

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
901 NORTH 5th STREET
KANSAS CITY, KANSAS 66101
ENVIRONMENTAL PROTECTION AGENCY-REGION VII
REGIONAL HEARING CLERK

11 OCT 27 11:2:50

BEFORE THE ADMINISTRATOR

IN THE MATTER OF)
)
) Docket No. CWA-07-2011-0112
)
The City of Hull, Iowa,)
)
) FINDINGS OF VIOLATION
Respondent.) AND ORDER FOR COMPLIANCE
)
)
)
Proceeding under Section 308(a) and)
309(a)(3) of the Clean Water Act,)
33 U.S.C. §§ 1318(a) and 1319(a)(3))
)

I. Statutory Authority

1. The FINDINGS OF VIOLATION are made and ORDER FOR COMPLIANCE ("Order") is issued pursuant to the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA"), by Section 309(a)(3) of the Clean Water Act ("CWA" or the "Act"), 33 U.S.C. § 1319(a)(3). As an element of this Order, provision of information is required pursuant to the authority of Section 308 of the CWA, 33 U.S.C. § 1318. These authorities have been delegated by the Administrator to the Regional Administrator, EPA Region 7, and further delegated to the Director, Water, Wetlands and Pesticides Division, EPA Region 7.

2. Section 301(a) of the Act, 33 U.S.C. § 1311(a), prohibits discharge of pollutants from a point source into navigable waters of the United States, except in compliance with, inter alia, Section 307 of the Act, 33 U.S.C. § 1317, and a permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342. Section 402 provides that pollutants may be discharged into navigable waters of the United States only in accordance with the terms of a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to that section. Section 307 provides for the promulgation of regulations establishing pretreatment standards for introduction of pollutants into publicly owned treatment works ("POTW").

3. The Iowa Department of Natural Resources ("IDNR") is the state agency with the authority to administer the federal NPDES and Pretreatment programs in Iowa pursuant to Sections 307 and 402 of the CWA, 33 U.S.C. §§ 1342 and 1317, respectively, and the implementing regulations. Pursuant to Section 402(i) of the CWA, 33 U.S.C. § 1342(i), the EPA retains concurrent enforcement authority with authorized state NPDES and Pretreatment programs under Section 309 of the CWA, 33 U.S.C. § 1319.

II. General Factual and Legal Allegations

4. The city of Hull, Iowa ("Respondent" or "City"), is a "person" within the meaning of Section 502(5) of the Act, 33 U.S.C. § 1362(5).
5. At all times relevant, Respondent was, and still is, the owner and/or operator of a POTW in Sioux County, Iowa, that includes a wastewater treatment plant ("WWTP") and sewage collection system, which receive wastewater from various domestic and non-domestic sources.
6. The POTW discharges to an unnamed tributary of Burr Oak Creek and Rock River.
7. The POTW is a "point source" that "discharges pollutants" to "navigable waters" of the United States, as these terms are defined by Section 502(14), (12) and (7) of the CWA, 33 U.S.C. § 1362(14), (12) and (7), respectively.
8. Respondent is therefore subject to the provisions of the CWA, 33 U.S.C. § 1251, et seq.
9. On or about May 14, 2001, IDNR issued to Respondent NPDES Permit IA0020991 pursuant to Section 402 of the Act, 33 U.S.C. § 1342, which was scheduled to expire on May 13, 2006. Respondent submitted an application for renewal of its permit, and the permit has been administratively extended pending reissuance by IDNR.
10. Respondent's NPDES Permit contains limitations for discharges of effluent from the POTW to the unnamed tributary of Burr Oak Creek and Rock River. The NPDES Permit contains POTW discharge limitations for, among other pollutants, Carbonaceous Biochemical Oxygen Demand measured over five days ("CBOD₅"), Total Suspended Solids ("TSS"), and Ammonia as Nitrogen ("NH₃").
11. The POTW receives industrial wastewater discharges from Formosa Food Company, Inc. (Formosa Food), therefore, Formosa Food is an "industrial user" or "IU," as defined by 40 C.F.R. § 403.3(j).
12. Respondent's wastewater contains "pollutants" as defined by Section 502(6) of the CWA, including, but not limited to, CBOD₅, TSS, NH₃, and pH.
13. On or about May 1, 1996, Respondent entered into a Treatment Agreement with Formosa Food, which included limitations and conditions for discharges from Formosa Food's facility to the POTW pursuant to provisions of the CWA, 33 U.S.C. § 1317. The 1996 Treatment Agreement limitations were reviewed and approved by IDNR, and thereafter incorporated into NPDES Permit IA0020991, which contains both final effluent limitations for Respondent and Pretreatment limits for Formosa Food's IU discharge to the POTW based on the provisions of the Treatment Agreement.

