



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 Patapsco Wastewater Treatment Plant**

Dear Mr. Scott, Mr. Shea, Ms. Lettman, Administrator Regan, Regional Administrator Ortiz, and Attorney General Garland:

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-0580, NPDES Number

MD0021601, which became effective October 1, 2017 and expires on September 30, 2022 (“Patapsco Discharge Permit” or the “NPDES Permit”) for the Patapsco Wastewater Treatment Plant (“Patapsco WWTP” or the “Plant”), located at 3501 Asiatic Avenue, Baltimore, Maryland. The Patapsco 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 Outfall 001A in the Patapsco 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 Patapsco 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 the Patapsco River, 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 Patapsco WWTP can discharge to the surface waters of Patapsco River.

From January 1, 2020 through November 30, 2021, the Patapsco WWTP violated the NPDES Permit’s weekly, monthly, seasonal, and annual Effluent Limitations, which include excess discharges of biochemical oxygen demand (“BOD”), enterococci, total nitrogen (“TN”), total phosphorus (“TP”), and total suspended solids (“TSS”).

Attached hereto as Exhibit A is a table of the Plant’s weekly and monthly effluent limit exceedances from January 1, 2020 through November 30, 2021 which total 23 violations and amount to 575 days in violation of the NPDES Permit. And, attached hereto as Exhibit B are tables of the Plant’s seasonal and annual effluent limit exceedances from January 1, 2020 through November 30, 2021 which total eight violations and presently amount to 1,411 days in violation of the NPDES Permit.

The 2021 seasonal and annual exceedances tables in Exhibit B are presently incomplete. TN and TP monthly effluent data have not yet been submitted by Baltimore City for May or December 2021.

The Department will recalculate the days in violation after Baltimore City submits additional effluent data for the Plant. **Special Conditions II(K) & II(A) n.6.**

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

B. Failure to Report Sampling Results

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

- 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 18 occasions, from June 2017 through August 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 540 days of violation. Attached hereto as Exhibit C is a table of the incomplete DMR sampling results that Baltimore City did not submit to the Department for the Patapsco WWTP.

The Department intends to pursue future failures to report sampling results as appropriate.

C. Sampling, Analysis, & Reporting Failures

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

- 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.

During an inspection and review of the Plant's operation from May 6 through June 4, 2021, the Department observed numerous violations associated with:

- a. sample collection/holding time,
- b. sample preservation/filtration,
- c. laboratory analysis,
- d. quality assurance sample collection,

- e. total residual chlorine analysis,
- f. 40 CFR Part 136 sample preservation, and
- g. the collection of rinsate and equipment blanks.

These broad operational deficiencies bring into question the accuracy of reported sampling data.

1. *PCB Testing and Reporting Failures*

Further, and more specifically, **Special Condition II(B)(1) n.16** requires Baltimore City to collect “rinsate blanks” to assess the adequacy of sampling equipment decontamination in order to ensure the accuracy of PCB sampling results. 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.

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”).

During an inspection and review of the Plant’s operation from May 6 through June 4, 2021, the Department learned that PCBs sampling data was being inaccurately reported. Between October 2020 and May 2021, Baltimore City reported rinsate blank test results in the place of sample test results. And, additional Total PCB samples collected in January 2021 were neither reported nor used to calculate loading. Baltimore City also failed to (a) report the PCB Congeners, and (b) provide the method blank criteria and results.

Separately, the Plant exceeded its PCB loading for 2020 of 27.2 grams by four and a half fold, 123.2, in violation of **Special Condition II(A)(1) n.4(b)**.

2. *Toxic Chemical Testing Failures*

Special Condition II(B)(1) n.16 requires Baltimore City to perform toxic chemical testing and monitoring. And, **Special Condition II(F)(4)** requires Baltimore City to perform this “in accordance with 40 CFR Part 136” and the Department’s Toxic Pollutant Monitoring Protocol and Reporting Requirements for Toxic Chemical Testing Analytical Data.

During an inspection and review of the Plant's operation from January 2020 through May 6, 2021, the Department learned that

- a. samples were not preserved as required by 40 CFR Part 136:
 - i. the pH of the compound Acrolein was adjusted to <2.0 SU instead of 4-5 SU, and
 - ii. the sample temperature at the time of receipt at the primary contact laboratory (ALS) of 8°C exceeded the 6°C temperature maximum;
- b. rinsate blank results and chain of custody documentation indicated significant reporting and operational irregularities;
- c. requisite chain of custody documents were incomplete; and
- d. the reporting limit used for Chromium VI was 10 ug/L, not the required 0.1 ug/L reporting limit.

