



NPDES Compliance Inspection Report

City of Othello Sewer Treatment Plant Othello, Washington

Permit #: WA0022357

Inspection Date: May 5, 2021

Prepared by:

Jon Klemesrud
U.S. Environmental Protection Agency, Region 10
Enforcement & Compliance Assurance Division
Water Enforcement & Field Branch
Field, Data & Drinking Water Enforcement Section

Signature/Date:

Supervisor Signature/Date:

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ATTACHMENT A - Aerial Image (Google Earth)

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ATTACHMENT F - May 1, 2021 - December 1, 2017 Effluent Limit Exceedances

(All details in this report were obtained through conversations with Jim Laird, Terry Clements, Sam Harris, Sam Bise, Geena Dorow, John Patrouch or from observations made during the inspection.)

I. Facility Information

Facility Name: City of Othello Sewer Treatment Plant (Othello STP)

Facility Owner/Operator: City of Othello

Physical Address: 2302 Cunningham Road
Othello, Washington 99344

Lat/Long: 46.825201, -119.226015

Mailing Address: 500 E. Main Street
Othello, Washington 99344

NAICS Code: 221320 (Sewage Treatment Facilities)
SIC Code: 4952 (Sewerage Systems)

Facility Contacts: Jim Laird, Lead Operator
City of Othello Public Works
Office Phone: (509) 488-6997
Email: jlaird@othellowa.gov

Terry Clements, Director
City of Othello Public Works
Office Phone: (509) 488-6997
Email: tclements@othellowa.gov

Shawn Logan, Mayor
City of Othello
Office Phone: (509) 488-5686
Email: slogan@othellowa.gov

Sam Harris, Operations Staff
City of Othello Public Works
Office Phone (509) 488-6997
Email: sharris@othellowa.gov

Sam Bise, Operations Staff
City of Othello Public Works
Office Phone (509) 488-6997
Email: sbise@othellowa.gov

Genna Dorow, City Council Member
City of Othello

John Patrouch, PE,
Varela Engineering and Management
Office Phone: (509) 328-6066
jpatrouch@varela-engr.com

Permit Number: WA0022357

Receiving Water: Owl Creek

II. Inspection Information

Inspection Date: May 5, 2021

Inspectors: Jon Klemesrud, Inspector
EPA Region 10, ECAD /FDDWES

Other Individuals: Art Jenkins, PE, Permit Unit Supervisor
Water Quality Program, Eastern Regional Office
Washington Department of Ecology

Arrival Time: 10:00 AM

Departure Time: 12:45 PM

Purpose: To determine facility compliance with the Clean Water Act and the State of Washington National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit.

III. Permit Information

The City of Othello Sewer Treatment Plant (“Facility”) is permitted under Washington Department of Ecology (Ecology) National Pollutant Discharge Elimination System (NPDES) Waste Discharge Permit # WA0022357. The Facility’s permit became effective on October 1, 2020 and is due to expire on September 30, 2025.

Prior to October 1, 2020, the facility was covered under the previous version of Permit # WA0022357 which was administratively continued after it expired on December 31, 2013.

The 2020 permit includes a Compliance Schedule which requires disinfection of the effluent, several studies intended to characterize the receiving water (Owl Creek), determine groundwater impacts, characterize effluent parameters, and estimate the amount of collection system inflow and infiltration entering the treatment system. The permit contains interim discharge limits as well as final discharge limits that will become effective October 1, 2030.

IV. Background

The City of Othello owns and operates the 80-acre facultative lagoon wastewater treatment system located on the western edge of the city limits. An aerial image is attached to this report (**Attachment A**) for a general footprint. The current 5 lagoon system has been in operation since 1981. The

sanitary sewer collection system was installed in 1955. Othello has an estimated resident population of 8,386 (2019 U.S. Census). The Facility has an average daily flow of 1.5 million gallons per day (MGD) and discharges continuously throughout the year.

In addition to the municipal wastewater, the collection system receives a seasonal flow of 80,000 gallons per day (GPD) (approx.) from a single industrial user (local juice processor) SVZ, USA. The flow from SVZ, USA is primarily municipal wastewater but also includes food processing wastewater. Peak flow from SVZ occurs during the month of September, the collection agreement began in 2017. No septage is accepted at the Facility.

According to EPA's Enforcement and Compliance History Online (ECHO), the Facility is in a significant non-compliance (SNC) status based on continued/historic effluent limit violations.

The Facility was last inspected by Ecology on November 29, 2017. On May 3, 2018, Othello provided a status report (**Attachment B**) to address compliance concerns that were identified during the 2017 Ecology inspection.

On March 12, 2021, the Facility was issued a Warning Letter (**Attachment C**) by Ecology for 6 months of permit violations for effluent limit exceedances of biochemical oxygen demand, TSS, pH, dissolved oxygen, and fecal coliform.

On April 7, 2021 the Facility submitted a response to the March 12, 2021 Warning Letter (**Attachment D**). The response provided a summary of the reported violations, an explanation of the causes, and the steps planned to prevent future violations.

V. Inspection Chronology

This was an announced inspection. On April 26, 2021, I spoke with Mr. Jim Laird, Othello Public Works Lead Operator, I stated that I'd been asked to conduct an NPDES compliance inspection of the Othello STP, in coordination with Ecology. We agreed to meet at the Public Works Office on May 4, 2021, at 10:00am. We discussed that I would be joined on the inspection by Mr. Art Jenkins of Ecology.

Once arrived at the Public Works Office on May 4th, 2021, Art Jenkins and I met with Facility representatives in the parking lot to begin the inspection. The inspection included an opening conference, a walk-through of the treatment system and in-house laboratory, a records review, and a closing conference.

For the walk-through, we observed general operations, process flow, sampling locations, the in-house laboratory and single outfall. We were allowed to inspect all areas requested.

The record review occurred inside the small office building located at the Facility, portions of the record review occurred post-inspection.

The closing conference occurred following our observation of the outfall and took place outside of the small office building. During the closing conference, I discussed my observations from the walk-through and from the initial records review. I also provided a copy of EPA's Small Business Resource Information Sheet and an EPA WWTP Compliance Advisory Handout.

VI. Opening Conference

The opening conference was held outside of the Public Works Office shortly after our arrival. In addition to Mr. Laird, we were also joined by facility representatives Mr. Clements, Mrs. Dorow, Mr. Harris, and Mr. Bise.

We had our initial introductions, I provided a business card and presented my EPA credentials to the group. I discussed the purpose and expectations of the inspection.

During the opening conference, Mr. Laird provided general information about current Facility operations and recent improvement projects. Mr. Laird has been an operator at the WWTP for approximately 15 years, he holds a current Level II wastewater treatment certification that expires on December 31, 2021. In addition to Mr. Laird, wastewater operations are currently supported by Mr. Harris and Mr. Bise. The Facility is also in an agreement with Mrs. Dorow, an Othello Council Member who hold a Level IV certification and is assisting in recent planning and updates.

According to the Facility, Ecology's Andy O'Neil (Technical Assistance Provider) and Diana Washington (Permit Manager) are also contacted as needed for support relating to operations and compliance.

