Maryland
Department of
the Environment

Larry Hogan, Governor
Boyd K. Rutherford, Lt. Governor

Ben Grumbles, Secretary
Horacio Tablada, Deputy Secretary

January 21, 2022

CERTIFIED MAIL – Return Receipt Requested

Mayor Brandon Scott &
The Baltimore City Council
250 City Hall
Baltimore, Maryland 21202

The Honorable Michael S. Regan
U.S. Environmental Protection Agency
Ariel Rios Building (1101A)
1200 Pennsylvania Avenue, Northwest
Washington, District of Columbia 20460

James L. Shea, City Solicitor
Baltimore City Solicitor's Office
Baltimore City Department of Law
100 North Holiday Street, Suite 101
Baltimore, Maryland 21202

Region 3 Administrator Adam Ortiz
U.S. Environmental Protection Agency
1650 Arch Street
Philadelphia, Pennsylvania 19103

Dawn Lettman, Chief Solicitor
Baltimore City Department of Law
Environmental/Legal & Regulatory Affairs
Practice Group
100 North Holliday Street, Suite 156
Baltimore, Maryland 21202

The Honorable Merrick B. Garland
U.S. Attorney General
U.S. Department of Justice
950 Pennsylvania Avenue, Northwest
Washington, District of Columbia 20530

Re: Notice of Intent to Commence Civil Action Under 33 U.S.C. § 1365 Against the Mayor and City Council of Baltimore for Clean Water Act Violations at the Back River Wastewater Treatment Plant

The Federal Water Pollution Control Act (the "Clean Water Act"), 33 U.S.C. § 1251 *et seq.*, prohibits the discharge of pollutants into waters of the United States, unless the U.S. Environmental Protection Agency ("EPA") issues a National Pollutant Discharge Elimination System ("NPDES") permit. The EPA may delegate its NPDES authority to a state, 33 U.S.C. § 1342(b), and has done so here to the State of Maryland Department of the Environment (the "Department"). The Department thus issues NPDES permits that authorize discharges under both federal and State law.

As such, the Mayor and City Council of Baltimore ("Baltimore City") applied for, and the Department issued, State Discharge Permit Number 15-DP-0581A, NPDES Number MD0021555, which became effective May 1, 2018, was modified on January 1, 2020, and expires on April 30, 2023 ("Back River Discharge Permit" or the "NPDES Permit") for the Back River Wastewater Treatment Plant ("Back River WWTP" or the "Plant"), located at 8201

Eastern Avenue, Baltimore, Maryland. The Back River Discharge Permit (1) details the actions Baltimore City is required to take to operate the Plant, and (2) limits Baltimore City's discharges of pollutants to (a) Outfall 001A in the Back River, and (b) Outfall 002A at Bear Creek which flows to Back River.

These NPDES Permit requirements and limitations are identified as "General Conditions" or "Special Conditions"; General Conditions being those that are standard requirements in discharge permits issued by the Department, and Special Conditions being those that are tailored to the specific facility, here the Back River WWTP.

The Department intends to commence a civil action against Baltimore City under 33 U.S.C. § 1365 for the violations of Clean Water Act detailed below including, but not limited to, discharging extensive quantities of pollution from the Plant into Back River and Bear Creek, waters of this State and waters of the United States, and other NPDES Permit violations that have occurred under Baltimore City's operation of the Plant.

A. Effluent Limit Exceedances

While all of the NPDES Permit Conditions are significant, **Special Conditions II(A)(1 - 2)**, "Effluent Limitations," are the Conditions that limit the amount and characteristics of pollution that the Back River WWTP can discharge to the surface waters of Back River and Bear Creek.

From May 2017 through November 2021, the Back River WWTP violated the NPDES Permit's daily, weekly, monthly, quarterly, and annual Effluent Limitations, which include excess discharges of biochemical oxygen demand ("BOD"), E. coli, total nitrogen ("TN"), total phosphorus ("TP"), total suspended solids ("TSS"), and toxicity.

Attached hereto as Exhibit A is a table of the Plant's daily, weekly, monthly, and quarterly effluent limit exceedances from May 2017 through November 2021, which total 131 total violations, and amount to 2,742 days in violation of the NPDES Permit. And, attached hereto as Exhibit B is a table of the Plant's TSS, TN, and TP annual effluent limit exceedance for 2021 which total three violations and amounts to 696 days in violation of the NPDES Permit and the Plants TN and TP.

The 2021 annual exceedances table in Exhibit B is presently incomplete. TN and TP monthly effluent data have not yet been submitted by Baltimore City for December 2021. The Department will recalculate the annual effluent limit exceedance days in violation after Baltimore City submits these TN and TP monthly effluent for the Plant.

The Department intends to pursue future and ongoing effluent limit exceedances as appropriate.

B. Failure to Report Effluent Limit Exceedances

In addition to the NPDES Permit limiting the pollution that the Plant can discharge into the environment, **General Condition III(B)(1)** requires Baltimore City to notify the Department within 24 hours if the Back River WWTP cannot or will not meet "any [P]ermit condition."

From August 2020 through May 2021, Baltimore City failed to report effluent limit exceedances at the Plant 125 times. Attached hereto as Exhibit C is a table of these effluent limit exceedances from the Back River WWTP that Baltimore City did not notify the Department of within 24 hours.

The Department intends to pursue future and ongoing effluent failure by Baltimore City to report effluent limit exceedances at the Back River WWTP as appropriate.

C. Failure to Report Sampling Results

The Back River Discharge Permit's **General Condition III(A)**, "Monitoring and Reporting," requires Baltimore City to

a. to take representative samples of the water being discharged from the Plant,
b. to accurately analyze these samples and record the results,
c. to create and submit certain reports (*e.g.*, Discharge Monitoring Reports, Monthly Operating Reports) to the Department, and
d. to retain all records and information resulting from these monitoring requirements.

