## Expedited Settlement Offer Worksheet Violations Form For Wastewater

Version 1 (updated April 2019)

Consult instructions regarding eligibility criteria and procedures prior to use.

| 1   Jack Peasley   WA021164     Mayor, City of Pomeroy   N80 7b. Street, I PO Box 370   Permit Expiration Date:   Octamemetry, 2018     V   CCX.TION AND ADDRESS OF FACILITY   EPA Contact Name:   Vancense a Oquendo     2   City of Pomeroy, Washington 99347   EPA Contact Name:   Vancense a Oquendo     24   West Pataha Street   Pomeroy, Washington 99347   EPA Contact Name:   Vancense a Oquendo     24   West Pataha Street   Pomeroy, Washington 99347   EPA Contact Name:   Vancense a Oquendo     7   FACILITY DESORIPTION / CONTACT NAMES   EPA Office:   Region 10 - Seattle, WA     8   Name of Facility Contact (ESO Worksheet recipient):   Snead and Jami Favor)     9   Name of Receiving Water Body (Indicate whether 303(d) listed):   Pataha Creek     9   Name of Receiving Water Body (Indicate whether 303(d) listed):   Pataha Creek     9   RRWATE ENTITY ADJUSTIMENT FACTOR   If yes, adjustment factor of 2.0 is applied.   No     9   Select the appropriate average volume of flow on a aday of discharge in millions of galons per day (MCD). If a facility discharges only on a periodic basis, do ngt include days with zero flow when calcularing the average low.   No   1     9   Select the appropriate a   |   |          | LEGAL NAME AND MAILING ADDRESS OF RESI |   | NPDES Permit Num      | ber                                   |                            |  |  |
|--|---|----------|--|---|-----------------------|---------------------------------------|----------------------------|--|--|
| Mayor, Cly of Pomeroy   November 1, 2018     N 80 70 R5 Street /P Dox 370   Permit Effective Date:   November 1, 2018     Vertice Vashington 99347   Permit Effective Date:   October 31, 2023 (admin ext)     Vertice Vashington 99347   Permit Effective Date:   October 31, 2023 (admin ext)     Vertice Vashington 99347   EPA Contact Name:   Vanessa Qouendo     21   City of Pomeroy Washewater Treatment Plant   EPA Contact Name:   Vanessa Qouendo     24   Vest Platha Street   Pomeroy, Washington 99347   EPA Contact Name:   EPA Contact Name:     24   Vest Platha Street   Pomeroy, Washington 99347   EPA Contact Name:   EPA Contact Name:     25   Region 10 - Seattle, WA   Mayor Jack Peasley with cc to current contracted plant operators (Samuel Name of Authorized Official (40 CFR 122.2); Mayor Jack Peasley   Mayor Jack Peasley     31   Name of Roceiving Water Body (Indicate Whether 303(d) Isted); Patha Creek   Permit Provide Peasley   Mayor Jack Peasley     32   PRIVATE ENTITY AOJUSTMENT FACTOR   If yes, adjustment factor of 2.0 is applied.   No   1     34   Isthe entity privately owned?   If yes, adjustment factor of 3.0 is applied.   No   1     5   Select the approprivate sverage flow: <td>1</td> <td></td> <td></td> <td colspan="6"></td>  | 1 |          |  |   |                       |                                       |                            |  |  |
| N 80 7th Street, PO Box 370   Permit Expiration Date:   October 31, 2023 (admin ext)     Clock TON AND ADDESS OF FACILITY   EPA Contact Name:   Vanessa Quendo     2   Clock of Pomoroy Washington 99347   EPA Contact Name:   Vanessa Quendo     24 West Pataha Street   EPA Contact Title:   Compliance Officer     24 West Pataha Street   Pomeroy, Washington 99347   EPA Contact Title:   Compliance Officer     EPA Office.   Region 10 - Seattle, WA   EPA Office.   Region 10 - Seattle, WA     Pomeroy, Washington 99347   Name of Facility Contact (ESO Worksheet recipient); Snead and Jami Favor)   Name of Authorized Official (40 CFR 122.22); Mayor Jack Peasley   Name of Authorized Official (40 CFR 122.22); Mayor Jack Peasley     3   Name of Roceiving Water Body (Indicate whether 303(d) listed); Patha Creek   Patha Creek     4   Is the entity privately owned?   If yes, adjustment factor of 2.0 is applied.   No     5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per day (MG). If a facility discharges on you applied basis, do ng include days with zero flow when calculating the average flow:   A < <0.059 mgd and <0.250 mgd   |   |          |  |   | Permit Effective Date | November 1, 20                        | 018                        |  |  |
| Pomeroy, Washington 99347     Image: City of Pomeroy, Washington 99347     Image: City of Pomeroy, Wastewater Treatment Plant<br>244 Wast Pataha Street<br>Pomeroy, Washington 99347     Image: City of Pomeroy, Wastewater Treatment Plant<br>244 Wast Pataha Street<br>Pomeroy, Washington 99347     Image: City of Pomeroy, Wastewater Treatment Plant<br>244 Wast Pataha Street<br>Pomeroy, Washington 99347     Image: City of Pomeroy, Wastewater Treatment Plant<br>244 Wast Pataha Street<br>Pomeroy, Washington 99347     Image: City of Pomeroy, Wastewater Treatment Plant<br>244 Wast Pataha Street<br>Pomeroy, Washington 99347     Image: City of Pomeroy, Wastewater Treatment Plant<br>244 Wast Pataha Street<br>Pataha Street<br>Patant Street<br>Pataha Street<br>Pataha Street<br>Pataha Street<br>Pa |   |          |  |   |                       |                                       |                            |  |  |
