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March 7, 2017

VIA CERTIFIED MAIL – RETURN SERVICE REQUESTED
#7012 0470 0001 7761 6508

Mr. Ray McCown
Mayor, City of Garfield
405 West California Street
P.O. Box 218
Garfield, WA 99130

Mr. Scott Pruitt
Director, Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Ms. Maia Bellon
Director, Washington State Department of Ecology
P.O. Box 47600
Olympia, WA 98504

Ms. Michelle Pirzadeh
Administrator, Environmental Protection Agency
Region 10
1200 6th Avenue
Seattle, WA 98101

RE: 60-Day Notice of Violations and Intent to Sue under § 505 of the Clean Water Act

Dear Messrs. McCown, Pirzadeh, Pruitt, and Bellon:

This letter is sent to notify you, the City of Garfield (hereinafter “Garfield”), the Washington State Department of Ecology (“DoE”), the Environmental Protection Agency (“EPA”), and other individuals named in this letter, that Snake River Waterkeeper (“Waterkeeper”) has identified numerous violations of Clean Water Act (“CWA”) permits by the Garfield Wastewater Treatment Plant (“WWTP”). Waterkeeper hereby notifies you that it is prepared to file a lawsuit pursuant to §505(a) of the CWA, 33 USC §1365(a)(1). This lawsuit would seek injunctive relief, permit revocation, civil penalties, mitigation measures, and other relief as the court deems necessary to correct and address the violations described in this letter.

I. Location of Violations

A. The Garfield Wastewater Treatment Plant

The WWTP is located at 1003 Elberton Road, Garfield, WA 99103. NPDES Permit No. WA0044822 (“Permit”) authorizes certain discharges of wastewater from into Silver Creek from Outfall 1, where the violations identified in this letter have occurred. The WWTP has a design flow of 70,000 gallons per day (g/d) with a peak flow of 288,000 g/d. Under the permit, the WWTP has effluent

limitations of 22.5 mg/L for Biochemical Oxygen Demand (BOD₅), 30 mg/L for Total Suspended Solids (TSS), 100 cfu/100 ml for Fecal Coliform Bacteria, and a pH of 6-9.

II. Enforcement Actions

As described in the attachments, the WWTP has violated its Permit 1,545 times since original issuance. The WWTP has been contacted by the DoE several times regarding these violations, with the most recent notice of violation occurring in an email dated December 13, 2016 pertaining to a larger scale enforcement action by the DoE. The WWTP began violating the Permit in March 2012 and continued to consistently violate the Permit until at least December 2016. These violations may consist of, *inter alia*, inadequate sampling, failure to complete Daily Monitoring Reports (“DMRs”), late completion of DMRs, violations of design criteria, and numerous one-time and/or ongoing effluent violations.

III. Description of Violations

Section 301(a) of the Clean Water Act prohibits the discharge of a pollutant from a point source into navigable waters of the United States except in accordance with a specific permit obtained and issued as part of the National Pollutant Discharge Elimination System (NPDES) described in the CWA. According to the provisions therein, charges under a NPDES permit may not exceed specified levels for criteria allowed by said permit. Appendix 1 included herewith contains a detailed, though not necessarily exhaustive, list of known violations.

IV. Requested Actions

The actions of the WWTP causing exceedences of Permit criteria violate §301 of the Clean Water Act and subject Garfield to the imposition of statutory penalties. Pursuant to 33 USC §1319(d), a violator is subject to a penalty of \$37,500 per day for each violation. *See also* CFR §19.4 (increasing the statutory limit to adjust for inflation). Thus, for each day the WWTP discharged or discharges more than its NPDES permit allows, Garfield may be held liable for this amount as a violation of § 301 of the CWA.

As provided under the CWA’s citizen’s suit enforcement provision, Waterkeeper is authorized to file suit against Garfield in federal court for these and other violations that Waterkeeper discovers after expiration of the 60-day notice period initiated by this letter. *See* 33 USC §1365(b). Waterkeeper is also entitled to recover reasonable attorney’s fees generated in the course of prevailing as a party to this action. *See* 33 USC §§ 1319(d); 1365(a), (b), (d).

