total Suspended Solids	30D Qty	6.37	10.5191	2/1/2007
February 2007	002	CBOD 5 day	1D Conc	15.0	25.	2/1/2007
February 2007	002	CBOD 5 day	30D Conc	10.0	11.625	2/1/2007
February 2007	002	CBOD 5 day	1D Qty	7.9609	9.16916	2/1/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	4.88	2/1/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	4.88	2/1/2007
February 2007	002	Phosphorus, Total (P)	30D Conc	3.2	22.7375	2/1/2007
February 2007	002	Phosphorus, Total (P)	30D Qty	1.7	6.14242	2/1/2007
February 2007	002	Dissolved Oxygen	1D Conc	6.0	3.36	2/1/2007
February 2007	002	Residue, Tot. Dissolved	30D Conc	1785	2527.03	2/1/2007
February 2007	601	Total Suspended Solids	30D Conc	12	19.25	2/1/2007

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
February 2007	601	Total Suspended Solids	30D Qty	3.6392	5.07355	2/1/2007
February 2007	601	Phosphorus, Total (P)	30D Conc	5.6	21.8175	2/1/2007
February 2007	601	Phosphorus, Total (P)	30D Qty	1.6983	5.12049	2/1/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	8.08	2/6/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	8.08	2/6/2007
February 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3930.	2/6/2007
February 2007	601	Total Suspended Solids	1D Conc	18	30.	2/6/2007
February 2007	601	Total Suspended Solids	1D Qty	5.4589	7.62602	2/6/2007
February 2007	002	Total Suspended Solids	1D Conc	18.0	288.	2/8/2007
February 2007	002	Total Suspended Solids	1D Qty	9.55	74.1908	2/8/2007
February 2007	002	CBOD 5 day	1D Conc	15.0	16.	2/8/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	65.5	2/8/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	65.5	2/8/2007
February 2007	002	Phosphorus, Total (P)	1D Qty	2.5	16.8732	2/8/2007
February 2007	002	Dissolved Oxygen	1D Conc	6.0	3.96	2/8/2007
February 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3500.	2/8/2007
February 2007	002	Dissolved Oxygen	1D Conc	6.0	5.43	2/9/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	31.5	2/13/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	31.5	2/13/2007
February 2007	002	Phosphorus, Total (P)	1D Qty	2.5	9.45236	2/13/2007
February 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2920.	2/13/2007
February 2007	601	Total Suspended Solids	1D Conc	18	44.	2/13/2007
February 2007	601	Total Suspended Solids	1D Qty	5.4589	11.9975	2/13/2007
February 2007	601	CBOD 5 day	1D Conc	15	17.	2/13/2007
February 2007	601	CBOD 5 day	1D Qty	4.5490	4.63541	2/13/2007
February 2007	601	Phosphorus, Total (P)	1D Conc	8.4	38.6	2/13/2007
February 2007	601	Phosphorus, Total (P)	1D Qty	2.5474	10.5251	2/13/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	29.8	2/15/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	29.8	2/15/2007
February 2007	002	Phosphorus, Total (P)	1D Qty	2.5	9.00427	2/15/2007
February 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3240.	2/15/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	21.5	2/20/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	21.5	2/20/2007
February 2007	002	Phosphorus, Total (P)	1D Qty	2.5	4.50994	2/20/2007
February 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2850.	2/20/2007
February 2007	601	Phosphorus, Total (P)	1D Conc	8.4	25.6	2/20/2007
February 2007	601	Phosphorus, Total (P)	1D Qty	2.5474	4.54927	2/20/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	8.64	2/22/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	8.64	2/22/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	12.	2/27/2007
February 2007	002	Phosphorus, Total (P)	1D Conc	4.8	12.	2/27/2007