D. Failure to Timely Submit Wastewater Capacity Management Plan

Special Conditions II(B)(2), II(B)(2) n.24, and II(C) of the Patapsco Discharge Permit requires Baltimore to submit to the Department an updated 2020 wastewater capacity management plan ("WCMP"). MDE's July 6, 2006 Guidance Document for Wastewater Capacity Management Plans, referred to in Special Condition II(C), directs municipalities to "[s]ubmit the Wastewater Capacity Management Plan ... to MDE for municipalities operating at 80% design capacity by January 31st based on the three year adjusted average flow." At 7.

Baltimore City submitted a 2017 WCMP on February 9, 2018. From 2018 through 2020, the Plant operated at or above 80% of its design capacity. Baltimore City's subsequent submittal of a 2020 WCMP on August 31, 2021, was seven months late, in violation of the NPDES Discharge Permit.

E. Systemic Fat, Oil, & Grease ("FOG") Mitigation Failures

1. *2010 NPDES Permit Violations*

The Plant's previous discharge permit, State Discharge Permit Number 10-DP-0580, NPDES Number MD0021601, effective October 1, 2010 and expired September 30, 2015 (the "2010 Patapsco NPDES Discharge Permit") prohibited the "discharge of floating solids or visible foam other than trace amounts." **Special Condition II(A)(1) n.1.**

Since at least May 20, 2013, the Department has documented the "unauthorized discharges of floating solids, identified as fats, oil, and grease" in violation of **Special Condition II(A)(1) n.1** of the 2010 NPDES Permit. In response to these persistent violations, the Department and Baltimore City entered into an administrative consent order, CO-16-2405, on June 7, 2016 (the "FOG Consent Order"), to cease these unauthorized discharges of FOG.

The FOG Consent Order required, *inter alia*, Baltimore City to “submit a plan and schedule for the repair of the skimmers at the Patapsco WWTP within 60 days.” At 5, § 5. On November 24, 2017, Baltimore City submitted a FOG Mitigation Plan. Shortly thereafter, Baltimore City submitted a FOG Mitigation Plan Revision (“Revised FOG Plan.”). The Revised FOG Plan required Baltimore City to, *inter alia*:

- upgrade the pump and scum removal systems for all primary settling tanks (“PSTs”),
- replace the flight plant brackets on PST nos. 2 through 6,
- install scum trough (skimmer) with actuated adjustment rods in PST nos. 1 through 3,

During the May 6, 2021 inspection of the Plant, the Department learned that Baltimore City did not complete any of this work. Further, this Plant inspection revealed that only five PSTs were in operation, not 18 as required by the Revised FOG Plan.

2. *2015 NPDES Discharge Permit Violations*

Special Condition II(A)(1) n.2 of the 2015 NPDES Discharge Permit prohibits the “discharge of floating solids or visible foam other than trace amounts.” And, **Special Condition II(M)(d)** requires Baltimore City to “report to the Department on an annual basis at the end of each calendar year all measures taken to comply with the [FOG Mitigation P]lan.”

On or about May 4, 2021, Blue Water Baltimore observed widespread FOGs in the water around the Plant’s discharge pipe in violation of **Special Condition II(A) n.1**. Baltimore City also failed to submit FOG mitigation plans to the Department in 2018, 2019, 2020, or 2021 in violation of **Special Condition II(M)** of the 2015 NPDES Discharge Permit.

F. Failure to Provide Adequate Operating Staff

General Condition III(B)(3)(b) requires Baltimore City to adequately staff the Patapsco WWTP with sufficient qualified personnel. On September 7, 2021, Baltimore City informed the Department that only five of its 45 certified operators or superintendents at the Plant were permanently licensed; the remaining 40 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.

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.

January 21, 2022

The May 6, 2021 Plant inspection revealed systemic operational and maintenance failures that affected discharge water quality, including, but not limited to, deficient FOG Mitigation Plan implementation. The lack of preventative maintenance, replacement, and repair of equipment at the Plant occurred concurrently with the onset of adversely effected discharge water quality and effluent limit exceedances, and constitutes 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 the Patapsco River and caused an adverse impact on the environment.