This letter complies with the CWA statutory notice requirement prescribed by 33 USC §1365(b). In addition to putting you on notice of the WWTP’s violations and our intent to sue, this letter is intended to prevent ongoing and further violations of the CWA. Should you believe any information in this letter to be inaccurate, please notify us immediately along with the basis for such belief. Another purpose of the notice requirement is to allow time for the parties to negotiate resolutions to the violation claims. Waterkeeper sends this notice in hopes of encouraging negotiations which may avoid the need for costly litigation. During the 60-day notice period, we can be available for discussion of remedies

and/or actions that would mitigate the violations described herein and bring Garfield and the WWTP into compliance with the CWA.

V. Persons Giving Notice

Waterkeeper is a non-profit organization with the mission of “applying science and law to protect, restore, and sustain waters of the Snake River Basin”. As a grassroots citizens group, Waterkeeper is dedicated to protecting the Basin’s waterways from pollution and helping communities preserve their right for clean water and responsible use of local resources. Serving within the national Waterkeeper Alliance, this Waterkeeper maintains exclusive jurisdiction over the full reach of the Snake River Basin, which includes all surface and groundwater sources as well as lands draining into its tributaries. As a tributary of the Palouse River which feeds directly into the Snake River, the violations identified herein directly and negatively impact the Snake River watershed, its residents and visitors, and adjacent or downstream communities that rely on its water for life and recreation. The name and address of the entities giving notice is:

Snake River Waterkeeper
2123 N. 16th St.
Boise ID, 83702
(208) 806-1303

F.S. “Buck” Ryan
2123 N. 16th St.
Boise ID, 83702
buck@snakeriverwaterkeeper.org

VI. Conclusion

If you have any questions regarding the content of this notice, please do not hesitate to contact the undersigned counsel at Gonzaga University Legal Assistance. We are willing to working with the WWTP, Garfield, and/or EPA to rectify the situation by ensuring that the WWTP ceases illegal discharges, meets all the requirements under its NPDES permit going forward, and mitigates the harm of these violations. Thank you for your prompt attention to the important matter.

Sincerely,

UNIVERSITY LEGAL ASSISTANCE

Rick Eichstaedt
Program Director, Attorney at Law

Colin F. De Bruhl
Law Clerk

Appendix 1 – Detailed list of Garfield Wastewater Treatment Plant Violations

Biochemical Oxygen Demand (5-Day) (BOD₅) Violations

Monitor End Date	Parameter	Units	Measurement Value	Violation	Limit Min/Max
3/31/2012	Biochemical Oxygen Demand (BOD ₅) (Not Applicable)	Lbs/Day	25.3	Numeric effluent violation	- /13.5
3/31/2012	Biochemical Oxygen Demand (BOD ₅) (Not Applicable)	Lbs/Day	45.7	Numeric effluent violation	- /9
3/31/2012	Biochemical Oxygen Demand (BOD ₅) (Total)	Percent	82.9	Numeric effluent violation	85/ -
5/31/2012	Biochemical Oxygen Demand (BOD ₅) (Not Applicable)	Milligrams/L (mg/L)	30.9	Numeric effluent violation	- /22.5
5/31/2012	Biochemical Oxygen Demand (BOD ₅) (Not Applicable)	Milligrams/L (mg/L)	46	Numeric effluent violation	- /15
5/31/2012	Biochemical Oxygen Demand (BOD ₅) (Not Applicable)	Lbs/Day	38.7	Numeric effluent violation	- /13.5
6/30/2012	Biochemical Oxygen Demand (BOD ₅) (Total)	Percent	43.4	Numeric effluent violation	85/ -
1/31/2012	Biochemical Oxygen	Percent	68.8	Numeric effluent violation	85/ -