| 2   City of Pomeroy Wastewater Treatment Plant   EPA Contact Title:   Compliance Officer     24 West Pataha Street   Pomeroy, Washington 99347   EPA Contact Title:   Compliance Officer     FACILITY DESCRIPTION / CONTACT NAMES   Mayor Jack Peasley with cc to current contracted plant operators (Samuel Name of Facility Contact (ESO Worksheet recipient): Snead and Jami Favor)   Name of Facility Contact (ESO Worksheet recipient): Snead and Jami Favor)     3   Name of Receiving Water Body (Indicate whether 303(d) listed):   Name of Receiving Water Body (Indicate whether 303(d) listed):     3   Name of Receiving Water Body (Indicate whether 303(d) listed):   No   1     4   Is the entity privately owned?   If yes, adjustment factor of 2.0 is applied.   No   1     5   Select the appropriate average solution on a day of discharge in millions of gallons per day (MGD). 250 mg di no 2.050 mg di no 2.050 mg di no 2.050 mg di no 4.020 mg di n  |   |          |  |   | · ·                   |                                       |                            |  |  |
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| 2   City of Pomeroy Wastewater Treatment Plant 224 West Ptaba Street Pomeroy, Washington 99347   EPA Contact Title: Compliance Officer     PACILITY DESCRIPTION / CONTACT NAMES   EPA Office:   Region 10 - Seattle, WA     Pomeroy, Washington 99347   Mayor Jack Peasley with cc to current contracted plant operators (Samuel Name of Facility Contact (ESO Worksheet recipient): Snead and Jam Favor)   Mayor Jack Peasley with cc to current contracted plant operators (Samuel Name of Authorized Official (40 CFR 122.22); Mayor Jack Peasley     3   Name of Receiving Water Body (Indicate whether 303(d) listed); Patha Creek     9   Name of Receiving Water Body (Indicate whether 303(d) listed); Patha Creek     9   PRIVATE ENTITY ADJUSTMENT FACTOR     4   Is the entity privately owned?   If yes, adjustment factor of 2.0 is applied. No     5   Select the appropriate average now on a periodic basis, do not include days with zero flow when calculating the average flow:   A     A   <0.050 mgd nd <0.250 mgd  |   |          | LOCATION AND ADDRESS OF FACILITY       |   | EPA Contact Name:     | Vanessa Oquendo                       |                            |  |  |
| 244 West Pataha Street<br>Pomeroy, Washington 99347   EPA Office: Region 10 - Seattle, WA     PACILITY DESCRIPTION / CONTACT NAMES   Mayor Jack Peasley with cc to current contracted plant operators (Samuel Name of Facility Contact (ESO Worksheet recipient): Snead and Jami Favor)     Name of Facility Contact (ESO Worksheet recipient): Snead and Jami Favor)   Snead and Jami Favor)     Name of Receiving Water Body (Indicate whether 303(d) listed): Pataha Creek   Name of Receiving Water Body (Indicate whether 303(d) listed): Pataha Creek     PRIVATE ENTITY ADJUSTMENT FACTOR   PRIVATE ENTITY ADJUSTMENT FACTOR     4   Is the entity privately owned?   If yes, adjustment factor of 2.0 is applied.   No     5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per day (MGC). If a facility discharges only on a periodic basis, ot ogl include days with zero flow when calculating the average flow:   A     A   <0.050 mgd (no adjustment is applied)  | 2 |          |  |   | EPA Contact Title:    | Compliance Officer                    |                            |  |  |
| Pomeroy, Washington 99347     PACILITY DESCRIPTION / CONTACT NAMES     Mayor Jack Peasley with cc to current contracted plant operators (Samuel Name of Facility Contact (ESO Worksheet recipient): Snead and Jami Favor)     Name of Authorized Official (do CFR 122.22): Mayor Jack Peasley     Are any findings a result of an inspection? No     Inspection Date(s) (If applicable):     Name of Receiving Water Body (Indicate whether 303(d) listed): Pataha Creek     PRIVATE ENTITY ADJUSTMENT FACTOR     4   Is the entity privately owned?     5   Select the appropriate average volume of flow on a day of discharge in millions of galions per day (MGD). If a facility discharges only on a periodic basis, do ngl include days with zero flow when calculating the average flow:     A   <0.050 mgd and <0.250 mgd  |   |          |  |   | EPA Office:           | Region 10 - Seattle, WA               |                            |  |  |
| Amound and the period of th  |   |          | Pomeroy, Washington 99347              |   |                       | , , , , , , , , , , , , , , , , , , , |                            |  |  |
| Amound and the period of th  |   |          |  |   | 1                     |                                       |                            |  |  |
