EPA United States Environmental Protection Agency

Region 6 - Enforcement & Compliance Assurance Division

INSPECTION REPORT

Inspection Date(s):	May 20-21, 2024	
Media Program:	Water	
Regulatory Program(s)	CWA - NPDES	
Company Name:	**Magnolia Water Utility Operating Company LLC**	
Facility Names:	Noted in report	
Facility Physical Locations:	Lafayette and Baton Rouge, Louisiana	
(city, state, zip code)		
Mailing address:	1630 Des Peres RD Ste 140	
(city, state, zip code)	St. Louis, MO 63131	
County/Parish:	Noted in report	
Facility Phone Number	314-380-8065	
Facility Contact:	Christopher Graman	Magnolia – Utility Engineer Manager
	cgraman@cswrgroup.com	
FRS Number:		
Identification/Permit Number:	Noted in report	
Media Identifier Number:		
NAICS:		
SIC:	4952 – Sewage Systems	

Personnel participating in inspection:		
Kenneth AuBuchon	EPA – R6/EN-WM	Environmental Engineer
Emily Yurk	EPA – R6/EN-WM	Environmental Scientist
Shane Miller	LDEQ	Senior Environmental Scientist - DCLB
Beau Powers	LDEQ	Environmental Scientist
Ian Walsh	LDEQ	Environmental Scientist
Christopher Graman	Magnolia Water UOC	Utility Engineer Manager
Jake Freeman	Magnolia Water UOC	Director of Engineering
David Farrar	Magnolia Water UOC	Operational Regional Manager
Scott Oalmann	Magnolia Water UOC	Operational Regional Manager
Michael Dick	Magnolia Water UOC	Operational Regional Manager
Tim Champagne	The Stat Group	STAT President
Tony Guidry	Clearwater Solutions (CWS)	Operations Superintendent
Brady Graves	Clearwater Solutions (CWS)	Operations Representative

EPA Lead Inspector Signature/Date	KENNETH AUBUCHON	Digitally signed by KENNETH AUBUCHON Date: 2024.07.31 13:16:15 -05'00'
	Kenneth AuBuchon	Date
Supervisor Signature/Date	ROBERTO BERNIER	Digitally signed by ROBERTO BERNIER Date: 2024.07.31 13:46:27 -05'00'
	Roberto Bernier	Date

Section I – INTRODUCTION

PURPOSE OF THE INSPECTION

EPA REGION 6 Lead Inspector, Kenneth AuBuchon accompanied by EPA Inspector Emily Yurk and the LDEQ Inspectors listed above, arrived at the Shadowwood Sewage Treatment Plant (STP), located at 111 Hasting Drive of Lafayette, Louisiana, at 09:38 AM (CT) on 05/20/2024 for an announced inspection. EPA REGION 6 Lead Inspector presented credentials to Christopher Graman and all Magnolia representatives while informing them that this was an EPA REGION 6 inspection to determine compliance as authorized by Clean Water Act (CWA) Section 308 and implementing regulations.

It was explained that six sites in the Lafayette and Baton Rouge areas were going to be reviewed. Each site is identified and discussed in Sections II/III – Observations / Areas of Concern below. The visits were part of a review for the requested removal of STPs from the 2017 Consent Decree Modification, Civil Action No. 6:98-0687 (CD).

This report is based on information supplied by Magnolia Water Utility Operating Company LLC (Magnolia) representatives, direct observations made by the EPA REGION 6 inspector(s), records and reports maintained by the permittee and other information including: photographs taken by EPA REGION 6 inspector(s), physical evidence collected by the EPA REGION 6 inspector(s), measurements taken by EPA REGION 6 inspector(s), verbal or written statements made by the representatives during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA REGION 6 inspector(s) by the Magnolia representatives during or subsequent to the on-site Inspection. In addition, information gathered prior to, or subsequent to, the Inspection from a review of EPA, State, and/or public records may be included in this report.

FACILITY DESCRIPTION

On 11/30/2022, the Magnolia Water Utility Operating Company LLC purchased Total Environmental Solutions, Inc (TESI) and assumed the 2017 Consent Decree Modification, Civil Action No. 6:98-0687. Appendix C of the CD provides a process for removing STPs for both Mechanical STPs and Pond STPs. As part of the process, EPA enforcement officers will review the final STP inspection report and determine whether each of the STPs listed in this report are able to maintain long-term, sustained compliance with the CWA, 33 U.S.C 1251 et seq., including the requirements of the applicable LPDES Permit.

Appendix B of the CD requires a Long-Term Compliance Plan. This Long-Term Compliance Plan includes remedial measures designed to bring the Sewage Treatment Plants (“STPs”) subject to the “Consent Decree with TESI” entered by the Court on December 21, 2000 (DN 167) into long-term, sustained compliance with the Clean Water Act (CWA) and the LPDES permits issued by LDEQ.