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	Demand (BOD5) (Total)				
5/31/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	46.2	Numeric effluent violation	- /9
1/31/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	41.5	Numeric effluent violation	- /15
1/31/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	81.1	Numeric effluent violation	- /13.5
1/31/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	138.1	Numeric effluent violation	- /9
5/31/2012	Biochemical Oxygen Demand (BOD5) (Total)	Percent	59.4	Numeric effluent violation	85/ -
1/31/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	40	Numeric effluent violation	- /22.5
6/30/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	12.9	Numeric effluent violation	- /9
12/31/2012	Biochemical Oxygen Demand (BOD5) (Total)	Percent	48.3	Numeric effluent violation	85/ -
12/31/2012	Biochemical Oxygen	Milligrams/L (mg/L)	22.9	Numeric effluent violation	- /15

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	Demand (BOD5) (Not Applicable)				
12/31/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	19.1	Numeric effluent violation	- /13.5
12/31/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	26	Numeric effluent violation	- /9
2/29/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	25.9	Numeric effluent violation	- /22.5
2/29/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	28	Numeric effluent violation	- /15
2/29/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	41.9	Numeric effluent violation	- /13.5
2/29/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	51.4	Numeric effluent violation	- /9
2/29/2012	Biochemical Oxygen Demand (BOD5) (Total)	Percent	62.3	Numeric effluent violation	85/ -
4/30/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	20.3	Numeric effluent violation	- /15
4/30/2012	Biochemical Oxygen	Lbs/Day	28.6	Numeric effluent violation	- /13.5

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	Demand (BOD5) (Not Applicable)				
4/30/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	34.4	Numeric effluent violation	- /9
4/30/2012	Biochemical Oxygen Demand (BOD5) (Total)	Percent	66.9	Numeric effluent violation	85/ -
11/30/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	36	Numeric effluent violation	- /15
11/30/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	42	Numeric effluent violation	- /13.5
11/30/2012	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	81.7	Numeric effluent violation	- /9
1/31/2013	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	39.9	Numeric effluent violation	- /22.5
1/31/2013	Biochemical Oxygen Demand (BOD5) (Total)	Percent	51.4	Numeric effluent violation	85/ -
1/31/2013	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	40	Numeric effluent violation	- /15
1/31/2013	Biochemical Oxygen	Lbs/Day	36.2	Numeric effluent violation	- /13.5

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	Demand (BOD5) (Not Applicable)				
1/31/2013	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	37.6	Numeric effluent violation	- /9
3/31/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	35.6	Numeric effluent violation Frequency of Sampling Violation	- /13.5
3/31/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	16.35	Numeric effluent violation Frequency of Sampling Violation	- /15
3/31/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	35.6	Numeric effluent violation Frequency of Sampling Violation	- /9
4/30/2014	Biochemical Oxygen Demand (BOD5) (Total)	Percent	66.95	Numeric effluent violation	85/ -
4/30/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	17.9	Numeric effluent violation	- /15
5/31/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	17.2	Numeric effluent violation	- /15
6/30/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	23.75	Numeric effluent violation	- /22.5
6/30/2014	Biochemical Oxygen	Milligrams/L (mg/L)	32.9	Numeric effluent violation	- /15

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	Demand (BOD5) (Not Applicable)				
6/30/2014	Biochemical Oxygen Demand (BOD5) (Total)	Percent	80.7	Numeric effluent violation	85/ -
8/31/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	42.55	Numeric effluent violation	- /22.5
8/31/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	42.55	Numeric effluent violation	- /15
8/31/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	23	Numeric effluent violation	- /9
8/31/2014	Biochemical Oxygen Demand (BOD5) (Total)	Percent	84.4	Numeric effluent violation	85/ -
7/31/2014	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	28	Numeric effluent violation	- /15
1/31/2015	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	32.15	Numeric effluent violation	- /22.5
1/31/2015	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	17.9	Numeric effluent violation	- /13.5
1/31/2015	Biochemical Oxygen	Milligrams/L (mg/L)	47.6	Numeric effluent violation	- /15