The Department’s subsequent inspection of the Patapsco 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	Violation Code	Parameter Code	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value	Percent Exceedance	Monthly Violations	Weekly Violations	
1	1/31/20	E90	61211	Enterococci	MO GEOMN	MPN/100mL	35	47	34	1	
2	7/31/20	E90	61211	Enterococci	MO GEOMN	MPN/100mL	35	56.4	61	1	
3	8/31/20	E90	00530	Solids, total suspended	MX WK AV	lb/d	27,000	30,500	13		1
4	8/31/20	E90	00530	Solids, total suspended	MX WK AV	mg/L	45	75	67		1
5	8/31/20	E90	61211	Enterococci	MO GEOMN	MPN/100mL	35	74	111	1	
6	7/31/21	E90	00610	Nitrogen, ammonia total [as N]	MX MO AV	lb/d	3,836	4,140	8	1	
7	7/31/21	E90	00610	Nitrogen, ammonia total [as N]	MX MO AV	mg/L	6.3	9.7	54	1	
8	7/31/21	E90	61211	Enterococci	MO GEOMN	MPN/100mL	35	108	209	1	
9	3/31/21	E90	61211	Enterococci	MO GEOMN	MPN/100mL	35	53	51	1	
10	4/30/21	E90	00310	BOD, 5-day, 20 deg. C	MX MO AV	lb/d	18,000	18,900	5	1	
11	4/30/21	E90	00310	BOD, 5-day, 20 deg. C	MX MO AV	mg/L	30	40	33	1	
12	4/30/21	E90	00310	BOD, 5-day, 20 deg. C	MX WK AV	mg/L	45	49	9		1
13	4/30/21	E90	00530	Solids, total suspended	MX MO AV	mg/L	30	32	7	1	
14	4/30/21	E90	61211	Enterococci	MO GEOMN	MPN/100mL	35	48	37	1	
15	5/31/21	E90	00310	BOD, 5-day, 20 deg. C	MX MO AV	mg/L	30	31	3	1	
16	5/31/21	E90	00530	Solids, total suspended	MX MO AV	mg/L	30	31	3	1	
17	5/31/21	E90	00610	Nitrogen, ammonia total [as N]	MX MO AV	mg/L	6.3	7.6	21	1	
18	5/31/21	E90	61211	Enterococci	MO GEOMN	MPN/100mL	35	119	240	1	
19	6/30/21	E90	00530	Solids, total suspended	MX WK AV	lb/d	27,000	31,700	17		1
20	6/30/21	E90	00530	Solids, total suspended	MX WK AV	mg/L	45	55	22		1
21	6/30/21	E90	00610	Nitrogen, ammonia total [as N]	MX MO AV	mg/L	6.3	7.5	19	1	
22	6/30/21	E90	61211	Enterococci	MO GEOMN	MPN/100mL	35	41	17	1	
23	7/31/21	E90	00530	Solids, total suspended	MX MO AV	mg/L	30	34	13	1	
Total									18	5	

Weekly & Monthly Violations

Monthly	Weekly	Total
18	5	23

Weekly & Monthly Violation Days

Monthly	Weekly	Total
540	35	575

Exhibit B

2020 Seasonal Effluent Limit Exceedances				
Month	Nitrogen		Phosphorous	
	Monthly Load (lbs/month)	Cumulative Load (lbs/year)	Monthly Load (lbs/month)	Cumulative Load (lbs/year)
May	86,476	86,476	8,506	8,506
June	78,208	164,684	8,830	17,336
July	60,502	225,186	8,643	25,979
August	161,450	386,636	24,839	50,817
September	51,986	438,622	5,885	56,703
October	44,333	482,956	2,891	59,594
Total Seasonal Load		482,956		59,594
Seasonal Load Limit		333,330		33,330
Seasonal Load Exceedance		149,626		26,264
Seasonal Exceedance Date		8/21/20		8/10/20
Seasonal Violations		1		1
Seasonal Violation Days		72		83
Total 2020 Seasonal Violation Days 155				

2021 Seasonal Effluent Limit Exceedances*				
Month	Nitrogen		Phosphorous	
	Monthly Load (lbs/month)	Cumulative Load (lbs/year)	Monthly Load (lbs/month)	Cumulative Load (lbs/year)
May	171,528	171,528	*	*
June	151,942	323,471	28,137	28,137
July	192,996	516,467	37,013	65,150
August	91,788	608,254	27,148	92,299
September	120,095	728,349	21,116	113,414
October	134,203	862,552	19,736	133,150
Total Seasonal Load		862,552		133,150
Seasonal Load Limit		333,330		33,330
Seasonal Load Exceedance		529,222		99,820
Seasonal Exceedance Date		7/2/21		7/5/21
Seasonal Violations		1		1
Seasonal Violations Days		122		119
Total 2021 Seasonal Violation Days 241 *				