14. On or about February 20, 2008, Respondent entered into a new Treatment Agreement with Formosa Food. As of the date of this Order, the terms of the 2008 Treatment Agreement have not been incorporated into Respondent's NPDES permit.

15. NPDES Permit IA0020991 establishes effluent limitations and conditions for the City's POTW, including but not limited to the following:

a) NH₃

i. 30-day average limitations:

Period	Concentration milligrams per Liter (mg/L)	Mass pounds per day (lbs/day)
January and February	14	72
March through June and September through December	12	61
July and August	8.7	44

ii. daily maximum limitations:

Period	Concentration mg/L	Mass lbs/day
January and February	22	109
March through June and September through December	18	91
July and August	13	66

iii. grab samples of final effluent to be taken no less frequently than two (2) days per week.

b) Monitoring and Reporting Requirements

- i. samples and measurements are to be representative of the volume and nature of the monitored wastewater;
- ii. analytical and sampling methods specified in 40 C.F.R. Part 136 or other methods approved in writing by the IDNR are to be used; and
- iii. any violation of a maximum daily discharge limit must be reported within 24 hours to the Director of the IDNR.

16. The 1996 Treatment Agreement and NPDES Permit Number IA0020991 establish "Industrial Contributor" Pretreatment limitations and conditions and monitoring for Formosa Food and reporting requirements for the City, including but not limited effluent limitations for CBOD₅, TSS, Total Kjeldahl Nitrogen (TKN), pH, and Oil and Grease (O&G). Limitations and conditions for Formosa Food in the Treatment Agreement and permit include, but are not limited to:

- a) CBOD₅ and TSS – 30-day average and daily maximum limitations based on 24-hour composite samples to be taken no less frequently than once every three (3) months;
- b) TKN – 30-day average and daily maximum limitations based on 24-hour composite samples to be taken no less frequently than once per week;

- c) pH – minimum and maximum values of 6 to 9 standard units, respectively, based on grab samples to be taken no less frequently than once per week;
- d) O&G – 30-day average limitation and daily maximum limitations based on grab samples to be taken no less frequently than once per month; and
- e) Monitoring and Reporting Requirements
 - i. samples and measurements are to be representative of the volume and nature of the monitored wastewater;
 - ii. analytical and sampling methods specified in 40 C.F.R. Part 136 or other methods approved in writing by the IDNR are to be used;
 - iii. effluent (waste) from Formosa Food must be monitored for compliance prior to discharge to the municipal collection system; and
 - iv. the 24-hour total effluent flow shall be measured in million gallons per day (MGD) seven days per week.

17. Pretreatment Standards established at 40 C.F.R. Part 403 have been promulgated under the authority of Section 307 of the CWA, 33 U.S.C. § 1317, and contain a general prohibition, at 40 C.F.R. § 403.5(a), against the introduction into a POTW of any pollutant or pollutants that cause interference or pass-through, as those terms are defined at 40 C.F.R. § 403.3(k) and (p), respectively; specific prohibitions as described in 40 C.F.R. § 403.5(b), against the introduction of certain pollutants into a POTW; and specific limits developed by or for a POTW pursuant to 40 C.F.R. § 403.5(a), to implement the prohibitions in 40 C.F.R. § 403.5(a) and (b).

18. The Treatment Agreement limits and conditions for Formosa Food incorporated into NPDES Permit IA0020991 are Pretreatment Standards pursuant to 40 C.F.R. § 403.5.

19. On or about November 30, 2009, through December 3, 2009, EPA performed an inspection of Respondent's POTW and of discharges from Formosa Food to the POTW ("Inspection") under the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a).

20. During the Inspection, the EPA inspector reviewed documents, including Monthly Operating Reports ("MORs") for the City and Formosa Food, observed the City's facility, and the Formosa Food facility, observed sampling and analysis techniques and practices, and collected effluent samples, which were later analyzed.

21. Following the Inspection, the City submitted information to the EPA inspector regarding actions the City had taken and planned to take to achieve compliance with its NPDES Permit.