February 2007	002	Phosphorus, Total (P)	1D Qty	2.5	2.97774	2/27/2007
February 2007	601	Phosphorus, Total (P)	1D Conc	8.4	14.9	2/27/2007
February 2007	601	Phosphorus, Total (P)	1D Qty	2.5474	3.33078	2/27/2007
February 2007	601	pH	1D Conc	9.0	9.19	2/27/2007
March 2007	002	Residue, Tot. Dissolved	30D Conc	1785	2292.22	3/1/2007
March 2007	601	Phosphorus, Total (P)	30D Conc	5.6	39.4625	3/1/2007
March 2007	601	Phosphorus, Total (P)	30D Qty	1.6983	7.57895	3/1/2007

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
March 2007	002	Total Suspended Solids	30D Conc	12.0	43.3333	3/1/2007
March 2007	002	Total Suspended Solids	30D Qty	6.37	12.1092	3/1/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	13.5	3/1/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	13.5	3/1/2007
March 2007	002	Phosphorus, Total (P)	30D Conc	3.2	21.2888	3/1/2007
March 2007	002	Phosphorus, Total (P)	1D Qty	2.5	3.43886	3/1/2007
March 2007	002	Phosphorus, Total (P)	30D Qty	1.7	5.11015	3/1/2007
March 2007	002	pH	1D Conc	9.0	9.13	3/1/2007
March 2007	601	Phosphorus, Total (P)	1D Conc	8.4	14.3	3/6/2007
March 2007	601	pH	1D Conc	9.0	9.2	3/6/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	9.17	3/6/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	9.17	3/6/2007
March 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2720.	3/8/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	21.8	3/8/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	21.8	3/8/2007
March 2007	002	Phosphorus, Total (P)	1D Qty	2.5	5.6934	3/8/2007
March 2007	601	Phosphorus, Total (P)	1D Conc	8.4	110.	3/13/2007
March 2007	601	Phosphorus, Total (P)	1D Qty	2.5474	22.7743	3/13/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	86.2	3/13/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	86.2	3/13/2007
March 2007	002	Phosphorus, Total (P)	1D Qty	2.5	20.4895	3/13/2007
March 2007	002	pH	1D Conc	9.0	9.46	3/13/2007
March 2007	002	Total Suspended Solids	1D Conc	18.0	51.	3/15/2007
March 2007	002	Total Suspended Solids	1D Qty	9.55	14.9988	3/15/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	20.2	3/15/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	20.2	3/15/2007
March 2007	002	Phosphorus, Total (P)	1D Qty	2.5	5.94071	3/15/2007
March 2007	601	Total Suspended Solids	1D Conc	18	19.	3/20/2007
March 2007	601	Phosphorus, Total (P)	1D Conc	8.4	26.5	3/20/2007
March 2007	601	Phosphorus, Total (P)	1D Qty	2.5474	4.49355	3/20/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	24.7	3/20/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	24.7	3/20/2007
March 2007	002	Phosphorus, Total (P)	1D Qty	2.5	5.07648	3/20/2007
March 2007	002	Total Suspended Solids	1D Conc	18.0	20.	3/22/2007
March 2007	002	Total Suspended Solids	1D Conc	18.0	22.	3/27/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.84	3/27/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.84	3/27/2007
March 2007	002	Total Suspended Solids	1D Conc	18.0	272.	3/29/2007
March 2007	002	Total Suspended Solids	1D Qty	9.55	79.7878	3/29/2007
March 2007	002	CBOD 5 day	1D Conc	15.0	43.	3/29/2007
March 2007	002	CBOD 5 day	1D Qty	7.9609	12.6135	3/29/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.82	3/29/2007
March 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.82	3/29/2007
April 2007	002	Phosphorus, Total (P)	30D Conc	3.2	4.22	4/1/2007
April 2007	002	Phosphorus, Total (P)	30D Qty	1.7	2.05642	4/1/2007
April 2007	002	Residue, Tot. Dissolved	30D Conc	1785	2442.5	4/1/2007
April 2007	002	Residue, Tot. Dissolved	30D Qty	812.01	1127.29	4/1/2007