Appendix B. Section II. Remedial Measures for Mechanical STPs 4. STP-Specific Process Control Plans for Mechanical STPs states "TESI shall develop and implement an STP-Specific Process Control Plan at each Mechanical STP." And Section III. Remedial Measures for Pond STPs 8. STP-Specific Process Control Plans for Pond STPs states "TESI shall develop and implement an STP-Specific Process Control Plan at each Pond STP."

Sections II / III – OBSERVATIONS / AREAS OF CONCERN

Site 1: Shadowwood STP- Mechanical (LA0075281) - 09:38 AM (CT) on 05/20/2024

The Shadowwood STP (LA0075281) is located at 111 Hasting Drive of Lafayette, Louisiana. The STP serves approximately 60 residential homes and 15 apartment units in the Shadowwood Subdivision.

Originally constructed in February 1982, the STP is an extended aeration activated sludge process plant consisting of a manual influent bar screen, four (4) circular galvanized steel reactors, a single circular galvanized steel clarifier, a tablet chlorinator, and chlorine disinfection. The aeration basins are connected in series with below grade pipes. The STP is permitted to discharge an average daily flow of 32,500 gallons per day (GPD).

The Shadowwood STP Management, Operations, & Maintenance Program (MOM) Version 2023-03 dated 08 March 2023 was provided on 05/17/2024 as requested. The following table from the Shadowwood MOM is the established process control parameters and acceptable ranges for the Shadowwood STP.

Table 9 – Extended Aeration Process Control Parameters and Acceptable Ranges, for the Shadowwood STP

Parameter	Minimum Value	Maximum Value	Units
Dissolved Oxygen (DO)	2	4	mg/L
RAS Rate	50%	150%	Of average daily flow
MLSS	2,000	5,000	mg/L
Mean Cell Residence Time	15	20	days
30-Minute Settleability	20%	50%	
Clarifier Sludge Blanket Depth	1	4	ft
Residual Chlorine	0.2	1.5	mg/L

Process control samples were not pulled at the time of the inspection. Process control samples are being collected as described in the MOM and were provided in a series of e-mails. Mr. Graman explained, "that Magnolia is developing a system to maintain process control parameters collected that will make it easier to provide when requested."

The Shadowwood STP was assessed by a third party on 01/21/2022. This assessment noted that "the treatment units were generally found to be in overall poor condition. The protective coating on the interior walls of the tanks shows extensive wear and peeling. The support bracing for the bar screen, aeration pipe supports, and final clarifier weir support exhibit heavy rust and corrosion".

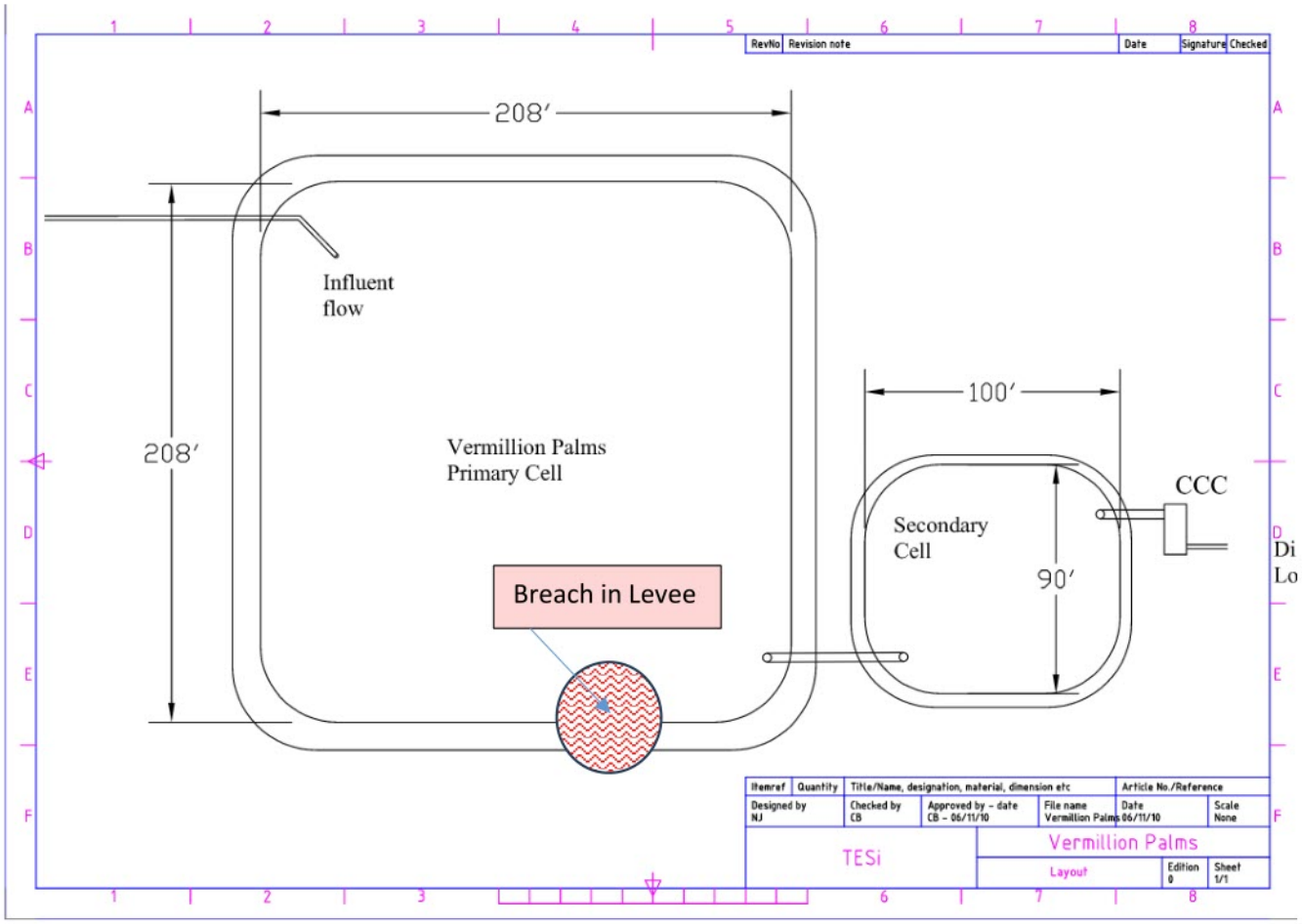
At the time of this inspection, heavy rust and corrosion was visible on the bar screen support bracing, clarifiers, chlorine contact chamber, and the v-notch weir box (see pictures below). Protective coating on the interior walls of the tanks also showed extensive wear and peeling.

