



John R. Kasich, Governor
Mary Taylor, Lt. Governor
Scott J. Nally, Director

April 29, 2013

RE: CITY OF SALEM
COLUMBIANA COUNTY
SALEM WASTEWATER TREATMENT PLANT
1600 PENNSYLVANIA AVENUE
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 January 31, 2013, this writer conducted an inspection of the Salem wastewater treatment plant (WWTP) located at 1600 Pennsylvania Avenue. Mr. Tim Rininger, Chief Operator, was present for the City. The 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 following is a summary of Agency observations and permit issues:

WWTP Inspection

The treatment system includes processes for grit removal, comminutor, 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 for land application through the approved sludge rules.

During the inspection, it was noted that all the primary clarifiers were operational. The comminutor is not operational. Plant staff was utilizing the by-pass bar screen at that time. All three roughing filters were operational. All the remaining units appeared operational. The primary digester had been returned to operation after repairs took approximately a year to complete.

At the time of the inspection, the final clarifiers had pin floc going over the weirs to the stream. The effluent leaving the chlorine contact tank appeared typical of a secondary plant.

Phosphorus Removal System

The City of Salem has installed a polymer tank and feed pumps in the blower building. The staff has been feeding alum and polymer. While the chemicals' have made an impact on the final

effluent it is insufficient meet permit limits. The City is not in compliance with its phosphorus limit.

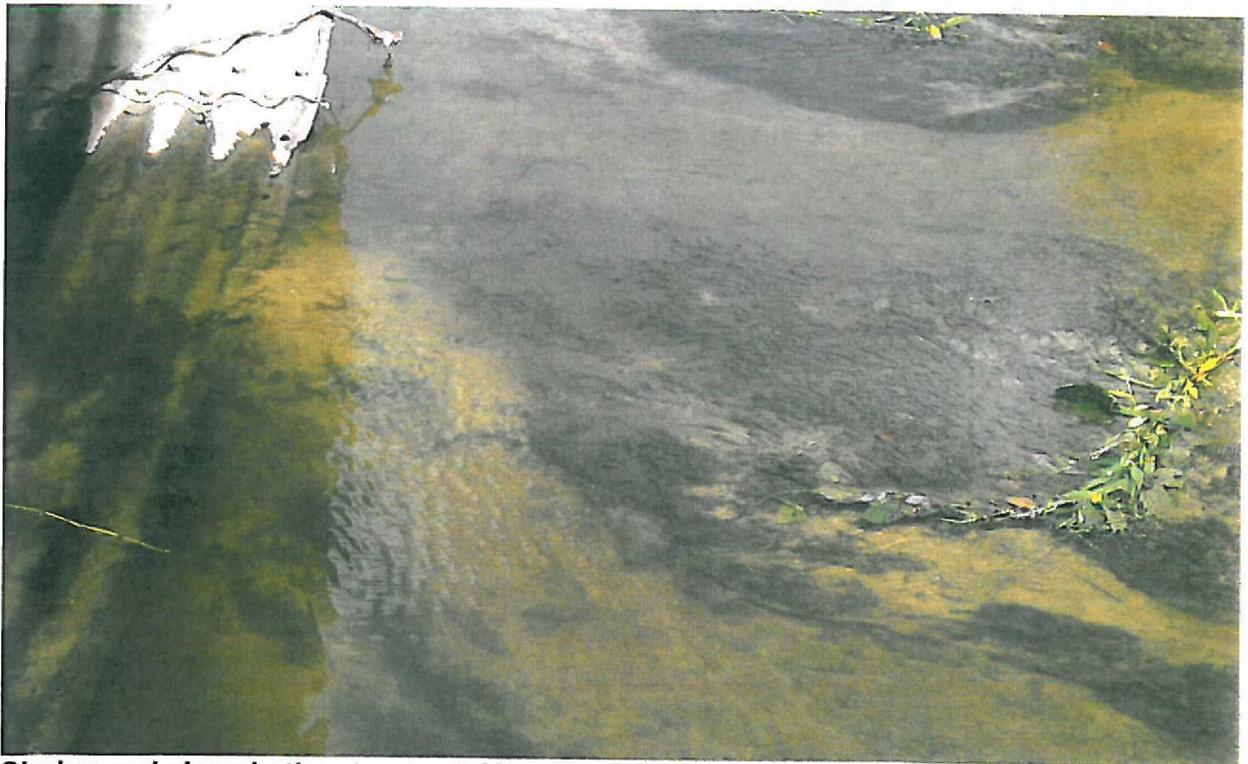
During the inspections throughout the last year, it was documented that the ongoing algae problems in-stream are still present (photos are attached). The stream had signs of algae downstream of where the effluent pipe enters the stream. The algae in the stream are indicative of the pass-through of phosphorus 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. The technical justification submitted by the City appears satisfactory and the limit proposed by the City should go final when it resolves its legal case with the Attorney General.