| Name of Facility Contact (ESO Worksheer tecipient): Snead and Jami Favor)       Name of Authorized Official (40 CFR 122.22): Mayor Jack Peesley       Are any findings a result of an inspection? No       Inspection Date(s) (if applicable):       Name of Receiving Water Body (Indicate whether 303(d) listed): Pataha Creek       PRIVATE ENTITY ADJUSTMENT FACTOR       Is the entity privately owned?     If yes, adjustment factor of 2.0 is applied.     No     1       Select the appropriate average volume of flow on a day of discharge in millions of galons per day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow when calculating the average flow:     No     1       A     <0.050 mgd and <1 mgd  |   |          | FACILITY DESCRIPTION / CONTACT NAMES   |   |                       |                                       | dalarta ang tang (O ang ta |  |  |
| Name of Authorized Official (40 CFR 122.22): Mayor Jack Peasley     Are any findings a result of an inspection? No     Inspection Date(s) (if applicable):     3     Name of Receiving Water Body (Indicate whether 303(d) listed): Pataha Creek     PRIVATE ENTITY ADJUSTMENT FACT OR     4   Is the entity privately owned?     If yes, adjustment factor of 2.0 is applied.   No     5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow when calculating the average flow:     A   <0.050 mgd (no adjustment is applied)   |   |          | Name of E                              | sility Contract (ECO )Monkahaat wasinianti)       |                       |                                       | ed plant operators (Samuel |  |  |
| Are any findings a result of an inspection? No     3   Inspection Date(s) (if applicable):<br>Inspection Date(s) (if applicable):     3   Name of Receiving Water Body (Indicate whether 303(d) listed): Pataha Creek     PRIVATE ENTITY ADJUSTMENT FACTOR     4   Is the entity privately owned?     5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per<br>day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow<br>when calculating the average flow:     A   <0.050 mgd and <0.250 mgd   |   |          |  |   |                       | or)                                   |                            |  |  |
| 3   Inspection Date(s) (if applicable):<br>Name of Receiving Water Body (Indicate whether 303(d) listed): Pataha Creek     PRIVATE ENTITY ADJUSTMENT FACTOR   1     4   Is the entity privately owned?   If yes, adjustment factor of 2.0 is applied. No   1     FLOW ADJUSTMENT FACTOR   1   1   No   1     5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow when calculating the average flow:   A   <0.050 mgd (no adjustment is applied)  |   |          |  |   |                       |                                       |                            |  |  |
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| PRIVATE ENTITY ADJUSTMENT FACTOR     4   Is the entity privately owned?   If yes, adjustment factor of 2.0 is applied.   No   1     5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow when calculating the average flow:   | ~ |          | Name of Possiving W                    | Inspection Date(s) (If applicable):               | Pataba Crook          |                                       |                            |  |  |
| 4   Is the entity privately owned?   If yes, adjustment factor of 2.0 is applied.   No   11     5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow when calculating the average flow:      A   <0.050 mgd (no adjustment is applied)  | 3 |          |  | ater body (indicate whether 505(d) listed).       | Fatana Creek          |                                       |                            |  |  |
| FLOW ADJUSTMENT FACTOR     5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow when calculating the average flow:     A   <0.050 mgd (no adjustment is applied)   No adjustment factor of 1.5 is applied.   X     B   20.050 mgd and <0.250 mgd   Adjustment factor of 1.5 is applied.   X     C   20.250 mgd and <1 mgd   Adjustment factor of 3.0 is applied.   C     D   21 mgd and <5 mgd   Adjustment factor of 1.0 is applied.   C     F   ≥10 mgd and <10 mgd   Adjustment factor of 10.0 is applied.   C     G   ≥50 mgd   Adjustment factor of 20.0 is applied.   C     F   ≥10 mgd and <50 mgd   Adjustment factor of 20.0 is applied.   C     G   ≥50 mgd   Adjustment factor of 20.0 is applied.   C     G   A   How many other state and federal formal enforcement action, adjustment factor is increased 50%.   0     enforcement actions has the responsible entity been subject to in the last three years? Include enforcement actions at this facility and any other facilities.   For each enforcement action, adjustment factor is increased 50%.   |   | 1        | PRIVATE ENTITY ADJUSTMENT FACTOR       |   |                       |                                       |                            |  |  |