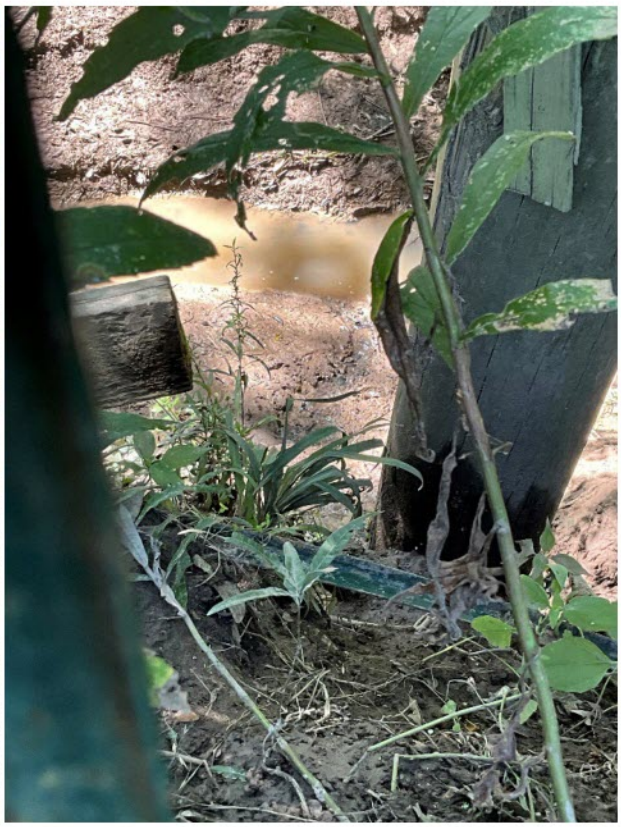
Site 2: Vermillion Palm STP - Pond (LAG541210) - 10:34 AM (CT) on 05/20/2024

The Vermillion Palm STP (LAG541210) is in Vermilion Parish off La. Hwy. 339 approximately 9 miles northeast of Abbeville, Louisiana. The STP serves an estimated 38 residential customers in the Vermilion Palms subdivision. The unincorporated area includes residences on Reno Rd. and is roughly bound by La. Hwy. 339 on the west side.

The existing Vermilion Palms wastewater treatment facility consists of a two-cell oxidation pond, tablet chlorinator, chlorine contact basin, and effluent pipe. Untreated wastewater flows into the northwest corner of cell no. 1, approximately 220' x 220', from an 8" gravity main. Wastewater then flows by gravity from cell no. 1 to cell no. 2, approximately 110' x 110'. Wastewater then flows from cell no. 2 to a tablet chlorinator and chlorine contact basin prior to its discharge into Bayou Pare Perdu at the site.

At the time of the inspection, a breach in the primary cell's levee, which was creating an unpermitted discharge, was observed. The bypass location is marked on the following diagram. Pictures of the discharge are also included on the following page.



