

The United States of America, by authority of the Attorney General of the United States and through the undersigned attorneys, acting at the request of the Administrator of the United States Environmental Protection Agency ("EPA"), and the State of Alaska, by the authority of the Attorney General of Alaska and through the undersigned attorney, and on behalf of the Alaska Department of Environmental Conservation ("ADEC"), file this Complaint and allege as follows:

NATURE OF ACTION

1. This is a civil action instituted against the City of Palmer, Alaska (the "City") for civil penalties and injunctive relief pursuant to Section 309(b) and (d) of the Federal Water Pollution Control Act of 1972, as amended (the "Clean Water Act" or the "CWA"), 33 U.S.C. § 1319(b)&(d), and the Alaska Pollutant Discharge Elimination System ("APDES") Program, Title 18, Chapter 83 of the Alaska Administrative Code ("AAC"), for the City's illegal discharges of pollutants in violation of Section 301(a) of the CWA, 33 U.S.C. § 1311(a), and Alaska Statutes ("AS") Titles 44 and 46 and 18 AAC 83. The claims against the City arise from violations of permit effluent limitations and conditions set forth in a National Pollutant Discharge Elimination System ("NPDES") permit issued to the City by EPA under Section 402 of the Clean Water Act, 33 U.S.C. § 1342, which continues in effect under the APDES Program and is subject to applicable Alaska statutes and regulations.

PARTIES

2. Plaintiff the United States is authorized to bring this action on behalf of EPA by Section 506 of the Clean Water Act, 33 U.S.C. § 1366, and by 28 U.S.C. §§ 516 and 519.

3. Plaintiff State of Alaska is authorized to bring this action on behalf of ADEC under AS 44.23.020.

4. The City is a municipality organized under the laws of the State of Alaska and thus is a "person" within the meaning of Section 502(5) of the Clean Water Act, 33 U.S.C. § 1362(5)

and 18 AAC 83.990(47), and a "municipality" within the meaning of Section 502(4) of the CWA, 33 U.S.C. § 1362(4) and 18 AAC 83.990(40).

5. Defendant City of Palmer is located in the Matanuska-Susitna Borough, approximately 45 miles northeast of Anchorage, Alaska.

JURISDICTION AND VENUE

6. This Court has original jurisdiction over this action pursuant to 28 U.S.C. §§ 1331 and 1345 because this is a civil action commenced by the United States that arises under the laws of the United States and pursuant to 28 U.S.C. § 1355, and because this is an action in part for the recovery of a penalty incurred under an act of Congress.

7. Venue is proper in this district pursuant to 28 U.S.C. § 1391(b) and Section 309(b) of the Clean Water Act, 33 U.S.C. § 1319(b), because the events or omissions giving rise to the claims herein occurred in this district. Venue is also proper in this district pursuant to 28 U.S.C. § 1395(a).

8. Notice of the commencement of this action has been given to the State of Alaska pursuant to Section 309(b) of the Clean Water Act, 33 U.S.C. § 1319(b), and the State of Alaska has joined this action as a co-plaintiff.

FEDERAL STATUTORY BACKGROUND

9. Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a), prohibits the "discharge of any pollutant by any person" except in compliance with various requirements including an NPDES permit issued pursuant to Section 402 of the Clean Water Act, 33 U.S.C. § 1342.

10. Section 502(12) of the Clean Water Act, 33 U.S.C. § 1362(12), defines "discharge of a pollutant" to include "any addition of any pollutant to navigable waters from any point source."

11. Section 502(6) of the Clean Water Act, 33 U.S.C. § 1362(6), defines "pollutant" to include, *inter alia*, sewage, chemical wastes, and industrial waste.

12. Section 502(7) of the Clean Water Act, 33 U.S.C. § 1362(7), defines "navigable waters" to mean "the waters of the United States, including the territorial seas."

13. Section 502(14) of the Clean Water Act, 33 U.S.C. § 1362(14), defines the term "point source" to include "any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch ... [or] conduit ... from which pollutants are or may be discharged."

14. Section 502(5) of the Clean Water Act, 33 U.S.C. § 1362(5), defines "person" to include a municipality of a State, and, in turn, "municipality" is defined to include a city. *See also* 33 U.S.C. § 1362(4).

15. Section 402(a) of the CWA, 33 U.S.C. § 1342(a), establishes the NPDES permit system, and authorizes EPA to issue permits that authorize the discharge of pollutants under specified circumstances.

16. NPDES Permits impose various conditions and limitations on discharges of pollutants including effluent limits, sampling and reporting requirements.

17. With respect to the effluent limitations in an NPDES permit, each violation of each limit in the permit constitutes one violation of the Clean Water Act. When a permittee exceeds a monthly average effluent limit, the permittee is deemed to be in violation of the NPDES Permit's effluent limit for each of the days of the month in which the violation occurred (e.g. 28, 29, 30, or 31 violations depending on the number of days in the month). When a permittee exceeds a weekly average effluent limit, such exceedances are counted as a violation for each day of the week (7 violations). When a permittee exceeds a daily maximum effluent limit, the exceedance is counted as one violation. Each exceedance of a separate type of effluent limit for a specific pollutant (*e.g.*

daily and monthly concentration limits, daily and monthly mass-based limits, or percent removal requirements) constitutes a separate violation.