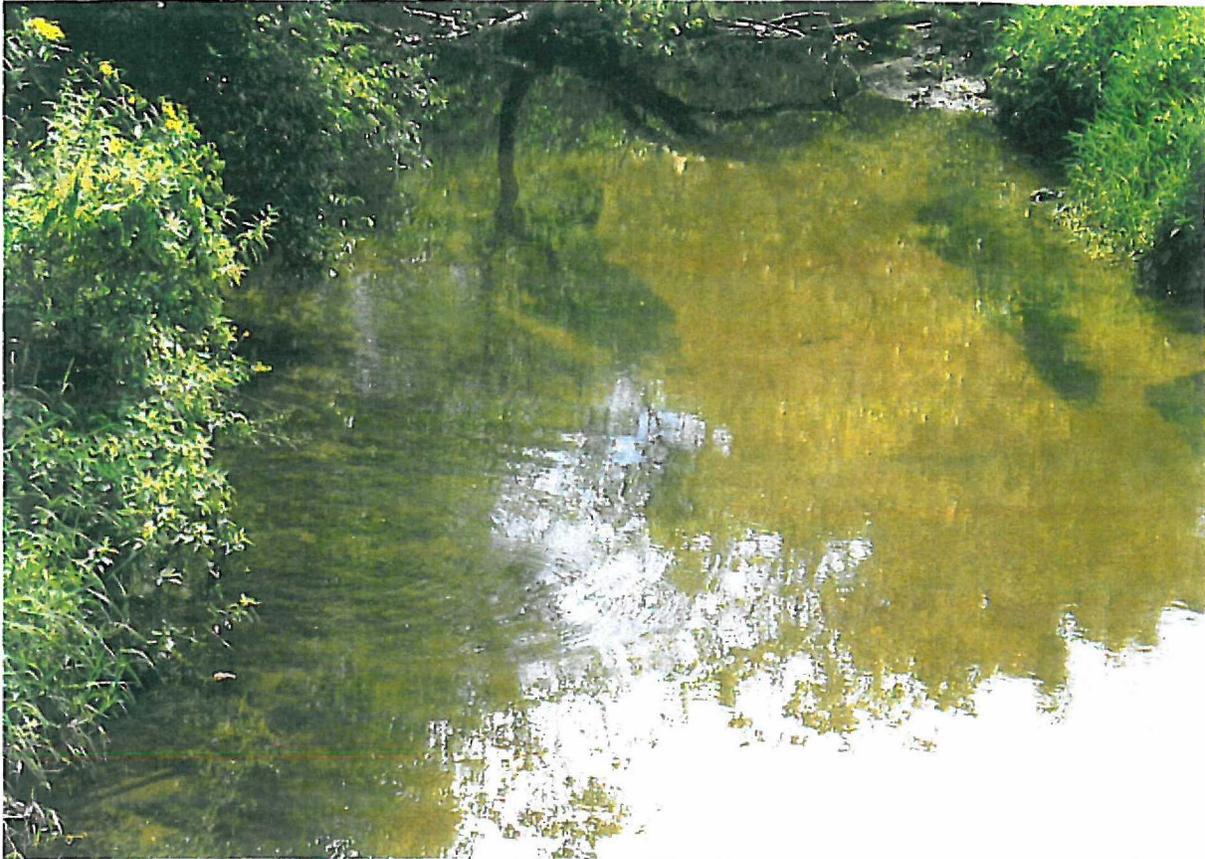
Upstream of Salem WWTP outfall, stream is free of algae.



Immediately downstream in mix zone from WWTP has algae growth.



Sludge and algae in the stream at Allen Road.



Algae downstream of City of Salem effluent on Pine Lake Road.

This facility has been in significant noncompliance with its final phosphorus limit since **December, 10, 2007**.

A review of the effluent data for your WWTP submitted by the City was reviewed for the period of January 2011 through February 2013. There are still numerous Phosphorus violations. The City has submitted Phase I of construction improvements to this office on December 2012. Revisions were requested and detail plans resubmitted by the City and the plans should be approved shortly.

pH Violations

The plant has been experiencing ongoing pH violations during the last couple of years. A summary of the recent violations is attached. The superintendent and his staff have made great strides in reducing the number of violations. The summary provided revealed the City and FreshMark appear to be moving in the right direction.

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-passes from this unit occasionally and these are not permitted. The facility has hired a contractor to press large quantities of sludge in a short period of time. This creates operational problems and compliance issues with the WWTP. The City must address this issue. The City is

hoping the Phase I improvements submitted to this office will provide extra sludge handling facilities for the Superintendent and his staff.

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, 2011, and February, 2013, was conducted. Identified violations for outfall 001 are listed in attachment 1: City of Salem Violations 1/11-2/13.

Wastewater Treatment Capacity

The review of the City of Salem monthly operating reports revealed that annual plant loadings are still exceeding the design capacity for BOD and Suspended Solids (SS) loadings. The City is hoping improvements to their WWTP and at the FreshMark location will rectify this problem.

Plant Staffing Requirements

The City added staff to the plant in early 2010. The additional staff has aided in operation and maintenance at the WWTP. The superintendent will be flexing the hours of the staff to maximize their effectiveness, and staffing levels appear satisfactory at this time. The superintendent has requested that electronic automation or a security guard be allowed to cover the third shift. This would allow him to shift additional man hours to the day turn where more complex repairs requiring more than one person could be accomplished. This office would not object to the alternative plan provided there is not reduction in the current seven employees at the WWTP. The alternative plan while not ideal, will allow additional maintenance to be completed.

