

OHIO E.P.A.

NOV 21 2011

Effective Date NOV 21 2011

ENTERED DIRECTOR'S JOURNAL

BEFORE THE  
OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

DIRECTOR'S FINAL  
FINDINGS AND ORDERS

Geneva Hills Group, Inc. :  
1380 Blue Valley Road :  
Lancaster, Ohio 43130 :

I certify this to be a true and accurate copy of the official documents as filed in the records of the Ohio Environmental Protection Agency.

Respondent,

PREAMBLE

By: [Signature] Date: 11-21-11

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to the Geneva Hills Group, Inc. (Respondent) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) Chapters 6109, 6111 and § 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of Respondent's public water system or wastewater treatment plant shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapters 6109 and 6111 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA (Director) has determined the following findings:

1. Respondent owns and operates "public water systems" (PWSs), at Geneva Hills-Lodge (Lodge), Geneva Hills-Frontier Lodge (Frontier Lodge), Geneva Hills-Pool (Pool), and Geneva Hills-Residence (Residence), which are also "transient water systems" as defined by ORC § 6109.01 and Ohio Administrative Code (OAC) Rule 3745-81-01.
2. The Lodge (PWS ID# OH2332312) serves a population of 200 people; the Frontier Lodge (PWS ID# OH2332112) serves a population of 80 people; the Pool (PWS ID# OH2344812) serves a population of 100; and the Residence (PWS ID# OH2332212)

serves a population of 83. All four PWSs are located at 1380 Blue Valley Road, Lancaster (Fairfield County), Ohio, 43130.

3. Respondent's Pool PWS is a seasonal system, operating from May 1 to September 30 each year.
4. The Respondent's PWSs obtain their drinking water from separate "ground water" sources as defined by OAC Rule 3745-81-01.
5. In accordance with OAC Rule 3745-81-21(A)(2)(a), a non-community water system using only ground water or purchased water and serving not more than one thousand persons shall monitor for total coliform with at least one sample each calendar quarter that the PWS provides water to the public.
6. In violation of OAC Rule 3745-81-21(A)(2)(a), for the Lodge, Respondent failed to monitor for total coliform during the monitoring periods of January 1 to March 31, 2007, October 1 to December 31, 2008 and January 1 to March 31, 2009.
7. In violation of OAC Rule 3745-81-21(A)(2)(a), for the Frontier Lodge, Respondent failed to monitor for total coliform during the January 1 to March 31, 2009 monitoring period.
8. In violation of OAC Rule 3745-81-21(A)(2)(a), for the Residence, Respondent failed to monitor for total coliform during the January 1 to March 31, 2009 monitoring period.
9. In accordance with OAC Rule 3745-81-21(B)(1), when a routine sample is determined to be total coliform-positive, the PWS shall monitor with a set of four repeat samples within twenty-four hours of being notified of the positive result.
10. In violation of OAC Rule 3745-81-21(B)(1), for the Lodge, Respondent failed to collect the required four repeat samples for total coliform within the required time frame following positive routine samples collected on February 10, 2006; September 5, 2006; October 24, 2006; and, January 28, 2008.
11. In violation of OAC Rule 3745-81-21(B)(1), for the Pool, Respondent failed to collect the required four repeat samples for total coliform within the required time frame following positive routine samples collected on August 11, 2010 and September 30, 2010.
12. In violation of OAC Rule 3745-81-21(B)(1), for the Residence, Respondent failed to collect the required four repeat samples for total coliform within the required time frame following positive routine samples collected on March 4, 2010; May 10, 2010; and, August 18, 2010.
13. In accordance with OAC Rule 3745-81-21(B)(6), version effective April 1, 1999 through December 31, 2007, when a PWS monitoring with fewer than five routine samples per month has one or more total coliform-positive samples, the PWS shall monitor with at

least five routine samples during the next month that the PWS provides water to the public.