| 5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow when calculating the average flow:     A   <0.050 mgd (no adjustment is applied)   | 4 |          | Is the entity privately owned?         | If yes, adjustment factor of 2.0 is applied.      | No                    |                                       | 1.0                        |  |  |
| 5   Select the appropriate average volume of flow on a day of discharge in millions of gallons per day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow when calculating the average flow:     A   <0.050 mgd (no adjustment is applied)   |   | ĺ        |  |   |                       |                                       |                            |  |  |
| day (MGD). If a facility discharges only on a periodic basis, do not include days with zero flow when calculating the average flow:     A   <0.050 mgd (no adjustment is applied)  | F |          |  | day of discharge in millions of college per       |                       |                                       |                            |  |  |
| when calculating the average flow:   A     A   <0.050 mgd (no adjustment is applied)   | Э |          |  |   |                       |                                       |                            |  |  |
| A   <0.050 mgd (no adjustment is applied)  |   |          |  | c basis, do <u>not</u> include days with zero now |                       |                                       |                            |  |  |
| B   ≥0.050 mgd and <0.250 mgd  |   | ^        | <b>U</b>                               | No adjustment factor is applied                   | 1                     |                                       |                            |  |  |
| C   ≥0.250 mgd and <1 mgd  |   | <u>A</u> |  |   | V                     |                                       | 1.5                        |  |  |
| D   ≥1 mgd and <5 mgd  |   |          |  |   | ^                     |                                       | 1.3                        |  |  |
| E   ≥5 mgd and <10 mgd   |   |          |  |   | <u> </u>              |                                       |                            |  |  |
| F   ≥10 mgd and <50 mgd   Adjustment factor of 15.0 is applied.     G   ≥50 mgd   Adjustment factor of 20.0 is applied.     REPEAT VIOLATOR ADJUSTMENT FACTOR     6   A   How many other state and federal formal enforcement actions has the responsible entity been subject to in the last three years? Include enforcement actions at this facility and any other facilities.   For each enforcement action, adjustment factor is increased 50%.   0  |   |          |  |   |                       |                                       |                            |  |  |
| G   ≥50 mgd   Adjustment factor of 20.0 is applied.     REPEAT VIOLATOR ADJUSTMENT FACTOR     6   A   How many other state and federal formal enforcement actions has the responsible entity been subject to in the last three years? Include enforcement actions at this facility and any other facilities.   For each enforcement action, adjustment factor is increased 50%.   0  |   | F        |  |   |                       |                                       |                            |  |  |
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| enforcement actions has the responsible entity<br>been subject to in the last three years? Include<br>enforcement actions at this facility and any other<br>facilities.  | 6 | А        |  | For each enforcement action, adjustment           | 0                     |                                       | 1.0                        |  |  |
| been subject to in the last three years? Include<br>enforcement actions at this facility and any other<br>facilities.  | - |          |  |   |                       |                                       |                            |  |  |
| enforcement actions at this facility and any other facilities.   |   |          |  |   |                       |                                       |                            |  |  |
| facilities.  |   |          |  |   |                       |                                       |                            |  |  |
| TOTAL ADJUSTMENT FACTOR 1.   |   |          |  |   |                       |                                       |                            |  |  |
|  |   |          |  |   | ΤΟΤΑΙ                 | ADJUSTMENT FACTOR                     | 1.50                       |  |  |
|  |   |          |  |   |                       |                                       | 1.00                       |  |  |



| Notes    | s: * | RCA = Requires Corrective Action   | Violation(s) / Corrective Action(s)   | CWA / Permit<br>Citation           | R<br>C<br>A* | No. of<br>Viol-<br>actions | Dollar<br>Amount<br>w/ Adjust.<br>Factor | Total                |       |
|----------|------|--|---|------------------------------------|--------------|----------------------------|--|----------------------|-------|