18. Section 309(d) of the CWA, 33 U.S.C. § 1319(d), subjects any person who violates, *inter alia*, Section 301 of the CWA, or "any permit condition or limitation" implementing Section 301 of the CWA in a permit issued under Section 402 of the CWA, to civil penalties. Pursuant to Section 309(d) of the CWA, 33 U.S.C. § 1319(d), as modified by the Debt Collection Improvement Act of 1996, 28 U.S.C.A. § 2461 note, and 40 C.F.R. § 19, civil penalties may be assessed in an amount not to exceed \$37,500 per day for each violation occurring after January 12, 2009.

19. Section 309(b) of the CWA, 33 U.S.C. § 1319(b), authorizes EPA to commence a civil action for appropriate relief, including a permanent or temporary injunction, for any violation for which it has the authority to issue a compliance order under Section 309(a). Section 309(a)(3) authorizes EPA to issue compliance orders whenever it finds that any person has violated Section 301 of the CWA, or any condition or limitation implementing such Section in a permit issued pursuant to Section 402 of the CWA. 33 U.S.C. § 1342 (a)(3).

ALASKA STATUTES AND REGULATIONS

20. AS 46.03.022 authorizes ADEC to take all action necessary to receive authorization from EPA to administer and enforce a NPDES program in accordance with Section 402 of the CWA, 33 U.S.C. § 1342.

21. On October 31, 2008, EPA approved the State of Alaska's application to administer and enforce an Alaska version of the NPDES program under Section 402 of the Clean Water Act.

22. 18 AAC 83 establishes the APDES permit system and authorizes ADEC to implement the program in a manner which meets the purposes of AS 46.03 and, in accordance with Section 402 of the CWA, 33 U.S.C. § 1342, and the requirements adopted by reference in 18

AAC 83.010.

23. Since October 31, 2008, the State of Alaska has been authorized by EPA to administer NPDES permits under the APDES Program for various facilities including those that discharge municipal wastewater.

24. 18 AAC 83.015 prohibits the discharge of pollutants by any person from any point sources into waters of the United States or the State without first obtaining an APDES permit from ADEC, unless the discharge is authorized by an APDES or NPDES permit that continues in effect under 18 AAC 83.155.

25. Under 18 AAC 83.155(c)-(d), the conditions of an expired NPDES permit or state-issued APDES permit remain fully effective and enforceable until the effective date of a new permit if:

a. The permittee has submitted a timely application for a new permit under 18 AAC 83.110, and the Department determines the application is complete under 18 AAC 83.110(d); and

b. ADEC, because of time, resource, or other constraints, but through no fault of the permittee, does not issue a new permit with an effective date on or before the expiration date of the previous permit.

26. Under 18 AAC 83.155(f), a federally-issued NPDES permit in effect at the time EPA gives its approval under the CWA of the state's administration of the APDES program serves as the APDES permit required under 18 AAC 83.015, and continues in effect, subject to 18 AAC 83.155(c)-(d) until its expiration date.

27. 18 AAC 83.990(47) defines "person" to include a municipality of the State, and, in turn, "municipality" is defined under 18 AAC 83.990(40) to include a city.

28. 18 AAC 83.990(23) defines "discharge of a pollutant or combination of pollutants" to "waters of the United States from any point source."

29. 18 AAC 83.990(49) defines "pollutant" to include, *inter alia*, sewage, chemical wastes, and industrial waste.

30. 18 AAC 83.990(48) defines the term "point source" to include "any discernible, confined and discrete conveyance, including but not limited to any pipe, ditch ... [or] conduit ... from which pollutants are or may be discharged."

31. Under 18 AAC 83.405(b), a permittee shall comply with all conditions of the permittee's APDES permit. Any permit noncompliance constitutes a violation of the Clean Water Act and APDES regulations.

32. An NPDES Permit which continues in effect as a state-administered APDES permit under 18 AAC 83.155 imposes various conditions and limitations on discharges of pollutants, including effluent limits and reporting requirements.

33. With respect to the effluent limitations in an expired NPDES permit which continues in effect as a state-administered APDES permit under 18 AAC 83.155, each violation of each limit in the permit constitutes one violation of APDES regulations. When a permittee exceeds a monthly average effluent limit, the permittee is deemed to be in violation of the permit's effluent limit for each of the days of the month in which the violation occurred (e.g. 28, 29, 30, or 31 violations, depending on the number of days in the month). When a permittee exceeds a weekly average effluent limit, such exceedances are counted as a violation for each day of the week (7 violations). When a permittee exceeds a daily maximum effluent limit, the exceedance is counted as one violation. Each exceedance of a separate type of effluent limit for a specific pollutant (e.g. daily and monthly concentration limits, daily and monthly mass-based limits, or percent removal requirements) constitutes a separate violation.