April 2007	601	Total Suspended Solids	30D Conc	12	33.25	4/1/2007

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
April 2007	601	Total Suspended Solids	30D Qty	3.6392	6.36722	4/1/2007
April 2007	601	CBOD 5 day	30D Conc	10	19.25	4/1/2007
April 2007	601	CBOD 5 day	30D Qty	3.0327	3.47983	4/1/2007
April 2007	601	Phosphorus, Total (P)	30D Conc	5.6	7.045	4/1/2007
April 2007	002	CBOD 5 day	1D Conc	15.0	21.	4/5/2007
April 2007	002	CBOD 5 day	1D Conc	15.0	21.	4/10/2007
April 2007	601	Total Suspended Solids	1D Conc	18	85.	4/10/2007
April 2007	601	Total Suspended Solids	1D Qty	5.4589	13.4159	4/10/2007
April 2007	601	CBOD 5 day	1D Conc	15	56.	4/10/2007
April 2007	601	CBOD 5 day	1D Qty	4.5490	8.83873	4/10/2007
April 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3740.	4/12/2007
April 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3250.	4/17/2007
April 2007	601	Total Suspended Solids	1D Conc	18	20.	4/17/2007
April 2007	002	Phosphorus, Total (P)	1D Conc	4.8	5.37	4/19/2007
April 2007	002	Phosphorus, Total (P)	1D Conc	4.8	5.37	4/19/2007
April 2007	002	Phosphorus, Total (P)	1D Qty	2.5	2.93906	4/19/2007
April 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2720.	4/19/2007
April 2007	002	Phosphorus, Total (P)	1D Conc	4.8	14.7	4/24/2007
April 2007	002	Phosphorus, Total (P)	1D Conc	4.8	14.7	4/24/2007
April 2007	002	Phosphorus, Total (P)	1D Qty	2.5	7.5781	4/24/2007
April 2007	601	Total Suspended Solids	1D Conc	18	20.	4/24/2007
April 2007	601	Total Suspended Solids	1D Qty	5.4589	5.50339	4/24/2007
April 2007	601	Phosphorus, Total (P)	1D Conc	8.4	15.7	4/24/2007
April 2007	601	Phosphorus, Total (P)	1D Qty	2.5474	4.32016	4/24/2007
May 2007	002	Total Suspended Solids	30D Conc	12.0	17.6	5/1/2007
May 2007	002	Total Suspended Solids	30D Qty	6.37	8.86727	5/1/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	13.4	5/1/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	13.4	5/1/2007
May 2007	002	Phosphorus, Total (P)	30D Conc	3.2	18.433	5/1/2007
May 2007	002	Phosphorus, Total (P)	1D Qty	2.5	6.60361	5/1/2007
May 2007	002	Phosphorus, Total (P)	30D Qty	1.7	7.82268	5/1/2007
May 2007	002	Residue, Tot. Dissolved	30D Conc	1785	2327.	5/1/2007
May 2007	002	Residue, Tot. Dissolved	30D Qty	812.01	1111.01	5/1/2007
May 2007	601	Total Suspended Solids	30D Conc	12	20.6	5/1/2007
May 2007	601	Total Suspended Solids	30D Qty	3.6392	3.96055	5/1/2007
May 2007	601	Phosphorus, Total (P)	1D Conc	8.4	15.3	5/1/2007
May 2007	601	Phosphorus, Total (P)	30D Conc	5.6	7.774	5/1/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.01	5/8/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.01	5/8/2007
May 2007	002	Phosphorus, Total (P)	1D Qty	2.5	3.23247	5/8/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	129.	5/10/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	129.	5/10/2007
May 2007	002	Phosphorus, Total (P)	1D Qty	2.5	51.3654	5/10/2007
May 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2900.	5/10/2007
May 2007	002	Total Suspended Solids	1D Conc	18.0	20.	5/22/2007
May 2007	002	Total Suspended Solids	1D Qty	9.55	9.75016	5/22/2007
May 2007	601	CBOD 5 day	1D Conc	15	28.	5/22/2007
May 2007	601	CBOD 5 day	1D Qty	4.5490	7.75774	5/22/2007

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
May 2007	002	Total Suspended Solids	1D Conc	18.0	100.	5/29/2007
May 2007	002	Total Suspended Solids	1D Qty	9.55	52.4222	5/29/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	9.22	5/29/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	9.22	5/29/2007