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	Demand (BOD5) (Not Applicable)				
1/31/2015	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Lbs/Day	31.1	Numeric effluent violation	- /9
1/31/2015	Biochemical Oxygen Demand (BOD5) (Total)	Percent	68.5	Numeric effluent violation	85/ -
2/28/2015	Biochemical Oxygen Demand (BOD5) (Total)	Percent	84.8	Numeric effluent violation Frequency of Sampling Violation	85/ -
3/31/2015	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	19.65	Numeric effluent violation	- /15
3/31/2015	Biochemical Oxygen Demand (BOD5) (Total)	Percent	70.1	Numeric effluent violation	85/ -
11/30/2016	Biochemical Oxygen Demand (BOD5) (Not Applicable)	Milligrams/L (mg/L)	17.9	Numeric effluent violation Frequency of Sampling Violation	- /15
11/30/2016	Biochemical Oxygen Demand (BOD5) (Total)	Percent	81.5	Numeric effluent violation Frequency of Sampling Violation	85/ -

Fecal Coliform Violations

3/31/12	Fecal Coliform (Not Applicable)	#/100ml	460.7	Numeric effluent violation	- /100
3/31/12	Fecal Coliform (Not Applicable)	#/100ml	1600	Numeric effluent violation	- /100

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6/30/12	Fecal Coliform (Not Applicable)	#/100ml	170	Numeric effluent violation	- /100
1/31/12	Fecal Coliform (Not Applicable)	#/100ml	1600	Numeric effluent violation	- /100
10/31/12	Fecal Coliform (Not Applicable)	#/100ml	600	Numeric effluent violation	- /100
10/31/12	Fecal Coliform (Not Applicable)	#/100ml	1600	Numeric effluent violation	- /100
12/31/12	Fecal Coliform (Not Applicable)	#/100ml	1600	Numeric effluent violation	- /100
12/31/12	Fecal Coliform (Not Applicable)	#/100ml	1600	Numeric effluent violation	- /100
2/29/12	Fecal Coliform (Not Applicable)	#/100ml	1600	Numeric effluent violation	- /100
4/30/12	Fecal Coliform (Not Applicable)	#/100ml	300.8	Numeric effluent violation	- /100
4/30/12	Fecal Coliform (Not Applicable)	#/100ml	1600	Numeric effluent violation	- /100
9/30/12	Fecal Coliform (Not Applicable)	#/100ml	300	Numeric effluent violation	- /100
11/30/12	Fecal Coliform (Not Applicable)	#/100ml	1196.3	Numeric effluent violation	- /100
11/30/12	Fecal Coliform (Not Applicable)	#/100ml	1600	Numeric effluent violation	- /100
1/31/13	Fecal Coliform (Not Applicable)	#/100ml	138.6	Numeric effluent violation	- /100
1/31/13	Fecal Coliform (Not Applicable)	#/100ml	5000	Numeric effluent violation	- /100
3/31/14	Fecal Coliform (Not Applicable)	#/100ml	215000	Numeric effluent violation Frequency of Sampling Violation	- /100
3/31/14	Fecal Coliform (Not Applicable)	#/100ml	215000	Numeric effluent violation Frequency of Sampling Violation	- /100
4/30/14	Fecal Coliform (Not Applicable)	#/100ml	4448	Numeric effluent violation	- /100
4/30/14	Fecal Coliform (Not Applicable)	#/100ml	22000	Numeric effluent violation	- /100
5/31/14	Fecal Coliform (Not Applicable)	#/100ml	148000	Numeric effluent violation	- /100
5/31/14	Fecal Coliform (Not Applicable)	#/100ml	148000	Numeric effluent violation	- /100
6/30/14	Fecal Coliform (Not Applicable)	#/100ml	260750	Numeric effluent violation	- /100