Special Condition II(B) of the NPDES Permit, "Minimum Monitoring Requirements," then fills in **General Condition III(A)** with the requisite what, how, how long, when, etc. of sampling and testing. After sampling and testing, **General Condition III(A)(2)(a)** then requires Baltimore City to have "summarized and submitted electronically" the Plant sampling "results obtained during each calendar month" in a Discharge Monitoring Report ("DMR").

On eight occasions, from January 2017 through June 2021, Baltimore City failed to submit sampling results for at least one parameter in its DMRs. Failing to submit sampling results in a DMR is a violation for each day of that calendar month; here, resulting in 240 days of violation. Attached hereto as Exhibit D is a table of the incomplete DMR sampling results that Baltimore City did not submit to the Department for the Back River WWTP.

The Department intends to pursue as appropriate additional violations to submit sampling results from July 2021 to the present and any future violations.

D. PCB Testing and Reporting Failures

Further, **General Condition III(A)** requires Baltimore City to follow appropriate testing protocols to ensure the accuracy of the sampling results. In order to ensure the accuracy of PCB sampling results, **Special Condition II(B)(1) n.16** requires Baltimore City to collect "rinsate

blanks" to assess the adequacy of sampling equipment decontamination. As such, after sampling equipment is decontaminated, a "rinsate" or "equipment" blank is obtained. A rinsate blank is a sample of uncontaminated water that has been poured over or through the sampling equipment. The rinsate blank results indicate whether the sampling equipment itself is artificially introducing PCB contamination into the samples; for this Plant, rinsate blanks sample results may not exceed 600 pg/L.

Similarly, **Special Condition II(F)(4)** requires the submission by Baltimore City of the PCB criteria and the sampling results for "method blanks" to ensure the accuracy of PCB sampling results. While rinsate/equipment blanks assess the adequacy of equipment decontamination, "method blanks" assess the artificial introduction of PCB contamination during sample preparation activities.

And, **Special Condition II(F)(4)** requires Baltimore City to submit Plant sampling results for both (a) the total concentration of Polychlorinated Biphenyls ("Total PCBs"), and (b) the 12 extremely toxic individual, unique well-defined PCB chemical compounds ("PCB Congeners").

From June 2018 through December 2020, 10 of the 11 quarterly reports Baltimore City submitted to the Department for the Plant indicated that rinsate or method blank samples (a) were broken in transit, (b) not reported, or (c) exceeded the 600 pg/L concentration limit. In these same 11 reports, Baltimore City also failed to submit PCB sampling results, PCB method blank criteria and sampling results, or PCB Congeners results.

Errors or omission in a quarterly report is a violation for each day of that quarter; here, 990 days of violation. Attached hereto as Exhibit E is a table of these errors and omission which raise doubt regarding the validity and accuracy of Baltimore City's Back River WWTP PCB sampling results.

The Department intends to pursue Baltimore City's future and ongoing failures to comply with the NPDES Discharge Permit's PCB sampling, testing, and report requirements at the Back River WWTP as appropriate.

E. Failure to Conduct Confirmatory Whole Effluent Toxicity ("WET") Testing

Special Condition II(B)(1) requires Baltimore City to conduct quarterly acute and chronic Whole Effluent Toxicity ("WET") testing at the Plant. If two consecutive WET tests are acute or chronic, **Special Condition II(D)(10)** requires Baltimore City to conduct a third confirmatory WET test within 30 days. Consecutive WET test results for February 25, 2021 and May 25, 2021 showed chronic toxicity at the Plant.

Baltimore City did not conduct a third confirmatory WET test within 30 days, which is a violation of the NPDES Permit.

F. Failure to Maintain Sampling Equipment

General Condition III(A)(5) requires Baltimore City to "calibrate and maintain all monitoring and analytical instrumentation to ensure accuracy of measurements."

During a June 16, 2021 inspection, the Department observed a slight accumulation of solids on the automatic sampler container for Outfall 001 at the Plant. The accumulation of solids on this monitoring and analytical instrumentation is a violation of this NPDES Permit Condition.

G. Failure to Efficiently Operate the Plant & Conduct Necessary Maintenance

General Condition III(B)(3)(a) requires Baltimore City to operate the Plant efficiently to minimize upsets and discharges of excessive pollution. And, **General Condition III(B)(3)(c)** requires ongoing maintenance of equipment at the Plant necessary to avoid adverse effects on the quality of discharge water.

As a result of the June 16, 2021 inspection of the Plant, the Department was informed by Baltimore City that the main centrifuge began malfunctioning in January 2021, reducing the Plant's dewatering capacity. The onset of effluent limit exceedances in August of 2020 indicate that the centrifuge may have begun malfunctioning early than January 2021.

The Department also observed various broken and malfunctioning equipment throughout the Plant that affect discharge water quality. The malfunctioning and broken equipment appeared to have not been properly repaired, replaced, or maintained. Additionally, the Department learned that construction was conducted in the Activation Area, an area of the Plant that affects discharge water quality.

The lack of preventative maintenance, replacement, and repair of equipment at the Plant, which occurred concurrently with the onset of adversely affected discharge water quality and effluent limit exceedances, constitutes a violation of the NPDES Permit.

H. Failure to Provide Adequate Operating Staff

General Condition III(B)(3)(b) requires Baltimore City to adequately staff the Back River WWTP with sufficient qualified personnel.

The June 16, 2021 inspection revealed that only two of 76 certified operators at the Plant were permanently licensed; the remaining 74 had temporary licenses. This staffing of mostly temporary licensed operators is indicative of inadequate staffing that likely contributed to Plant-wide NPDES Permit violations, and is itself a violation of the NPDES Permit.