22. On or about August 4, 2010, EPA issued a request for information to Respondent pursuant to the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), requiring submittal of information regarding, among other things, Respondent's regulation of Industrial Users, including discharges from the Formosa Food's facility to the POTW. Respondent submitted its response to the information request by letter and Statement of Certification dated September 2, 2010, hereafter referred to as the "City's Information Request Response."

23. On or about August 4, 2010, EPA issued a request for information to Formosa Food pursuant to the authority of Section 308(a) of the CWA, 33 U.S.C. § 1318(a), requiring submittal of information regarding, among other things, Formosa Food's production, wastewater processes and discharges to the City's POTW. The Respondent submitted its response to the information request by letter and Statement of Certification dated September 3, 2010, hereafter referred to as the "Formosa Food's Information Request Response."

24. Information from the EPA Inspection, the City's submission following the Inspection, the City's Information Request Response, and Formosa Food's Information Request Response indicate, in part, that the City:

- a) has been working with a consultant to develop and implement improvements to its POTW to effectively treat ammonia and other pollutant parameters;
- b) has implemented or plans to implement improvements to its sample collection and analysis processes to ensure compliance with the requirements of the NPDES Permit and 40 C.F.R. Part 136;
- c) has prepared a template for providing 24-hour notices to IDNR regarding permit violations; and
- d) has practiced inconsistent, and at times inappropriate, sampling procedures for monitoring the discharges from Formosa Food to the POTW.

III. Findings of Violation

25. The facts stated in Paragraphs 4 through 24 above, are hereby incorporated by reference.

NPDES Permit Ammonia Effluent Limit Violations

26. Based on the City's MORs, information and data collected during the Inspection and the City's Information Request Response, from January 2007 through at least April 2011 Respondent violated limitations set forth in its NPDES Permit IA0020991 for NH₃, as identified in Appendix A of this Order, and summarized as follows:

- a) 22 months of violation of the 30-day average concentration limitation;
- b) 10 months of violation of the 30-day average mass limitation;
- c) 98 violations of the daily maximum concentration limitation; and
- d) 28 violations of the daily maximum mass limitation.

27. Respondent's discharges of NH₃ in excess of the NPDES Permit limitations are violations of the NPDES Permit IA0020991, and as such are violations of Sections 301(a) of the CWA, 33 U.S.C. § 1311(a).

Failure to Comply with WWTP Sampling and Analysis Requirements

28. Based on the City's MORs, information and data collected during the Inspection and the City's Information Request Response, Respondent violated the conditions of its NPDES Permit IA0020991 by failing to sample and analyze pH using a grab sample, failing to properly preserve samples during and following sample collection, failing to use the correct test method for analysis of TSS, and failing to properly measure influent and effluent flow for the WWTP.

29. Respondent's failures to sample and analyze discharges from the POTW in compliance with the conditions of its NPDES permit are violations of the NPDES Permit IA0020991, and as such, are violations of Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Discharge Without a Permit

30. Based on the City's MORs, information and data collected during the Inspection and the City's Information Request Response, Respondent discharged pollutants from locations not authorized by NPDES Permit IA0020991; including but not limited to:

- a) discharges from two or more constructed overflow locations at lift stations in the City's wastewater collection system that discharge to ditches; and
- b) discharges from one constructed overflow location at a lift station that is not included in the NPDES Permit but is referred to by the City as Outfall 002.

31. Respondent's discharges without authorization under an NPDES permit are violations of Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

Failure to Comply with Pretreatment Sampling and Analysis Requirements

32. Based on the City's MORs, information and data collected during the Inspection and the City's Information Request Response and Formosa Food's Information Request Response, Respondent failed to consistently use appropriate sample collection and analysis techniques and procedures, as required by NPDES Permit IA0020991, for determining whether discharges from Formosa Food to the POTW are in compliance with the NPDES Permit and the Treatment Agreement, including but not limited to the following:

- a) failure to measure flow for Formosa Food's discharge to the POTW at the outfall structure, which could result in inaccurate pollutant loadings measurements;
- b) failure to consistently sample CBOD₅, TSS, and TKN using composite samples; and
- c) failure to consistently follow testing procedure quality control practices to ensure accurate and representative sample collection.

33. Respondent's failures to appropriately sample and analyze discharges from Formosa Food to the City's POTW are violations of the NPDES Permit IA0020991, and as such are violations of Sections 301(a) and 307(d) of the CWA, 33 U.S.C. §§ 1311(a) and 1317(d).