VII. Site Inspection

Following the opening conference, we drove to the headworks of the treatment system to begin our facility walk-through. Photographs taken during the walk-through used in this inspection report, including a complete photo log appears in **Attachment E**.

For the entire walk-through, we were joined by Mr. Laird, Mr. Clements, Mrs. Dorow, Mr. Harris, and Mr. Bise. Facility consultant Mr. John Patrouch of Varela Engineering and Management (Varela) arrived shortly after beginning the walk-through and was present throughout the remainder of the inspection. According to the Facility, Varela, as well as Esvelt Environmental Engineering has been contracted to focus on improvements capable of meeting the interim discharge limits associated with the new permit.

Wastewater collection and treatment at the Facility consist of the following processes:

1. Gravity flow collection to a splitter box at the headworks
2. Two primary lagoons (Pond 1a and Pond 1b)
3. Open channel with a coarse screening
4. Cascade aeration channel (concrete step aerator)
5. Two secondary treatment/facultative lagoons (Pond 2 and Pond 3)
6. Polishing pond (Pond 4)
7. Chlorine contact chamber (inactive)
8. Discharge to Owl Creek via underground pipe (outfall 001)

Our walk-through began at the headworks, the Facility had an influent flow rate of 1.1 MGD. Flow is recorded via a Teledyne ISCO 4210 Ultrasonic Flow Meter (**Photo 1 and Photo 2**). The influent meter was recently calibrated/certified on March 24, 2021 by Whitney Equipment Company Inc. (WECI). Influent composite samples required by the permit are taken by a ISCO 3710 refrigerated sampler (**Photo 3**) located near the headworks.

Influent flow is routed to a splitter box which distributes flow to two primary lagoons (Pond 1a and Pond 1b) (**Photo 4**). The primary lagoons discharge to an open channel (**Photo 5**) with a coarse screen/grate located at the end of channel near the headworks (**Photo 6**). According to the facility, screenings are manually collected off the screen and open channel at least once a day if not more frequently. Removed screenings are collected in covered bins and sent to the local landfill.

After screening, flow can be directed back to the primary lagoons or can enter the cascade aeration channel (concrete step aerator) (**Photo 7**) to the two facultative secondary treatment lagoons (Pond 2 and Pond 3). Pond 3 gravity flows into the final polishing lagoon (Pond 4). According to the facility, the lagoon system has a retention time of approximately 180 days.

From Pond 4, water is routed to an unused chlorine contact chamber (**Photo 8**). According to the Facility, water passes through the chamber but is not disinfected. The Facility has not disinfected their effluent in over 15 years due to the chlorination equipment having been removed after portions were no longer operable.

Effluent composite samples are taken by an ISCO refrigerated sampler (**Photo 9**) at the end of the chlorine contact chamber. Effluent is then discharged to Owl Creek through an underground pipe (**Photo 10**). Owl Creek discharges into Lower Crab Creek approximately 10 miles downstream of the discharge point.

Effluent flow is recorded by an ISCO 4230 Bubbler Flow Meter (**Photo 11**), at the time of inspection effluent flow metered at 0.72 MGD. The effluent flow meter was also calibrated/certified on March 24, 2021 by Whitney Equipment Company Inc. (WECI).

The Facility has an in-house laboratory setup in a small office building near the chlorine contact chamber and west of Pond 3. Dissolved Oxygen (DO) and pH are analyzed in-house by Facility staff. The on-site laboratory was last accredited for the analyzed parameters by Quality Control Services in Portland, Oregon on April 13, 2021. In preparation for the Facility's new disinfection system, the in-house laboratory also received accreditation for their spectrophotometer, used for monitoring/reporting Total Residual Chlorine.

Calibration reagents were current. The DO meter is calibrated daily, and the pH meter undergoes a 3-point calibration prior to each use. Calibration records are documented a corresponding notebook for each device.

According to the Facility, effluent pH and DO is monitored three times a day until continuous monitoring equipment is installed as part of a disinfection system upgrade project. The project is scheduled for installation in September 2021. Mr. Laird stated that the Facility has received written approval from Ecology Permit Manager Dianna Washington for this interim frequency of pH and DO monitoring.

Remaining monitoring parameters required 2/week or monthly by the permit (i.e. TSS, BOD5, Total Ammonia, Fecal Coliform) are analyzed by a local laboratory, Kuo Testing Laboratories located in Othello. Kuo Testing laboratories is Ecology certified laboratory.

Monitoring results are submitted by the Facility to Ecology's Water Quality Permitting and Reporting Information System (PARIS).

VIII. File Review

Following our walk-through of the lagoons system and on-site laboratory, I reviewed the following records and documents as part of this inspection:

- Operator Certification – James Laird – Group II certification # 7019, expiration of 12/31/21
- Operation and Maintenance (O&M) Manual – last modified in March 1995, the manual was not reviewed at the time of inspection, but verified it was on-site.
- Plant Flow Plan (Diagram)
- DO/pH Bench Sheet Data
- Calibration Certification
- Laboratory Results and Discharge Monitoring Reports (DMRs) for months selected at random: January 2021, September 2020, March 2019, December 2018.
- Receiving Water Study: Trace Metals QAPP (Permit Condition S9. E.1)
- Design Basis, Plans & Specifications for Disinfection System (Permit Condition S9.A.1)
- Receiving Water Temperature Study QAPP (Permit Condition S9.D.1)
- Cyanide and Mercury Source Tracing in the Collection System QAPP (Permit Condition S11.A)

IX. Areas of Concern

The following areas of concern were noted as part of this inspection:

A. Effluent Limit Exceedances

Part S1. A. of the permit states, “the discharge of any of the following pollutants more frequently than, or at a level in excess of, that identified an authorized by this permit violates the terms and conditions of this permit”

According to Ecology’s Water Quality Permitting and Reporting Information System (PARIS), since the last compliance inspection on November 29, 2017, the Facility has reported 284 effluent limit exceedances. Primarily the exceedances for pH, Fecal Coliform, biochemical oxygen demand (BOD) and total suspended solids (TSS). A summary of the reported effluent limit exceedances (May 1, 2021 – December 1, 2017) appears in **Attachment F**.

According to the Facility, the cause of many of the exceedances are due to ongoing issues with infiltration/inflow (I/I). It is estimated that 200,000 gallons a day enter the treatment plant which has been diluting the treatment process. To evaluate/address (I/I), Othello contracted with American Leak Detection in February 2020 to conduct smoke testing of the collection system. 31 issues were identified from the testing that would allow stormwater in the sewer system.

On March 24, 2021, the Facility signed a contract with Planned and Engineered Construction, Inc for a sewer lining project in an effort to reduce the I/I. A copy of the contract was provided during the inspection, allocated funds for the sewer lining project amounted to \$893,602.16.

To limit TSS and pH exceedances, the Facility is exploring purchasing a surface agitator/diffuser to be used within Pond 4 and/or algaecide dosing.