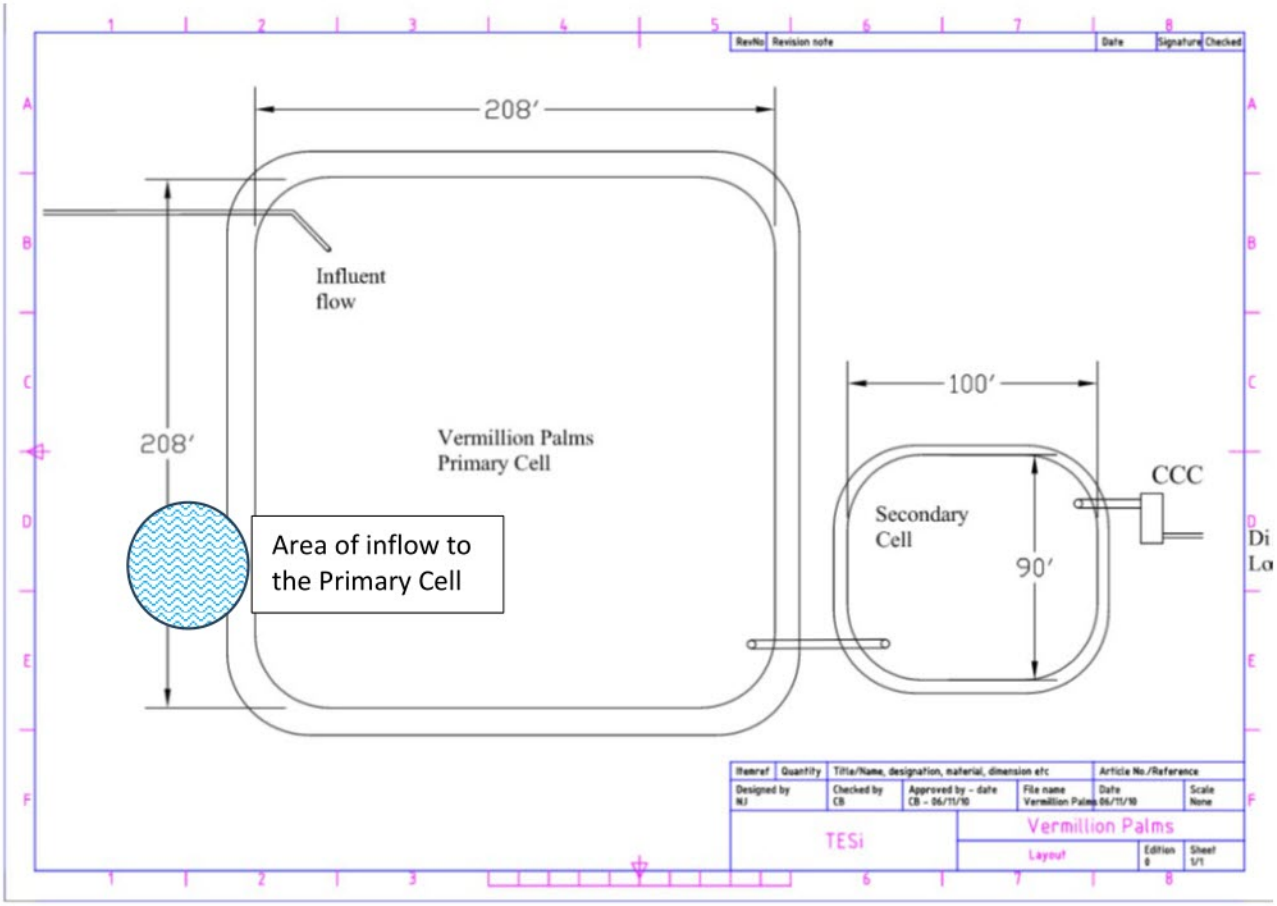
A requirement of LDEQ Permit LAG540000. Contained in Part III Standard Conditions for LPDES Permits Section D. Reporting Requirements 6. Requirements for Notification b. Prompt notification as required by LAC 33: I.3917, in the event of an unauthorized discharge that exceeds a reportable quantity specified in LAC 33: I. Chapter 39. Subchapter E, but does not cause an emergency condition, the discharger shall promptly notify DPS by telephone at (225) 925-6595 (collect calls accepted 24 hours a day) within 24 hours after learning of the discharge. And d. Written Notification Procedures. Written reports for any unauthorized discharge that requires notification under Section D.6.a or b, shall be submitted by the discharger to the Office of Environmental Compliance, Emergency and Radiological Services Division - SPOC in accordance with LAC 33:I.3925 within seven calendar days after the notification required by D.6.a or 6.b, unless otherwise provided for in a valid permit or other department regulation. Written notification reports shall include, but not be limited to, the following information…

The Vermillion Palm STP MOM Version 2023-03 dated 20 March 2023 was provided on 05/17/2024 as requested. Section 5.1 of the MOM, Sewer Spills, Leaks, and Overflows, states “Spills, leaks, and overflows of untreated sanitary sewer and solids are considered violations of State Regulations, including the facility's LPDES discharge permit. All such unwanted and unauthorized discharges must be reported in accordance with applicable LDEQ regulations, including any special requirements listed in the facility's LPDES discharge permit. During each site visit, the operator or technician should visually assess each pond site to determine whether spills, leaks, or overflows have occurred since the last visit to the site. The operator or technician should not only inspect the areas immediately adjacent to the pond(s) but also those

areas (e.g., ditches and surface waters) where spilled materials may have flowed or otherwise accumulated. The areas where spill materials are identified to have contacted the ground surface are referred to as the "spill zone". The spill, including the description of the spill zone, must be noted on the facility's *Spill/ Upset report* within 24 hours. Following notification of a possible spill, leak or bypass, a crew is dispatched to investigate. The initial response team is responsible for assessing the cause of the problem and determining the level of effort needed to correct the problem. If the overflow is confirmed, Magnolia Water UOCs Manager of Compliance shall complete an online report required by LDEQ. Within 5 days of completion of the online report, the Manager of Compliance shall submit a certified *unauthorized Discharge Notification Report* form to LDEQ. Both forms are presented within Appendix B. At a minimum, the information reported shall include:"