34. AS 46.03.760(e) provides that any person who violates an APDES regulation, or "any term or condition" in a permit authorized under the APDES program, is liable in a civil action to the state for a sum to be assessed by the court of not less than \$500, nor more than \$100,000 for the initial violation, nor more than \$10,000 for each day after that on which the violation continues.

FACTUAL ALLEGATIONS UNDERLYING CLAIMS FOR RELIEF

35. The City is the owner and operator of a publicly owned treatment works (the "Facility") which consists of wastewater collection, transmission, and treatment systems located in Palmer, Alaska.

36. In addition to the City's population, the Facility serves adjacent areas of the Matanuska-Susitna Borough, with the total service area covering approximately 31.1 square miles.

37. The Facility's total estimated service population in 2007 was 11,836 people, including the City of Palmer.

38. The Facility consists of a lagoon system that provides secondary treatment and ultraviolet disinfection of sewage.

39. The Facility is a "treatment works" as defined by Section 212(2)(A) and (B) of the CWA, 33 U.S.C. § 1292(2)(A) and (B), and a "publicly owned treatment works" as defined by the federal regulations implementing the CWA at 40 C.F.R. §122.2 (cross-referencing the definition at 40 C.F.R. § 403.3(q)) and 18 AAC 83.990(56).

40. The City discharges wastewater from the Facility year-round into the Matanuska River, which flows into the Knik Arm of Cook Inlet. Facility wastewater is discharged from Outfall 001, located at latitude: 61° 33' 30" N, longitude: 149° 06' 20" W. The Facility's outfall enters the Matanuska River approximately 5 miles northeast of tidewater at the head of Knik Arm.

41. The Matanuska River basin is used as rearing, feeding, and migrating habitat by all five species of pacific salmon, and by other marine life and water fowl. The Upper Knik Arm of the Cook Inlet contains important coastal wetlands and estuarine habitats for pacific salmon.

42. The Facility's Outfall 001 is a "point source" within the meaning of Section 502(14) of the CWA, 33 U.S.C. § 1362(14) and 18 AAC 83.990(48).

43. At all relevant times, the City has "discharged pollutants" including sewage from its Facility within the meaning of Sections 502(6) and (12) of the CWA, 33 U.S.C. §§ 1362(6) and (12), and 18 AAC 83.990(23), into the Matanuska River.

44. Pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, on December 5, 2006, EPA issued the City an NPDES permit ("the Permit") for the Facility, Permit Number AK002249-7, which expired on December 31, 2011. The City timely applied for a new permit thereby administratively extending the permit in accordance with federal regulations, 40 C.F.R. § 122.6 and state APDES regulations, 18 AAC 83.155(c).

45. Parts I and III.B. of the Permit require the City to monitor its effluent and summarize monitoring results for the Facility each month in a Discharge Monitoring Report ("DMR"). The City submits its DMRs and other reports, including Sewer Lagoon Reports to EPA and/or ADEC each month.

46. Part I.B. of the Permit establishes effluent limits for discharges from Outfall 001. These effluent limits include, but are not limited to, ammonia, fecal coliform, flow, biochemical oxygen demand ("BOD"), total suspended solids ("TSS"), and total residual chlorine. The Permit contains several types of limits for specific pollutants (parameters), which include daily and monthly average concentration limits, daily and monthly mass-based limits (quantity), and/or percentage removal requirements.

47. Part I.B. Table 1 of the Permit imposes the following effluent limits:

- a. Ammonia Monthly Average Concentration: 8.7 mg/L in all months except July and August, and 1.7 mg/L in July and August (salmon spawning season).
- b. Ammonia Daily Maximum Concentration: 18.5/mg/L in all months except July and August, and 3.6 mg/L in July and August (salmon spawning season).
- c. Ammonia Monthly Average Quantity (mass): 68.9 lbs/day in all months except July and August, and of 13.5 lbs/day in July and August.
- d. Ammonia Daily Maximum Quantity (mass): 146.6 lbs/day in all months except July and August, and 28.5 lbs/day in July and August.
- e. Biological Oxygen Demand (“BOD”) Weekly Average: 45 mg/L
- f. Biological Oxygen Demand Monthly Average: 30 mg/L
- g. Biological Oxygen Demand Monthly Average Minimum Percent Removal: 85%.
- h. Fecal Coliform Daily Maximum: 200/100ml in all months except July and August and 40/100ml in July and August.
- i. Fecal Coliform Monthly Geographic Mean: 100/100ml in all months except July and August and 20/100ml in July and August.
- j. Total Suspended Solids (“TSS”) Monthly Average: 30 mg/L.
- k. Flow Daily Maximum: .95 mgd.

48. Part I.B. Table 1 of the Permit also requires the City to sample its effluent’s pH and temperature five times weekly.