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6/30/14	Fecal Coliform (Not Applicable)	#/100ml	260750	Numeric effluent violation	- /100
8/31/14	Fecal Coliform (Not Applicable)	#/100ml	20770	Numeric effluent violation	- /100
8/31/14	Fecal Coliform (Not Applicable)	#/100ml	160000	Numeric effluent violation	- /100
7/31/14	Fecal Coliform (Not Applicable)	#/100ml	80600	Numeric effluent violation	- /100
7/31/14	Fecal Coliform (Not Applicable)	#/100ml	170000	Numeric effluent violation	- /100
9/30/14	Fecal Coliform (Not Applicable)	#/100ml	90000	Numeric effluent violation	- /100
9/30/14	Fecal Coliform (Not Applicable)	#/100ml	31425	Numeric effluent violation	- /100
10/31/14	Fecal Coliform (Not Applicable)	#/100ml	4980	Numeric effluent violation	- /100
10/31/14	Fecal Coliform (Not Applicable)	#/100ml	7400	Numeric effluent violation	- /100
11/30/14	Fecal Coliform (Not Applicable)	#/100ml	64825	Numeric effluent violation	- /100
11/30/14	Fecal Coliform (Not Applicable)	#/100ml	64825	Numeric effluent violation	- /100
12/31/14	Fecal Coliform (Not Applicable)	#/100ml	2143.7	Numeric effluent violation	- /100
12/31/14	Fecal Coliform (Not Applicable)	#/100ml	160000	Numeric effluent violation	- /100
1/31/15	Fecal Coliform (Not Applicable)	#/100ml	80500	Numeric effluent violation	- /100
1/31/15	Fecal Coliform (Not Applicable)	#/100ml	160000	Numeric effluent violation	- /100
2/28/15	Fecal Coliform (Not Applicable)	#/100ml	50075	Numeric effluent violation Frequency of Sampling Violation	- /100
2/28/15	Fecal Coliform (Not Applicable)	#/100ml	50075	Numeric effluent violation Frequency of Sampling Violation	- /100
3/31/15	Fecal Coliform (Not Applicable)	#/100ml	43620	Numeric effluent violation	- /100
3/31/15	Fecal Coliform (Not Applicable)	#/100ml	160000	Numeric effluent violation	- /100
4/30/15	Fecal Coliform (Not Applicable)	#/100ml	100200	Numeric effluent violation	- /100
4/30/15	Fecal Coliform (Not Applicable)	#/100ml	1E+06	Numeric effluent violation	- /100

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5/31/15	Fecal Coliform (Not Applicable)	#/100ml	39300	Numeric effluent violation	- /100
5/31/15	Fecal Coliform (Not Applicable)	#/100ml	39300	Numeric effluent violation	- /100
6/30/15	Fecal Coliform (Not Applicable)	#/100ml	119.5	Numeric effluent violation	- /100
6/30/15	Fecal Coliform (Not Applicable)	#/100ml	180	Numeric effluent violation	- /100
7/31/15	Fecal Coliform (Not Applicable)	#/100ml	4072	Numeric effluent violation	- /100
7/31/15	Fecal Coliform (Not Applicable)	#/100ml	4072	Numeric effluent violation	- /100
9/30/15	Fecal Coliform (Not Applicable)	#/100ml	64790	Numeric effluent violation	- /100
9/30/15	Fecal Coliform (Not Applicable)	#/100ml	160000	Numeric effluent violation	- /100
10/31/15	Fecal Coliform (Not Applicable)	#/100ml	11263	Numeric effluent violation	- /100
10/31/15	Fecal Coliform (Not Applicable)	#/100ml	35000	Numeric effluent violation	- /100
11/30/15	Fecal Coliform (Not Applicable)	#/100ml	1336.4	Numeric effluent violation	- /100
11/30/15	Fecal Coliform (Not Applicable)	#/100ml	17000	Numeric effluent violation	- /100
2/29/16	Fecal Coliform (Not Applicable)	#/100ml	7475	Numeric effluent violation	- /100
2/29/16	Fecal Coliform (Not Applicable)	#/100ml	17000	Numeric effluent violation	- /100
6/30/16	Fecal Coliform (Not Applicable)	#/100ml	540	Numeric effluent violation Frequency of Sampling Violation	- /100

Total Suspended Solids (TSS) Violations

Monitor End Date	Parameter	Units	Measurement Value	Violation	Limit Min/Max
3/31/12	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	49	Numeric effluent violation	- /20
6/30/12	Solids (Residue)	Percent	-133.3	Numeric effluent violation	85/ -