WWTP Odors

This plant has received a few calls from the local public regarding odors coming from the WWTP. The Superintendent has conducted discussions with these parties and has remedied most of them. The City must continue to evaluate all possible methods to eliminate the odors.

Action Items

The following outstanding issues at the wastewater plant must be addressed. The City must develop a dated schedule of specific milestones to attain compliance with the NPDES permit.

This schedule will include:

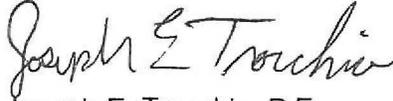
- 1) Completing discussions with FreshMark to pretreat their wastewater stream and oversee construction for their necessary improvements to meet the local limit for phosphorous;
- 2) Entering into contracts to make improvements at the WWTP to address phosphorous, sludge handling, and plant overflows;
- 3) Immediately resolving all ongoing violations attached to this correspondence; and
- 4) Address ongoing odor issues.

By April 22, 2013, please address the action items with a letter to myself and Summer Plantz of the Ohio Attorney General's Office.

SALEM WASTEWATER TREATMENT PLANT
APRIL 29, 2013
PAGE 6 OF 6

Should you have any comments or questions, feel free to contact me at (330) 963-1193.

Respectfully,



Joseph E. Trocchio, P.E.
Environmental Engineer
Division of Surface Water

JET/cs

cc: Don Weingart, Utilities Superintendent
Jeff Zimmerman, Plant Manager
Matt Hoops, Assistant Utilities Superintendent
Summer Plantz, Assistant Attorney General

ec: Ryan Laake, Pretreatment Coordinator, Ohio EPA, DSW, CO
Donna Kniss, Pretreatment Coordinator, Ohio EPA, DSW, NEDO
Virginia Wilson, Environmental Supervisor, Ohio EPA, DSW, NEDO
Dean Stoll, P.E., Enforcement Coordinator, Ohio EPA, DSW, NEDO

File/Public/Permit Compliance/City of Salem

City of Salem WWTP Effluent Violations: January 2011 - February 2013

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	January 2011	Phosphorus, Total (P)	7D Conc	1.5	8.75	1/1/2011
3PD00027*JD	January 2011	Phosphorus, Total (P)	30D Qty	15	128.328	1/1/2011
3PD00027*JD	January 2011	Phosphorus, Total (P)	7D Qty	23	69.8805	1/1/2011
3PD00027*JD	January 2011	Phosphorus, Total (P)	30D Conc	1.0	15.35	1/1/2011
3PD00027*JD	January 2011	pH, Minimum	1D Conc	6.5	6.39	1/2/2011
3PD00027*JD	January 2011	Phosphorus, Total (P)	7D Conc	1.5	18.5	1/8/2011
3PD00027*JD	January 2011	Phosphorus, Total (P)	7D Qty	23	156.406	1/8/2011
3PD00027*JD	January 2011	Phosphorus, Total (P)	7D Conc	1.5	18.	1/15/2011
3PD00027*JD	January 2011	Phosphorus, Total (P)	7D Qty	23	161.672	1/15/2011
3PD00027*JD	January 2011	Phosphorus, Total (P)	7D Conc	1.5	13.	1/22/2011
3PD00027*JD	January 2011	Phosphorus, Total (P)	7D Qty	23	97.2782	1/22/2011
3PD00027*JD	February 2011	Total Suspended Solids	30D Conc	20	27.9285	2/1/2011
3PD00027*JD	February 2011	Total Suspended Solids	30D Qty	303	388.135	2/1/2011
3PD00027*JD	February 2011	Phosphorus, Total (P)	30D Conc	1.0	14.4375	2/1/2011
3PD00027*JD	February 2011	Phosphorus, Total (P)	7D Conc	1.5	14.5	2/1/2011
3PD00027*JD	February 2011	Phosphorus, Total (P)	30D Qty	15	153.265	2/1/2011
3PD00027*JD	February 2011	Phosphorus, Total (P)	7D Qty	23	135.243	2/1/2011
3PD00027*JD	February 2011	Phosphorus, Total (P)	7D Conc	1.5	8.75	2/8/2011
3PD00027*JD	February 2011	Phosphorus, Total (P)	7D Qty	23	78.4583	2/8/2011
3PD00027*JD	February 2011	Dissolved Oxygen	1D Conc	6.0	4.93	2/21/2011
3PD00027*JD	February 2011	Total Suspended Solids	7D Conc	30	71.75	2/22/2011
3PD00027*JD	February 2011	Total Suspended Solids	7D Qty	454	1085.17	2/22/2011
3PD00027*JD	February 2011	Phosphorus, Total (P)	7D Conc	1.5	20.	2/22/2011
3PD00027*JD	February 2011	Phosphorus, Total (P)	7D Qty	23	264.117	2/22/2011
3PD00027*JD	February 2011	Dissolved Oxygen	1D Conc	6.0	5.79	2/24/2011
3PD00027*JD	February 2011	Dissolved Oxygen	1D Conc	6.0	4.78	2/25/2011
3PD00027*JD	February 2011	Dissolved Oxygen	1D Conc	6.0	4.87	2/26/2011
3PD00027*JD	February 2011	Dissolved Oxygen	1D Conc	6.0	5.	2/27/2011
3PD00027*JD	March 2011	Copper, Total Recovers	1D Qty	0.48	.89097	3/1/2011
3PD00027*JD	March 2011	Copper, Total Recovers	30D Qty	0.30	.89097	3/1/2011
3PD00027*JD	March 2011	Total Suspended Solids	30D Conc	20	105.687	3/1/2011
3PD00027*JD	March 2011	Total Suspended Solids	7D Conc	30	157.5	3/1/2011
3PD00027*JD	March 2011	Total Suspended Solids	30D Qty	303	2697.99	3/1/2011
3PD00027*JD	March 2011	Total Suspended Solids	7D Qty	454	4694.77	3/1/2011
3PD00027*JD	March 2011	CBOD 5 day	30D Conc	15	41.0875	3/1/2011
3PD00027*JD	March 2011	CBOD 5 day	7D Conc	22	53.175	3/1/2011
3PD00027*JD	March 2011	CBOD 5 day	30D Qty	227	1069.09	3/1/2011
3PD00027*JD	March 2011	CBOD 5 day	7D Qty	333	1619.44	3/1/2011
3PD00027*JD	March 2011	Phosphorus, Total (P)	30D Conc	1.0	9.5	3/1/2011
3PD00027*JD	March 2011	Phosphorus, Total (P)	30D Qty	15	152.430	3/1/2011
3PD00027*JD	March 2011	Copper, Total Recovers	1D Conc	32	37.	3/1/2011
3PD00027*JD	March 2011	Copper, Total Recovers	30D Conc	20	37.	3/1/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.86	3/2/2011