49. As set forth in the Table A attached hereto, the City’s DMRs and Sewer Lagoon Reports indicate that the Facility had at least 2326 violations of these effluent limits and sampling requirements from June of 2010 to February of 2015. Each of these 2326 violations by the City constitutes a violation of Section 301 of the CWA, 33 U.S.C. 1311 *et seq.*

50. In addition, the City committed hundreds of similar violations prior to June of 2010.

51. Part II.A.1 of the Permit requires the City to review its operation and maintenance plan by March 30, 2007 to ensure that it includes appropriate best management practices and

review it annually thereafter. Part II.B requires the City to develop a Quality Assurance Plan for all monitoring required by the Permit by March 30, 2007.

52. The City failed to review and update its operations and maintenance plan as required by Part II.A.1 of the Permit and also failed to develop a quality assurance plan as required by Part II.B of its Permit.

53. Upon reasonable opportunity for further investigation and discovery, evidence will show that the City has continued to violate the Permit since February of 2015.

CLAIMS FOR RELIEF

FIRST CLAIM FOR RELIEF

Claim for Penalties under Section 309(d) of the Clean Water Act

54. Paragraphs 1 through 53 are re-alleged and incorporated herein by reference.

55. As set forth herein and in Table A attached hereto, from 2007 through February 2015, the City discharged pollutants from the Facility and failed to sample for temperature and pH in violation of the Permit and the CWA.

56. As set forth in the Table A attached hereto, the City's DMRs and Sewer Lagoon Reports indicate that the Facility had at least 2326 violations of the Permit's effluent limits and sampling requirements from June of 2010 to February of 2015

57. From 2007 to the present, the City failed to review and update its operations and maintenance plan as required by Part II.A.1 of the Permit and failed to develop a quality assurance plan as required by Part II.B of the Permit.

58. Upon reasonable opportunity for further investigation and discovery, evidence will show that the City has continued to violate the Permit and CWA since February of 2015.

59. Pursuant to Section 309(d) of the Clean Water Act, 33 U.S.C. § 1319(d), as modified by the Debt Collection Improvement Act of 1996, 28 U.S.C. § 2461, and 40 C.F.R. Part 19, the City is liable for a civil penalty not to exceed \$37,500 per day for each violation that occurred after January 12, 2009.

SECOND CLAIM FOR RELIEF

Claim for Injunctive Relief under Section 309(b) of the Clean Water Act

60. Paragraphs 1 through 53 are re-alleged and incorporated herein by reference.

61. As set forth herein and in Table A attached hereto, from 2007 through February 2015, the City discharged pollutants from the Facility and failed to sample for temperature and pH in violation of the Permit and the CWA.

62. As set forth in the Table A attached hereto, the City's DMRs and Sewer Lagoon Reports indicate that the Facility had at least 2326 violations of the Permit's effluent limits and sampling requirements from June of 2010 to February of 2015.

63. From 2007 to the present, the City failed to review and update its operations and maintenance plan as required by Part II.A.1 of the Permit and failed to develop a quality assurance plan as required by Part II.B of the Permit.

64. Upon reasonable opportunity for further investigation and discovery, evidence will show that the City has continued to violate the Permit and CWA since February of 2015.

65. Unless enjoined by the Court, the City will continue to violate Section 301 of the CWA, 33 U.S.C. 1311.

66. Pursuant to Section 309(b) of the Clean Water Act, 33 U.S.C. § 1319(b), the United States is entitled to injunctive relief against the City restraining further violations of, and requiring compliance with, the CWA.

THIRD CLAIM FOR RELIEF

Claim for Penalties under AS 46.03.760(e)

67. Paragraphs 1 through 53 are re-alleged and incorporated herein by reference.

68. As set forth herein and in Table A attached hereto, from 2007 through February 2015, the City discharged pollutants from the Facility and failed to sample for temperature and pH in violation of the Permit.

69. As set forth in the Table A attached hereto, the City's DMRs and Sewer Lagoon Reports indicate that the Facility had at least 2326 violations of the Permit's effluent limits and sampling requirements from June of 2010 to February of 2015

70. From 2007 to the present, the City failed to review and update its operations and maintenance plan as required by Part II.A.1 of the Permit and failed to develop a quality assurance plan as required by Part II.B of the Permit.

71. Upon reasonable opportunity for further investigation and discovery, evidence will show that the City has continued to violate the Permit since February of 2015.

72. Pursuant to AS 46.03.760(e), the City is liable for a civil penalty to the State of Alaska for each violation any APDES regulation or any term or condition of the Permit of not less than \$500 nor more than \$100,000 for the initial violation, nor more than \$10,000 for each day after that on which the violation continues.

FOURTH CLAIM FOR RELIEF

Claim for Injunctive Relief under AS 46.03.765

73. Paragraphs 1 through 53 are re-alleged and incorporated herein by reference.

74. As set forth herein and in Table A attached hereto, from 2007 through February 2015, the City discharged pollutants from the Facility and failed to sample for temperature and pH in violation of the Permit and 18 AAC 83.405(b).