May 2007	002	Phosphorus, Total (P)	1D Qty	2.5	4.83333	5/29/2007
May 2007	601	Total Suspended Solids	1D Conc	18	48.	5/29/2007
May 2007	601	Total Suspended Solids	1D Qty	5.4589	7.53972	5/29/2007
May 2007	601	Phosphorus, Total (P)	1D Conc	8.4	10.8	5/29/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	10.3	5/31/2007
May 2007	002	Phosphorus, Total (P)	1D Conc	4.8	10.3	5/31/2007
May 2007	002	Phosphorus, Total (P)	1D Qty	2.5	4.67436	5/31/2007
July 2007	002	Phosphorus, Total (P)	30D Conc	3.2	4.69667	7/1/2007
July 2007	002	Phosphorus, Total (P)	30D Qty	1.7	2.50633	7/1/2007
July 2007	002	Residue, Tot. Dissolved	30D Conc	1785	2683.33	7/1/2007
July 2007	002	Residue, Tot. Dissolved	30D Qty	812.01	1404.77	7/1/2007
July 2007	601	Nitrogen, Ammonia	30D Conc	1.0	1.458	7/1/2007
July 2007	601	Nitrogen, Ammonia	30D Qty	0.3032	.32745	7/1/2007
July 2007	601	Nitrogen, Ammonia	1D Conc	1.5	1.59	7/3/2007
July 2007	002	Phosphorus, Total (P)	1D Qty	2.5	2.61411	7/5/2007
July 2007	002	Total Suspended Solids	1D Conc	18.0	19.	7/10/2007
July 2007	002	Total Suspended Solids	1D Qty	9.55	9.94584	7/10/2007
July 2007	002	CBOD 5 day	1D Conc	15.0	41.	7/10/2007
July 2007	002	CBOD 5 day	1D Qty	7.9609	21.4620	7/10/2007
July 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3180.	7/10/2007
July 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2910.	7/12/2007
July 2007	601	Nitrogen, Ammonia	1D Conc	1.5	2.33	7/17/2007
July 2007	601	Nitrogen, Ammonia	1D Qty	0.4549	.47976	7/17/2007
July 2007	002	Total Suspended Solids	1D Conc	18.0	33.	7/19/2007
July 2007	002	Total Suspended Solids	1D Qty	9.55	18.0862	7/19/2007
July 2007	002	Phosphorus, Total (P)	1D Conc	4.8	12.6	7/19/2007
July 2007	002	Phosphorus, Total (P)	1D Conc	4.8	12.6	7/19/2007
July 2007	002	Phosphorus, Total (P)	1D Qty	2.5	6.90566	7/19/2007
July 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3320.	7/19/2007
July 2007	002	Phosphorus, Total (P)	1D Conc	4.8	7.29	7/26/2007
July 2007	002	Phosphorus, Total (P)	1D Conc	4.8	7.29	7/26/2007
July 2007	002	Phosphorus, Total (P)	1D Qty	2.5	3.56497	7/26/2007
July 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.34	7/31/2007
July 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.34	7/31/2007
July 2007	002	Phosphorus, Total (P)	1D Qty	2.5	3.51315	7/31/2007
July 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2740.	7/31/2007
July 2007	601	Nitrogen, Ammonia	1D Conc	1.5	2.43	7/31/2007
July 2007	601	Nitrogen, Ammonia	1D Qty	0.4549	.59692	7/31/2007
July 2007	601	Phosphorus, Total (P)	1D Conc	8.4	8.88	7/31/2007
August 2007	002	Phosphorus, Total (P)	30D Conc	3.2	8.08	8/1/2007
August 2007	002	Phosphorus, Total (P)	30D Qty	1.7	4.34222	8/1/2007
August 2007	002	Residue, Tot. Dissolved	30D Conc	1785	2710.	8/1/2007
August 2007	002	Residue, Tot. Dissolved	30D Qty	812.01	1444.08	8/1/2007
August 2007	601	Total Suspended Solids	30D Conc	12	19.75	8/1/2007

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
August 2007	601	Total Suspended Solids	30D Qty	3.6392	5.25585	8/1/2007
August 2007	601	Nitrogen, Ammonia	30D Conc	1.0	1.5915	8/1/2007
August 2007	601	Nitrogen, Ammonia	30D Qty	0.3032	.41468	8/1/2007
August 2007	601	Phosphorus, Total (P)	30D Conc	5.6	7.72	8/1/2007
August 2007	601	Phosphorus, Total (P)	30D Qty	1.6983	2.02549	8/1/2007
August 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3000.	8/2/2007
August 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2750.	8/7/2007
August 2007	601	Total Suspended Solids	1D Conc	18	22.	8/7/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	7.98	8/9/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	7.98	8/9/2007