I. DMR-QA Study

General Condition III(B)(11) requires Baltimore City to "furnish to the Department, within a reasonable time, any information which the Department may request." The

Department's authority to administer this NPDES Permit is derived from the EPA's delegation of its authority under the Clean Water Act to the Department. EPA requires Baltimore City's participation in and submission of information for its Discharge Monitoring Report - Quality Assurance Study 41 ("DMR-QA Study") for the Back River WWTP. Deadlines for the DMR-QA Study include:

- April 23, 2021: DMR-QA Study 41 begins
- June 4, 2021: Submit address verification to DMR-QA Coordinator
- August 27, 2021: DMR-QA Study 41 ends
- October 22, 2021: Submit DMR-QA 41 Results to DMR-QA Coordinator
- December 17, 2021: Submit corrective action reports and retest results to DMR-QA Coordinator, if applicable

During the June 16, 2021 inspection Baltimore City informed the Department that it had not responded in a reasonable time to an EPA email regarding the DMR-QA Study. Baltimore City's failure to respond to EPA in a reasonable time with information EPA requested is a violation of the NPDES Permit.

J. Industrial Stormwater Discharge Permit Violations

General Condition III(B)(19) requires Baltimore City to "maintain coverage under [Maryland's] 'General Permit for Discharges from Storm[w]ater Associated with Industrial Activities.'" ("Md. Stormwater Permit").

As such, Baltimore City applied for, and the Department issued, Industrial Stormwater Discharge Permit coverage under State Discharge Permit Number 12SW0630, NPDES Number MD000630, which became effective May 1, 2018 and expires on January 14, 2022 for the Back River Wastewater Treatment Plant.

On June 16, 2021, the Department conducted an inspection of the Plant for Md. Stormwater Permit compliance. This inspection revealed that Baltimore City, *inter alia,* failed to

a. conduct quarterly routine facility inspections in violation of Part V(A)(1) of the Md. Stormwater Permit,
b. correct violations identified in its annual inspection report in violation of Parts IV(C-D) and V of the Md. Stormwater Permit,
c. perform the visual inspections in violation of Part V(A) of the Md. Stormwater Permit,
d. conduct at least one quarterly visual assessment during a snow melt in violation of Part V(A)(4) of the Md. Stormwater Permit,
e. update to its stormwater pollution prevention plan ("SWPPP") in violation of Part II(C)(3) of the Md. Stormwater Permit,
f. did not provided stormwater pollution prevention training for all employees in violation of Part III(B)(1)(b)(ix) of the Md. Stormwater Permit, and
g. maintain a SWPPP site map with required information in violation of Part III(C)(2)(c) of the Md. Stormwater Permit.

Baltimore City's failure to comply with the Md. Stormwater Permit is a violation of the NPDES Permit.

Conclusion

General Condition III(B)(4) requires Baltimore City to "take all reasonable steps to minimize any adverse impact to the waters of this State, human health[,] or the environment."

Baltimore City's unauthorized discharge of pollutants from the Plant and other NPDES Permit violations observed by the Department and detailed above are violative of this General Condition and constitute significant violations of State and federal water pollution laws, and have contaminated the surface waters of Back River and Bear Creek and caused an adverse impact on the environment.

The Department's subsequent inspection of the Back River WWTP on September 20, 2021 revealed that several of the above-described violations are ongoing in nature. The Department intends to pursue future ongoing NPDES Permit violations as appropriate.

Consequently, the State of Maryland Department of the Environment hereby gives notice of its intent to file suit within 60 days, if Baltimore City does not promptly redress the violations described herein.

Sincerely,

D. Lee Currey, Director
Water and Science Administration

Enclosures

cc: The Honorable Lawrence J. Hogan, Jr., Governor of Maryland
The Honorable Brian E. Frosh, Attorney General of Maryland
Alice Volpita, Baltimore Harbor Waterkeeper, Blue Water Baltimore

