NPDES Inspection Report – Wastewater Treatment Facility

National Database Information	
Inspection Date: September 11, 2024	Inspection Type: CEI – Wastewater Treatment Facility
Entry/Exit Time: 11:30 am – 12:50 pm	NPDES ID Number: SDG589801
NAICS Code: 221320	Inspection ID: 202409_SDG589801
Lead inspector and affiliation: Stephanie Passarelli / EPA Region 8	
Inspector and affiliation: Stephanie Meyers / EPA Region 8	

Facility Location Information	
Site/Facility Name & Location: Dakota Sioux Casino WWTF Lake Traverse Reservation, South Dakota Lat/Long: 45° 0' 12.67" N, 97° 9' 17.10" W	Email Report to: Chad Frevert, Compliance Safety Officer Dakota Sioux Casino & Hotel cfrevert@dakotasioux.com

Contact Information	
	Name(s)/Title
Facility Contacts:	Chad Frevert / Compliance Safety Officer / Dakota Sioux Casino & Hotel
	Tim Peters / Facilities Manager / Dakota Sioux Casino & Hotel
Person/Company meeting definition of "Operator"	Dakota Sioux Casino & Hotel
Authorized Official(s)	Chad Frevert / Compliance Safety Officer / Dakota Sioux Casino & Hotel

Permit Information		
Is the permit on site and available? **Yes, digitally**	Lagoon Category: **No Discharge**	Monitoring Frequency: **N/A**
Effective Date: **10/01/2022**	Expiration Date: **3/31/2027**	Is the Facility under a compliance schedule? **No**
Is correct contact information indicated on ICIS? **Yes**	Indicate correct contact information: **N/A**	
Receiving Water(s): **No-discharge**		
Regulatory Inspector's source of information: Notice of Intent for the permit, ICIS, ECHO and facility representatives		

Areas Evaluated During Inspection		
Permit	**Self-Monitoring Program**	Pretreatment
Records	Compliance Schedule	Pollution Prevention
Facility Site Review	Laboratory	Stormwater
Effluent/Receiving Waters	**Operations and Maintenance**	Combined Sewer Overflow
Flow Measurement	Sludge Handling/Disposal	Sanitary Sewer Overflow

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Inspection Narrative and Site Description

1.0 Introduction

On Tuesday, September 11, 2024, Environmental Protection Agency (EPA) inspectors Stephanie Passarelli and Stephanie Meyers (inspectors, we), conducted a compliance evaluation inspection of the Dakota Sioux Casino & Hotel wastewater treatment facility (facility; WWTF) located within the exterior boundaries of the Lake Traverse Reservation in South Dakota.

The purpose of the inspection was to evaluate compliance with the Clean Water Act (CWA) and the facility's National Pollutant Discharge Elimination System (NPDES) permit. The EPA is responsible for implementing the NPDES program in Indian Country within the State of South Dakota.

Inspectors were accompanied by casino representatives Chad Frevert, Safety & Compliance Officer, and Tim Peters, Facilities Manager. The inspection was coordinated with Mr. Frevert in advance, a letter notifying the Tribe of the EPA's inspection presence on the Reservation was sent on August 29, 2024. Throughout the inspection, inspectors noted their observations on a checklist which reflected conditions of the permit. Photographs taken during the inspection are included in the attached photo log (Enclosure 2).

2.0 Facility Information

At the time of the inspection, NPDES permit coverage for the facility was effective under the EPA Region 8 General Permit for Wastewater Lagoons in Indian Country (Permit) (general NPDES ID SDG589###; facility-specific NPDES ID SDG589801), as Potential to Discharge, but no Discharge (NODIS) authorized.

The facility is a two-cell non-discharging lagoon system. The facility collects wastewater from the Dakota Sioux Casino collecting domestic wastewater and non-domestic wastewater from casino operations, restaurant, and convenience store serving a population of approximately 200-500 people per the facility Authorization letter and confirmed by facility representative.

3.0 Inspection Narrative

The inspection commenced at approximately 11:30 am; inspectors arrived at the Dakota Sioux Casino & Hotel and checked in with security staff who contacted Mr. Frevert. An opening conference was held at the casino with Mr. Frevert, Compliance Safety Officer and Mr. Peters, Facilities Manager. We presented our credentials, explained the purpose of the inspection and discussed NPDES compliance and current operations of the WWTF.