August 2007	002	Phosphorus, Total (P)	1D Qty	2.5	4.05946	8/9/2007
August 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2750.	8/9/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	8.91	8/14/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	8.91	8/14/2007
August 2007	002	Phosphorus, Total (P)	1D Qty	2.5	4.89003	8/14/2007
August 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2740.	8/14/2007
August 2007	601	Nitrogen, Ammonia	1D Conc	1.5	2.13	8/14/2007
August 2007	601	Nitrogen, Ammonia	1D Qty	0.4549	.49985	8/14/2007
August 2007	601	Phosphorus, Total (P)	1D Conc	8.4	11.5	8/14/2007
August 2007	601	Phosphorus, Total (P)	1D Qty	2.5474	2.69871	8/14/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	5.66	8/16/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	5.66	8/16/2007
August 2007	002	Phosphorus, Total (P)	1D Qty	2.5	3.01851	8/16/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	4.97	8/21/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	4.97	8/21/2007
August 2007	002	Phosphorus, Total (P)	1D Qty	2.5	2.64301	8/21/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	28.4	8/23/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	28.4	8/23/2007
August 2007	002	Phosphorus, Total (P)	1D Qty	2.5	15.6833	8/23/2007
August 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3060.	8/23/2007
August 2007	002	Total Suspended Solids	1D Conc	18.0	25.	8/30/2007
August 2007	002	Total Suspended Solids	1D Qty	9.55	12.2255	8/30/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	7.96	8/30/2007
August 2007	002	Phosphorus, Total (P)	1D Conc	4.8	7.96	8/30/2007
August 2007	002	Phosphorus, Total (P)	1D Qty	2.5	3.89262	8/30/2007
August 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2700.	8/30/2007
August 2007	601	Total Suspended Solids	1D Conc	18	30.	8/30/2007
August 2007	601	Total Suspended Solids	1D Qty	5.4589	8.64116	8/30/2007
August 2007	601	Nitrogen, Ammonia .	1D Conc	1.5	2.18	8/30/2007
August 2007	601	Nitrogen, Ammonia .	1D Qty	0.4549	.62792	8/30/2007
August 2007	601	Phosphorus, Total (P)	1D Conc	8.4	8.69	8/30/2007
September 2007	002	Phosphorus, Total (P)	30D Conc	3.2	9.94875	9/1/2007
September 2007	002	Phosphorus, Total (P)	30D Qty	1.7	2.63092	9/1/2007
September 2007	002	Residue, Tot. Dissolved	30D Conc	1785	2958.75	9/1/2007
September 2007	601	Total Suspended Solids	30D Conc	12	20.5	9/1/2007
September 2007	601	Total Suspended Solids	30D Qty	3.6392	6.38747	9/1/2007
September 2007	601	Phosphorus, Total (P)	30D Conc	5.6	10.41	9/1/2007
September 2007	601	Phosphorus, Total (P)	30D Qty	1.6983	3.22783	9/1/2007

Reporting Period	Station	Parameter	Limit Type	Limit	Reported Value	Violation Date
September 2007	002	Total Suspended Solids	1D Conc	18.0	28.	9/4/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	4.81	9/4/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	4.81	9/4/2007
September 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3250.	9/4/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	11.6	9/6/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	11.6	9/6/2007
September 2007	002	Phosphorus, Total (P)	1D Qty	2.5	3.02951	9/6/2007
September 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	3160.	9/6/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	16.3	9/11/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	16.3	9/11/2007
September 2007	002	Phosphorus, Total (P)	1D Qty	2.5	4.64567	9/11/2007
September 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2900.	9/11/2007