The required initial notification and the written report for this unpermitted discharge was not provided and could not be located in EDMS. The STP's MOM "Spill/Upset report" was not provided at the time of this report.

At the time of the inspection, surface water was observed flowing from the neighboring community directly into the primary cell. The inflow location is marked on the following diagram. Pictures of the discharge are also included on the following page.



In an e-mail from Mr. Graman dated 7/27/2024 he explains that "berm repairs have been completed in July 2024 to stop the leaking which was observed from Cell 1." The scope of work preformed and the pictures of completed work were provided on 7/29/2024. See below.

SCOPE OF WORK

1. Excavate and backfill existing rodent holes.
2. Increase berm elevation 2ft, in area ~6ft x 6ft.
3. Increase berm elevation 2ft, in area ~10ft x 30ft.
4. Widen berm to 6ft, and increase elevation 3ft. Excavate and backfill existing rodent holes.
5. Increase berm elevation 2ft, in area ~6ft x 6ft.
6. Increase berm elevation 2ft, in area ~7ft x 50ft.
7. Increase berm elevation 2ft, in area ~7ft x 12ft.
8. Increase berm elevation 2ft, in area ~4ft x 4ft.
9. Increase berm elevation 2ft, in area ~10ft x 150ft.
10. Remove existing debris from lagoon bank.
11. Emergency Ber Repair:
    - -Install Silt Fence along all perimeters of area of work.
    - -Widen 100 LF of unstable berm ~4 FT with imported select fill.
    - -Drive approximately 100 Linear Feet of non-coated, 14 foot long steel sheet piles along edge of unstable berm to provide berm stabilization while excavating.
    - -Excavate approximately 100-feet of trench, 3 foot wide and 6 foot to 9 foot deep in order to remove existing top soil, root systems and associated growth from existing berm.
    - -Backfill trench with imported select fill with 12" loose lifts compacted to a minimum of 95% compaction.
    - -Remove sheet piles.
    - -Remove silt fence.

The following table from the Vermillion Palm MOM is a summary of the process control locations and parameters that are sampled and monitored by Magnolia Water UOC's Operations and Compliance staff at the Vermillion Palm STP. The MOM states, "Process control data, including CBOD, BOD, TSS, VSS, sBOD, and sCBOD shall be collected from the pond at least quarterly by samplers."

Table 10: Process Control Sampling Parameters and Locations

FACILITY	FREQUENCY	SITE ID	SITE DESCRIPTION	PARAMETERS
Vermillion Palms	Quarterly	Site #1	Cell #1 Influent	pH, Temperature, Total Ammonia, Alkalinity, BOD5, TSS
Vermillion Palms	Quarterly	Site #2	Cell #1 Effluent	pH, Temperature, D.O., Total Ammonia, NO3, Alkalinity, BOD5, CBOD5
Vermillion Palms	Quarterly	Site #3	Final Pond Effluent	pH, Temperature, D.O., Total Ammonia, NO3, Alkalinity, BODs, SBODs, CBODs, SCBODs, TSS

During the inspection, Mr. Graman stated, "that the process samples detailed above in the site MOM are not being collected."

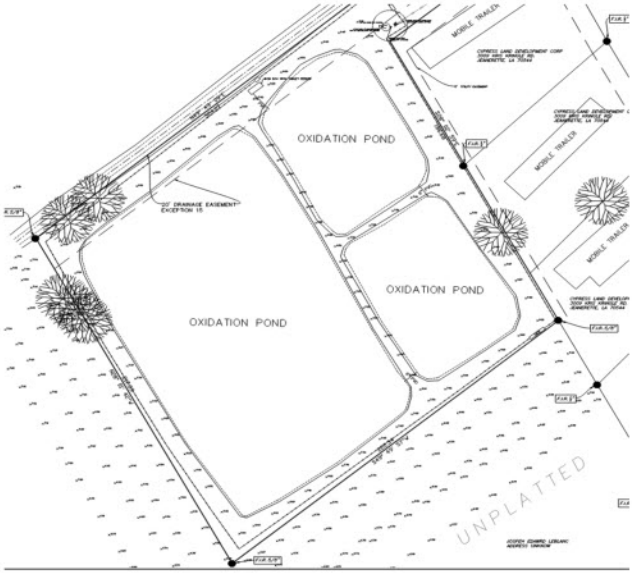
At the time of the inspection, approximately 2.5 foot of sludge was observed in the chlorine contact chamber (see picture below). The sites' MOM states, "During each site visit, Magnolia Water UOCs personnel shall inspect each chlorine contact chamber for the presence of floatable and settled solids. Any floatable solids in the chlorine contact chamber shall be removed by skimming on the same day the problem is Identified. If settled solids are present in the chlorine contact chamber, they shall be removed if, at any location within the chlorine contact chamber, the settled solids are deep enough to register when measured with a Sludge Judge sampling device. Removal of floatable and settled solids within the chlorine contact chamber shall be documented by Magnolia Water UOCs personnel on the applicable plant's Operation and Maintenance Report ("O&M Report")."