75. As set forth in the Table A attached hereto, the City's DMRs and Sewer Lagoon Reports indicate that the Facility had at least 2326 violations of the Permit's effluent limits and sampling requirements from June of 2010 to February of 2015.

76. From 2007 to the present, the City failed to review and update its operations and maintenance plan as required by Part II.A.1 of the Permit and failed to develop a quality assurance plan as required by Part II.B of the Permit.

77. Upon reasonable opportunity for further investigation and discovery, evidence will show that the City has continued to violate the Permit and CWA since February of 2015.

78. Unless enjoined by the Court, the City will continue to violate 18 AAC 83.405(b).

79. Pursuant to AS 46.03.765, the State of Alaska is entitled to injunctive relief against the City restraining further violations of, and requiring compliance with, 18 AAC 83 and the Permit.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs United States of America and the State of Alaska pray that this Court:

A. Order Defendant to pay a civil penalty to the United States of up to \$37,500 per day for each violation that occurred on or after January 12, 2009;

B. Order Defendant to pay a civil penalty to the State of Alaska of not less than \$500 nor more than \$100,000 for the initial violation, nor more than \$10,000 for each day after that on which the violation continues;

C. Issue a Preliminary Injunction enjoining the Defendant from any and all ongoing and future violations of the CWA and APDES regulations, and Order the Defendant to undertake expeditiously all measures necessary to comply with the Clean Water Act, its NPDES permit, and APDES regulations, including any necessary structural and operational changes to the Facility;
and

D. Grant such other relief as may be just and proper and as the public interest and the equities of the case may require.

Respectfully Submitted,

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Table A: City of Palmer Violations June 2010 – February 2015

Effluent Parameter	Permit Limit	Number of Violations	Dates of Violations
Ammonia Monthly Average Concentration (one violation for each day of the month)	8.7 mg/L 1.7 mg/L (July and August)	727	2/2015, 1/2015, 7/2014, 6/2014, 5/2014, 4/2014, 3/2014, 2/28/2014, 1/2014, 6/2013, 5/2013, 4/2013, 3/2013, 2/2013, 1/2013, 8/2012, 7/2012, 6/2012, 5/2012, 4/2012, 3/2012, 2/2012, 1/2012, 12/2011
Ammonia Daily Maximum Concentration (one violation per day)	18.5 mg/L 3.6 mg/L (July and August)	88	2/27/2015, 2/19/2015, 2/11/2015, 2/4/2015, 1/28/2015, 7/23/2014, 7/16/2014, 7/9/2014, 7/3/2014, 6/25/2014, 6/17/2014, 6/13/2014, 6/4/2014, 5/28/2014, 5/21/2014, 5/15/2014, 5/7/2014, 4/30/2014, 4/23/2014, 4/16/2014, 4/8/2014, 4/4/2014, 3/26/2014, 3/19/2014, 3/12/2014, 3/5/2014, 2/26/2014, 2/19/2014, 2/12/2014, 2/5/2014, 1/29/2014, 1/22/2014, 6/5/2013, 5/29/2013, 5/22/2013, 5/16/2013, 5/8/2013, 5/1/2013, 4/24/2013, 4/17/2013, 4/10/2013, 4/3/2013, 3/27/2013, 3/20/2013, 3/13/2013, 3/6/2013, 2/27/2013, 2/20/2013, 2/12/2013, 2/6/2013, 1/29/2013, 1/23/2013, 1/16/2013, 1/9/2013, 8/14/2012, 8/10/2012, 8/1/2012, 7/25/2012, 7/18/2012, 7/12/2012, 7/3/2012, 6/27/2012, 6/20/2012, 6/13/2012, 6/6/2012, 5/30/2012, 5/23/2012, 5/16/2012, 5/9/2012, 5/2/2012, 4/25/2012, 4/18/2012, 4/11/2012, 4/4/2012, 3/28/2012, 3/21/12, 3/14/2012, 3/7/2012, 2/22/2012, 2/15/2012, 2/8/2012, 2/1/2012, 1/25/2012, 1/18/2012, 1/10/2012, 1/4/2012, 12/29/2011, 12/22/11
Ammonia Monthly Average	68.9 lbs/day	669	2/2015 1/2015, 7/2014, 6/2014,