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	(Total suspended (TSS))				
1/31/12	Solids (Residue) (Total suspended (TSS))	Percent	82.8	Numeric effluent violation	85/ -
5/31/12	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	29	Numeric effluent violation	- /20
5/31/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	27.5	Numeric effluent violation	- /18
5/31/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	29.1	Numeric effluent violation	- /12
1/31/12	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	35	Numeric effluent violation	- /20
1/31/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	67.15	Numeric effluent violation	- /18
1/31/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	125.6	Numeric effluent violation	- /12
5/31/12	Solids (Residue) (Total	Percent	80.3	Numeric effluent violation	85/ -

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	suspended (TSS))				
6/30/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	14.4	Numeric effluent violation	- /12
3/31/12	Solids (Residue) (Total suspended (TSS))	Percent	54.8	Numeric effluent violation	85/ -
12/31/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	18.6	Numeric effluent violation	- /18
12/31/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	20.4	Numeric effluent violation	- /12
12/31/12	Solids (Residue) (Total suspended (TSS))	Percent	59.7	Numeric effluent violation	85/ -
2/29/12	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	22	Numeric effluent violation	- /20
2/29/12	Solids (Residue) (Total suspended (TSS))	Percent	82.5	Numeric effluent violation	85/ -
4/30/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	28.3	Numeric effluent violation	- /18
4/30/12	Solids (Residue) (Total	Lbs/Day	29.6	Numeric effluent violation	- /12

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	suspended (TSS))				
4/30/12	Solids (Residue) (Total suspended (TSS))	Percent	82.6	Numeric effluent violation	85/ -
11/30/12	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	53.5	Numeric effluent violation	- /30
11/30/12	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	104	Numeric effluent violation	- /20
11/30/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	119	Numeric effluent violation	- /18
11/30/12	Solids (Residue) (Total suspended (TSS))	Lbs/Day	236.1	Numeric effluent violation	- /12
11/30/12	Solids (Residue) (Total suspended (TSS))	Percent	77.7	Numeric effluent violation	85/ -
1/31/13	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	33	Numeric effluent violation	- /20
1/31/13	Solids (Residue) (Total suspended (TSS))	Lbs/Day	26.5	Numeric effluent violation	- /18
1/31/13	Solids (Residue) (Total	Lbs/Day	31.3	Numeric effluent violation	- /12

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	suspended (TSS))				
1/31/13	Solids (Residue) (Total suspended (TSS))	Percent	71.3	Numeric effluent violation	85/ -
3/31/14	Solids (Residue) (Total suspended (TSS))	Percent	82.6	Numeric effluent violation Frequency of Sampling Violation	85/ -
3/31/14	Solids (Residue) (Total suspended (TSS))	Lbs/Day	18.3	Numeric effluent violation Frequency of Sampling Violation	- /18
3/31/14	Solids (Residue) (Total suspended (TSS))	Lbs/Day	18.3	Numeric effluent violation Frequency of Sampling Violation	- /12
8/31/14	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	23	Numeric effluent violation	- /20
1/31/15	Solids (Residue) (Total suspended (TSS))	Milligrams/L (mg/L)	49	Numeric effluent violation	- /20
1/31/15	Solids (Residue) (Total suspended (TSS))	Lbs/Day	32	Numeric effluent violation	- /12
1/31/15	Solids (Residue) (Total suspended (TSS))	Percent	78.6	Numeric effluent violation	85/ -
3/31/15	Solids (Residue) (Total	Milligrams/L (mg/L)	21	Numeric effluent violation	- /20

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	suspended (TSS))				
3/31/15	Solids (Residue) (Total suspended (TSS))	Percent	75.6	Numeric effluent violation	85/ -
7/31/16	Solids (Residue) (Total suspended (TSS))	Percent	71.4	Numeric effluent violation Frequency of Sampling Violation	85/ -