An ABASCO baffle curtain has been purchased for the effluent of Pond 4. The cost of the baffle was approximately \$4,660 and Mr. Laird stated that it would hopefully be delivered in the coming week. The Facility is also in the process of obtaining quotes for installation of baffles and solar powered surface agitators for the primary lagoons (Pond 1a and Pond 1b) in an attempt to improve BOD and TSS removal.

To address fecal coliform exceedances, the Facility has contracted for a new disinfection system (chlorination/dechlorination) to be operational by September 30, 2021 (a permit requirement). The project also includes continuous monitoring equipment for effluent chlorine residual, pH, and dissolved oxygen.

B. Facility Loading

Part S4.A of the Permit states that the flows or waste loads for the permitted facility must not exceed a Maximum Month Design Flow (MMDF) of 7.5 MGD and the maximum month influent loading for TSS and BOD of 2600 lb/day.

According to Ecology's Water Quality Permitting and Reporting Information System (PARIS), since the last compliance inspection on November 29, 2017, the Facility has reported 8 facility design loading exceedances. The events are summarized in the table below:

Date	Reported Value
01/01/2020	3772 lbs/day (Average Monthly BOD)
01/01/2020	2684 lbs/day (Average Monthly TSS)
12/01/2019	2856 lbs/day (Average Monthly TSS)
07/01/2019	3701 lbs/day (Average Monthly TSS)
07/01/2019	2742 lbs/day (Average Monthly BOD)
07/01/2019	14.593 MGD (Flow)
06/01/2019	5340 lbs/day (Average Monthly BOD)
08/01/2018	2723 lbs/day (Average Monthly TSS)

C. Effluent Disinfection

Part S5. of the permit states "the permittee must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) that are installed to achieve compliance with the terms and conditions of this permit.

As stated earlier in this report, effluent has not been disinfected in over 15 years and the chlorination equipment has been removed after it was no longer operable. The concern is that the Facility was designed/engineered for chlorination within the chlorine contact chamber as a method of disinfection and the process hasn't been operable resulting in fecal coliform effluent limit exceedances (as documented in Area of Concern A).

According to the Facility, a new disinfection system including chlorination and dechlorination) is scheduled/contracted to be installed and operational by September 30, 2021. Part S.9.A of the permit states: “the permittee must begin disinfecting discharge by September 1, 2021 to the system and submit an electric notice of completion to Ecology when it is finished.”

D. Recording Elements of pH and Dissolved Oxygen Monitoring

Within Part S3. of the permit, it states for each measurement or sample taken, the Permittee must record: “1. The date, exact place, method, and time of sampling or measurement. 2. The individual who performed the sampling or measurement. 3. The dates the analyses were performed. 4. The individual who performed the analyses. 5. The analytical techniques or methods used. 6. The results of all analyses.”

At the time of inspection, it was noted that for pH and Dissolved Oxygen monitoring, the Facility was only recording the value and date of the monitoring/analyses. We discussed the permit requirement at the time of inspection and the Facility stated that they will begin recording all of the required monitoring elements moving forward.

X. Closing Conference

Following the walk-through of the Facility, a closing conference was held with Mr. Laird, Mr. Clements, Mrs. Dorow, Mr. Harris, and Mr. Bise. I discussed my inspection observations including Area of Concern A, C, D. I then thanked all representatives for their time and cooperation with the inspection.

ATTACHMENT A

Aerial Image (Google Earth)



ATTACHMENT B

May 3, 2018 Status Report



May 3, 2018

www.varela-engr.com
va@varela-engr.com

Diana Washington, PE
Senior Water Quality Engineer
Washington State Department of Ecology
4601 N Monroe
Spokane, WA 99205-1295

RE: Othello Wastewater Treatment Plant – NPDES Permit No. WA0022357
Response to November 29, 2017 Compliance Inspection

Dear Ms. Washington:

On behalf of the City of Othello, Varela and Associates, Inc. has prepared this status report to update you on the progress that the City is making to address the issues presented in the Compliance Inspection report documentation dated February 6, 2018.

The March 1, 2018 meeting attended by Mayor Shawn Logan and City Administrator Wade Farris as well as Varela and Associates, Esvelt Environmental Engineering, and Ecology staff provided a platform to discuss the complex water resource issues in the City. The discussion helped to understand the goals and roles of the City and Ecology and also helped to clarify the issues presented in the Compliance Inspection Report.

The City has contracted with Varela and Associates to prepare a Wastewater Facility Plan that will evaluate improvements to the treatment lagoons as well as evaluate potential future treatment alternatives including a mechanical plant and water reuse scenarios.

The following issues were identified in the Compliance Report:

1. Fecal Coliform violations

Ecology requires addressing the lack of disinfection. The disinfection system has not been operated for a long time and much of the equipment has been removed or is no longer operable. The City has contracted with Varela and Associates to prepare an engineering report identifying disinfection alternatives and that recommends a selected alternative for design and construction. The engineering report is scheduled to be completed by early summer 2018 to allow time for Ecology review prior to applying for Ecology funding design and construction in October 2018.

If, as expected, chlorine will continue to be used for effluent disinfection, the system will include dechlorination and the lab and operator will be trained and accredited for the ultra-low method of testing chlorine residual.

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MAY 07 2018

Department of Ecology
Eastern Washington Office

Diana Washington, PE
Senior Water Quality Engineer
Washington State Department of Ecology
May 3, 2018
Page 2

2. pH violations

The engineering report for disinfection will include a section that addresses alternatives for effluent pH adjustment. It is expected that both the disinfection and pH adjustment section will be designed and installed at the same time.

3. BOD violations

The wastewater lagoon system has the capacity to treat the influent BOD loads. The effluent BOD concentrations are almost always below permit limits. The majority of the BOD violations are due to not achieving the secondary treatment standard of 85% BOD removal. The primary cause of not achieving the percent reduction standard is low influent BOD concentrations caused by infiltration.

The city is currently (spring 2018) TVing the most likely sections of the sewer system to have an infiltration problem. This information will be evaluated in the Wastewater Facility Plan to determine if lining sewers will be a cost effective means to reduce infiltration into the sewer system. Reducing infiltration should increase the influent concentration of BOD, thereby reducing the number of instances that the plant violates the 85% BOD removal permit requirement.

4. TSS violations

Total suspended solid violations appear to be generally high effluent concentrations that result from algae growth in the lagoons. Effluent filtration to reduce effluent TSS will be an option evaluated in the Facility Plan.

Please contact me if you have any questions or would like to discuss the project.

Sincerely,

VARELA & ASSOCIATES, INC.



John C. Patrouch, PE
Project Engineer

cc: Wade Farris, City Administrator
Terry Clements, Public Works Director
Allison Esvelt, PE

JCP\172-26\wastewater facility plan

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MAY 07 2018

Department of Ecology
Eastern Washington Office

ATTACHMENT C

March 12, 2021 Warning Letter



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N. Monroe Street • Spokane, Washington 99205-1295 • (509) 329-3400

March 12, 2021

The Honorable Shawn Logan
City of Othello
500 East Main Street
Othello, WA 99344

RE: Warning Letter for National Pollutant Discharge Elimination System Permit WA0022357

Dear Mayor Logan:

The City of Othello is out of compliance with National Pollutant Discharge Elimination System (NPDES) permit WA0022357 that was issued August 21, 2020. For the past six months, the City of Othello has had numerous discharge monitoring report (DMR) violations, permit limit exceedances, and unreported or missing samples. Additionally, the City has failed to follow the requirements in Section S3 of their NPDES permit by not reporting violations to Ecology. Below is an explanation of the violations.