Exhibit A

	Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Monitoring Location Code	Limit Season ID	Parameter Code	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value	Percent Exceedance	Quarterly Violations	Monthly Violations	Weekly Violations	Daily Violations
1	5/31/17	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	223,215	124		1		
2	5/31/17	001	A	EG	1	00600	Nitrogen, total [as N]	TOTAL	lb/mo	99,782	223,215	124				
3	6/30/17	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	192,425	93		1		
4	6/30/17	001	A	EG	1	00600	Nitrogen, total [as N]	TOTAL	lb/mo	99,782	192,425	93				
5	7/31/17	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	194,026	94		1		
6	7/31/17	001	A	EG	1	00600	Nitrogen, total [as N]	TOTAL	lb/mo	99,782	194,026	94				
7	4/30/18	002	A	1	0	50060	Chlorine, total residual	MAXIMUM	mg/L	0.01	0.10	809				1
8	4/30/18	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	393	19			1	
9	5/31/18	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	112,513	13		1		
10	7/31/18	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	103,650	4		1		
11	9/30/18	001	A	1	0	51040	E. coli	MX MO GMN	MPN/100mL	126.00	146.00	16		1		
12	9/30/18	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	120,550	21		1		
13	3/31/19	002	A	1	0	51040	E. coli	MX MO GMN	MPN/100mL	126.00	242.00	92		1		
14	3/31/19	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	lb/d	220	240	9		1		
15	3/31/19	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	468	42			1	
16	4/30/19	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	335	2			1	
17	4/30/19	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	mg/L	0.30	0.40	33			1	
18	6/30/19	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX MO AV	lb/d	11,000	54,761	398		1		
19	6/30/19	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	lb/d	16,000	229,865	1,337			1	
20	6/30/19	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX MO AV	mg/L	10	56	460		1		
21	6/30/19	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	mg/L	15	233	1,453			1	
22	10/31/19	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	123,187	23		1		
23	12/31/19	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	mg/L	15	17	13			1	
24	12/31/19	002	A	1	0	50060	Chlorine, total residual	MAXIMUM	mg/L	0.01	1.50	13,536	*			
25	8/31/20	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	105,102	5		1		
26	9/30/20	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	108,392	9		1		
27	10/31/20	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	142,303	43		1		
28	12/31/20	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	lb/d	220	298	35		1		
29	12/31/20	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	712	116			1	
30	12/31/20	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	mg/L	0.30	0.40	33			1	
31	12/31/20	001	A	1	0	00530	Solids, total suspended	MX WK AV	lb/d	16,000	22,704	42			1	
32	1/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	lb/d	220	241	10		1		
33	1/31/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	lb/d	16,000	17,426	9			1	
34	1/31/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	15.00	16.00	7			1	
35	2/28/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX MO AV	lb/d	11,000	26,044	137		1		
36	2/28/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	lb/d	16,000	50,488	216			1	
37	2/28/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX MO AV	mg/L	10	20	100		1		
38	2/28/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	mg/L	15	35	133			1	
39	2/28/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	lb/d	220	773	251		1		
40	2/28/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	1,668	405			1	
41	2/28/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	mg/L	0.20	0.60	200		1		
42	2/28/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	mg/L	0.30	1.10	267			1	
43	2/28/21	002	A	1	0	00665	Phosphorus, total [as P]	MO AVG	mg/L	0.20	0.80	300		1		
44	2/28/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	lb/d	11,000	54,768	398		1		
45	2/28/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	lb/d	16,000	102,949	543			1	
46	2/28/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	mg/L	10.00	40.00	300		1		
47	2/28/21	002	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	45.00	52.00	16			1	
48	2/28/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	15.00	70.00	367			1	
49	3/31/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX MO AV	lb/d	11,000	25,757	134		1		
50	3/31/21	001	A	1		00310	BOD, 5-day, 20 deg. C	MX WK AV	lb/d	16,000	49,153	207			1	
51	3/31/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX MO AV	mg/L	10	21	110		1		
52	3/31/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	mg/L	15	36	140			1	
53	3/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	lb/d	220	940	327		1		
54	3/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	1,920	482			1	
55	3/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	mg/L	0.20	0.80	300		1		
56	3/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	mg/L	0.30	1.50	400			1	

	Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Monitoring Location Code	Limit Season ID	Parameter Code	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value	Percent Exceedance	Quarterly Violations	Monthly Violations	Weekly Violations	Daily Violations
57	3/31/21	002	A	1	0	00665	Phosphorus, total [as P]	MO AVG	mg/L	0.20	0.70	250		1		
58	3/31/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	lb/d	11,000	53,975	391		1		
59	3/31/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	lb/d	16,000	118,355	640			1	
60	3/31/21	002	A	1	0	00530	Solids, total suspended	MX MO AV	mg/L	30.00	36.00	20		1		
61	3/31/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	mg/L	10.00	43.00	330		1		
62	3/31/21	002	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	45.00	64.00	42			1	
63	3/31/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	15.00	89.00	493			1	
64	3/31/21	001	A	1	0	TT000	Toxicity, Chronic	MAXIMUM	tox chronic	1.02	1.20	18	1			
65	4/30/21	001	A	1		00310	BOD, 5-day, 20 deg. C	MX MO AV	lb/d	11,000	22,155	101		1		
66	4/30/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	lb/d	16,000	29,777	86			1	
67	4/30/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX MO AV	mg/L	10	22	120		1		
68	4/30/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	mg/L	15	28	87			1	
69	4/30/21	001	A	1	0	51040	E. coli	MX MO GMN	MPN/100mL	126.00	152.00	21		1		
70	4/30/21	002	A	1	0	51040	E. coli	MX MO GMN	MPN/100mL	126.00	341.00	171		1		
71	4/30/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	lb/d	220	964	338		1		
72	4/30/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	1,355	311			1	
73	4/30/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	mg/L	0.20	0.90	350		1		
74	4/30/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	mg/L	0.30	1.40	367			1	
75	4/30/21	002	A	1	0	00665	Phosphorus, total [as P]	MO AVG	mg/L	0.20	0.80	300		1		
76	4/30/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	lb/d	11,000	41,100	274		1		
77	4/30/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	lb/d	16,000	60,228	276			1	
78	4/30/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	mg/L	10.00	41.00	310		1		
79	4/30/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	15.00	64.00	327			1	
80	5/31/21	001	A	1	0	00610	Nitrogen, ammonia total [as N]	MX MO AV	lb/d	2,200	2,450	11		1		
81	5/31/21	001	A	1	0	00610	Nitrogen, ammonia total [as N]	MX WK AV	lb/d	3,300	3,658	11			1	
82	5/31/21	001	A	1	0	00610	Nitrogen, ammonia total [as N]	MX MO AV	mg/L	2	2.70	35		1		
83	5/31/21	002	A	1	0	00610	Nitrogen, ammonia total [as N]	MX MO AV	mg/L	2	3.20	60		1		
84	5/31/21	001	A	1	0	00610	Nitrogen, ammonia total [as N]	MX WK AV	mg/L	3	4.20	40			1	
85	5/31/21	002	A	1	0	00610	Nitrogen, ammonia total [as N]	MX WK AV	mg/L	3	4.40	47			1	
86	5/31/21	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	168,255	69		1		
87	5/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	423	28			1	
88	5/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	lb/d	220	504	129		1		
89	5/31/21	001	A	EG	1	00665	Phosphorus, total [as P]	MO TOTAL	lb/mo	6,652	14,709	121		1		
90	5/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	mg/L	0.20	0.50	150		1		
91	5/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	mg/L	0.30	0.50	67			1	
92	5/31/21	002	A	1	0	00665	Phosphorus, total [as P]	MO AVG	mg/L	0.20	0.60	200		1		
93	5/31/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	lb/d	11,000	15,867	44		1		
94	5/31/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	lb/d	16,000	18,600	16			1	
95	5/31/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	mg/L	10.00	17.00	70		1		
96	5/31/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	15.00	21.00	40			1	
97	6/30/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX MO AV	lb/d	11,000	13,267	21		1		
98	6/30/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	lb/d	16,000	35,654	123			1	
99	6/30/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX MO AV	mg/L	10	12	20		1		
100	6/30/21	001	A	1	0	00310	BOD, 5-day, 20 deg. C	MX WK AV	mg/L	15	25	67			1	
101	6/30/21	001	A	1	0	00610	Nitrogen, ammonia total [as N]	MX MO AV	lb/d	2,200	3,538	61		1		
102	6/30/21	001	A	1	0	00610	Nitrogen, ammonia total [as N]	MX WK AV	lb/d	3,300	4,329	31			1	
103	6/30/21	001	A	1	0	00610	Nitrogen, ammonia total [as N]	MX MO AV	mg/L	2	3.80	90		1		
104	6/30/21	002	A	1	0	00610	Nitrogen, ammonia total [as N]	MX MO AV	mg/L	2	4.30	115		1		
105	6/30/21	001	A	1	0	00610	Nitrogen, ammonia total [as N]	MX WK AV	mg/L	3	4.70	57			1	
106	6/30/21	002	A	1	0	00610	Nitrogen, ammonia total [as N]	MX WK AV	mg/L	3	5.10	70			1	
107	6/30/21	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	203,420	104		1		
108	6/30/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	lb/d	220	674	206		1		
109	6/30/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	1,963	495			1	
110	6/30/21	001	A	EG	1	00665	Phosphorus, total [as P]	MO TOTAL	lb/mo	6,652	15,368	131		1		
111	6/30/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	mg/L	0.20	0.60	200		1		
112	6/30/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	mg/L	0.30	1.30	333			1	