Facility representatives indicated the Casino has been in operation since 2007. The facility is operated and maintained by the facility staff. However, the Lake Traverse Utility Commission helps to support some maintenance operations including mowing of cell berms and surrounding areas as needed. There are currently no plans in place for expansion, however the casino has discussed potential for the hotel to expand operations. Mr. Frevert indicated notification would be provided to EPA if any changes to operations are proposed that would impact flow to the lagoon. If needed, the Casino would evaluate potential to add a third cell west of current lagoon system. Current influent to the lagoons includes domestic wastewater, and non-domestic wastewater from the casino, restaurant, and convenience store.

Facility staff maintain records related to the lagoon for the required 3-year period. The facility is in the process of digitizing hard-copy records retained by the previous Compliance Safety Officer. Mr. Frevert indicated facility staff conducted routine inspections of the lagoon systems recording observations electronically. Records of inspections included components required in the facility permit, however facility staff requested an example checklist to ensure consistent weekly inspections are conducted. EPA indicated an example checklist would be provided with the Final Inspection Report, in additon, facility staff can reference Appendix D of the 2022 general permit for an Example Lagoon Inspection Form. Facility representatives were not aware of a current Operations & Maintenance manual available to assist operators with routine operations and maintenance activities at the WWTF but would look through prior compliance officer's records.

In July 2024, Mr. Frevert contacted EPA to discuss the potential for an emergency discharge of the lagoon due to heavy rains and the facility close to reaching capacity, and to determine any required reporting or sampling. EPA staff reviewed requirements of the Facility's permit and encouraged the facility to coordinate with an approved lab to obtain sample bottles in the event an emergency discharge was needed. No further notification was received regarding need to discharge, and Mr. Frevert indicated no emergency discharge has been needed to date but mentioned that they may need to discharge from the lagoon in the near future.

After the opening conference, inspectors proceeded to conduct a site review of the WWTF. During the field portion of the inspections, inspectors were led by Chad Frevert to the lagoon and surrounding area.

Inspectors proceeded to walk the lagoon perimeter to observe operations and facility conditions. An overview of Cell 1 (Photograph 1) shows the berms and surrounding areas have been maintained, however vegetation greater than six inches in height were observed on the inside cell walls. The inspectors and facility representative continued to walk along the southern perimeter of Cell 1 and west to Cell 2. Photograph 2 shows the proximity of the Big Sioux River which runs parallel to the southern border of Cell 2. As the inspectors continued north and west along the perimeter of Cell 2, we identified several animal burrows in the berm. Past the northwest corner of Cell 2, an animal burrow was visible and extended from the outside cell walls across the top of berm. At the location of the burrow, inspectors identified a leak (Photograph 3 & 4) in the outside cell wall resulting in a discharge to the swale on the north side of the cell. Inspectors tracked the progression of flow from the point of discharge (Photograph 5) to the furthest point the discharge reached (Photographs 6-8), approximately 200 feet. Mr. Frevert was unaware of the discharge, indicating facility staff had inspected the facility via ATV earlier in the day. He contacted facility staff and they responded to further identify and address the burrow and leak.

Inspectors also identified a blue flexible piping (Photograph 9) along the north side of Cell 2, east of the point of discharge. Mr. Frevert indicated facilities staff were arranging equipment in the event an emergency discharge was needed, as previously discussed. Per Mr. Frevert, piping was positioned in the area of the Outfall, but not used. No evidence of a discharge to the surrounding area near the blue piping was observed.

The inspection concluded at approximately 12:50 p.m. Following inspection of the facility, inspectors held a brief closing conference with Mr. Frevert where preliminary findings were discussed.

5.0 Post-Inspection Activities and Conclusion

Following the onsite inspection, Mr. Frevert contacted EPA on Monday, September 16th to confirm the leak had been addressed and provided pictures of the repair work on the berm. He later indicated the leak had fully stopped approximately 40 minutes after the end of the inspection on September 11th and did not appear to proceed further than the location where inspectors had observed. Pictures reflecting post conditions are included in Enclosure 3.