A review of facility DMRs showed that for the time frame of 01/01/2023 to 06/30/2023 the required Enterococci samples were not obtained due to a reported no discharge. Facility reported samples for the first quarter of 2023 (10/10/2023 to 03/31/2023) but reported no discharge during the second quarter of 2023 (04/01/2023 to 06/30/2023). The following is a table of reported flows for 2022 and 2023.

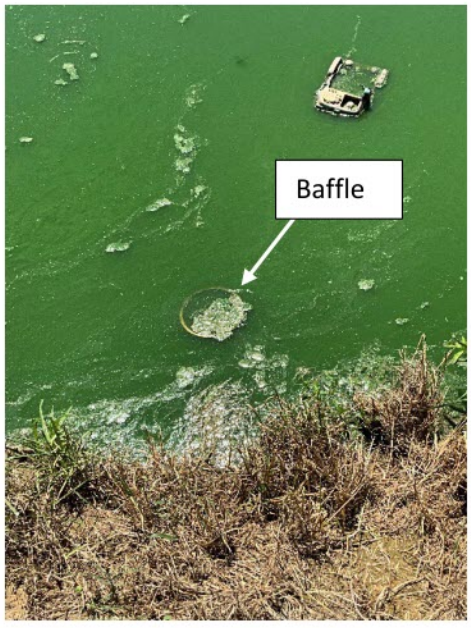
Year	Quarter	Discharge gals/day
2022	1st QTR	18,928
	2nd QTR	18,928
	3rd QTR	32,784
	4th QTR	9,353
2023	1st QTR	9,353
	2nd QTR	NO DISCHARGE
	3nd QTR	3,491
	4th QTR	5,997

Site 3: Cypress Land Estates STP - Pond (LAG540098) - 11:00 AM (CT) on 05/20/2024

The Cypress Land Estates STP (LAG540098) is located at 12647 Tupelo Circle, within the City of Erath in Vermillion Parish, Louisiana. The STP provides sewage treatment for mobile-home type customers with an estimated 43 residential customers. The STP is a three-cell oxidation pond permitted to discharge less than 25,000 Gallons Per Day (GPD). The stabilization pond system consists of a sewer lift station, three (3) settling ponds in series, and a chlorination chamber near the outfall.



At the time of the inspection, the baffle from the final pond to chlorine contact chamber was not installed to prevent solids from entering the chlorine contact chamber and being discharged. See the picture below.



At the time of the inspection, solids were observed built up in the discharge vault and after the v-notch weir. Rust deterioration was observed on the chlorine contact vault and v-notch weir. See the pictures below.

The Cypress Land Estates STP Management, Operations, & Maintenance Program (MOM) Version 2023-03 dated 20 March 2023 was provided on 06/03/2024 as requested. The following table from the Cypress Land Estates STP MOM is a summary of the process control locations and parameters that are sampled and monitored by Magnolia Water UOC's Operations and Compliance staff at the Cypress Land Estates STP. The MOM states, "Process control data, including CBOD, BOD, TSS, VSS, sBOD, and sCBOD shall be collected from the pond at least quarterly by samplers."

Table 10: Process Control Sampling Parameters and Locations

FACILITY	FREQUENCY	SITE ID	SITE DESCRIPTION	PARAMETERS
Cypress Land	Quarterly	Site #1	Cell #1 Influent	pH, Temperature, Total Ammonia, Alkalinity, BOD_5, TSS
Cypress Land	Quarterly	Site #2	Cell #1 Effluent	pH, Temperature, D.O., Total Ammonia, NO_3, Alkalinity, BOD_5, $CBOD_5$
Cypress Land	Quarterly	Site #3	Cell #2 Effluent	pH, Temperature, D.O., Total Ammonia, NO_3, Alkalinity, BOD_5, $CBOD_5$
Cypress Land	Quarterly	Site #4	Final Pond Effluent	pH, Temperature, D.O., Total Ammonia, NO_3, Alkalinity, BOD_5, $SBOD_5$, $CBOD_5$, $SCBOD_5$, TSS

During the inspection, Mr. Graman stated, "that the process samples detailed above in the site MOM are not being collected."

Site 4: Pen's Place STP - Mechanical (LAG540098) - 10:30 AM (CT) on 05/21/2024

The Pen's Place STP (LAG540098) is located at the end of Pen Dr. in the Pen's Place subdivision. The system serves 18 residential customers of the Pen's Place Subdivision in Livingston Parish near Walker, Louisiana.