Amount (one violation for each day of the month)	13.5 lbs/day (July and August)		5/2014, 4/2014, 3/2014, 2/2014, 1/31/2014, 5/2013, 4/2013, 3/2013, 1/2013, 8/2012, 7/2012, 6/2012, 5/2012, 4/2012, 3/2012, 2/2012, 1/31/2012, 12/2011
Ammonia Daily Maximum Amount (one violation per day)	146.6 lbs/day 28.5 lbs/day (July and August)	27	2/27/2015, 7/23/2014, 7/16/2014, 2/27/2015, 7/23/2014, 7/16/2014, 7/9/2014, 7/3/2014, 6/4/2014, 5/21/2014, 4/30/2014, 4/23/2014, 4/16/2014, 4/8/2014, 4/4/2014, 3/26/2014, 3/19/2014, 3/12/2014, 4/17/2013, 1/23/2013, 8/14/2012, 8/10/2012, 8/1/2012, 7/25/2012, 7/18/2012, 7/3/2012, 6/20/2012, 4/11/2012, 4/4/2012 3/21/2012
BOD Weekly Average Concentration	45 mg/L	14	5/19/2011, 6/25/2010
BOD Monthly Average Concentration	30 mg/L	31	5/2011
BOD Monthly Average Minimum Removal	85%	30	6/2010
Fecal Coliform Daily Maximum	200/100ml	4	2/11/2015, 1/28/2015, 4/24/2013, 5/2/2013,
Fecal Coliform Monthly Geographic Mean	100/100ml	30	4/2013
TSS Monthly Average	30 mg/L	31	7/31/2010
Flow Daily Maximum	.95 mgd	2	3/31/2011, 6/30/2012
Failure to Sample PH	5x per week	343	6/4/2010, 6/7/2010, 6/25/2010, 7/6/2010, 7/7/2010, 7/13/2010, 7/14/2010, 7/15/2010, 7/20/2010, 7/21/2010, 7/26/2010, 7/27/2010, 7/28/2010, 7/29/2010, 8/6/2010, 8/13/2010, 8/20/2010, 8/23/2010, 8/27/2010, 8/30/2010, 8/31/2010, 9/10/2010, 9/13/2010, 9/20/2010, 9/27/2010, 10/4/2010, 11/1/2010, 11/8/2010, 11/11/2010, 11/15/2010, 11/16/2010, 11/17/2010, 11/25/2010, 11/26/2010, 12/10/2010, 12/17/2010, 12/20/2010, 12/24/2010, 12/27/2010, 12/31/2010, 1/3/2011, 1/17/2011, 1/24/2011, 1/31/2011, 2/3/2011, 2/4/2011, 2/18/2011, 2/21/2011, 2/28/2011, 3/7/2011, 3/14/2011, 3/21/2011, 3/28/2011, 3/31/2011, 4/1/2011, 4/4/2011, 4/11/2011, 4/18/2011, 4/25/2011,