Findings, requested corrective actions, and recommendations identified pursuant to the inspection are identified in the section below.

Findings, Corrective Actions and Recommendations

Finding #1: The Permittee was not fully documenting weekly lagoon inspections.
A facility representative stated the lagoon was inspected on a regular basis and maintained inspection logs. However, the inspection logs did not include all required documentation of weekly inspections. Facility staff requested an example lagoon inspection form to ensure accurately documenting required elements.

Permit requirement:
Section 6.5.1 of the Permit states, "On at least a weekly basis, unless otherwise modified by written approval from EPA, the Permittee shall inspect its wastewater treatment facility. Permission for less frequent inspections must be requested in writing by the Permittee and may be granted on a case-by-case basis where appropriate (e.g. a lagoon located in a remote area where access is a problem during the winter and compliance issues are not present), at the discretion of EPA. The Permittee shall maintain a notebook/logbook recording all information obtained during the inspection using indelible ink pens (or inspection logs may be kept in electronic format in accordance with proper record-keeping procedures) and in sufficient detail so that decision logic may be traced back, once reviewed. At a minimum, the notebook/logbook shall include the following (see Appendix D of this Permit for an Example Lagoon Inspection Form):

6.5.1.1. Name of facility and permit number;
6.5.1.2. Date and time of the inspection;
6.5.1.3. Name of the inspector(s);
6.5.1.4. The facility's discharge status;
6.5.1.5. The flow rate of the discharge, if occurring;
6.5.1.6. Determine if a discharge is occurring, has occurred since the previous inspection, and/or if a discharge is likely to occur before the next inspection. (Note: If a discharge has occurred or is likely to occur before the next inspection, perform the appropriate monitoring and reporting requirements in Sections 3 and 5.4 of this Permit if not already done.);
6.5.1.7. If there is any leakage through the dikes;
6.5.1.8. If there are any animal burrows in the dike;
6.5.1.9. If there is any erosion of the dikes (e.g., rills, cracks or other structural indications of erosion);
6.5.1.10. If there are any rooted plants, including weeds or trees growing in the water;
6.5.1.11. If the vegetative growth on the dikes need mowing (i.e. no greater than 6" tall or any height that may interfere with monitoring, operation and maintenance of the system);
6.5.1.12. Visual observation for visible sheen, floating oil, floating solids and foam;
6.5.1.13. Visual observation to check for evidence of illicit septic dumping;
6.5.1.14. List the date scheduled for operation and maintenance procedures to be undertaken at the wastewater treatment facility;
6.5.1.15. Identification of operational and/or maintenance problems, and a determination of whether proper operation and maintenance procedures are being undertaken at the frequency necessary to maintain working operations and the overall treatment and collection systems of the wastewater treatment lagoon system;
6.5.1.16. Recommendations, as appropriate, to remedy identified problems;
6.5.1.17. A brief description of any actions taken with regard to problems identified;
6.5.1.18. Overall visual observations to identify potential concerns with the "health" of the lagoon system (e.g., water is cloudy, water coloration concerns (e.g. red, black, grey, dark blue-green and cloudy), etc.); and
6.5.1.19. Other information, problems identified, or observations, as appropriate.

The Permittee shall maintain the notebook/logbook in accordance with required record-keeping items listed above and shall make the log available for inspection, upon request, by authorized representatives of the U.S. Environmental Protection Agency or the applicable Tribe(s) (see Appendix A for list of Tribes).

Problems identified during the inspection (including, but not limited to, those associated with this section of the Permit) shall be corrected at the time of inspection, if possible. If they cannot be corrected at the time of the inspection, the inspector must identify a corrective action to remedy the problem(s), as well as a timeline for completion of the remedy. Corrective actions to remedy problem(s) shall be in line with (and addressed through) proper operation and maintenance (Section 6.6 of this Permit.). All problems identified during inspections, as well as associated corrective actions and timelines, shall be documented in the inspection log."