1. Effluent Limit Violations

Between October 2020 and February 28, 2021, the City of Othello generated approximately 31 permit violations in the WQWebDMR database for BOD₅, TSS, pH, dissolved oxygen and fecal coliform.

Section S1.A of the permit authorizes the discharge of municipal wastewater at the permitted location subject to compliance with effluent limitations set in the permit.

2. Reporting Noncompliance

Section S3.F of the City of Othello's permit requires the facility to notify Ecology immediately when they violate or are unable to comply with permit conditions. They must follow up with a written report within five days that includes the description of the noncompliance and its cause and actions taken to prevent reoccurrence of noncompliance. The City of Othello has not reported permit violations to Ecology as required by Section S3.F. Each failure to report noncompliance constitutes a separate violation of the permit.

Contact with the Facility

The Department of Ecology had the following communications with the City of Othello regarding the permit violations.

- 9/29/2020 – Email from Ecology to facility discussing BOD samples and testing.
- 12/01/2020 – Email from Ecology to facility including permit language on reporting noncompliance and making notes on DMRs when violations occur.
- 03/11/2021 – Ecology email response to facility regarding February 2021 violations and reporting noncompliance.

Within 30 days from receipt of this warning letter, please provide the following to Ecology:

1. Submit a written report explaining the cause of the violations identified in this letter.
2. Identify the steps taken to prevent future violations.

Send the report electronically to Rob Buchert, Senior Compliance Specialist at rbuc461@ecy.wa.gov or by mail at Water Quality Program, Department of Ecology, 4601 N. Monroe Street, Spokane, Washington 99205-1265.

This warning letter is to make you aware of the importance the Department of Ecology places on the legal implications of noncompliance with the limits, monitoring requirements, and terms and/or conditions established in your permit.

Continued noncompliance will result in formal enforcement action by Ecology. Formal enforcement action may include Notice of Violation, Administrative Order, and Penalties of up to \$10,000 per day per violation.

Please contact the Region's wastewater operator technical assistance provider, Andy O'Neill at (509) 710-3676 or aone461@ecy.wa.gov if you need technical assistance or have questions about operator certification.

Please contact me at (509) 209-1586 or Rob.Buchert@ecy.wa.gov if you have questions regarding this warning letter or Ecology's enforcement process.

Sincerely,



Rob Buchert
Senior Compliance Specialist
Water Quality Program
Eastern Regional Office

RB:sj

cc. Terry Clements, City of Othello
Jim Laird, City of Othello
Shawn Obrien, City of Othello
Diana Washington, PE, Ecology Permit Manager Eastern Region
Andy O'Neill, Ecology Technical Assistance Eastern Region
Art Jenkins, PE, Water Quality Permit Unit Supervisor Eastern Region

Table 1: Violations from October 2020 – February 2021

Monitoring Month	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Limit	Type of Violation
October 2020	001	BOD5	lbs/day	Avg. monthly	400.678	390	Permit limit exceedance
	001	BOD5	mg/L	Avg. monthly	37.3111	30	Permit limit exceedance
	001	BOD5	Percent	Avg. monthly	62.8	85	Permit limit exceedance
	001	Dissolved Oxygen	mg/L	Daily Sample	-	-	Frequency of sampling violation
	001	Fecal Coliform	#/100 ml	Weekly geometric mean	1113.91	540	Permit limit exceedance
	001	pH	s.u.	Daily sample	-	-	Frequency of sampling violation
	001	pH	s.u.	Daily sample	-	-	Frequency of sampling violation
	001	TSS	Percent	Avg. Monthly	76	85	Permit limit exceedance
November 2020	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.2	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	BOD5	Percent	Daily sample	77.83	85	Permit limit exceedance

Monitoring Month	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Limit	Type of Violation
	001	TSS	Percent	Daily sample	60.775	85	Permit limit exceedance
December 2020	001	BOD5	Percent	Avg. Monthly	79.3875	85	Permit limit exceedance
	001	Dissolved Oxygen	mg/L	Daily sample	-	-	Frequency of sampling violation
	001	Fecal Coliform	#/100 ml	Weekly geometric mean	2419	540	Permit limit exceedance
	001	pH	s.u.	Daily sample	-	-	Frequency of sampling violation
	001	pH	s.u.	Single sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Single sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Single sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Single sample	-	-	Frequency of sampling violation
	001	TSS	Percent	Avg. monthly	67.53	85	Permit limit exceedance
January 2021	001	BOD5	Percent	Avg. monthly	78.7	85	Permit limit exceedance
	001	Fecal Coliform	#/100 ml	Weekly geometric mean	1440	540	Permit limit exceedance
	001	TSS	Percent	Avg. monthly	78.4	85	Permit limit exceedance
February 2021	001	BOD5	Percent	Avg. monthly	81.8	85	Permit limit exceedance
	001	Fecal Coliform	#/100 ml	Weekly geometric mean	2419	540	Permit limit exceedance
	001	TSS	Percent	Avg. monthly	79.8	85	Permit limit exceedance

ATTACHMENT D

April 7, 2021 Response to Warning Letter



STATE OF WASHINGTON
DEPARTMENT OF ECOLOGY

4601 N. Monroe Street • Spokane, Washington 99205-1295 • (509) 329-3400

March 12, 2021

The Honorable Shawn Logan
City of Othello
500 East Main Street
Othello, WA 99344

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1. Effluent Limit Violations

Between October 2020 and February 28, 2021, the City of Othello generated approximately 31 permit violations in the WQWebDMR database for BOD5, TSS, pH, dissolved oxygen and fecal coliform.

Section S1.A of the permit authorizes the discharge of municipal wastewater at the permitted location subject to compliance with effluent limitations set in the permit.

2. Reporting Noncompliance

Section S3.F of the City of Othello's permit requires the facility to notify Ecology immediately when they violate or are unable to comply with permit conditions. They must follow up with a written report within five days that includes the description of the noncompliance and its cause and actions taken to prevent reoccurrence of noncompliance. The City of Othello has not reported permit violations to Ecology as required by Section S3.F. Each failure to report noncompliance constitutes a separate violation of the permit.

Contact with the Facility

The Department of Ecology had the following communications with the City of Othello regarding the permit violations.

- 9/29/2020 – Email from Ecology to facility discussing BOD samples and testing.
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- 03/11/2021 – Ecology email response to facility regarding February 2021 violations and reporting noncompliance.

Within 30 days from receipt of this warning letter, please provide the following to Ecology:

1. Submit a written report explaining the cause of the violations identified in this letter.
2. Identify the steps taken to prevent future violations.

Send the report electronically to Rob Buchert, Senior Compliance Specialist at rbuc461@ecy.wa.gov or by mail at Water Quality Program, Department of Ecology, 4601 N. Monroe Street, Spokane, Washington 99205-1265.