14. In violation of OAC Rule 3745-81-21(B)(6), version effective April 1, 1999 through December 31, 2007, for the Lodge, Respondent failed to monitor with five total coliform samples during the months of January 2006 and November 2006.
15. In accordance with OAC Rule 3745-81-21(B)(7), when a PWS monitoring with fewer than five routine samples per month has one or more total coliform-positive samples, the PWS shall monitor with at least five routine samples during the next month that the PWS provides water to the public.
16. In violation of OAC Rule 3745-81-21(B)(7), for the Lodge, Respondent failed to monitor with five total coliform samples during the month September 2008 after a total coliform positive result during the month of August 2008.
17. In violation of OAC Rule 3745-81-21(B)(7), for the Pool, Respondent failed to monitor with five total coliform samples during the months of September 2008, May 2009, June 2010 and September 2010 after total coliform positive results in the months of August 2008, April 2009, May 2009 and August 2009.
18. In violation of OAC Rule 3745-81-21(B)(7), for the Residence, Respondent failed to monitor with five total coliform samples during the months of April 2010, June 2010 and September 2010 after total coliform positive results during the months of March 2010, May 2010 and August 2010.
19. In accordance with OAC Rule 3745-81-14(D), version effective August 3, 2004 through December 31, 2007, failure to monitor with repeat samples as required by OAC Rule 3745-81-21 is a maximum contaminant level (MCL) violation as well as a monitoring and reporting violation. Failure to monitor with the required repeat samples is a violation that may pose an acute risk to human health (acute MCL).
20. In violation of OAC Rule 3745-81-14(D), version effective August 3, 2004 through December 31, 2007, for the Lodge, Respondent violated the acute MCL during the months of February 2006, September 2006 and October 2006 by failing to collect the required repeat samples.
21. In accordance with OAC Rule 3745-81-14(C), a PWS is in violation of the MCL for total coliforms and may pose an acute risk to human health if any repeat sample collected in accordance with OAC Rule 3745-81-21 is positive for fecal coliform or *Escherichia coli* (*E. coli*).
22. In violation of OAC Rule 3745-81-14(C), for the Residence, Respondent violated the acute MCL during the month of May 2010, when multiple samples results were positive for *E. coli*.

23. In accordance with OAC Rule 3745-81-14(B), a PWS which monitors with fewer than forty samples per month is in compliance with the MCL for total coliforms when no more than one sample during a month is total coliform-positive.
24. In violation of OAC Rule 3745-81-14(B), for the Lodge, Respondent violated the MCL for total coliform when its PWS had more than one sample that was total coliform-positive during the months of September 2006, October 2006, December 2007, and August 2008.
25. In violation of OAC Rule 3745-81-14(D), for the Pool, Respondent violated the MCL for total coliform when its PWS had more than one sample that was total coliform-positive during the months of August 2008, June 2010 and August 2010.
26. In violation of OAC Rule 3745-81-14(D), for the Residence, Respondent violated the MCL for total coliform when its PWS had more than one sample that was total coliform-positive during the months of March 2010, May 2010 and August 2010.
27. In accordance with OAC Rule 3745-81-32, the owner or operator of a PWS shall provide public notification for violations and submit copies of the required public notice and verification forms to the Director.
28. In violation of OAC Rule 3745-81-32, Respondent failed to issue public notification and submit a copy of the required public notice and verification form for:
  - a. Lodge:
    - i. Failure to monitor with a routine sample for total coliform bacteria during the monitoring periods of January 1 to March 31, 2007; October 31 to December 31, 2008; and, January 1 to March 31, 2009;
    - ii. Failure to collect the required four repeat samples for total coliform within the required time frame during the months of February 2006, September 2006, October 2006 and January 2008;
    - iii. Failure to monitor with five total coliform samples the month after a total coliform positive result during the months of January 2006, November 2006 and September 2008;
    - iv. Posing an acute risk to human health when repeat samples were not collected in accordance with OAC Rule 3745-81-21 during the months of February 2006, September 2006 and October 2006;
    - v. Exceeding the monthly MCL when more than one sample was positive for total coliform during the months of September 2006, October 2006, December 2007 and August 2008;

b. Frontier Lodge:

- i. Failure to monitor for total coliform bacteria during the January 1 to March 31, 2009 monitoring period;

c. Pool:

- i. Failure to collect the required four repeat samples for total coliform within the required time frame during the months of August 2010 and September 2010;
- ii. Failure to monitor with five total coliform samples the month after a total coliform positive result during the months of September 2008, May 2009, June 2010 and September 2010;
- iii. Exceeding the monthly MCL when more than one sample was positive for total coliform during the months of August 2008, June 2010 and August 2010;

d. Residence:

- i. Failure to monitor for total coliform bacteria during the January 1 to March 31, 2009 monitoring period;
- ii. Failure to collect the required four repeat samples for total coliform within the required time frame during the months of March 2010, May 2010 and August 2010;
- iii. Failure to monitor with five total coliform samples the month after a total coliform positive result during the months of April 2010, June 2010 and September 2010;
- iv. Posing an acute risk to human health when repeat samples were positive for E. coli during the month of May 2010; and,
- v. Exceeding the monthly MCL when more than one sample was positive for total coliform during the months of March 2010 and May 2010.

29. Respondent performed investigations on the Lodge well in 1997 and 2007; the results of these investigations indicated that a new water source was necessary.

30. Each violation cited above represents a separate violation of ORC § 6109.31.

31. In accordance with OAC Rule 3745-84-02(A), no person shall operate or maintain a PWS in the state of Ohio without a PWS license issued by the Director.

32. Pursuant to ORC § 3745.11, a person applying for a PWS license to operate (LTO) or a PWS LTO renewal under ORC § 6109.21 and OAC 3745-84-05 shall pay the appropriate fee according to ORC § 3745.11(M) at the time of submission of the application to the Director.
33. Respondent owns and operates Geneva Hills, a "site" and its associated wastewater treatment plant ("WWTP"), located at 1380 Blue Valley Road, Lancaster, Ohio in Fairfield County.
34. Respondent's WWTP discharges "sewage" and/or "other wastes" to "waters of the state", as those terms are defined in ORC Section 6111.01.
35. Respondent holds a valid, unexpired National Pollutant Discharge Elimination System (NPDES) permit, number 4PR00094\*CD (effective November 1, 2008), for the WWTP. Discharge from the site goes to an unnamed tributary of the Hocking River.
36. Hocking River and its unnamed tributary constitute "waters of the state" as defined by ORC § 6111.01.
37. On June 20, 2011, Ohio EPA performed a reconnaissance inspection of the WWTP and found that the plant was not being properly operated. Respondent violated Part III of its NPDES permit by failing to maintain the WWTP in good working order. Respondent's failure to comply with this provision of its NPDES permit is a violation of the permit, and ORC §§ 6111.04 and 6111.07.
38. In accordance with ORC § 6111.07(C), no person knowingly shall submit false information or records or fail to submit information or records pertaining to discharges of sewage, industrial wastes, or other wastes or to sludge management required as a condition of a permit or knowingly render inaccurate any monitoring device or other method required to be maintained by the Director.
39. Respondent is in violation of reporting requirements outlined in its NPDES permit for failure to submit discharge monitoring reports (DMRs) for the Sites' WWTP for April 2009, June 2009, June 2010, April 2011 and May 2011.
40. In accordance with OAC Rule 3745-7-02, each person owning or operating a treatment works shall designate one or more operators of record to oversee the technical operation of the treatment works and supply notification on a form acceptable to the Director. Respondent has failed to submit this notification to Ohio EPA.
41. In accordance with ORC § 6111.07(A), no person shall violate or fail to perform any duty imposed by ORC §§ 6111.01 to 6111.08 or violate any order, rule, or term or condition of a permit issued or adopted by the Director pursuant to those sections. Each day of violation is a separate offense.