Section 5.9 of the permit states, "The Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this Permit, and records of all data used to complete the application for the Permit, for a period of at least three years from the date of the sample, measurement, report or application. Records of monitoring required by the Permit related to sludge use and disposal activities must be kept at least five years (or longer as required by 40 CFR Part 503). This period may be extended by request of the EPA at any time. Data collected on site, data used to prepare the DMR, copies of DMRs, and a copy of this NPDES Permit must be maintained on site."

Corrective Action:
Ensure that weekly lagoons inspections are conducted and documented in accordance with the permit. Ensure that weekly lagoon inspection reports are retained in accordance with the recordkeeping requirements of the permit. Provide the EPA and the Sisseton Wahpeton Oyate Tribe Environmental Department (Tribe) with at least one month's worth of weekly lagoon inspection reports.

Finding #2: Excessive vegetation was evident throughout the cells, and an animal burrow was observed.
Excessive vegetation exceeding six inches in height were present on the inside slopes of the cell walls (Photograph 1). Additionally, we observed an animal burrow on the berm on the north side of Cell 2 (Photograph 4).

Permit requirement:
Section 6.6 of the Permit states, "The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this Permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a Permittee only when the operation is necessary to achieve compliance with the conditions of this Permit.

The Permittee shall do the following as part of the operation and maintenance program for the wastewater treatment facility…

6.6.1.10. The Permittee shall ensure that necessary action to promptly remove burrowing animals from the dikes is taken and documented in the maintenance log;
6.6.1.11. The Permittee shall ensure prompt repair of damage to dikes caused by burrowing animals and/or erosion and documentation of all actions in the maintenance log;
6.6.1.12. The Permittee shall ensure removal of rooted plants, including weeds and trees, from the water on a regular basis or as needed and documentation of all actions in the maintenance log; and
6.6.1.13. The Permittee shall ensure that the dikes are kept mowed on a regular basis during the growing season or as needed (i.e., vegetation not greater than 6" tall or any height that may interfere

with monitoring, operation and maintenance of the system) and that documentation of all actions taken are recorded in the maintenance log...”

<u>Corrective Action</u>:
Remove the overgrown vegetation and trees from inside the cells in accordance with Section 6.6 and relevant subparts of the Permit. In a response to the EPA and the Tribe, provide photographs indicating this corrective action has been completed and provide the date of completion.

<u>Finding #3: An Operations and Maintenance (O&M) Manual was not available for the operators and was not in use by the facility.</u>

<u>Permit Requirement:</u>
Section 6.6 of the Permit, Proper Operation and Maintenance (O&M) states, “The Permittee shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of the Permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up, auxiliary facilities and/or similar systems, which are installed by a Permittee, when the operation is necessary to achieve and maintain compliance with the conditions of the Permit.”

The Permittee shall do the following as part of the operation and maintenance program for the wastewater treatment facility:

6.6.1 For Permittees not previously covered under the Region 8 General Permit for Wastewater Lagoon Systems in Indian Country, the Permittee shall, as soon as reasonable and practicable, but no later than six (6) months after the effective date of this Permit, do the following as part of the operation and maintenance program for the wastewater treatment facility:

6.6.1.1 Have a current O & M Manual(s) that describes the proper operational procedures and maintenance requirements of the wastewater treatment facility;
6.6.1.2 Have the O & M Manual(s) readily available to the operator of the wastewater treatment facility and require that the operator become familiar with the manual(s) and any updates;
6.6.1.3 Have a schedule(s) for routine operation and maintenance activities at the wastewater treatment facility; and,
6.6.1.4 Require the operator to perform the routine operation and maintenance requirements in accordance with the schedule(s).