| 7        |      | MONITORING / REPORTING<br>Failure to submit compliance schedule report:  | ESA eligible if violations occup<br>Part S.5 of the permit and Summary of   | urred within the 2<br>Part S.5 and | 24 mo        | onths imn                  | nediately price                          | or to the ESA offer. |       |
| <b>'</b> | Α    |  | Permit Report Submittals outline the  | Summary of                         |              |                            | \$75                                     | =                    |       |
|          | В    | Submitted more than 30 days late   | annual requirement to submit operator   | Permit Report                      | No           | 3                          | \$113                                    | =                    | \$338 |
|          | С    |  | certification due on March 15 every year.<br>For 2023, this certification was submitted<br>late on May 10, 2023. Operations Manual<br>Review Confirmation Letter submitted late<br>on September 1, 2022 with due date of<br>March 15, 2022. Permit Renewal<br>Application Monitoring Data Report not<br>submitted by October 31, 2022 (required<br>monitoring data missing in renewal<br>application). Wasteload Assessment due<br>March 15, 2022 was submitted late on<br>June 15, 2022. | Submittals                         | No           | 1                          | \$225                                    | =                    | \$225 |
| 8        |      | Failure to submit timely discharge monitoring report (DMR) and/or DMR submitted with failure to conduct self-monitoring:   |   |                                    |              |                            |  |                      |       |
|          | Α    | DMR late but less than 30 days late  |   |                                    |              |                            | \$75                                     |                      |       |
|          | В    | DMR submitted more than 30 days late   |   |                                    |              |                            | \$113                                    |                      |       |
|          | С    | DMR not submitted or DMR submitted with a<br>failure to sample pollutants - conventional<br>pollutants<br>(count each conventional pollutant not reported<br>or not sampled as a violation; BOD, TSS, pH, oil<br>and grease, e. coli, fecal coliform)                                  |   |                                    |              |                            | \$113                                    | =                    |       |
|          | D    | DMR not submitted or DMR submitted with a failure to sample pollutants - toxic pollutants (count each toxic pollutant not reported or not sampled as a violation)  |   |                                    |              |                            | \$113                                    |                      |       |
| 9        |      | Failure to conduct self-monitoring in accordance<br>with permit requirements, including but no limited to<br>required sample type, sample location,<br>representative sampling, meeting 40 CFR 136 or<br>other permit requirements (count each pollutant<br>with one or more failures) |   |                                    |              |                            | \$38                                     | =                    |       |

| 10 |   | Failure to submit any other required report or notice<br>(e.g., biosolids report, pretreatment report,<br>industrial user notification, planned changes,<br>anticipated noncompliance, anticipated bypass, |                                |                     |       |           |                |    |                  |
|----|---|--|--------------------------------|---------------------|-------|-----------|----------------|----|------------------|
|    | Α | Late but less than 30 days late  |                                |                     |       |           | \$75           |    |                  |
|    | В |  |                                |                     |       |           | \$113          |    |                  |
|    | С |  |                                |                     |       |           | \$225          | =  |                  |
| 11 |   | 24-Hour Noncompliance Notice   |                                |                     |       | T         |                |    |                  |
|    | A |  |                                |                     |       |           | \$113          |    |                  |
|    | В |  |                                |                     |       |           | \$75           | =  |                  |
| 12 |   | 5-Day Written Noncompliance Follow-up Report:  |                                |                     |       |           |                |    |                  |