September 2007	601	Total Suspended Solids	1D Conc	18	22.	9/11/2007
September 2007	601	Total Suspended Solids	1D Qty	5.4589	6.80316	9/11/2007
September 2007	601	Phosphorus, Total (P)	1D Conc	8.4	20.9	9/11/2007
September 2007	601	Phosphorus, Total (P)	1D Qty	2.5474	6.463	9/11/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	10.5	9/13/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	10.5	9/13/2007
September 2007	002	Phosphorus, Total (P)	1D Qty	2.5	2.73428	9/13/2007
September 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2710.	9/13/2007
September 2007	002	Total Suspended Solids	1D Conc	18.0	23.	9/18/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.56	9/18/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.56	9/18/2007
September 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2990.	9/18/2007
September 2007	601	Total Suspended Solids	1D Conc	18	33.	9/18/2007
September 2007	601	Total Suspended Solids	1D Qty	5.4589	10.4295	9/18/2007
September 2007	601	Phosphorus, Total (P)	1D Conc	8.4	8.64	9/18/2007
September 2007	601	Phosphorus, Total (P)	1D Qty	2.5474	2.73065	9/18/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.81	9/20/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	6.81	9/20/2007
September 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2750.	9/20/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	5.61	9/25/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	5.61	9/25/2007
September 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2920.	9/25/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	17.4	9/27/2007
September 2007	002	Phosphorus, Total (P)	1D Conc	4.8	17.4	9/27/2007
September 2007	002	Phosphorus, Total (P)	1D Qty	2.5	5.03163	9/27/2007
September 2007	002	Residue, Tot. Dissolved	1D Conc	2677.5	2990.	9/27/2007

NPDES Permit Limit Frequency for January through September 2007

Violation Date	Station	Parameter	Sample Frequency	Expected	Reported
2/1/2007	901	Phosphorus, Total (P)	2/Month	2	1
4/1/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
4/8/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
4/15/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
4/22/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
5/1/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
5/8/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
5/15/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
5/22/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
5/1/2007	901	Phosphorus, Total (P)	2/Month	2	1
7/1/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
7/8/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
7/15/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
7/22/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
8/1/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
8/8/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
8/15/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
8/22/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
8/22/2007	601	Total Suspended Solids	1/Week	1	0
8/22/2007	601	Nitrogen, Ammonia (NH3)	1/Week	1	0
8/22/2007	601	Fecal Coliform	1/Week	1	0
8/22/2007	601	CBOD 5 day	1/Week	1	0
8/22/2007	601	Phosphorus, Total (P)	1/Week	1	0
8/22/2007	601	pH	1/Week	1	0
8/22/2007	601	Residue, Total Dissolved	1/Week	1	0
9/1/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
9/8/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
9/15/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0
9/22/2007	002	Nitrogen, Ammonia (NH3)	2/Week	2	0