The STP is a concrete single train activated sludge process permitted to discharge less than 25,000 Gallons Per Day (GPD). This new wastewater plant, which was installed in 2020, is comprised of a main pre-cast concrete structure which has an 8,500-gallon aeration chamber and a 1,984-gallon final clarifier. A second, smaller concrete basin contains the chlorine contact chamber. A small sample box is located just after the chlorine contact chamber. Two blowers, two motors, and an electrical control panel are located on the concrete above the aeration chamber. The lift station is located next to the plant by the entrance gate.

The STP could not be fully evaluated due to solids removal from the mechanical system the afternoon prior to our visit. A reinspection should occur at the STP during normal operations before removal from the CD can be considered.

The original wastewater treatment system was a two-cell oxidation pond installed in 1999 with an 8,000 GPD design capacity. In 2020, the lagoons were discontinued with the installation of a new 8,000 GPD mechanical return activated sludge wastewater treatment plant with chlorine contact. The two abandoned lagoons are located behind the new plant.

At the time of the inspection, the abandoned lagoons were full and appeared to be discharging. Information was requested on the closure and elimination of the unpermitted discharge from the lagoons. In an e-mail from Mr. Graman, dated 7/29/2024, he explained that "Magnolia Water UOC is working with a licensed Engineer to coordinate the needed improvements and permitting with LDH (Louisiana Department of Health). The Lagoon effluent is planned to be plugged and the Lagoon cells brought into use as a flow equalization structure to buffer the peak flows from the system."

At the time of the inspection, the pre-cast concrete 8,500-gallon aeration chamber was observed leaking (see pictures below). Information was requested related to the repairs required to fix the leaking concrete aeration chamber. In an e-mail from Mr. Graman, dated 7/29/2024, he explained that he is "working with Operations group to confirm the install data of the sump pump to control the leaking water." And is "working with the Operations group to confirm the next steps for investigating and planning repair to address the leaking tankage."

Site 5: Martin Lake Resort STP - Pond (LAG540619) - 11:25 AM (CT) on 05/21/2024

The Martin Lake Resort STP (LAG540619) is located at the end of Lake Martin Road off Hwy 431 in Prairieville, Louisiana. It is estimated that the facility serves 10 homes in the neighborhood.

The facility consists of two cells and one lift station. The lift station pumps the flow into Cell 1, located to the east. Cell 1 is the primary treatment cell. The sludge deposits here and settles out for the growth of anaerobic organisms at the bottom of the pond. A transfer pipe sends the flow to Cell 2 for an additional level of treatment. The effluent pipe in Cell 2 is a PVC pipe connecting to the chlorine contact chamber (CCC). This is a tank that uses chlorine tablets to provide final disinfection for the system. The effluent leaves the system to the north.

At the time of the inspection, Mr. Graman explained that legal issues regarding property ownership were occurring at the STP. The legal issues did not affect Magnolia's ability to obtain required discharge samples but, Mr. Graman explained that access to the property and property alterations were restricted.

The Martin Lake Resort STP Management, Operations, & Maintenance Program (MOM) Version 2023-03 dated 20 March 2023 was provided on 06/03/2024 as requested. The following table from the Martin Lake Resort STP MOM is a summary of the process control locations and parameters that are sampled and monitored by Magnolia Water UOC's Operations and Compliance staff at the Martin Lake Resort STP. The MOM states, "Process control data, including CBOD, BOD, TSS, VSS, sBOD, and sCBOD shall be collected from the pond at least quarterly by samplers."

Table 10: Process Control Sampling Parameters and Locations

FACILITY	FREQUENCY	SITE ID	SITE DESCRIPTION	PARAMETERS
Martin Lake Resort	Quarterly	Site #1	Cell #1 Influent	pH, Temperature, Total Ammonia, Alkalinity, BOD_5, TSS
Martin Lake Resort	Quarterly	Site #2	Cell #1 Effluent	pH, Temperature, D.O., Total Ammonia, NO_3, Alkalinity, BOD5, CBOD5
Martin Lake Resort	Quarterly	Site #3	Final Pond Effluent	pH, Temperature, D.O., Total Ammonia, NO_3, Alkalinity, BOD_5, $SBOD_5$, $CBOD_5$, $SCBOD_5$, TSS