42. In accordance with ORC § 6111.04(C), no person to whom a permit has been issued shall place or discharge, or cause to be placed or discharged, in any waters of the state, any sewage, sludge, sludge materials, industrial waste, or other wastes in excess of the permissive discharges specified under an existing permit.
43. Respondent violated terms and conditions of its NPDES permit on numerous occasions as cited in Attachment A. Each violation cited in Attachment A constitutes a separate violation of ORC §§ 6111.04 and 6111.07. Attachment A is hereby incorporated in to these Orders as if fully stated herein.
44. These Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sewer system. Any such construction or modification is subject to the permit to install (PTI) requirements of OAC Chapter 3745-42.
45. These Orders do not modify NPDES Permit No. 4PR00094\*CD. The purpose of these Orders is to correct conditions of Respondent's noncompliance with NPDES Permit No. 4PR00094\*CD and not to alter said permit.
46. Compliance with the ORC Chapter 6111 is not contingent upon the availability or receipt of financial assistance.
47. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the State to be derived from such compliance in accomplishing the purposes of ORC Chapter 6111.

#### V. ORDERS

1. Within thirty (30) days of the effective date of these Orders, Respondent shall submit applications and appropriate fees to obtain an LTO for each of the PWSs.
2. Within thirty (30) days of the effective date of these Orders, Respondent shall remedy the violation in Finding No. 28 by issuing a public notification and by submitting copies of the required public notice and verification form to the Ohio EPA, Division of Drinking and Ground Waters (DDAGW), Central Office (CO), Lazarus Government Center, P.O. Box 1049, Columbus, Ohio 43216-1049, Attn: Julie Gillenwater, in accordance with OAC Rule 3745-81-32, for:
  - a. Lodge:
    - i. Failure to monitor with a routine sample for total coliform bacteria during the monitoring periods of January 1 to March 31, 2007; October 31 to December 31, 2008; and, January 1 to March 31, 2009;

- ii. Failure to collect the required four repeat samples for total coliform within the required time frame during the months of February 2006, September 2006, October 2006 and January 2008;
- iii. Failure to monitor with five total coliform samples the month after a total coliform positive result during the months of January 2006, November 2006 and September 2008;
- iv. Posing an acute risk to human health when repeat samples were not collected in accordance with OAC Rule 3745-81-21 during the months of February 2006, September 2006 and October 2006;
- v. Exceeding the monthly MCL when more than one sample was positive for total coliform during the months of September 2006, October 2006, December 2007 and August 2008;

b. Frontier Lodge:

- i. Failure to monitor for total coliform bacteria during the January 1 to March 31, 2009 monitoring period;

c. Pool:

- i. Failure to collect the required four repeat samples for total coliform within the required time frame during the months of August 2010 and September 2010;
- ii. Failure to monitor with five total coliform samples the month after a total coliform positive result during the months of September 2008, May 2009, June 2010 and September 2010;
- iii. Exceeding the monthly MCL when more than one sample was positive for total coliform during the months of August 2008, June 2010 and August 2010;

d. Residence:

- i. Failure to monitor for total coliform bacteria during the January 1 to March 31, 2009 monitoring period;
- ii. Failure to collect the required four repeat samples for total coliform within the required time frame during the months of March 2010, May 2010 and August 2010;
- iii. Failure to monitor with five total coliform samples the month after a total coliform positive result during the months of April 2010, June 2010 and September 2010;
- iv. Posing an acute risk to human health when repeat samples were positive

for E. coli during the month of May 2010; and,

- v. Exceeding the monthly MCL when more than one sample was positive for total coliform during the months of March 2010 and May 2010.