Ammonia Violations

Monitor End Date	Parameter	Units	Measurement Value	Violation	Limit Min/Max
3/31/2012	Ammonia (Total)	Milligrams/L (mg/L)	3.7	Numeric effluent violation	- /1.8
3/31/2012	Ammonia (Total)	Milligrams/L (mg/L)	5.2	Numeric effluent violation	- /3
6/30/2012	Ammonia (Total)	Milligrams/L (mg/L)	4.9	Numeric effluent violation	- /1.8
6/30/2012	Ammonia (Total)	Milligrams/L (mg/L)	4.9	Numeric effluent violation	- /3
1/31/2012	Ammonia (Total)	Milligrams/L (mg/L)	10.5	Numeric effluent violation	- /1.8
1/31/2012	Ammonia (Total)	Milligrams/L (mg/L)	14.7	Numeric effluent violation	- /3
5/31/2012	Ammonia (Total)	Milligrams/L (mg/L)	4.2	Numeric effluent violation	- /1.8
5/31/2012	Ammonia (Total)	Milligrams/L (mg/L)	5.1	Numeric effluent violation	- /3
7/31/2012	Ammonia (Total)	Milligrams/L (mg/L)	2	Numeric effluent violation	- /1.8
2/29/2012	Ammonia (Total)	Milligrams/L (mg/L)	3.6	Numeric effluent violation	- /1.8
2/29/2012	Ammonia (Total)	Milligrams/L (mg/L)	3.9	Numeric effluent violation	- /3
4/30/2012	Ammonia (Total)	Milligrams/L (mg/L)	3	Numeric effluent violation	- /1.8
4/30/2012	Ammonia (Total)	Milligrams/L (mg/L)	4.3	Numeric effluent violation	- /3

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1/31/2013	Ammonia (Total)	Milligrams/L (mg/L)	5.2	Numeric effluent violation	- /1.8
1/31/2013	Ammonia (Total)	Milligrams/L (mg/L)	7.3	Numeric effluent violation	- /3
3/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	2.7	Numeric effluent violation Frequency of Sampling Violation	- /.003
3/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	3.1	Numeric effluent violation Frequency of Sampling Violation	- /.003
3/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	2.9	Numeric effluent violation Frequency of Sampling Violation	- /.0018
4/30/2014	Ammonia (Total)	Milligrams/L (mg/L)	6.9	Numeric effluent violation	- /.0018
4/30/2014	Ammonia (Total)	Milligrams/L (mg/L)	7.1	Numeric effluent violation	- /.003
4/30/2014	Ammonia (Total)	Milligrams/L (mg/L)	6.7	Numeric effluent violation	- /.003
5/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	4.1	Numeric effluent violation	- /.0018
5/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	3	Numeric effluent violation	- /.003
5/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	5.2	Numeric effluent violation	- /.003
8/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	4.9	Numeric effluent violation	- /3
6/30/2014	Ammonia (Total)	Milligrams/L (mg/L)	5.05	Numeric effluent violation	- /.0018
8/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	9.75	Numeric effluent violation	- /1.8
6/30/2014	Ammonia (Total)	Milligrams/L (mg/L)	2.3	Numeric effluent violation	- /.003
8/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	14.6	Numeric effluent violation	- /3
6/30/2014	Ammonia (Total)	Milligrams/L (mg/L)	7.8	Numeric effluent violation	- /.003
7/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	8.3	Numeric effluent violation	- /1.8
7/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	7	Numeric effluent violation	- /3
7/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	7.2	Numeric effluent violation	- /3

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7/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	10.7	Numeric effluent violation	- /3
9/30/2014	Ammonia (Total)	Milligrams/L (mg/L)	3.35	Numeric effluent violation	- /1.8
9/30/2014	Ammonia (Total)	Milligrams/L (mg/L)	4.7	Numeric effluent violation	- /3
10/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	2.2	Numeric effluent violation	- /1.8
12/31/2014	Ammonia (Total)	Milligrams/L (mg/L)	1.9	Numeric effluent violation	- /1.8
1/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	4	Numeric effluent violation	- /3
1/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	3.05	Numeric effluent violation	- /1.8
3/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	2.7	Numeric effluent violation	- /1.8
3/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	3.3	Numeric effluent violation	- /3
4/30/2015	Ammonia (Total)	Milligrams/L (mg/L)	6.2	Numeric effluent violation	- /3
4/30/2015	Ammonia (Total)	Milligrams/L (mg/L)	5.35	Numeric effluent violation	- /1.8
4/30/2015	Ammonia (Total)	Milligrams/L (mg/L)	4.5	Numeric effluent violation	- /3
5/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	6.5	Numeric effluent violation	- /1.8
5/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	7.3	Numeric effluent violation	- /3
5/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	5.7	Numeric effluent violation	- /3
6/30/2015	Ammonia (Total)	Milligrams/L (mg/L)	6.9	Numeric effluent violation	- /3
6/30/2015	Ammonia (Total)	Milligrams/L (mg/L)	7.4	Numeric effluent violation	- /3
6/30/2015	Ammonia (Total)	Milligrams/L (mg/L)	7.15	Numeric effluent violation	- /1.8
7/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	4.7	Numeric effluent violation	- /3
7/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	4.2	Numeric effluent violation	- /3
7/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	3.8667	Numeric effluent violation	- /1.8
9/30/2015	Ammonia (Total)	Milligrams/L (mg/L)	7	Numeric effluent violation	- /3