In addition to the operation and maintenance items in the manual for the lagoon system, ALL Permittees shall do the following maintenance, at a minimum:

The Permittee shall maintain a daily log in either paper (e.g. bound notebook) or electronic format containing a summary record of all operation and maintenance activities at the wastewater treatment facility. At a minimum, the log shall include the following information:

6.6.1.5. Date and time;
6.6.1.6. Name and title of person(s) making the log entry;
6.6.1.6. Name of the persons(s) performing the activity;
6.6.1.7. A brief description of the activity; and,
6.6.1.8. A brief description of any operations and maintenance activity performed on the wastewater treatment lagoon system
6.6.1.9. The Permittee shall ensure that necessary action to promptly correct the problem of leakage through the dikes is taken and documented in the maintenance log
6.6.1.10. The Permittee shall ensure that necessary action to promptly remove burrowing animals from the dikes is taken and documented in the maintenance log
6.6.1.11. The Permittee shall ensure prompt repair of damage to dikes caused by burrowing animals and/or erosion and documentation of all actions in the maintenance log
6.6.1.12. The Permittee shall ensure removal of rooted plants, including weeds and trees, from the water on a regular basis or as needed and documentation of all actions in the maintenance log;
6.6.1.13. The Permittee shall ensure that the dikes are kept mowed on a regular basis during the growing season or as needed (i.e., vegetation not greater than 6" tall or any height that may interfere with monitoring, operation and maintenance of the system) and that documentation of all actions taken are recorded in the maintenance log.
6.6.1.14. Other information, as appropriate.

Corrective Action:
Develop and implement an O&M Manual prepared in accordance with Section 6.6 of the Permit. In a response to the EPA and the Tribe, provide a copy of the O&M Manual.

Finding #4: During the inspection, a leak in the cell wall was identified resulting in a discharge to a swale. For a description of the leak which occurred on September 11, 2024, please see section 3.0 Inspection Narrative of the report above. The identified leak lasted approximately 40 minutes in duration following the inspection, the facility was unable to obtain sample bottles and collect a sample during this timeframe.

Permit requirement:
Section 3.2 of the Permit "POTENTIAL TO DISCHARGE (NODIS) Monitoring Requirements: No Discharge Requirement" states:

Effective immediately as of the effective date of the permit coverage letter and lasting through the life of this Permit, there shall be no discharge except in accordance with the bypass provisions of this Permit. Facilities covered under the NODIS category are not expected to discharge, and this Permit does not authorize discharges from these facilities, except in accordance with the bypass provisions of this Permit. However, if an upset, bypass or any other unauthorized discharge is discovered or is expected to occur, the discharge is to be monitored and the Permittee must follow the monitoring and reporting requirements outlined in this section and Section 5.4.2 of this Permit.

Self-Monitoring Requirements: If a discharge is discovered or expected to occur, the discharge shall be monitored as shown below:….

In addition, Section 6.6 of the Permit states, "The Permittee shall, at all times, properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of the Permit. Proper operation and maintenance also include adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up, auxiliary facilities and/or similar systems, which are installed by a Permittee, when the operation is necessary to achieve and maintain compliance with the conditions of the Permit."

Corrective Action:
Ensure that the facility performs proper operation and maintenance to prevent degradation of the lagoon cells and surrounding area. Provide the EPA and the Tribe with a routine schedule for maintenance of the lagoon facilities.

In the event of a future unauthorized discharge, ensure the facility complies with Section 3.2 of the permit to collect a sample as required.

The Notice of Noncompliance as required in Section 5.10.2 of the Permit was provided to EPA for the September 11, 2024 leak. Additionally, a written submission as required in Section 5.10.3 was also provided to EPA within the required five days.

Finding #5: The facility had an unpermitted, unauthorized discharge in 2019 and 2024, and tentative plans to discharge in 2024.
In August 2019, facility representatives notified EPA of their need to discharge due to lagoon levels being high. At the time, the facility was not covered under any permit, they had rescinded their renewal application under the Lagoon General Permit stating they had no plans to discharge and therefore did not need permit coverage. From August 7, 2019 to September 9, 2019, the facility discharged from cell 2 into a field north of the lagoon system. In email correspondence, facility representatives stated they did take samples of the discharge, but no records of sampling have been submitted nor are results found in EPA databases.

During July 2024, as well as during the September 2024 inspection, facility representatives discussed the potential to discharge again due to lagoon levels being high. At the time of the inspection, a hose was put in place to prepare for the need to discharge (photograph 9).

Additionally, during the September 2024 inspection, the facility experienced a leak in the Cell 2 berm wall resulting in an unauthorized discharge.