	Monitoring Period End Date	Perm Feature ID	Limit Set Designator	Monitoring Location Code	Limit Season ID	Parameter Code	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value	Percent Exceedance	Quarterly Violations	Monthly Violations	Weekly Violations	Daily Violations
113	6/30/21	002	A	1	0	00665	Phosphorus, total [as P]	MO AVG	mg/L	0.20	0.50	150		1		
114	6/30/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	lb/d	11,000	27,839	153		1		
115	6/30/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	lb/d	16,000	95,672	498			1	
116	6/30/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	mg/L	10.00	21.00	110		1		
117	6/30/21	002	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	45.00	51.00	13			1	
118	6/30/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	15.00	63.00	320			1	
119	7/31/21	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	129,076	29		1		
120	7/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	lb/d	220	298	35		1		
121	7/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	lb/d	330	491	49			1	
122	7/31/21	001	A	EG	1	00665	Phosphorus, total [as P]	MO TOTAL	lb/mo	6,652	9,165	38		1		
123	7/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	mg/L	0.20	0.40	100		1		
124	7/31/21	001	A	1	0	00665	Phosphorus, total [as P]	MX WK AV	mg/L	0.30	0.60	100			1	
125	7/31/21	002	A	1	0	00665	Phosphorus, total [as P]	MO AVG	mg/L	0.20	0.50	150		1		
126	7/31/21	001	A	1	0	00530	Solids, total suspended	MX MO AV	mg/L	10.00	11.00	10		1		
127	7/31/21	001	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	15.00	17.00	13			1	
128	7/31/21	002	A	1	0	00530	Solids, total suspended	MX WK AV	mg/L	45.00	49.00	9			1	
129	8/31/21	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	133,628	34		1		
130	9/30/21	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	147,437	48		1		
131	9/30/21	001	A	1	0	00665	Phosphorus, total [as P]	MX MO AV	mg/L	0.20	0.21	5		1		
132	9/30/21	002	A	1	0	00665	Phosphorus, total [as P]	MO AVG	mg/L	0.20	0.21	5		1		
133	10/31/21	002	A	1	0	51040	E. coli	MX MO GMN	MPN/100mL	126	138.00	10		1		
134	10/31/21	001	A	1	1	00600	Nitrogen, total [as N]	MO TOTAL	lb/mo	99,782	144,023	44		1		
135	10/31/21	002	A	1	0	00665	Phosphorus, total [as P]	MO AVG	mg/L	0.2	0.26	30		1		
												Total	1	76	53	1

Violations

Quarterly	Monthly	Weekly	Daily	**Total**
1	76	53	1	131

Days of Violations

Quarterly	Monthly	Weekly	Daily	**Total**
90	2,280	371	1	2,742

*no longer a limit at Outfall 002 per permit modification effective 5/1/18.