		<p>5/2/2011, 5/3/2011, 5/9/2011, 5/16/2011, 5/17/2011, 5/18/2011, 5/23/2011, 5/30/2011, 6/3/2011, 6/6/2011, 6/17/2011, 6/20/2011, 6/27/2011, 7/4/2011, 7/8/2011, 7/11/2011, 7/18/2011, 7/25/2011, 8/1/2011, 8/8/2011, 8/15/2011, 8/22/2011, 8/29/2011, 9/5/2011, 9/9/2011, 9/12/2011, 9/19/2011, 9/26/2011, 10/3/2011, 10/10/2011, 10/17/2011, 10/24/2011, 10/25/2011, 10/26/2011, 10/27/2011, 11/7/2011, 11/11/2011, 11/14/2011, 11/21/2011, 11/24/2011, 11/25/2011, 11/30/2011, 12/2/2011, 12/5/2011, 12/9/2011, 12/12/2011, 12/16/2011, 12/19/2011, 12/21/2011, 12/23/2011, 12/26/2011, 12/28/2011, 12/30/2011, 1/2/2012, 1/6/2012, 1/9/2012, 1/16/2012, 1/23/2012, 1/30/2012, 2/6/2012, 2/13/2012, 2/20/2012, 2/27/2012, 3/5/2012, 3/12/2012, 3/19/2012, 3/26/2012, 3/30/2012, 4/2/2012, 4/9/2012, 4/16/2012, 4/23/2012, 4/30/2012, 5/14/2012, 5/21/2012, 5/28/2012, 6/4/2012, 6/11/2012, 6/18/2012, 6/25/2012, 7/2/2012, 7/4/2012, 7/9/2012, 7/11/2012, 7/12/2012, 7/16/2012, 7/30/2012, 8/20/2012, 9/3/2012, 9/7/2012, 9/10/2012, 9/17/2012, 9/24/2012, 10/1/2012, 10/8/2012, 10/15/2012, 11/1/2012, 11/5/2012, 11/7/2012, 11/12/2012, 11/16/2012, 11/19/2012, 11/20/2012, 11/21/2012, 11/22/2012, 11/23/2012, 11/26/2012, 12/3/2012, 12/7/2012, 12/10/2012, 12/14/2012, 12/17/2012, 12/24/2012, 12/25/2012, 12/31/2012, 1/1/2013, 1/7/2013, 1/14/2013, 1/21/2013, 1/28/2013, 2/4/2013, 2/11/2013, 2/18/2013, 3/4/2013, 3/11/2013, 3/18/2013, 3/25/2013, 3/29/2013, 4/1/2013, 4/8/2013, 4/15/2013, 4/22/2013, 5/3/2013, 5/6/2013, 5/13/2013, 5/20/2013, 5/27/2013, 5/31/2013, 6/3/2013, 6/10/2013, 6/17/2013,</p>
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		<p>6/18/2013, 6/19/2013, 6/20/2013, 6/24/2013, 7/1/2013, 7/4/2013, 7/8/2013, 7/15/2013, 7/22/2013, 7/29/2013, 8/2/2013, 8/5/2013, 8/7/2013, 8/12/2013, 8/19/2013, 8/26/2013, 9/2/2013, 9/6/2013, 9/9/2013, 9/16/2013, 9/23/2013, 9/30/2013, 10/7/2013, 10/14/2013, 10/21/2013, 10/28/2013, 10/29/2013, 10/30/2013, 10/31/2013, 11/1/2013, 11/4/2013, 11/11/2013, 11/13/2013, 11/14/2013, 11/18/2013, 11/19/2013, 11/25/2013, 11/27/2013, 11/28/2013, 11/29/2013, 12/2/2013, 12/9/2013, 12/16/2013, 12/20/2013, 12/23/2013, 12/25/2013, 12/27/2013, 12/30/2013, 1/1/2014, 1/6/2014, 1/13/2014, 1/14/2014, 1/15/2014, 1/20/2014, 1/27/2014, 2/3/2014, 2/10/2014, 2/17/2014, 2/21/2014, 2/24/2014, 2/28/2014, 3/4/2014, 3/10/2014, 3/17/2014, 3/24/2014, 3/31/2014, 4/1/2014, 4/2/2014, 4/3/2014, 4/7/2014, 4/11/2014, 4/14/2014, 4/21/2014, 4/28/2014, 5/5/2014, 5/12/2014, 5/16/2014, 5/19/2014, 5/26/2014, 5/30/2014, 6/2/2014, 6/6/2014, 6/9/2014, 6/10/2014, 6/11/2014, 6/12/2014, 6/16/2014, 6/18/2014, 6/23/2014, 6/30/2014, 7/4/2014, 7/7/2014, 7/14/2014, 7/21/2014, 7/28/2014, 8/4/2014, 8/11/2014, 8/18/2014, 8/25/2014, 9/1/2014, 9/5/2014, 9/8/2014, 9/15/2014, 9/22/2014, 9/29/2014, 10/6/2014, 10/13/2014, 10/20/2014, 10/27/2014, 10/28/2014, 10/29/2014, 10/30/2014, 11/3/2014, 11/10/2014, 11/11/2014, 11/14/2014, 11/17/2014, 11/18/2014, 11/24/2014, 11/25/2014, 11/26/2014, 11/27/2014, 11/28/2014, 12/1/2014, 12/8/2014, 12/15/2014, 12/22/2014, 12/23/2014, 12/25/2014, 12/29/2014, 12/30/2014, 12/31/2014, 1/1/2015, 1/5/2015, 1/12/2015, 1/19/2015, 1/21/2015, 1/26/2015, 2/2/2015, 2/9/2015, 2/16/2015,</p>
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			2/20/2015, 2/23/2015
Failure to Sample Temp.	5x per week	330	6/4/2010, 6/7/2010, 6/25/2010, 7/26/2010, 7/27/2010, 7/28/2010, 7/29/2010, 8/6/2010, 8/13/2010, 8/20/2010, 8/23/2010, 8/27/2010, 8/30/2010, 8/31/2010, 9/10/2010, 9/13/2010, 9/20/2010, 9/27/2010, 10/4/2010, 11/1/2010, 11/8/2010, 11/11/2010, 11/15/2010, 11/16/2010, 11/17/2010, 11/25/2010, 11/26/2010, 12/10/2010, 12/17/2010, 12/20/2010, 12/24/2010, 12/27/2010, 12/31/2010, 1/3/2011, 1/17/2011, 1/24/2011, 1/31/2011, 2/3/2011, 2/4/2011, 2/18/2011, 2/21/2011, 2/28/2011, 3/7/2011, 3/14/2011, 3/21/2011, 3/28/2011, 3/31/2011, 4/1/2011, 4/4/2011, 4/11/2011, 4/18/2011, 4/25/2011, 5/2/2011, 5/9/2011, 5/16/2011, 5/17/2011, 5/18/2011, 5/23/2011, 5/30/2011, 6/3/2011, 6/6/2011, 6/17/2011, 6/20/2011, 6/27/2011, 7/4/2011, 7/8/2011, 7/11/2011, 7/18/2011, 7/25/2011, 8/1/2011, 8/8/2011, 8/15/2011, 8/22/2011, 8/29/2011, 9/5/2011, 9/9/2011, 9/12/2011, 9/19/2011, 9/26/2011, 10/3/2011, 10/10/2011, 10/17/2011, 10/24/2011, 10/25/2011, 10/26/2011, 10/27/2011, 11/7/2011, 11/11/2011, 11/14/2011, 11/21/2011, 11/24/2011, 11/25/2011, 11/30/2011, 12/2/2011, 12/5/2011, 12/9/2011, 12/12/2011, 12/16/2011, 12/19/2011, 12/21/2011, 12/23/2011, 12/26/2011, 12/28/2011, 12/30/2011, 1/2/2012, 1/6/2012, 1/9/2012, 1/16/2012, 1/23/2012, 1/30/2012, 2/6/2012, 2/13/2012, 2/20/2012, 2/27/2012, 3/5/2012, 3/12/2012, 3/19/2012, 3/26/2012, 3/30/2012, 4/2/2012, 4/9/2012, 4/16/2012, 4/23/2012, 4/30/2012, 5/14/2012, 5/21/2012, 5/25/2012, 6/4/2012, 6/11/2012, 6/18/2012, 6/25/2012, 7/2/2012, 7/4/2012, 7/9/2012, 7/11/2012, 7/12/2012, 7/16/2012, 7/30/2012,