Permit Requirement:
Section 1.5 of the permit (Categories and Subcategories of Coverage) indicates authorization for coverage under this permit will be limited to one of the following two categories of wastewater lagoon systems:

DISCHARGE (DIS) – Authorization to Discharge. This category is used for wastewater treatment lagoon facilities that either discharge on a continuous, periodic, seasonal or other intermittent basis. No prior notification to EPA is required before starting to discharge once notification of Permit coverage from EPA is received, however discharges may require Tribal Environmental Office notifications (specified in the Tribal Environmental Office Notification information in Section 1.6 of the Permit, below).
For Permit coverage, this category is further broken down into three sub-categories depending on the frequency of discharge and required reporting: Sub-category A (monthly reporting), Sub-category B (quarterly reporting), and Sub-category C (semiannual reporting). This sub-category designation shall be determined by EPA based on the evaluation of NOI information submitted. Section 3 of the Permit contains additional details on the permit limits, monitoring and reporting requirements related to these sub-categories.

POTENTIAL TO DISCHARGE (NODIS) – This category is for those wastewater treatment lagoon facilities that do not anticipate discharge to occur but still have the potential to discharge (e.g. upset or bypass discharges). These wastewater treatment facilities do not have authorization to discharge under regular operating conditions and are required to have no discharge except in accordance with the upset or bypass provisions of the Permit. A discharge may include, but is not limited to, discharge of water from the lower end of the treatment or containment system through a release structure or over or through retention dikes. Should a facility in this category anticipate the need to perform discharges on a regular, periodic or other intermittent basis, or discharges beyond authorized bypasses or upset conditions begin to occur during the Permit terms, EPA may determine that the facility's Permit category and coverage requirements should be changed to "discharge (DIS)".

Section 2.1 of the permit ("Obtaining Authorization for Coverage Under this Permit" states:

2.1.1 To obtain authorization under this permit, a facility must:

> Submit a complete and accurate NOI using an EPA notice of intent form for coverage under this Permit. The "NPDES 2020 Lagoon General Permit Notice of Intent Form" is located electronically at: https://www.epa.gov/npdes-permits/region-8-npdes-lagoon-general-permit

Corrective Action:
Coordinate with EPA to change permit coverage from No Authorization to Discharge (NODIS) to Authorization to Discharge (DIS). A relevant EPA contact to address questions regarding a change in permit coverage is Michael Boeglin reachable at boeglin.michael@epa.gov . In a response to the EPA and the Tribe, provide a timeline to address the corrective action and projected date of completion to address this finding.

Included below are the submission Instructions for the NOI:

There are three methods of submission:

1) (**PREFERRED METHOD**) Electronic fillable pdf submission:

a. Using the fillable pdf version of the electronic NOI application accessible at: https://www.epa.gov/npdes-permits/region-8-npdes-lagoon-general-permit, complete the application and sign electronically (requires Adobe Acrobat® signature functionality).

b. Send the signed completed NOI pdf and all required supplemental material in an email with the **Subject: "R8 LGP NOI- [*provide facility name*], [*provide permit number*]"** to **Boeglin.michael@epa.gov**.

2) Electronic scanned pdf submission (if unable to sign electronically):

a. Using a hardcopy version of the NOI (e.g., received with the notification letter that EPA mailed to permittees, or printed from the website listed in method 1, above), complete the application **in ink**.

b. Scan the signed completed NOI into pdf format and attach it in an email (along with all required supplemental material) with the **Subject: "R8 LGP NOI- [*provide facility name*], [*provide permit number*]"** to **Boeglin.michael@epa.gov**.

c. For scanned submissions, a mailed in "wet" signature is also required for our records. Please mail the original signed hardcopy application and all required supplemental material to:

Wastewater Section c/o Michael Boeglin
(8WD-CWW)
1595 Wynkoop Street
Denver, Colorado 80202

3) Hardcopy mailed submission: a. Using a hardcopy version of the NOI (e.g., received with the notification letter that EPA mailed to permittees, or printed from the website listed in method 1, above), complete the application **in ink**.

b. Mail the original signed hardcopy application and all required supplemental material to:

Wastewater Section c/o Michael Boeglin
(8WD-CWW)
1595 Wynkoop Street
Denver, Colorado 80202