This warning letter is to make you aware of the importance the Department of Ecology places on the legal implications of noncompliance with the limits, monitoring requirements, and terms and/or conditions established in your permit.

Continued noncompliance will result in formal enforcement action by Ecology. Formal enforcement action may include Notice of Violation, Administrative Order, and Penalties of up to \$10,000 per day per violation.

Please contact the Region's wastewater operator technical assistance provider, Andy O'Neill at (509) 710-3676 or aone461@ecy.wa.gov if you need technical assistance or have questions about operator certification.

Please contact me at (509) 209-1586 or Rob.Buchert@ecy.wa.gov if you have questions regarding this warning letter or Ecology's enforcement process.

Sincerely,



Rob Buchert
Senior Compliance Specialist
Water Quality Program
Eastern Regional Office

RB:sj

cc. Terry Clements, City of Othello
Jim Laird, City of Othello
Shawn Obrien, City of Othello
Diana Washington, PE, Ecology Permit Manager Eastern Region
Andy O'Neill, Ecology Technical Assistance Eastern Region
Art Jenkins, PE, Water Quality Permit Unit Supervisor Eastern Region

Table 1: Violations from October 2020 – February 2021

Monitoring Month	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Limit	Type of Violation
October 2020	001	BOD5	lbs/day	Avg. monthly	400.678	390	Permit limit exceedance
	001	BOD5	mg/L	Avg. monthly	37.3111	30	Permit limit exceedance
	001	BOD5	Percent	Avg. monthly	62.8	85	Permit limit exceedance
	001	Dissolved Oxygen	mg/L	Daily Sample	-	-	Frequency of sampling violation
	001	Fecal Coliform	#/100 ml	Weekly geometric mean	1113.91	540	Permit limit exceedance
	001	pH	s.u.	Daily sample	-	-	Frequency of sampling violation
	001	pH	s.u.	Daily sample	-	-	Frequency of sampling violation
	001	TSS	Percent	Avg. Monthly	76	85	Permit limit exceedance
November 2020	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.2	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Daily sample	9.1	9	Permit limit exceedance
	001	BOD5	Percent	Daily sample	77.83	85	Permit limit exceedance

City of Othello
March 12, 2021
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Monitoring Month	Monitoring Point	Monitoring Parameter	Unit	Statistical Base	Value Entered	Limit	Type of Violation
	001	TSS	Percent	Daily sample	60.775	85	Permit limit exceedance
December 2020	001	BOD5	Percent	Avg. Monthly	79.3875	85	Permit limit exceedance
	001	Dissolved Oxygen	mg/L	Daily sample	-	-	Frequency of sampling violation
	001	Fecal Coliform	#/100 ml	Weekly geometric mean	2419	540	Permit limit exceedance
	001	pH	s.u.	Daily sample	-	-	Frequency of sampling violation
	001	pH	s.u.	Single sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Single sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Single sample	9.1	9	Permit limit exceedance
	001	pH	s.u.	Single sample	-	-	Frequency of sampling violation
	001	TSS	Percent	Avg. monthly	67.53	85	Permit limit exceedance
January 2021	001	BOD5	Percent	Avg. monthly	78.7	85	Permit limit exceedance
	001	Fecal Coliform	#/100 ml	Weekly geometric mean	1440	540	Permit limit exceedance
	001	TSS	Percent	Avg. monthly	78.4	85	Permit limit exceedance
February 2021	001	BOD5	Percent	Avg. monthly	81.8	85	Permit limit exceedance
	001	Fecal Coliform	#/100 ml	Weekly geometric mean	2419	540	Permit limit exceedance
	001	TSS	Percent	Avg. monthly	79.8	85	Permit limit exceedance

ATTACHMENT E

Photograph Log

All photographs taken by Jon Klemesrud on May 5, 2021

Nikon Coolpix AW100

Photo Log – Othello STP



Photo #:01 (DSCN2108)
Description: Photo of the ISCO 4210 Flow Meter control panel and recording log. Flow was reading 1.1MGD at the time of the photo.



Photo #:02 (DSCN2110)
Description: Facing east, photo of the influent weir and flow meter.



Photo #:03 (DSCN2109)
Description: Near the headworks, photo of ISCO 3710 refrigerated influent sampler.



Photo #:04 (DSCN2113)
Description: Facing west, photo of primary lagoon (Pond 1a) in foreground.

Photo Log- Othello STP



Photo #:05 (DSCN2111)
Description: Facing east, photo of the open channel that receives wastewater from the two primary lagoons.



Photo #:06 (DSCN2112)
Description: Facing south, photo of manual coarse screen located at the end of the open channel.



Photo #:07 (DSCN2114)
Description: Facing west, photo of the cascade aeration channel (concrete step aerator).



Photo #:08 (DSCN2116)
Description: Facing north, photo of the chlorine contact chamber.

Photo Log- Othello STP

	
Photo #:09 (DSCN2118) Description: Facing south, photo of the ISCO refrigerated effluent sampler.	Photo #:10 (DSC2126) Description: Facing north, photo of the outfall/discharge to Owl Creek.

Complete list of photographs taken during the inspection:

- DSCN2108 – Photo of the ISCO 4210 Flow Meter control panel and recording log. Flow was reading 1.1MGD at the time of the photo.
- DSCN2109 – Near the headworks, photo of ISCO 3710 refrigerated influent sampler.
- DSCN2110 – Facing east, photo of the influent weir and flow meter.
- DSCN2111 – Facing east, photo of the open channel that receives wastewater from the two primary lagoons.
- DSCN2112 – Facing south, photo of manual coarse screen located at the end of the open channel.
- DSCN2113 – Facing west, photo of primary lagoon (Pond 1a) in foreground.
- DSCN2114 – Facing west, photo of the cascade aeration channel (concrete step aerator).
- DSCN2115 – Facing south, photo of secondary lagoon and polishing lagoon (Pond 3 in foreground, Pond 4 in background)
- DSCN2116 – Facing north, photo of the chlorine contact chamber.
- DSCN2117 – Facing east, photo of the outfall of the chlorine contact chamber to underground discharge pipe.
- DSCN2118 – Facing south, photo of the ISCO refrigerated effluent sampler.
- DSCN2119 – Photo of the effluent ISCO 4230 Bubble Flow Meter

DSCN2120 – Photo of Hach pH Meter

- DSCN2121 – Photo of 4/13/21 Certificate of Calibration by Quality Control Services
- DSCN2122 – Photo of Dissolved Oxygen Meter and calibration log.
- DSCN2123 – Photo of the Plant Flow Plan
- DSCN2124 – Photo of the Plant Flow Plan
- DSCN2125 – Photo of the 1/15/21 effluent bench sheet form
- DSCN2126 – Facing north, photo of the outfall/discharge to Owl Creek.