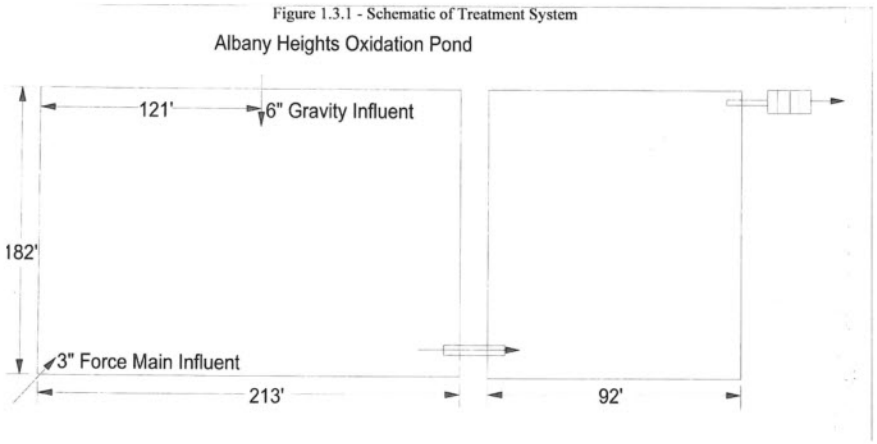
During the inspection, Mr. Graman stated, "that the process samples detailed above in the site MOM are not being collected."

At the time of the inspection, the chlorine contact chamber (CCC) was located in a flooded area of the receiving stream (see picture below). The STP's discharge sampling location appeared to be full and influenced by the river's backflow. When the river water level rises it inundates the CCC and influences the discharge samples and floods the discharge sampling location. In an e-mail from Mr. Graman, dated 7/29/2024, he explained that "Magnolia Water UOC is working with a licensed Engineer to plan the needed repairs to modify the CCC effluent piping to prevent backflows in this manner."

Site 6: Albany Heights - Pond (LAG540040) - 12:32 PM (CT) on 05/21/2024

The Albany Heights STP (LAG540040) is on Adagio Rd in Albany, Louisiana. It is estimated that the facility serves 28 homes in the neighborhood.

The facility consists of two cells. Cell 1 is the primary treatment cell. The sludge deposits here and settles out for the growth of anaerobic organisms at the bottom of the pond. A PVC transfer pipe sends the flow to Cell 2 for an additional level of treatment. The effluent pipe from Cell 2 is a PVC pipe connecting to the chlorine contact chamber (CCC). This is a tank that uses chlorine tablets to provide final disinfection for the system. The effluent leaves the system to the northwest.



At the time of the inspection a large breach in the main pond's levee was observed (see pictures below). A large pump was being used to pump effluent from the main cell into the second smaller cell in order to lower the main pond's level. This was done in a attempt to prevent discharge through the levee breach. Mr. Graman explained that due to boundary disputes with the local parish, heavy equipment was unable to be brought in to conduct the required repairs to the levee.

In a supplemental letter addressing the reported "No Discharge" conditions at the Albany Heights STP dated 02/09/2024, Mr. Graman details that "since the submittal of the Final STP Reports, damage to the berms has been discovered which has resulted in leaking from that location. This damage was previously unobserved as the damage was in an area that was unable to be cleared of vegetation due to the property line. Coordination is underway to repair this damaged section and stop the leaking from the berm. It is possible that an effluent discharge will be re-established when the berm repairs are performed to the leaking area."

At the time of the inspection, a path forward for the berm breach was requested. In an e-mail from Mr. Graman, dated 7/29/2024, he explained that "Magnolia Water UOC is working to get parish approval for the addition of a culvert to the drainage ditch which will facilitate the install of an Access Road to the facility. This Access Road will allow the needed equipment and dirt material to be brought on site to perform the berm repairs to the leaking area."

The Albany Heights STP Management, Operations, & Maintenance Program (MOM) Version 2023-03 dated 20 March 2023 was provided on 06/03/2024 as requested. The following table from the Albany Heights STP MOM is a summary of the process control locations and parameters that are sampled and monitored by Magnolia Water UOC's Operations and Compliance staff at the Albany Heights STP. The MOM states, "Process control data, including CBOD, BOD, TSS, VSS, sBOD, and sCBOD shall be collected from the pond at least quarterly by samplers."

Table 10: Process Control Sampling Parameters and Locations

FACILITY	FREQUENCY	SITE ID	SITE DESCRIPTION	PARAMETERS
Albany Heights	Quarterly	Site #1	Cell #1 Influent	pH, Temperature, Total Ammonia, Alkalinity, BOD5, TSS
Albany Heights	Quarterly	Site #2	Cell #1 Effluent	pH, Temperature, D.O., Total Ammonia, NO3, Alkalinity, BOD5, CBOD5

During the inspection, Mr. Graman stated, "that the process samples detailed above in the site MOM are not being collected."

At the time of the inspection, the baffle from the final pond to chlorine contact chamber was not installed properly and was therefore unable to prevent solids from entering the chlorine contact chamber and being discharged. See the picture below.

Section IV – FOLLOW UP

Additional information was received by EPA after exiting the sites on the following dates:

1) E-mail received from Mr. Graman on July 24, 2024, Follow-up from 5/20 and 5/21 visit.
2) E-mail received from Mr. Graman on July 26, 2024, Inspections from May.
3) E-mail received from Mr. Graman on July 27, 2024, Follow-up Information for may site visits.
4) E-mail received from Mr. Graman on July 29, 2024, Follow-up Information for may site visits.

Section V – LIST OF APPENDICES

Additional documents are available upon request.