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9/30/2015	Ammonia (Total)	Milligrams/L (mg/L)	16.1	Numeric effluent violation	- /3
9/30/2015	Ammonia (Total)	Milligrams/L (mg/L)	11.55	Numeric effluent violation	- /1.8
10/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	3.55	Numeric effluent violation	- /1.8
10/31/2015	Ammonia (Total)	Milligrams/L (mg/L)	5.1	Numeric effluent violation	- /3
7/31/2016	Ammonia (Total)	Milligrams/L (mg/L)	3.61	Numeric effluent violation Frequency of Sampling Violation	- /3
7/31/2016	Ammonia (Total)	Milligrams/L (mg/L)	3.305	Numeric effluent violation Frequency of Sampling Violation	- /1.8
6/30/2016	Ammonia (Total)	Milligrams/L (mg/L)	2.1	Numeric effluent violation Frequency of Sampling Violation	- /1.8
6/30/2016	Ammonia (Total)	Milligrams/L (mg/L)	3.4	Numeric effluent violation Frequency of Sampling Violation	- /3

Design Criteria Violations

Monitor End Date	Parameter	Units	Measurement Value	Violation
3/31/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	117.7	Exceedance of Design Criteria
5/31/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	173	Exceedance of Design Criteria
5/31/2012	Flow (Not Applicable)	Gallons/Day (gpd)	150996	Exceedance of Design Criteria
6/30/2012	Flow (Not Applicable)	Gallons/Day (gpd)	107161	Exceedance of Design Criteria
1/31/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	234.3	Exceedance of Design Criteria
10/31/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	571.4	Exceedance of Design Criteria
7/31/2012	Flow (Not Applicable)	Gallons/Day (gpd)	83417	Exceedance of Design Criteria
7/31/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	124.7	Exceedance of Design Criteria
12/31/2012	Flow (Not Applicable)	Gallons/Day (gpd)	150384	Exceedance of Design Criteria

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8/31/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	128.6	Exceedance of Design Criteria
2/29/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	188.5	Exceedance of Design Criteria
11/30/2012	Flow (Not Applicable)	Gallons/Day (gpd)	113094	Exceedance of Design Criteria
4/30/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	191.9	Exceedance of Design Criteria
9/30/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	144.3	Exceedance of Design Criteria
11/30/2012	Biochemical Oxygen Demand (BOD5) (Total)	Lbs/Day	176.9	Exceedance of Design Criteria
11/30/2012	Solids (Residue) (Total suspended (TSS))	Lbs/Day	256.2	Exceedance of Design Criteria
1/31/2013	Flow (Not Applicable)	Gallons/Day (gpd)	149304	Exceedance of Design Criteria
3/31/2014	Flow (Not Applicable)	Gallons/Day (gpd)	188068	Exceedance of Design Criteria
3/31/2014	Biochemical Oxygen Demand (BOD5) (Total)	Lbs/Day	360	Exceedance of Design Criteria
5/31/2015	Solids (Residue) (Total suspended (TSS))	Lbs/Day	129.5	Exceedance of Design Criteria
11/30/2015	Biochemical Oxygen Demand (BOD5) (Total)	Lbs/Day	132.5	Exceedance of Design Criteria
2/29/2016	Flow (Not Applicable)	Gallons/Day (gpd)	103260	Exceedance of Design Criteria