|    | Α |  |                                |                     |       |           | \$113          | =  |                  |
|    | В | Report provided late and/or incomplete   |                                |                     |       |           | \$75           | =  |                  |
| 13 |   | Noncompliance Not Required Within 24 Hours:  |                                |                     |       |           |                |    |                  |
|    | Α | Failure to provide report with DMR   |                                |                     |       |           | \$38           |    |                  |
|    | В | Report provided late and/or incomplete   |                                |                     |       |           | \$15           | =  |                  |
|    |   |  |                                | Subtotal Monito     | oring | g / Repor | ting Violatior | าร | \$563            |
|    |   |  |                                |                     |       |           |                |    |                  |
|    |   | OPERATIONS AND MAINTENANCE   | ESA eligible if violations occ | urred within the 24 | 4 ma  | onths im  |                |    | o the ESA offer. |
| 14 |   | Failure to conduct and document self-inspections of  |                                |                     |       |           | \$60           | =  |                  |
|    |   | facility (count each month with one or more missed   |                                |                     |       |           |                |    |                  |
|    |   | and/or undocumented inspection)  |                                |                     |       |           |                |    |                  |
| 15 |   | Failure to document all required information in self-  |                                |                     |       |           | \$30           | =  |                  |
|    |   | inspections or conduct a complete inspection   |                                |                     |       |           |                |    |                  |
|    |   | (count each month with one or more partially   |                                |                     |       |           |                |    |                  |
|    |   | documented/completed inspection unless the   |                                |                     |       |           |                |    |                  |
|    |   | month is accounted for in #15)   |                                |                     |       |           |                |    |                  |
| 16 |   | Failure to identify and document corrective actions  |                                |                     |       |           | \$30           | =  |                  |
| 10 |   |  |                                |                     |       |           | φõõ            |    |                  |
| 17 |   | Failure to meet operation and maintenance  |                                |                     |       |           | \$150          | =  |                  |
|    |   | requirement of the permit  |                                |                     |       |           | ,              |    |                  |
| 18 |   | Failure to manage removed substances in  |                                |                     |       |           | \$375          | =  |                  |
|    |   | accordance with the permit   |                                |                     |       |           |                |    |                  |
|    |   |  |                                |                     |       |           |                |    |                  |
|    |   |  | Sut                            | total Operations a  | nd    | Maintena  | nce Violation  |    | \$0              |

|    |   |  |                    | <b>T</b> - 4 - |           | ted Settleme   |                     | \$9       |
|----|---|--|--------------------|----------------|-----------|----------------|---------------------|-----------|
| 23 | Enter total estimate economic benefit calculated rou  |  | \$ 788             |                | Sampila   |                | an total <u>1</u> 0 |           |
|    | ECONOMIC BENEFIT ESTIMATE   | ESA eligible if estimated eco  | onomic benefit of  | non            | complia   | ice is less th | an total ES         | A offer.  |
|    |   |  |                    |                |           |                |                     |           |
|    | without approved pretreatment programs (excluding failure to provide notice counted in #11) |  |                    |                |           |                |                     |           |
|    | management/pretreatment requirement for POTWs   |  |                    |                |           | , ,,           |                     |           |
| 22 | Failure to meet industrial waste  |  |                    |                |           | \$150          |                     |           |