ATTACHMENT F

May 1, 2021 – December 1, 2017 Effluent Limit Exceedances

WA0022357 Reported Effluent Limit Exceedances (May 1, 2021 - December 1, 2017)

Date:	Parameter :	Permit Limit	Reported Value
May 1, 2021	BOD5 Monthly Average	30 mg/L	34.51 mg/L
May 1, 2021	BOD5 Weekly Average	45 mg/L	45.89 mg/L
May 1, 2021	BOD5 Percent Removal	85%	77%
May 1, 2021	TSS Percent Removal	85%	81%
April 29, 2021	pH Daily Max	9	9.1
April 28, 2021	pH Daily Max	9	9.1
April 27, 2021	pH Daily Max	9	9.2
April 26, 2021	pH Daily Max	9	9.4
April 25, 2021	pH Daily Max	9	9.3
April 24, 2021	pH Daily Max	9	9.4
April 23, 2021	pH Daily Max	9	9.6
April 22, 2021	pH Daily Max	9	9.5
April 21, 2021	pH Daily Max	9	9.8
April 20, 2021	pH Daily Max	9	9.5
April 19, 2021	pH Daily Max	9	9.6
April 18, 2021	pH Daily Max	9	9.5
April 17, 2021	pH Daily Max	9	9.4
April 16, 2021	pH Daily Max	9	9.4
April 15, 2021	pH Daily Max	9	9.3
April 14, 2021	pH Daily Max	9	9.2
April 6, 2021	Mercury (dissolved)	19.71 ng/L	47.8 ng/L
April 1, 2021	TSS Average Monthly	45 mg/L	45.27 mg/L
April 1, 2021	TSS Average Weekly	65 mg/L	71.5 mg/L
April 1, 2021	TSS Percent Removal	85%	77%
April 1, 2021	Mercury (average monthly)	13.5 ng/L	47.8 ng/L
April 1, 2021	BOD5 Average Monthly	30 mg/L	30.78 mg/L
April 1, 2021	BOD5 Percent Removal	85%	80.8%
March 2, 2021	Mercury (dissolved)	19.71 ng/L	31.6 ng/L
March 1, 2021	BOD5 Percent Removal	85%	73.7%
March 1, 2021	Mercury (average monthly)	13.5 ng/L	31.6 ng/L
March 1, 2021	TSS Percent Removal	85%	70.5%
February 1, 2021	TSS Percent Removal	85%	79.8%
February 1, 2021	Fecal Coliform (weekly)	540 /100ml	2419 /100ml
February 1, 2021	BOD5 Percent Removal	85%	81.80
January 1, 2021	Fecal Coliform (weekly)	540 /100ml	1440 /100ml
January 1, 2021	BOD5 Percent Removal	85%	78.7%
January 1, 2021	TSS Percent Removal	85%	78.4%
December 3, 2020	pH Daily Max	9	9.10
December 2, 2020	pH Daily Max	9	9.10
December 1, 2020	pH Daily Max	9	9.10
December 1, 2020	TSS Percent Removal	85%	67.5%

December 1, 2020	Fecal Coliform (weekly)	540 /100ml	2419 /100ml
December 1, 2020	BOD5 Percent Removal	85%	79.38
October 1, 2020	BOD5 Average Monthly	30	37.31
October 1, 2020	BOD5 Average Monthly	390 lbs/day	400.678 lbs/ day
October 1, 2020	BOD5 Percent Removal	85%	62.8%
October 1, 2020	TSS Percent Removal	85%	76%
October 1, 2020	Fecal Coliform (weekly)	540 /100ml	1113.91 /100ml
September 1, 2020	BOD5 Percent Removal	85%	33.00
September 1, 2020	Fecal Coliform Monthly	200 /100ml	1220.00
September 1, 2020	TSS Average Monthly	45 mg/L	58 mg/L
September 1, 2020	TSS Percent Removal	85%	51%
September 1, 2020	BOD5 Average Weekly	585 Lbs/Day	936 Lbs/Day
September 1, 2020	pH	8.5	8.9
September 1, 2020	BOD5 Average Weekly	45 mg/L	103 mg/L
September 1, 2020	TSS Average Monthly	390 lbs/day	581 lbs/day
September 1, 2020	BOD5 Average Monthly	390 lbs/day	617 lbs/day
September 1, 2020	Fecal Coliform (weekly)	400 /100ml	1600 / 100ml
September 1, 2020	BOD5 Average Monthly	30 mg/L	65 mg/L
September 1, 2020	TSS Average Weekly	65 mg/L	100 mg/L
September 1, 2020	TSS Average Weekly	585 Lbs/Day	1121 lbs/day
August 1, 2020	BOD5 Percent Removal	85%	54%
August 1, 2020	TSS Percent Removal	85%	58%
August 1, 2020	Fecal Coliform Monthly	200 / 100ml	217 /100ml
August 1, 2020	Fecal Coliform Weekly	400 / 100ml	540 / 100ml
August 1, 2020	pH	8.5	8.9
August 1, 2020	TSS Average Monthly	45 mg/L	49 mg/L
August 1, 2020	TSS Average Weekly	65 mg/L	79 mg/L
August 1, 2020	BOD5 Average Monthly	30 mg/L	31 mg/L
July 1, 2020	TSS Average Monthly	45 mg/L	51 mg/L
July 1, 2020	BOD5 Percent Removal	85%	54%
July 1, 2020	BOD5 Average Weekly	45 mg/L	48 mg/L
July 1, 2020	pH	8.5	9.1
July 1, 2020	TSS Percent Removal	85%	29%
July 1, 2020	BOD5 Average Monthly	30 mg/L	41 mg/L
July 1, 2020	TSS Average Weekly	65 mg/L	71 mg/L
June 1, 2020	pH	8.5	8.6
June 1, 2020	BOD5 Average Weekly	45 mg/L	47 mg/L
May 1, 2020	Fecal Coliform Weekly	400 /100ml	2420 /100ml
April 1, 2020	BOD5 Percent Removal	85%	70%
April 1, 2020	TSS Percent Removal	85%	59%
April 1, 2020	pH	8.5	9.5
April 1, 2020	BOD5 Average Monthly	30 mg/L	32 mg/L
April 1, 2020	TSS Average Weekly	65 mg/L	72 mg/L
March 1, 2020	TSS Percent Removal	85%	66%