Exhibit B

2021 Annual Exceedances						
	Total Suspended Solids		**Total Nitrogen**		**Total Phosphorous**	
Month	Monthly Load (lbs/month)	Cumumlative Load (lbs/year)	Monthly Load (lbs/month)	Cumumlative Load (lbs/year)	Monthly Load (lbs/month)	Cumumlative Load (lbs/year)
January	300,653	300,653	140,305	140,305	6,681	6,681
February	1,345,676	1,646,329	205,216	345,520	20,185	26,866
March	1,556,626	3,202,954	271,505	617,025	28,960	55,827
April	1,251,637	4,454,592	244,222	861,247	27,475	83,302
May	467,236	4,921,828	164,907	1,026,153	13,742	97,044
June	586,772	5,508,599	198,385	1,224,538	16,765	113,809
July	282,064	5,790,663	128,211	1,352,749	10,257	124,066
August	212,160	6,002,823	131,953	1,484,702	5,175	129,240
September	245,206	6,248,029	141,675	1,626,377	5,449	134,689
October	135,020	6,383,050	143,122	1,769,498	5,401	140,090
November *	60,384	6,443,433	82,122	1,851,620	3,381	143,472
December †		6,443,433		1,851,620		143,472
Total Annual Load		6,443,433		1,851,620		143,472
Annual Load Limit		3,959,228		1,276,480 ‡		63,824 ‡
Annual Load Exceedance		2,484,205		575,140		79,648
Annual Exceedance Date		4/19/21		7/13/21		4/9/21
Annual Limit Violations		1		1		1
Annual Violation Days		257		172		267

* Monthly TSS concentration below detection limit (<5 mg/L). Assumes 2.5 mg/L (1/2 of DL) in the calculation.

† Monthly load amount not yet submitted.

‡ Concentration based annual load limit.

2021 Annual Limit Violations	3
2021 Annual Violation Days (incomplete)	696

Exhibit C

	Date	Parameter	Result	Permit Limitation
1	August, 2020	Total Nitrogen	105,102 lbs./Month	99,782 lbs./Month
2	August, 2020	Total Nitrogen	108,392 lbs./Month	99,782 lbs./Month
3	August, 2020	Total Nitrogen	143,203 lbs./Month	99,782 lbs./Month
4	September, 2020	Total Nitrogen	108,392 lbs./Month	99,782 lbs./Month
5	October, 2020	Total Nitrogen	142,303 lbs./Month	99,782 lbs./Month
6	December 15-21,	Total Suspended Solids	22,704 lbs./Week.	16,000 lbs. lbs./Week.
7	December 22-28,	Total Suspended Solids	18,278 lbs./Week.	16,000 lbs. lbs./Week.
8	December 15-21,	Total Phosphorous	0.42 mg/L	0.3 mg/L
9	December, 2020	Total Phosphorous	298 lbs./Month	220 lbs./Month
10	December 15-21,	Total Phosphorous	712 lbs./Week	330 lbs./Week
11	December 22-28,	Total Phosphorous	481 lbs./Week	330 lbs./Week
12	January 8-14, 2021	Total Suspended Solids	17,426 lbs./Week	16,000 lbs./Week
13	January 8-14, 2021	Total Suspended Solids	16 mg/L/Week	15 mg/L
14	January, 2021	Total Phosphorous	241 lbs./Month	220 lbs./Month
15	February, 2021	BOD5	26,044 lbs./Month	11,000 lbs./Month
16	February 8-14, 2021	BOD5	18,077 lbs./Weekly Av.	16,000 lbs./Week
17	February 15-21,	BOD5	25,746 lbs./Weekly Av.	16,000 lbs./Week
18	February 22-28,	BOD5	50,488 lbs./Week Av.	16,000 lbs./Week
19	February, 2021	BOD5	16.6 mg/L/Weekly Average	15 mg/L/Weekly Average concentration
20	February, 2021	BOD5	19.2 mg/L/Weekly Average	15 mg/L/Weekly Average
21	February, 2021	BOD5	35.3 mg/L/Weekly Average	15 mg/L/Weekly Average
22	February, 2021	BOD5	20 mg/L/Monthly Average Concentration	10 mg/L/Monthly Average Concentration
23	February 8-14, 2021	Total Phosphorous	0.48 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
24	February 15-21 2021	Total Phosphorous	0.41 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
25	February 22-28,	Total Phosphorous	1.1 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
26	February 1-7, 2021	Total Phosphorous	369 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
27	February 8-14, 2021	Total Phosphorous	524 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
28	February 15-21,	Total Phosphorous	530 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
29	February 22-28,	Total Phosphorous	1668 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
30	February, 2021	Total Phosphorous	0.6 mg/L/Monthly Average Concentration	0.2 mg/L/Monthly Average
31	February, 2021	Total Phosphorous	1.1 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
32	February, 2021	Total Suspended Solids	54,768.0 lbs./Monthly Average Loading	11,000 lbs./Monthly Average Loading
33	February 8-14, 2021	Total Suspended Solids	18,077 lbs./Week	16,000 lbs./Weekly Average
34	February 15-21,	Total Suspended Solids	25,746 lbs./Week	16,000 lbs./Weekly Average
35	February, 2021	Total Suspended Solids	40 mg/L/Max. Monthly Average	10 mg/L/Monthly Average
36	February 8- 14, 2021	Total Suspended Solids	28.9 mg/L Weekly Average Concentration	15 mg/L/Weekly Average
37	February 15-21,	Total Suspended Solids	47.3 mg/L/Weekly Average Concentration	15 mg/L/Weekly Average
38	February 22-28,	Total Suspended Solids	70.1 mg/L/Weekly Average Concentration	15 mg/L/Weekly Average