2020 Annual Effluent Limit Exceedances				
Month	Nitrogen		Phosphorous	
	Monthly Load (lbs/month)	Cumulative Load (lbs/year)	Monthly Load (lbs/month)	Cumulative Load (lbs/year)
January	107,309	107,309	16,300	16,300
February	88,753	196,062	9,004	25,304
March	147,088	343,149	14,069	39,373
April	119,004	462,153	11,334	50,707
May	86,476	548,629	8,506	59,213
June	78,208	626,837	8,830	68,043
July	60,502	687,340	8,643	76,686
August	161,450	848,790	24,839	101,524
September	51,986	900,776	5,885	107,410
October	44,333	945,109	2,891	110,301
November	37,616	982,725	4,067	114,368
December	46,412	1,029,137	3,978	118,346
Total Annual Load		1,029,137		118,346
Annual Load Limit (Trib. Strategy)		889,300		66,700
Annual Load Limit (Conc.-Based)		543,380		40,754
Annual Load Exceedance		485,757		77,592
Annual Exceedance Date		5/30/20		4/4/21
Annual Violations		1		1
Annual Violation Days		216		272
Total 2020 Annual Violation Days 488				

2021 Annual Effluent Limit Exceedances*				
Month	Nitrogen		Phosphorous	
	Monthly Load (lbs/month)	Cumulative Load (lbs/year)	Monthly Load (lbs/month)	Cumulative Load (lbs/year)
January	52,575	52,575	2,103	2,103
February	214,334	266,909	5,468	7,571
March	275,902	542,811	9,705	17,276
April	242,272	785,083	22,937	40,213
May	171,528	956,611	*	40,213
June	151,942	1,108,554	28,137	68,350
July	192,996	1,301,550	37,013	105,363
August	91,788	1,393,337	27,148	132,512
September	120,095	1,513,432	21,116	153,627
October	134,203	1,647,635	19,736	173,363
November	202,848	1,850,483	20,774	194,137
December	*	1,850,483	*	194,137
Total Annual Load		1,850,483		194,137
Annual Load Limit (Trib. Strategy)		889,300		66,700
Annual Load Limit (Conc.-Based)		509,165		38,187
Annual Load Exceedance		1,341,318	*	155,950
Annual Exceedance Date		3/28/21	*	4/28/21
Annual Violations		1		1
Annual Violation Days		279	*	248
Total 2021 Annual Violation Days 527 *				

2020-2021 Seasonal Violations	4
2020-2021 Annual Violations	4
Total	8
20-2021 Seasonal Violation Days	396
2020-2021 Annual Violation Days	1,015 *
Total	1,411 *

* Incomplete. Load data not yet submitted.

Exhibit C

Monitoring Period End Date	Perm Feature ID	Monitoring Location Code	Limit Season ID	Parameter Desc	Statistical Base Short Desc	Limit Unit Short Desc	Limit Value	DMR Value	NODI Code	Violation Code	Incomplete DMR
6/30/17	001	1	0	Cyanide, free [amen. to chlorination]	MO AVG & LOAD	ppb & lb/d			M	D80	1
2/28/19	001	1	0	Oxygen, dissolved [DO]	INST MIN	mg/L	5			D90	1
3/31/19	001	1	0	Oxygen, dissolved [DO]	INST MIN	mg/L	5			D90	1
4/30/19	001	1	0	Oxygen, dissolved [DO]	INST MIN	mg/L	5			D90	1
6/30/19	001	1	0	Oxygen, dissolved [DO]	INST MIN	mg/L	5		E	D90	1
7/31/19	001	1	0	BOD, 5-day, 20 deg. C	MX MO AV	lb/d	18,000		M	D90	1
9/30/19	001	1	0	Solids, total suspended	MX MO AV	lb/d	18,000		M	D90	1
10/31/19	001	1	0	Phosphate, ortho [as P]	MO AVG	lb/d & mg/L			M	D80	1
11/30/19	001	1	0	Phosphate, ortho [as P]	MO AVG	lb/d			M	D80	1
9/30/20	001	1	0	Cyanide, free [amen. to chlorination]	MO AVG	ppb			M	D80	1
11/30/20	001	1	0	BOD, 5-day, 20 deg. C	MX MO AV	lb/d	18,000		M	D90	1
12/31/20	001	1	0	Solids, total suspended	MX MO AV	lb/d	18,000		M	D90	1
1/31/21	001	1	0	Solids, total suspended	MX MO AV	lb/d	18,000		M	D90	1
2/28/21	001	1	0	Cyanide, free [amen. to chlorination]	MO AVG	ppb			M	D80	1
3/31/21	001	1	0	BOD, 5-day, 20 deg. C	MX MO AV	lb/d	18,000		M	D90	1
4/30/21	001	1	0	Cyanide, free [amen. to chlorination]	MO AVG	ppb			M	D80	1
5/31/21	001	1	0	Phosphorus, total [as P]	MX MO AV	lb/d	1,220		M	D90	1
8/31/21	001	1	0	Solids, total suspended	MX MO AV & MX WK AV	lb/d & mg/L	various		M	D90	1

Violations	18 *
Days of Violations	540

* Data was not provided for one or more parameter during the monitoring period.