3. From the effective date of these Orders, Respondent shall comply with all current and future contaminant monitoring schedules issued by the Director.
4. From the effective date of these Orders, Respondent shall comply with total coliform bacteria monitoring and MCL requirements, in accordance with OAC Rules 3745-81-21 and 3745-81-14, respectively.
5. Within thirty (30) days of the effective date of these Orders, Respondent shall contract with a certified laboratory to collect and analyze required PWS samples for twelve (12) months. Within forty (40) days of the effective date of these Orders, Respondent shall submit a copy of the signed laboratory contract to the DDAGW contact in Section X.
6. Within sixty (60) days of the effective date of these Orders, Respondent shall submit a general plan, in accordance with requirements in OAC 3745-91. This general plan should include a description of measures to be taken to obtain an approvable source(s) of water for each of the four PWSs to ensure compliance with ORC Chapter 6109 and OAC rules adopted thereunder, as well as a detailed compliance schedule with applicable milestone dates of significant events that are necessary to attain compliance.
7. Within sixty (60) days of approval of the general plan, Respondent shall comply with the approved general plan and the detailed schedule.
8. Within thirty (30) days of the effective date of these Orders, Respondent shall employ a Class I Certified Operator, in accordance with OAC Chapter 3745-07, to oversee the operation of the WWTP. Respondent shall supply a completed Operator of Record form within thirty (30) days of the effective date of these Orders to: Ohio EPA, Division of Surface Water, P.O. Box 1049, Columbus, Ohio 43216-1049, Attn: Daniel Kopec.
9. Within thirty (30) days of the effective date of these Orders, Respondent shall remedy the violations in Finding No. 39 by submitting the outstanding DMRs to Ohio EPA and shall continue to submit all future monthly DMRs in accordance with Part III of its NPDES permit.
10. Within thirty (30) days of the effective date of these Orders, Respondent shall install an outfall marker sign in accordance with NPDES permit 4PR00094 Part II, Item N.
11. Within ninety (90) days of the effective date of these Orders, Respondent shall bring the Site's WWTP into compliance and properly maintain and operate the WWTP in good working order. Should Respondent fail to achieve compliance within these 90 days, within one hundred fifty (150) days of the effective date of these Orders Respondent shall submit a WWTP study with a plan for any WWTP improvements necessary to achieve and maintain compliance with its NPDES permit and any successor permit to Ohio EPA Division of Surface Water for approval.

## **VI. TERMINATION**

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chiefs of Ohio EPA's DDAGW and DSW acknowledge, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete." This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is as defined in OAC Rule 3745-33-03(E).

## **VII. OTHER CLAIMS**

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to the operation of Respondent's PWS or WWTP.

## **VIII. OTHER APPLICABLE LAWS**

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state, and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

## **IX. MODIFICATIONS**

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

## **X. NOTICE**

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio Environmental Protection Agency  
Central District Office  
Division of Drinking and Ground Waters  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049  
Attn: Susan Schell

Ohio Environmental Protection Agency  
Central District Office  
Division of Surface Water  
50 West Town Street, Suite 700  
P.O. Box 1049  
Columbus, Ohio 43216-1049  
Attn: Erin Sherer

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

#### **XI. RESERVATION OF RIGHTS**

Ohio EPA reserves its rights to seek civil or administrative penalties against Respondent for violations specifically cited in these Orders. Ohio EPA and Respondent each reserve all other rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

#### **XII. WAIVER**

In order to resolve disputed claims, without admission of fact, violation or liability, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Except for the right to seek civil or administrative penalties against Respondent for violations specifically cite in these Orders, which right Ohio EPA does not waive, compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity. Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

#### **XIII. EFFECTIVE DATE**

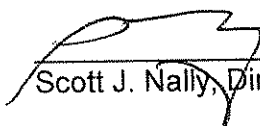
The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

**XIV. SIGNATORY AUTHORITY**

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

**IT IS SO ORDERED AND AGREED:**

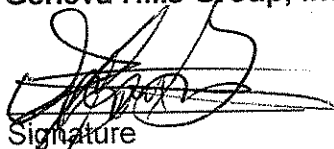
**Ohio Environmental Protection Agency**

  
\_\_\_\_\_  
Scott J. Nally, Director

NOV 21 2011  
Date

**IT IS SO AGREED:**

**Geneva Hills Group, Inc.**

  
\_\_\_\_\_  
Signature

28 OCT 11  
Date

GEOFFREY W. BURNS  
Printed or Typed Name and Title

Attachment "A"