	Date	Parameter	Result	Permit Limitation
39	February 8- 14, 2021	Total Suspended Solids	31,571 lbs./Week	16,000 lbs./Week
40	February 15-21,	Total Suspended Solids	70,938 lbs./Week	16,000 lbs./Week
41	February 22-28,	Total Suspended Solids	102,949 lbs./Week	16,000 lbs./Week
42	February 22-28,	Total Suspended Solids Outfall 002	52 mg/L/Weekly Average	45 mg/L/Weekly Average
43	March 1-7, 2021	Total Suspended Solids	26.4 mg/L/Weekly Average	15 mg/L/Weekly Average
44	March 15- 21, 2021	Total Suspended Solids	32.6 mg/L/Weekly Average	15 mg/L/Weekly Average
45	March 22- 28, 2021	Total Suspended Solids	89.4 mg/L/Weekly Average	15 mg/L/Weekly Average
46	March 1-7, 2021	Total Suspended Solids	38,616 lbs./Week	16,000 lbs./Week
47	March 15-21, 2021	Total Suspended Solids	35,020 lbs./Week	16,000 lbs./Week
48	March 22-28, 2021	Total Suspended Solids	118,355 lbs./Week	16,000 lbs./Week
49	March, 2021	Total Suspended Solids	43 mg/L/Max. Monthly Average	10 mg/L/Monthly Average
50	March, 2021	Total Suspended Solids	53,075 lbs./Monthly Average Loading	11,000 lbs./Monthly Average Loading
51	March 22-28, 2021	BOD5	36.2 mg/L/Weekly Average	15 mg/L/Weekly Average
52	March, 2021	BOD5	21 mg/L/Monthly Average Concentration	10 mg/L Monthly Average Concentration
53	March, 2021	BOD5	22,757 lbs./Month	11,000 lbs./Month
54	March 1-7, 2021	BOD5	19,321 lbs./Weekly Av.	16,000 lbs./Week
55	March 8-14, 2021	BOD5	16,725 lbs./Weekly Av.	16,000 lbs./Week
56	March 22-28, 2021	BOD5	49,153 lbs./Weekly Av.	16,000 lbs./Week
57	March 1-7, 2021	Total Phosphorous	0.61 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
58	March 8-14, 2021	Total Phosphorous	0.52 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
59	March 22-28, 2021	Total Phosphorous	1.52 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
60	March 1-7, 2021	Total Phosphorous	870 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
61	March 8-14, 2021	Total Phosphorous	598 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
62	March 15-21, 2021	Total Phosphorous	368 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
63	March 22-28, 2021	Total Phosphorous	1,920 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
64	March 2021	Total Phosphorous	0.8 mg/L/Monthly Average Concentration	0.2 mg/L/Monthly Average
65	March 2021	Total Phosphorous	940 lbs./Month	220 lbs./Month
66	March 22-28, 2021	Total Suspended Solids Outfall 002	64 mg/L/Weekly Average	45 mg/L/Weekly Average
67	March, 2021	Total Suspended Solids Outfall 002	36 mg/L/Max. Monthly Average	30 mg/L/Monthly Average
68	March, 2021	Total Suspended Solids Outfall 002	*	
69	March, 2021	BOD5 Outfall 002	*	
70	April 1-7, 2021	Total Suspended Solids	43 mg/L/Weekly Average	15 mg/L/Weekly Average
71	April 8-14, 2021	Total Suspended Solids	36.6 mg/L/Weekly Average	15 mg/L/Weekly Average
72	April 15-21, 2021	Total Suspended Solids	27.6 mg/L/Weekly Average	15 mg/L/Weekly Average
73	April 22-28, 2021	Total Suspended Solids	64.4 mg/L/ Weekly Average	15 mg/L/Weekly Average
74	April 1-7, 2021	Total Suspended Solids	48,626 lbs./Week	16,000 lbs./Week
75	April 8-14, 2021	Total Suspended Solids	38,258 lbs./Week	16,000 lbs./Week
76	April 15-21, 2021	Total Suspended Solids	25,652 lbs./Week	16,000 lbs./Week

	Date	Parameter	Result	Permit Limitation
77	April 22-28, 2021	Total Suspended Solids	60,228 lbs./Week	16,000 lbs./Week
78	April, 2021	Total Suspended Solids	41 mg/L/Max. Monthly Average	10 mg/L /Monthly Average
79	April, 2021	Total Suspended Solids	41,100 lbs./Monthly Average Loading	11,000 lbs./Monthly Average Loading
80	April 1-7, 2021	BOD5	19.4 mg/L/Weekly Average	15 mg/L/Weekly Average
81	April 8-14, 2021	BOD5	28.3mg/L/Weekly Average	15 mg/L/Weekly Average
82	April 22-28, 2021	BOD5	27.5 mg/L/Weekly Average	15 mg/L/Weekly Average
83	April 1-7, 2021	BOD5	21,833 lbs./Weekly Av.	16,000 lbs./Week
84	April 8-14, 2021	BOD5	29,777 lbs./Weekly Av.	16,000 lbs./Week
85	April 22-28, 2021	BOD5	26,343 lbs./Weekly Av.	16,000 lbs./Week
86	April, 2021	BOD5	22 mg/L/Monthly Average Concentration	10 mg/L/Monthly Average Concentration
87	April, 2021	BOD5	22,155 lbs./Month	11,000 lbs./Month
88	April 1-7, 2021	Total Phosphorous	0.93 mg/L Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
89	April 8-14, 2021	Total Phosphorous	0.88 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
90	April 15-21, 2021	Total Phosphorous	0.57 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
91	April 22-28, 2021	Total Phosphorous	1.4 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
92	April 1-7, 2021	Total Phosphorous	1,065 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
93	April 8-14, 2021	Total Phosphorous	922 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
94	April 15-21, 2021	Total Phosphorous	548 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
95	April 22-28, 2021	Total Phosphorous	1,355 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
96	April, 2021	Total Phosphorous	0.9 mg/L/Monthly Average Concentration	0.2 mg/L/Monthly Average
97	April, 2021	Total Phosphorous	964 lbs./Month	220 lbs./Month
98	April, 2021	E. coli	157 MPN/100 ML monthly Geomean	126 MPN/100 ML monthly maximum Geomean
99	April 2021 Outfall	E. coli	341 MPN/100 ML monthly Geomean	126 MPN/100 ML monthly maximum Geomean
100	May 1-7, 2021	Total Suspended Solids	21.4 mg/L/Weekly Average	15 mg/L/Weekly Average
101	May 15-21, 2021	Total Suspended Solids	15.9 mg/L/Weekly Average Concentration	15 mg/L/Weekly Average
102	May 1-7, 2021	Total Suspended Solids	18,600 lbs./Week	16,000 lbs./Week
103	May, 2021	Total Suspended Solids	17 mg/L/Max. Monthly Average	10 mg/L/Monthly Average
104	May, 2021	Total Suspended Solids	15,867 lbs./Monthly Average Loading	11,000 lbs./Monthly Average Loading
105	May, 2021	Total Suspended Solids	5,251,859 lbs. cumulative total to date	3,959,228 lbs./year maximum annual cumulative total loading
106	May, 2021	Total Nitrogen	168,255 lbs. monthly total	99,782 lbs. Monthly total
107	May 1-7, 2021	Ammonia	3.34 mg/L/Weekly Average Concentration	3 mg/L/Weekly Average
108	May 22-28, 2021	Ammonia	4.2 mg/L/Weekly Average Concentration	3 mg/L/Weekly Average Concentration
109	May, 2021	Ammonia	2,450 lbs./Monthly Average Loading	2,200 lbs./month maximum weekly average loading
110	May, 2021	Ammonia	2.7 mg/L/Monthly Average Concentration	2 mg/L/Monthly Average Concentration
111	May 1-7, 2021	Total Phosphorous	423 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
112	May 8-14, 2021	Total Phosphorous	336 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
113	May 15-21, 2021	Total Phosphorous	421 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading
114	May 22-28, 2021	Total Phosphorous	351 lbs./Weekly Average Loading	330 lbs./Weekly Average Loading