|    | INDUSTRIAL WASTE  | ESA eligible if violations occ   | urred within the f | 50 mc          | nths im   | nediately pri  | or to the Eq        | SA offer  |
|    |   |  |                    | Subto          | otal Reco | ords Violation | ns                  |           |
|    | excluding records not maintained in #22)  |  |                    |                |           |                |                     |           |
|    | permit (count each month with one or more failure   |  |                    |                |           | ŢĴŎ            |                     |           |
| 1  | Failure to maintain other records required by the   |  |                    |                |           | \$38           | =                   |           |
|    | records (count each month with one or more failure)   |  |                    |                |           |                |                     |           |
| 0  | Failure to create/maintain sampling and/or analysis   |  |                    |                |           | \$60           | =                   |           |
| _  | RECORDS   | ESA eligible if violations occ   | urred within the 2 | 24 mc          | onths im  |                |                     | SA offer. |
|    |   |  |                    |                |           |                | ·                   | ¥         |
|    | ,   |  | Subtotal Ff        | fluen          | t Limitat | ons Violatior  | าร                  | \$        |
|    | violation)  |  |                    |                |           |                |                     |           |
|    | (count each toxic pollutant separately as a   |  |                    |                |           |                |                     |           |
|    | above the limit - toxic pollutants  |  |                    |                |           |                |                     |           |
| E  |   |  |                    |                |           | \$300          | =                   |           |
|    | violation)  | of 1.28 lbs/day.   |                    |                |           |                |                     |           |
|    | (count each toxic pollutant separately as a   | reported value of 1.68 lbs/day and a limit   |                    |                |           |                |                     |           |
|    | above the limit - toxic pollutants  | the maximum total daily ammonia with   |                    |                |           |                |                     |           |
| С  |   | November 1, 2023, the facility exceeded  |                    |                |           | \$150          | =                   |           |
|    | fecal coliform)   | ammonia with reported value of 2.4<br>lbs/day and a limit of 1.28 lbs/day. On      |                    |                |           |                |                     |           |
|    | a violation; BOD, TSS, pH, oil and grease, e. coli,   | exceeded the maximum total daily   |                    |                |           |                |                     |           |
|    | (count each conventional pollutant separately as  | 15 mg/L. On October 18, 2023, the facility   |                    |                |           |                |                     |           |
|    | above the limit - conventional pollutants   | suspended solids with a reported monthly average value of 19.5 mg/L and a limit of |                    |                |           |                |                     |           |
| В  | Months with effluent exceedance 40% or more   | July 2023, the facility exceeded total   | S1.A and S1.B      | No             | 1         | \$113          | =                   | \$        |
|    | fecal coliform)   | 18.8571 mg/L and a limit of 15 mg/L. In  |                    |                |           |                |                     |           |
|    |   | reported monthly average value of  |                    |                |           |                |                     |           |
|    | (count each conventional pollutant separately as  | comply with. In June 2023, the facility exceeded total suspended solids with a     |                    |                |           |                |                     |           |
|    | above the limit - conventional pollutants   | wastewater flows that the permittee must   |                    |                |           |                |                     |           |
| A  |   | effluent limits for high and low treated   | S1.A and S1.B      | No             | 3         | \$75           | =                   | \$2       |
| 9  | Failure to meet effluent limitations:   | Part S1.A and S1.B of the permit outline   |                    |                |           |                |                     |           |