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3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.66	3/4/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	4.04	3/5/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.51	3/8/2011
3PD00027*JD	March 2011	Total Suspended Solids	7D Conc	30	72.5	3/8/2011
3PD00027*JD	March 2011	Total Suspended Solids	7D Qty	454	3298.75	3/8/2011
3PD00027*JD	March 2011	CBOD 5 day	7D Conc	22	32.34	3/8/2011
3PD00027*JD	March 2011	CBOD 5 day	7D Qty	333	1291.85	3/8/2011
3PD00027*JD	March 2011	Phosphorus, Total (P)	7D Conc	1.5	10.125	3/8/2011
3PD00027*JD	March 2011	Phosphorus, Total (P)	7D Qty	23	225.207	3/8/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.12	3/9/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	4.88	3/10/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.94	3/11/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.67	3/12/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.92	3/13/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.51	3/14/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	4.48	3/15/2011
3PD00027*JD	March 2011	Total Suspended Solids	7D Conc	30	185.333	3/15/2011
3PD00027*JD	March 2011	Total Suspended Solids	7D Qty	454	2928.69	3/15/2011
3PD00027*JD	March 2011	CBOD 5 day	7D Conc	22	79.8333	3/15/2011
3PD00027*JD	March 2011	CBOD 5 day	7D Qty	333	1228.95	3/15/2011
3PD00027*JD	March 2011	Phosphorus, Total (P)	7D Conc	1.5	10.375	3/15/2011
3PD00027*JD	March 2011	Phosphorus, Total (P)	7D Qty	23	146.488	3/15/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	4.03	3/16/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	4.02	3/17/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	4.06	3/18/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	4.53	3/19/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	4.85	3/20/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.7	3/21/2011
3PD00027*JD	March 2011	Total Suspended Solids	7D Conc	30	54.3333	3/22/2011
3PD00027*JD	March 2011	Total Suspended Solids	7D Qty	454	629.392	3/22/2011
3PD00027*JD	March 2011	Phosphorus, Total (P)	7D Conc	1.5	7.	3/22/2011
3PD00027*JD	March 2011	Phosphorus, Total (P)	7D Qty	23	84.0156	3/22/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.67	3/23/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.57	3/24/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.35	3/25/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.49	3/26/2011
3PD00027*JD	March 2011	Dissolved Oxygen	1D Conc	6.0	5.24	3/27/2011
3PD00027*JD	April 2011	Total Suspended Solids	7D Conc	30	44.	4/1/2011
3PD00027*JD	April 2011	Total Suspended Solids	30D Qty	303	376.866	4/1/2011
3PD00027*JD	April 2011	Total Suspended Solids	7D Qty	454	733.805	4/1/2011
3PD00027*JD	April 2011	CBOD 5 day	7D Conc	22	27.3	4/1/2011
3PD00027*JD	April 2011	CBOD 5 day	7D Qty	333	469.996	4/1/2011
3PD00027*JD	April 2011	Phosphorus, Total (P)	30D Conc	1.0	10.9375	4/1/2011