	Date	Parameter	Result	Permit Limitation
115	May 1-7, 2021	Total Phosphorous	0.47 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
116	May 8-14, 2021	Total Phosphorous	0.39 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
117	May 15-21, 2021	Total Phosphorous	0.50 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
118	May 22-28, 2021	Total Phosphorous	0.40 mg/L/Weekly Average Concentration	0.3 mg/L/Weekly Average Concentration
119	May, 2021	Total Phosphorous	0.5 mg/L/Monthly Average Concentration	0.2 mg/L/Monthly Average
120	May, 2021	Total Phosphorous	504 lbs./Month	220 lbs./Month
121	May, 2021	Total Phosphorous	14,709 lbs. monthly total	6,652 lbs. Monthly total
122	May, 2021	Total Phosphorous	97,797 lbs. cumulative total to date	79,277 lbs./year maximum annual cumulative total loading
123	May 1-7, 2021	Ammonia Outfall 2	4.41 mg/L/Weekly Average Concentration	3 mg/L/Weekly Average
124	May 22-28, 2021	Ammonia Outfall 2	4.14 mg/L/Weekly Average Concentration	3 mg/L/Weekly Average Concentration
125	May, 2021	Ammonia Outfall 2	3.2 mg/L/Monthly Average Concentration	2 mg/L/Monthly Average Concentration

Violations	125

* Sample collected March 12, 2021; not analyzed by laboratory.

Exhibit D

Monitoring Period End Date	Perm Feature ID	Monitoring Location Code	Limit Season ID	Parameter Code	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value	NODI Code	Violation Code	Incomplete Monthly DMR	Incomplete Quarterly DMR
4/30/18	001	1	0	78247	Chromium, hexavalent tot recoverable	MO AVG	mg/L				D80	1	
6/30/18	001	1	0	79819	Polychlorinated biphenyls [PCB] pg/L	QRTR AVG	g/qtr				D80		1
9/30/18	001	1	0	79819	Polychlorinated biphenyls [PCB] pg/L	QRTR AVG	g/qtr				D80		1
12/31/18	002	1	0	78247	Chromium, hexavalent tot recoverable	MO AVG	ug/L				D80	1	
6/30/19	002	1	0	50060	Chlorine, total residual	MO	mg/L	.011			D90	1	
12/31/19	002	1	0	TS000	Toxicity, Acute	QTRTOTAL	tox acute				D80		1
3/31/21	001	1	0	79819	Polychlorinated biphenyls [PCB] pg/L	QRTR AVG	g/qtr			E	D80		1
6/30/21	002	1	0	TS000	Toxicity, Acute	QTRTOTAL	tox acute			E	D80		1
											Totals	3	5

Violations

Quarterly	Monthly	**Total**
3	5	8

Days of Violations

Quarterly	Monthly	**Total**
270	150	420

Exhibit E

	Sample Date	Outfall 001	Rinsate Blank	Outfall 002	Rinsate Blank	Method Blank
1	6/30/18	744	73.9	No Smpl.		NR
2	10/3/18	590	159	658	136	NR
3	12/12/18	799	174	770	113	114
4	2/28/19	397	107	448	118	NR
5	6/13/19	1,760	994†	1,010	174	NR
6	9/18/19	1,810	615†	1,500	1,190†	141
7	12/18/19	1,090	BIT	988	234	111
8	2/27/20	1,070	222	873	681†	NR
9	6/2/20	706	818†	555	319	73
10	9/2/20	1,310	147	1,480	174	NR
11	12/2/20	909	1,920†	753	1,190†	NR

Violations	**11**
Days of Violations	**990**

* All measurements in pg/L
† Exceeds 600 pg/L concentration limit
No Smpl.: No Sample Collected
NR: Not Reported
BIT: Sample Broken in Transit