March 1, 2020	BOD5 Average Monthly	85%	80%
March 1, 2020	TSS Average Monthly	390 lbs/day	473 lbs/day
March 1, 2020	TSS Average Monthly	45 mg/L	49 mg/L
March 1, 2020	BOD5 Average Monthly	30 mg/L	36 mg/L
March 1, 2020	pH	8.5	9.2
March 1, 2020	TSS Average Weekly	585 Lbs/Day	598 lbs/day
February 1, 2020	TSS Percent Removal	85%	60%
February 1, 2020	pH	8.5	8.8
February 1, 2020	Fecal Coliform	400 /100ml	1120 /100ml
February 1, 2020	BOD5 Average Monthly	85%	84%
January 1, 2020	Fecal Coliform Monthly	200 / 100ml	1409 /100ml
January 1, 2020	Fecal Coliform Weekly	400 / 100ml	2420 100/ml
January 1, 2020	BOD5 Average Weekly	585 Lbs/Day	829 Lbs/day
January 1, 2020	BOD5 Average Weekly	45 mg/L	111 mg/L
January 1, 2020	BOD5 Average Monthly	30 mg/L	38 mg/L
January 1, 2020	BOD5 Design Criteria	2600 lbs/day	3772 lbs/day
January 1, 2020	TSS Design Criteria	2600 lbs/day	2684 lbs/day
December 1, 2019	Fecal Coliform Monthly	200 /100ml	1054 /100ml
December 1, 2019	Fecal Coliform Weekly	400 / 100ml	1300 / 100ml
December 1, 2019	pH	8.5	8.7
December 1, 2019	TSS Design Criteria	2600 lbs/day	2856 lbs/day
October 1, 2020	Fecal Coliform Weekly	400 /100ml	921 /100ml
September 1, 2020	TSS Average Weekly	65 mg/L	67 mg/L
September 1, 2019	BOD5 Average Weekly	585 Lbs/Day	1094 Lbs/day
September 1, 2019	Fecal Coliform	400 /100ml	1600 /100ml
September 1, 2019	BOD5 Average Monthly	390 lbs/day	552 lbs/day
September 1, 2019	TSS Average Weekly	585 lbs/Day	625 lbs/day
September 1, 2019	BOD5 Average Weekly	45 mg/L	83 mg/L
September 1, 2019	TSS Percent Removal	85%	64%
September 1, 2019	pH	8.5	8.8
September 1, 2019	Fecal Coliform	200 /100ml	583 /100ml
September 1, 2019	TSS Average Monthly	390 lbs/day	451 lbs/day
September 1, 2019	BOD5 Average Monthly	30 mg/L	49 mg/L
September 1, 2019	BOD5 Percent Removal	85%	68%
August 1, 2019	pH	6.5	2
August 1, 2019	BOD5 Average Monthly	30 mg/L	43 mg/L
August 1, 2019	BOD5 Percent Removal	85%	76%
August 1, 2019	TSS Average Monthly	45 mg/L	51 mg/L
August 1, 2019	BOD5 Average Weekly	585 Lbs/Day	594 lbs/day
August 1, 2019	TSS Percent Removal	85%	60%
August 1, 2019	TSS Average Weekly	65 mg/L	74 mg/L
August 1, 2019	TSS Average Monthly	390 lbs/day	459 lbs/day
August 1, 2019	BOD5 Average Weekly	45 mg/L	66 mg/L
August 1, 2019	TSS Average Weekly	585 Lbs/Day	724 lbs/day

August 1, 2019	Fecal Coliform Weekly	400 /100ml	920 / 100ml
August 1, 2019	BOD5 Average Monthly	390 lbs/day	393 lbs/day
July 1, 2019	TSS Percent Removal	85%	75%
July 1, 2019	TSS Average Monthly	390 lbs/day	546 lbs/day
July 1, 2019	BOD5 Average Monthly	30 mg/L	44 mg/L
July 1, 2019	BOD5 Percent Removal	85%	79%
July 1, 2019	TSS Design Criteria	2600 lbs/day	3701 lbs/day
July 1, 2019	BOD5 Average Monthly	390 lbs/day	410 lbs/day
July 1, 2019	BOD5 Design Criteria	2600 lbs/day	2742 lbs/day
July 1, 2019	TSS Average Weekly	585 Lbs/Day	1023 lbs/day
July 1, 2019	TSS Average Monthly	45 mg/L	72 mg/L
July 1, 2019	pH	8.5	8.7
July 1, 2019	Flow Design Criteria	7.5 MGD	14.593 MGD
July 1, 2019	BOD5 Average Weekly	45 mg/L	53 mg/L
July 1, 2019	Fecal Coliform	400 /100ml	2420 /100ml
July 1, 2019	TSS Average Weekly	65 mg/L	135 mg/L
June 1, 2019	TSS Average Weekly	65 mg/L	76 mg/L
June 1, 2019	TSS Percent Removal	85%	70%
June 1, 2019	BOD5 Average Monthly	30 mg/L	38 mg/L
June 1, 2019	BOD5 Average Weekly	45 mg/L	60 mg/L
June 1, 2019	BOD5 Design Criteria	2600 lbs/day	5340 lbs/day
May 1, 2019	TSS Average Monthly	390 lbs/day	476 lbs day
May 1, 2019	BOD5 Percent Removal	85%	81%
May 1, 2019	TSS Average Monthly	45 mg/L	63 mg/L
May 1, 2019	pH	8.5	8.7
May 1, 2019	TSS Average Weekly	65 mg/L	116 mg/L
May 1, 2019	TSS Percent Removal	85%	68%
May 1, 2019	TSS Weekly Average	585 Lbs/Day	891 Lbs/day
April 1, 2019	TSS Weekly Average	585 Lbs/Day	962 lbs/day
April 1, 2019	pH	8.5	8.7
April 1, 2019	TSS Percent Removal	85%	66%
April 1, 2019	BOD5 Average Monthly	85%	77%
April 1, 2019	TSS Average Monthly	45 mg/L	63 mg/L
April 1, 2019	Fecal Coliform Weekly	400 /100ml	921 /100ml
April 1, 2019	TSS Average Monthly	390 lbs/day	578 lbs/day
April 1, 2019	TSS Average Weekly	65 mg/L	122 mg/L
March 1, 2019	TSS Percent Removal	85%	76%
March 1, 2019	TSS Average Monthly	390 lbs/day	432 lbs/day
March 1, 2019	BOD5 Average Monthly	30 mg/L	35 mg/L
March 1, 2019	Fecal Coliform Monthly	200 /100ml	2420 /100ml
March 1, 2019	Fecal Coliform Monthly	400 /100ml	2420 /100ml
March 1, 2019	BOD5 Percent Removal	85%	84%
February 1, 2019	TSS Average Monthly	45 mg/L	60 mg/L
February 1, 2019	TSS Percent Removal	85%	35%