City of Salem WWTP Effluent Violations: January 2011 - February 2013

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	April 2011	Phosphorus, Total (P)	7D Conc	1.5	17.	4/1/2011
3PD00027*JD	April 2011	Phosphorus, Total (P)	30D Qty	15	217.487	4/1/2011
3PD00027*JD	April 2011	Phosphorus, Total (P)	7D Qty	23	326.808	4/1/2011
3PD00027*JD	April 2011	Copper, Total Recovers	30D Qty	0.30	.34184	4/1/2011
3PD00027*JD	April 2011	Dissolved Oxygen	1D Conc	6.0	5.91	4/4/2011
3PD00027*JD	April 2011	Copper, Total Recovers	1D Conc	32	53.	4/5/2011
3PD00027*JD	April 2011	Copper, Total Recovers	1D Qty	0.48	1.01887	4/5/2011
3PD00027*JD	April 2011	Dissolved Oxygen	1D Conc	6.0	4.12	4/5/2011
3PD00027*JD	April 2011	Dissolved Oxygen	1D Conc	6.0	5.49	4/6/2011
3PD00027*JD	April 2011	Phosphorus, Total (P)	7D Conc	1.5	8.75	4/8/2011
3PD00027*JD	April 2011	Phosphorus, Total (P)	7D Qty	23	184.438	4/8/2011
3PD00027*JD	April 2011	Phosphorus, Total (P)	7D Conc	1.5	10.5	4/15/2011
3PD00027*JD	April 2011	Phosphorus, Total (P)	7D Qty	23	189.373	4/15/2011
3PD00027*JD	April 2011	Phosphorus, Total (P)	7D Conc	1.5	7.5	4/22/2011
3PD00027*JD	April 2011	Phosphorus, Total (P)	7D Qty	23	169.331	4/22/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	30D Conc	1.0	6.43125	5/1/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	7D Conc	1.5	6.375	5/1/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	30D Qty	15	101.795	5/1/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	7D Qty	23	126.721	5/1/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	7D Conc	1.5	7.	5/8/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	7D Qty	23	79.1935	5/8/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	7D Conc	1.5	3.75	5/15/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	7D Qty	23	73.0410	5/15/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	7D Conc	1.5	7.73333	5/22/2011
3PD00027*JD	May 2011	Phosphorus, Total (P)	7D Qty	23	117.782	5/22/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	30D Conc	1.0	5.4	6/1/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	7D Conc	1.5	5.25	6/1/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	30D Qty	15	50.6627	6/1/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	7D Qty	23	57.8669	6/1/2011
3PD00027*JD	June 2011	Chlorine, Total Residue	1D Conc	.02	.05	6/5/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	7D Conc	1.5	5.25	6/8/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	7D Qty	23	54.1491	6/8/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	7D Conc	1.5	6.	6/15/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	7D Qty	23	46.3511	6/15/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	7D Conc	1.5	5.25	6/22/2011
3PD00027*JD	June 2011	Phosphorus, Total (P)	7D Qty	23	37.0797	6/22/2011
3PD00027*JD	June 2011	pH, Minimum	1D Conc	6.5	6.43	6/27/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	30D Conc	1.0	8.85	7/1/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	7D Conc	1.5	9.5	7/1/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	30D Qty	15	88.6579	7/1/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	7D Qty	23	66.8270	7/1/2011
3PD00027*JD	July 2011	Copper, Total Recovers	30D Conc	20	22.	7/1/2011
3PD00027*JD	July 2011	pH, Minimum	1D Conc	6.5	6.34	7/4/2011

City of Salem WWTP Effluent Violations: January 2011 - February 2013

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	July 2011	pH, Minimum	1D Conc	6.5	6.43	7/5/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	7D Conc	1.5	9.5	7/8/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	7D Qty	23	76.7333	7/8/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	7D Conc	1.5	8.5	7/15/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	7D Qty	23	174.342	7/15/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	7D Conc	1.5	7.25	7/22/2011
3PD00027*JD	July 2011	Phosphorus, Total (P)	7D Qty	23	58.5596	7/22/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	30D Conc	1.0	11.	8/1/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	7D Conc	1.5	11.5	8/1/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	30D Qty	15	80.3394	8/1/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	7D Qty	23	80.3517	8/1/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	7D Conc	1.5	11.375	8/8/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	7D Qty	23	86.5591	8/8/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	7D Conc	1.5	9.75	8/15/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	7D Qty	23	69.1207	8/15/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	7D Conc	1.5	11.	8/22/2011
3PD00027*JD	August 2011	Phosphorus, Total (P)	7D Qty	23	79.1065	8/22/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	30D Conc	1.0	16.4375	9/1/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	7D Conc	1.5	9.5	9/1/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	30D Qty	15	165.120	9/1/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	7D Qty	23	73.8567	9/1/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	7D Conc	1.5	14.75	9/8/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	7D Qty	23	110.931	9/8/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	7D Conc	1.5	22.	9/15/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	7D Qty	23	183.194	9/15/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	7D Conc	1.5	19.5	9/22/2011
3PD00027*JD	September 2011	Phosphorus, Total (P)	7D Qty	23	292.499	9/22/2011
3PD00027*JD	September 2011	pH, Minimum	1D Conc	6.5	6.46	9/28/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	30D Conc	1.0	16.5625	10/1/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	7D Conc	1.5	16.5	10/1/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	30D Qty	15	134.259	10/1/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	7D Qty	23	160.065	10/1/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	7D Conc	1.5	21.75	10/8/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	7D Qty	23	149.170	10/8/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	7D Conc	1.5	14.75	10/15/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	7D Qty	23	122.432	10/15/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	7D Conc	1.5	13.25	10/22/2011
3PD00027*JD	October 2011	Phosphorus, Total (P)	7D Qty	23	105.367	10/22/2011
3PD00027*JD	October 2011	Chlorine, Total Residu	1D Conc	.02	.15	10/31/2011
3PD00027*JD	November 2011	Phosphorus, Total (P)	30D Conc	1.0	17.25	11/1/2011
3PD00027*JD	November 2011	Phosphorus, Total (P)	7D Conc	1.5	13.	11/1/2011
3PD00027*JD	November 2011	Phosphorus, Total (P)	30D Qty	15	174.691	11/1/2011
3PD00027*JD	November 2011	Phosphorus, Total (P)	7D Qty	23	113.565	11/1/2011