Compliance Data for Geneva Hills Center WWTP between 12/1/2008 to 3/31/2011

Summary

Permit Effluent Limit Violations: 22  
 Permit Effluent Code Violations: 11

Permit Effluent Frequency Violations: 11\*  
 Compliance Schedule Violations: 0

Report Date	Station	Parameter	Unit	Value	Limit	Violation	Report Date
July 2009	001	Total Suspended Solids	30D Conc	12	13.		7/1/2009
August 2009	001	Total Suspended Solids	30D Conc	12	15.		8/1/2009
September 2009	001	Total Suspended Solids	30D Conc	12	15.		9/1/2009
December 2009	001	Total Suspended Solids	30D Conc	12	72.		12/1/2009
December 2009	001	Total Suspended Solids	7D Conc	18	139.		12/8/2009
January 2010	001	Total Suspended Solids	30D Conc	12	13.		1/1/2010
May 2010	001	Total Suspended Solids	30D Conc	12	15.		5/1/2010
July 2010	001	Total Suspended Solids	30D Conc	12	25.		7/1/2010
July 2010	001	Total Suspended Solids	7D Conc	18	25.		7/8/2010
July 2010	001	Dissolved Oxygen	1D Conc	6.0	2.31		7/9/2010
August 2010	001	CBOD 5 day	30D Conc	10	17.5		8/1/2010
August 2010	001	Dissolved Oxygen	1D Conc	6.0	5.06		8/6/2010
August 2010	001	CBOD 5 day	7D Conc	15	33.8		8/15/2010
September 2010	001	Total Suspended Solids	30D Conc	12	26.		9/1/2010
September 2010	001	Total Suspended Solids	7D Conc	18	26.		9/1/2010
September 2010	001	Nitrogen, Ammonia (NH3)	30D Conc	1.0	1.965		9/1/2010
September 2010	001	Nitrogen, Ammonia (NH3)	7D Conc	1.5	1.965		9/1/2010
October 2010	001	Total Suspended Solids	30D Conc	12	46.		10/1/2010
October 2010	001	Total Suspended Solids	7D Conc	18	75.		10/15/2010
November 2010	001	Total Suspended Solids	30D Conc	12	285.		11/1/2010
November 2010	001	Total Suspended Solids	30D Qty	0.32	32362		11/1/2010
November 2010	001	Total Suspended Solids	7D Conc	18	285.		11/15/2010

Month		Code Violations		Report Date
February 2009	001	Total Suspended Solids	AF	2/5/2009
February 2009	001	Nitrogen, Ammonia (NH3)	AF	2/5/2009
February 2009	001	Nitrogen, Ammonia (NH3)	AF	2/5/2009
February 2009	001	Nitrogen, Ammonia (NH3)	AF	2/5/2009
February 2009	001	Nitrogen, Ammonia (NH3)	AF	2/5/2009
February 2009	001	CBOD 5 day	AF	2/5/2009
February 2009	001	Dissolved Oxygen	AF	2/5/2009
February 2009	001	Dissolved Oxygen	AF	2/12/2009
February 2009	001	Dissolved Oxygen	AF	2/19/2009
February 2009	001	Dissolved Oxygen	AF	2/26/2009
March 2009	001	Dissolved Oxygen	AF	3/5/2009

Month		Frequency Violations		Report Date
April 2010	001	Total Suspended Solids	1	04/01/2010
April 2010	001	Nitrogen, Ammonia (NH3)	1	04/01/2010
April 2010	001	CBOD 5 day	1	04/01/2010
August 2009	001	Dissolved Oxygen	1	08/01/2009
August 2010	001	Dissolved Oxygen	1	08/08/2010
September 2009	001	Dissolved Oxygen	1	09/08/2009
October 2010	001	Dissolved Oxygen	1	10/01/2010
October 2009	001	Dissolved Oxygen	1	10/08/2009
December 2008	001	Dissolved Oxygen	1	12/09/2008
December 2008	001	Dissolved Oxygen	1	12/15/2008
December 2008	001	Dissolved Oxygen	1	12/22/2008