February 1, 2019	Fecal Coliform Monthly	200 /100ml	2164 /100ml
February 1, 2019	TSS Average Monthly	390 lbs/day	581 lbs/day
February 1, 2019	TSS Average Weekly	585 Lbs/Day	718 lbs/day
February 1, 2019	TSS Average Weekly	65 mg/L	80 mg/L
February 1, 2019	Fecal Coliform	400 /100ml	2420 / 100ml
January 1, 2019	pH	8.5	8.8
January 1, 2019	Fecal Coliform Monthly	200 /100ml	357 / 100ml
January 1, 2019	Fecal Coliform Weekly	400 /100ml	435 /100ml
January 1, 2019	TSS Percent Removal	85%	77%
December 1, 2018	TSS Percent Removal	85%	79%
December 1, 2018	Fecal Coliform	200 / 100ml	1366 /100ml
December 1, 2018	pH	8.5	8.8
December 1, 2018	Fecal Coliform	400 /100ml	2420 /100ml
November 1, 2018	BOD5 Average Monthly	30 mg/L	33 mg/L
November 1, 2018	Fecal Coliform	400 /100ml	579/ 100ml
November 1, 2018	pH	8.5	8.8
November 1, 2018	TSS Percent Removal	85%	73%
November 1, 2018	BOD5 Percent Removal	85%	77%
November 1, 2018	Fecal Coliform Monthly	200 /100ml	400 /100ml
October 1, 2018	TSS Average Monthly	45 mg/L	50 mg/L
October 1, 2018	Fecal Coliform Monthly	200 /100ml	485 /100ml
October 1, 2018	BOD5 Percent Removal	85%	63%
October 1, 2018	TSS Average Monthly	390 lbs/day	511 lbs/day
October 1, 2018	BOD5 Average Weekly	45 mg/L	70 mg/L
October 1, 2018	BOD5 Average Weekly	585 Lbs/Day	671 lbs /day
October 1, 2018	TSS Percent Removal	85%	45%
October 1, 2018	TSS Average Weekly	585 Lbs/Day	641lbs /day
October 1, 2018	Fecal Coliform Weekly	400 / 100ml	1550/ 100ml
October 1, 2018	BOD5 Average Monthly	390 lbs/day	449 lbs/day
October 1, 2018	BOD5 Average Monthly	30mg/L	45mg/L
September 1, 2018	BOD5 Average Monthly	30mg/L	49 mg/L
September 1, 2018	pH	8.5	8.9
September 1, 2018	Fecal Coliform	400 /100ml	2420 /100ml
September 1, 2018	BOD5 Average Monthly	390 lbs/day	406 lbs/day
September 1, 2018	TSS Percent Removal	85%	28%
September 1, 2018	BOD5 Average Weekly	45 mg/L	52 mg/L
September 1, 2018	TSS Weekly Average	65 mg/L	107 mg/L
September 1, 2018	TSS Weekly Average	585 Lbs/Day	833 Lbs/day
September 1, 2018	TSS Average Monthly	45mg/L	71 mg/L
September 1, 2018	TSS Average Monthly	390 lbs/day	583 lbs/day
September 1, 2018	BOD5 Percent Removal	85%	61%
September 1, 2018	Fecal Coliform Monthly	200 /100ml	249 /100ml
August 1, 2018	BOD5 Average Monthly	30 mg/L	49 mg/L
August 1, 2018	BOD5 Average Weekly	45 mg/L	62 mg/L

August 1, 2018	Fecal Coliform	200 /100ml	317 / 100ml
August 1, 2018	Fecal Coliform Weekly	400 /100ml	2420 / 100ml
August 1, 2018	BOD5 Percent Removal	85%	61%
August 1, 2018	TSS Percent Removal	85%	54%
August 1, 2018	TSS Average Monthly	45 mg/L	96 mg/L
August 1, 2018	TSS Average Weekly	65 mg/L	124 mg/L
August 1, 2018	TSS Average Monthly	390 lbs/day	639 lbs/day
August 1, 2018	TSS Average Weekly	585 lbs/day	807 lbs/day
August 1, 2018	pH	8.5	9.0
August 1, 2018	TSS Design Criteria	2600 lbs/day	2723 /lbs/day
July 1, 2018	BOD5 Percent Removal	85%	76%
July 1, 2018	TSS Percent Removal	85%	35%
July 1, 2018	pH	8.5	9.7
July 1, 2018	TSS Average Monthly	45 mg/L	108 mg/L
July 1, 2018	TSS Average Weekly	65 mg/L	138 mg/L
July 1, 2018	TSS Average Monthly	390 lbs/day	480 lbs/day
July 1, 2018	TSS Average Weekly	585 lbs/Day	614 lbs/day
July 1, 2018	BOD5 Average Monthly	30 mg/L	41 mg/L
July 1, 2018	BOD5 Average Weekly	45 mg/L	55 mg/L
June 1, 2018	BOD5 Average Monthly	30 mg/L	37 mg/L
June 1, 2018	TSS Average Monthly	45 mg/L	83 mg/L
June 1, 2018	TSS Average Weekly	65 mg/L	139 mg/L
June 1, 2018	TSS Average Weekly	585 Lbs/Day	615 lbs/day
June 1, 2018	pH	8.5	9.9
June 1, 2018	BOD5 Percent Removal	85%	65%
June 1, 2018	TSS Percent Removal	85%	40%
June 1, 2018	Fecal Coliform Weekly	400 / 100ml	2420 /100ml
May 1, 2018	BOD5 Average Monthly	30 mg/L	34 mg/L
May 1, 2018	BOD5 Average Weekly	45 mg/L	53 mg/L
May 1, 2018	TSS Average Monthly	45 mg/L	79 mg/L
May 1, 2018	TSS Average Weekly	65 mg/L	107 mg/L
May 1, 2018	TSS Average Monthly	390 lbs/day	571 lbs/day
May 1, 2018	TSS Weekly Average	585 Lbs/Day	783 lbs/day
May 1, 2018	pH	8.5	9.6
May 1, 2018	BOD5 Percent Removal	85%	70%
May 1, 2018	TSS Percent Removal	85%	24%
April 1, 2018	BOD5 Average Monthly	30 mg/L	38 mg/L
April 1, 2018	TSS Average Monthly	45 mg/L	86 mg/L
April 1, 2018	TSS Average Weekly	65 mg/L	131 mg/L
April 1, 2018	TSS Average Monthly	390 lbs/day	616 lbs/day
April 1, 2018	TSS Average Weekly	585 Lbs/Day	956 Lbs/day
April 1, 2018	pH	8.5	9.7
April 1, 2018	BOD5 Percent Removal	85%	70%
April 1, 2018	TSS Percent Removal	85%	36%

March 1, 2018	BOD5 Average Monthly	30 mg/L	31 mg/L
March 1, 2018	TSS Average Monthly	45 mg/L	48 mg/L
March 1, 2018	TSS Average Weekly	585 Lbs/Day	598 Lbs/day
March 1, 2018	pH	8.5	9.4
March 1, 2018	BOD5 Percent Removal	85%	74%
March 1, 2018	TSS Percent Removal	85%	65%
March 1, 2018	Fecal Coliform Weekly	400 /100ml	4111 /100ml
February 1, 2018	TSS Percent Removal	85%	66%
February 1, 2018	Fecal Coliform Weekly	400 /100ml	435 /100ml
January 1, 2018	Fecal Coliform Monthly	200 /100ml	865 /100ml
January 1, 2018	Fecal Coliform Weekly	400 /100ml	2420 /100ml
January 1, 2018	TSS Average Weekly	65 mg/L	83 mg/L
January 1, 2018	TSS Average Monthly	390 lbs/day	680 Lbs/day
January 1, 2018	TSS Average Weekly	585 Lbs/day	1240 Lbs/day
January 1, 2018	TSS Percent Removal	85%	59%
January 1, 2018	TSS Average Monthly	45 mg/L	47 mg/L
December 1, 2017	Fecal Coliform	200 /100ml	1118 /100ml
December 1, 2017	TSS Average Monthly	390 Lbs/day	707 Lbs/day
December 1, 2017	TSS Average Monthly	45 mg/L	50 mg/L
December 1, 2017	TSS Percent Removal	85%	65%
December 1, 2017	pH	8.5	10.5
December 1, 2017	Fecal Coliform Weekly	400 /100ml	2419 /100ml
December 1, 2017	TSS Average Weekly	585 Lbs/day	895 Lbs/day