City of Salem WWTP Effluent Violations: January 2011 - February 2013

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	November 2011	Phosphorus, Total (P)	7D Conc	1.5	20.25	11/8/2011
3PD00027*JD	November 2011	Phosphorus, Total (P)	7D Qty	23	149.383	11/8/2011
3PD00027*JD	November 2011	Phosphorus, Total (P)	7D Conc	1.5	18.25	11/15/2011
3PD00027*JD	November 2011	Phosphorus, Total (P)	7D Qty	23	213.721	11/15/2011
3PD00027*JD	November 2011	Phosphorus, Total (P)	7D Conc	1.5	17.5	11/22/2011
3PD00027*JD	November 2011	Phosphorus, Total (P)	7D Qty	23	222.094	11/22/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	30D Conc	1.0	17.75	12/1/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	7D Conc	1.5	18.	12/1/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	30D Qty	15	238.929	12/1/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	7D Qty	23	360.884	12/1/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	7D Conc	1.5	25.5	12/8/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	7D Qty	23	238.398	12/8/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	7D Conc	1.5	11.5	12/15/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	7D Qty	23	119.221	12/15/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	7D Conc	1.5	16.	12/22/2011
3PD00027*JD	December 2011	Phosphorus, Total (P)	7D Qty	23	237.213	12/22/2011
3PD00027*JD	January 2012	Phosphorus, Total (P)	30D Conc	1.0	13.5	1/1/2012
3PD00027*JD	January 2012	Phosphorus, Total (P)	7D Conc	1.5	18.375	1/1/2012
3PD00027*JD	January 2012	Phosphorus, Total (P)	30D Qty	15	166.755	1/1/2012
3PD00027*JD	January 2012	Phosphorus, Total (P)	7D Qty	23	198.992	1/1/2012
3PD00027*JD	January 2012	Phosphorus, Total (P)	7D Conc	1.5	21.	1/8/2012
3PD00027*JD	January 2012	Phosphorus, Total (P)	7D Qty	23	209.601	1/8/2012
3PD00027*JD	January 2012	Phosphorus, Total (P)	7D Conc	1.5	9.75	1/15/2012
3PD00027*JD	January 2012	Phosphorus, Total (P)	7D Qty	23	139.754	1/15/2012
3PD00027*JD	January 2012	Phosphorus, Total (P)	7D Conc	1.5	7.5	1/22/2012
3PD00027*JD	January 2012	Phosphorus, Total (P)	7D Qty	23	173.163	1/22/2012
3PD00027*JD	January 2012	pH, Minimum	1D Conc	6.5	6.4	1/23/2012
3PD00027*JD	January 2012	pH, Minimum	1D Conc	6.5	6.42	1/24/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	7D Conc	1.5	9.75	2/1/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	30D Qty	15	87.1846	2/1/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	7D Qty	23	97.7580	2/1/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	30D Conc	1.0	8.875	2/1/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	7D Conc	1.5	7.75	2/8/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	7D Qty	23	73.6863	2/8/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	7D Conc	1.5	8.75	2/15/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	7D Qty	23	91.3415	2/15/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	7D Conc	1.5	9.25	2/22/2012
3PD00027*JD	February 2012	Phosphorus, Total (P)	7D Qty	23	85.9526	2/22/2012
3PD00027*JD	March 2012	Phosphorus, Total (P)	30D Conc	1.0	7.875	3/1/2012
3PD00027*JD	March 2012	Phosphorus, Total (P)	7D Conc	1.5	7.	3/1/2012
3PD00027*JD	March 2012	Phosphorus, Total (P)	30D Qty	15	85.6583	3/1/2012
3PD00027*JD	March 2012	Phosphorus, Total (P)	7D Qty	23	78.2132	3/1/2012
3PD00027*JD	March 2012	Phosphorus, Total (P)	7D Conc	1.5	9.25	3/8/2012