		<p>8/20/2012, 9/3/2012, 9/4/2012, 9/5/2012, 9/7/2012, 9/10/2012, 9/17/2012, 9/24/2012, 10/1/2012, 10/8/2012, 10/15/2012, 11/1/2012, 11/5/2012, 11/7/2012, 11/12/2012, 11/16/2012, 11/19/2012, 11/20/2012, 11/21/2012, 11/22/2012, 11/23/2012, 11/26/2012, 12/3/2012, 12/7/2012, 12/10/2012, 12/14/2012, 12/17/2012, 12/24/2012, 12/25/2012, 12/31/2012, 1/1/2013, 1/7/2013, 1/14/2013, 1/21/2013, 1/28/2013, 2/4/2013, 2/11/2013, 2/18/2013, 3/4/2013, 3/11/2013, 3/18/2013, 3/25/2013, 3/29/2013, 4/1/2013, 4/8/2013, 4/15/2013, 4/22/2013, 5/3/2013, 5/6/2013, 5/13/2013, 5/20/2013, 5/27/2013, 5/31/2013, 6/3/2013, 6/10/2013, 6/17/2013, 6/18/2013, 6/19/2013, 6/20/2013, 6/24/2013, 7/1/2013, 7/4/2013, 7/8/2013, 7/15/2013, 7/22/2013, 7/29/2013, 8/5/2013, 8/7/2013, 8/12/2013, 8/19/2013, 8/26/2013, 9/2/2013, 9/6/2013, 9/9/2013, 9/16/2013, 9/23/2013, 9/30/2013, 10/7/2013, 10/14/2013, 10/21/2013, 10/28/2013, 10/29/2013, 10/30/2013, 10/31/2013, 11/1/2013, 11/4/2013, 11/11/2013, 11/13/2013, 11/14/2013, 11/18/2013, 11/19/2013, 11/25/2013, 11/27/2013, 11/28/2013, 11/29/2013, 12/2/2013, 12/9/2013, 12/16/2013, 12/20/2013, 12/23/2013, 12/25/2013, 12/27/2013, 12/30/2013, 1/4/2014, 1/6/2014, 1/13/2014, 1/1/2014, 1/15/2014, 1/20/2014, 1/27/2014, 2/3/2014, 2/10/2014, 2/17/2014, 2/21/2014, 2/24/2014, 2/28/2014, 3/4/2014, 3/10/2014, 3/17/2014, 3/24/2014, 3/31/2014, 4/1/2014, 4/2/2014, 4/3/2014, 4/7/2014, 4/11/2014, 4/14/2014, 4/21/2014, 4/28/2014, 5/5/2014, 5/12/2014, 5/16/2014, 5/19/2014, 5/26/2014, 5/30/2014, 6/2/2014, 6/6/2014, 6/9/2014, 6/10/2014, 6/11/2014, 6/12/2014,</p>
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			6/16/2014, 6/18/2014, 6/23/2014, 6/30/2014, 7/4/2014, 7/7/2014, 7/14/2014, 7/21/2014, 7/28/2014, 8/4/2014, 8/11/2014, 8/18/2014, 8/25/2014, 9/1/2014, 9/5/2014, 9/8/2014, 9/15/2014, 9/22/2014, 9/29/2014, 10/6/2014, 10/13/2014, 10/20/2014, 10/27/2014, 10/28/2014, 10/29/2014, 10/30/2014, 11/3/2014, 11/10/2014, 11/11/2014, 11/17/2014, 11/18/2014, 11/24/2014, 11/25/2014, 11/26/2014, 11/27/2014, 11/28/2014, 12/1/2014, 12/8/2014, 12/15/2014, 12/22/2014, 12/23/2014, 12/25/2014, 12/29/2014, 1/1/2015, 1/5/2015, 1/12/2015, 1/19/2015, 1/21/2015, 1/26/2015, 2/2/2015, 2/9/2015, 2/16/2015, 2/20/2015, 2/23/2015
TOTAL VIOLATIONS		2326	