City of Salem WWTP Effluent Violations: January 2011 - February 2013

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	March 2012	Phosphorus, Total (P)	7D Qty	23	118.723	3/8/2012
3PD00027*JD	March 2012	pH, Minimum	1D Conc	6.5	6.48	3/11/2012
3PD00027*JD	March 2012	pH, Minimum	1D Conc	6.5	6.34	3/12/2012
3PD00027*JD	March 2012	Phosphorus, Total (P)	7D Conc	1.5	7.75	3/15/2012
3PD00027*JD	March 2012	Phosphorus, Total (P)	7D Qty	23	81.3424	3/15/2012
3PD00027*JD	March 2012	pH, Minimum	1D Conc	6.5	6.45	3/19/2012
3PD00027*JD	March 2012	Phosphorus, Total (P)	7D Conc	1.5	7.5	3/22/2012
3PD00027*JD	March 2012	Phosphorus, Total (P)	7D Qty	23	64.3544	3/22/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	30D Conc	1.0	13.	4/1/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	7D Conc	1.5	13.	4/1/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	30D Qty	15	100.080	4/1/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	7D Qty	23	101.509	4/1/2012
3PD00027*JD	April 2012	pH, Minimum	1D Conc	6.5	6.27	4/2/2012
3PD00027*JD	April 2012	pH, Minimum	1D Conc	6.5	6.35	4/3/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	7D Conc	1.5	8.75	4/8/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	7D Qty	23	65.6744	4/8/2012
3PD00027*JD	April 2012	pH, Minimum	1D Conc	6.5	6.42	4/9/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	7D Conc	1.5	11.75	4/15/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	7D Qty	23	84.9003	4/15/2012
3PD00027*JD	April 2012	pH, Minimum	1D Conc	6.5	6.35	4/16/2012
3PD00027*JD	April 2012	pH, Minimum	1D Conc	6.5	6.42	4/17/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	7D Conc	1.5	18.5	4/22/2012
3PD00027*JD	April 2012	Phosphorus, Total (P)	7D Qty	23	148.237	4/22/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	30D Conc	1.0	13.125	5/1/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	7D Conc	1.5	15.	5/1/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	30D Qty	15	114.183	5/1/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	7D Qty	23	122.463	5/1/2012
3PD00027*JD	May 2012	pH, Minimum	1D Conc	6.5	6.47	5/7/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	7D Conc	1.5	10.75	5/8/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	7D Qty	23	116.247	5/8/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	7D Conc	1.5	13.25	5/15/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	7D Qty	23	116.902	5/15/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	7D Conc	1.5	13.5	5/22/2012
3PD00027*JD	May 2012	Phosphorus, Total (P)	7D Qty	23	101.121	5/22/2012
3PD00027*JD	May 2012	pH, Minimum	1D Conc	6.5	6.45	5/28/2012
3PD00027*JD	May 2012	pH, Minimum	1D Conc	6.5	6.45	5/29/2012
3PD00027*JD	June 2012	Phosphorus, Total (P)	30D Conc	1.0	10.5	6/1/2012
3PD00027*JD	June 2012	Phosphorus, Total (P)	7D Conc	1.5	11.25	6/1/2012
3PD00027*JD	June 2012	Phosphorus, Total (P)	30D Qty	15	87.7060	6/1/2012
3PD00027*JD	June 2012	Phosphorus, Total (P)	7D Qty	23	89.6335	6/1/2012
3PD00027*JD	June 2012	Phosphorus, Total (P)	7D Conc	1.5	12.75	6/8/2012
3PD00027*JD	June 2012	Phosphorus, Total (P)	7D Qty	23	123.397	6/8/2012
3PD00027*JD	June 2012	Phosphorus, Total (P)	7D Conc	1.5	9.	6/15/2012

City of Salem WWTP Effluent Violations: January 2011 - February 2013

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	June 2012	Phosphorus, Total (P)	7D Qty	23	70.6508	6/15/2012
3PD00027*JD	June 2012	Phosphorus, Total (P)	7D Conc	1.5	9.	6/22/2012
3PD00027*JD	June 2012	Phosphorus, Total (P)	7D Qty	23	67.1421	6/22/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	30D Conc	1.0	12.7	7/1/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	7D Conc	1.5	16.5	7/1/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	30D Qty	15	87.3048	7/1/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	7D Qty	23	123.531	7/1/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	7D Conc	1.5	10.	7/8/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	7D Qty	23	62.6796	7/8/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	7D Conc	1.5	12.75	7/15/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	7D Qty	23	79.4339	7/15/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	7D Conc	1.5	9.5	7/22/2012
3PD00027*JD	July 2012	Phosphorus, Total (P)	7D Qty	23	63.4649	7/22/2012
3PD00027*JD	July 2012	Chlorine, Total Residu	1D Conc	.02	.1	7/23/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	30D Conc	1.0	15.0625	8/1/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	7D Conc	1.5	14.5	8/1/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	30D Qty	15	100.482	8/1/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	7D Qty	23	82.9823	8/1/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	7D Conc	1.5	16.	8/8/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	7D Qty	23	111.914	8/8/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	7D Conc	1.5	14.25	8/15/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	7D Qty	23	93.0400	8/15/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	7D Conc	1.5	15.5	8/22/2012
3PD00027*JD	August 2012	Phosphorus, Total (P)	7D Qty	23	113.990	8/22/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	30D Conc	1.0	21.	9/1/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	7D Conc	1.5	12.	9/1/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	30D Qty	15	186.589	9/1/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	7D Qty	23	102.331	9/1/2012
3PD00027*JD	September 2012	pH, Minimum	1D Conc	6.5	6.4	9/4/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	7D Conc	1.5	19.5	9/8/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	7D Qty	23	149.829	9/8/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	7D Conc	1.5	26.5	9/15/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	7D Qty	23	280.646	9/15/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	7D Conc	1.5	26.	9/22/2012
3PD00027*JD	September 2012	Phosphorus, Total (P)	7D Qty	23	213.549	9/22/2012
3PD00027*JD	October 2012	Total Suspended Solids	30D Conc	20	25.7692	10/1/2012
3PD00027*JD	October 2012	Phosphorus, Total (P)	30D Conc	1.0	19.5	10/1/2012
3PD00027*JD	October 2012	Phosphorus, Total (P)	7D Conc	1.5	20.	10/1/2012
3PD00027*JD	October 2012	Phosphorus, Total (P)	30D Qty	15	151.236	10/1/2012
3PD00027*JD	October 2012	Phosphorus, Total (P)	7D Qty	23	173.504	10/1/2012
3PD00027*JD	October 2012	Phosphorus, Total (P)	7D Conc	1.5	16.75	10/8/2012
3PD00027*JD	October 2012	Phosphorus, Total (P)	7D Qty	23	134.151	10/8/2012
3PD00027*JD	October 2012	Phosphorus, Total (P)	7D Conc	1.5	17.5	10/15/2012

City of Salem WWTP Effluent Violations: January 2011 - February 2013

Permit No	Reporting Period	Parameter	Limit Type	Limit	Reported Value	Violation Date
3PD00027*JD	October 2012	Phosphorus, Total (P)	7D Qty	23	130.355	10/15/2012
3PD00027*JD	October 2012	Phosphorus, Total (P)	7D Conc	1.5	23.75	10/22/2012
3PD00027*JD	October 2012	Phosphorus, Total (P)	7D Qty	23	166.932	10/22/2012
3PD00027*JD	October 2012	pH, Minimum	1D Conc	6.5	6.4	10/29/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	30D Conc	1.0	18.4375	11/1/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	7D Conc	1.5	24.5	11/1/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	30D Qty	15	149.497	11/1/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	7D Qty	23	199.745	11/1/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	7D Conc	1.5	13.75	11/8/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	7D Qty	23	118.659	11/8/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	7D Conc	1.5	14.5	11/15/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	7D Qty	23	113.222	11/15/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	7D Conc	1.5	21.	11/22/2012
3PD00027*JD	November 2012	Phosphorus, Total (P)	7D Qty	23	166.362	11/22/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	30D Conc	1.0	16.5	12/1/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	7D Conc	1.5	20.	12/1/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	30D Qty	15	163.956	12/1/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	7D Qty	23	193.716	12/1/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	7D Conc	1.5	17.5	12/8/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	7D Qty	23	168.839	12/8/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	7D Conc	1.5	19.	12/15/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	7D Qty	23	214.090	12/15/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	7D Conc	1.5	9.5	12/22/2012
3PD00027*JD	December 2012	Phosphorus, Total (P)	7D Qty	23	79.1784	12/22/2012
3PD00027*JD	January 2013	Phosphorus, Total (P)	30D Conc	1.0	9.85	1/1/2013
3PD00027*JD	January 2013	Phosphorus, Total (P)	7D Conc	1.5	8.25	1/1/2013
3PD00027*JD	January 2013	Phosphorus, Total (P)	30D Qty	15	88.4722	1/1/2013
3PD00027*JD	January 2013	Phosphorus, Total (P)	7D Qty	23	70.6337	1/1/2013
3PD00027*JD	January 2013	Phosphorus, Total (P)	7D Conc	1.5	11.25	1/8/2013
3PD00027*JD	January 2013	Phosphorus, Total (P)	7D Qty	23	97.2555	1/8/2013
3PD00027*JD	January 2013	Phosphorus, Total (P)	7D Conc	1.5	9.25	1/15/2013
3PD00027*JD	January 2013	Phosphorus, Total (P)	7D Qty	23	98.7667	1/15/2013
3PD00027*JD	January 2013	Phosphorus, Total (P)	7D Conc	1.5	10.25	1/22/2013
3PD00027*JD	January 2013	Phosphorus, Total (P)	7D Qty	23	87.8526	1/22/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	30D Conc	1.0	13.	2/1/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	7D Conc	1.5	10.75	2/1/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	30D Qty	15	137.533	2/1/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	7D Qty	23	99.8095	2/1/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	7D Conc	1.5	19.5	2/8/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	7D Qty	23	182.009	2/8/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	7D Conc	1.5	12.	2/15/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	7D Qty	23	133.580	2/15/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	7D Conc	1.5	9.75	2/22/2013
3PD00027*JD	February 2013	Phosphorus, Total (P)	7D Qty	23	134.735	2/22/2013