IV. Order for Compliance

34. Based on the foregoing Findings of Violation, and pursuant to the authority of Section 309(a)(3) of the Act, 33 U.S.C. § 1319(a)(3) and Section 308 of the Act, 33 U.S.C. § 1318, Respondent is hereby ORDERED AS FOLLOWS:

35. Within forty-five (45) calendar days of receipt of this Order, Respondent shall provide to EPA, with a copy to IDNR, a written Compliance Report, Plans, and Schedules describing in detail how Respondent has achieved, or plans to achieve, compliance with NPDES Permit IA0020991 and correct the violations described in the Findings of Violation noted herein. At a minimum, the proposal shall include:

- a) the name of a contact person for purposes of communications regarding this Order;
- b) a copy of MORs submitted to the IDNR from May 2011 through the date of your Report;
- c) with regard to compliance with effluent limitations:
 - i. an explanation, with supporting documentation, of all actions taken from July 2010 to date to comply with the effluent limitations for the POTW, including but not limited to NH₃; and
 - ii. a detailed Plan and Schedule for implementing any process changes, construction or other actions to achieve compliance with all effluent limitations;
- d) with regard to unauthorized discharges:
 - i. a detailed description and diagram, if available, of the outfall structure at each lift station within the City's wastewater collection system;
 - ii. a list or log of all discharges (based on observations or estimations) from each of the overflow structures since January 2008;
 - iii. a description, with documentation and plans or reports, if available, of any collection system evaluation that has been performed to determine potential sources of inflow and infiltration (I/I) and any work that has been performed to repair or replace the sewer lines, manholes, lift stations, etc.; and
 - iv. a detailed Plan and Schedule for implementing additional investigation, repair and replacement work in the collection system to reduce I/I and eliminate discharges from lift stations and overflow locations.

36. Within forty-five (45) days of receipt of this Order, Respondent shall provide EPA a proposed Monitoring Plan, for EPA review and approval that is designed to comply with the requirements of the NPDES Permit to accurately measure discharges from Formosa Food to

the POTW, and discharges from the POTW to the receiving stream. At a minimum, the proposed Monitoring Plan shall comply with all terms of the NPDES Permit and, as appropriate, the Treatment Agreement, and shall include:

- a) a description, with supporting documentation, of all activities initiated to date to ensure all sampling and analysis of the City's POTW and Formosa Food's Pretreatment discharge, comply with the sampling and analysis requirements of the NPDES Permit, including the applicable provisions of 40 C.F.R. Part 136;
- b) for monitoring Formosa Food:
 - i. the location(s) where samples of Formosa Food's wastewater shall be taken;
 - ii. the parameters, including flow and pollutants, to be monitored, as specified in the NPDES Permit and Treatment Agreement;
 - iii. the frequency of sampling for flow and each pollutant parameter;
 - iv. a description of how the proposed sampling will be representative of fluctuations in Formosa Food's production and/or quality of the wastewater;
 - v. the sampling and analysis methods that will be utilized to determine compliance with each measured parameter;
 - vi. a quality control plan, including the qualifications of the person(s) performing and/or supervising the monitoring to ensure accurate and consistent monitoring, analysis and reporting; and
 - vii. a description of how the results of split-sample and independent monitoring performed by Formosa Food shall be reported on MORs in addition to results of monitoring performed by the City.
- c) for monitoring the City's POTW discharges:
 - i. the location(s) where influent and effluent samples of the POTW's wastewater shall be taken;
 - ii. the parameters, including flow and pollutants, to be monitored, as specified in the NPDES Permit;
 - iii. the frequency of sampling for flow and each pollutant parameter;
 - iv. a description of how the proposed sampling will be representative of fluctuations in the POTW's discharges and/or quality of the wastewater;
 - v. the sampling and analysis methods which will be utilized to determine compliance with each measured parameter; and
 - vi. a quality control plan, including the qualifications of the person(s) performing and/or supervising the monitoring to ensure accurate and consistent monitoring, analysis and reporting.

37. EPA will review the Plans and Schedules submitted by Respondent pursuant to Paragraphs 35 and 36, above. After consultation with the IDNR, the EPA shall approve the Schedules contained within the Compliance Plans and Schedules and the Monitoring Plan, or require modification and resubmission of such Plans and/or Schedules, or a portion thereof, pursuant to Paragraph 38, below. Upon approval, the Schedule for the Compliance Plans and

Schedules and the Monitoring Plan shall be deemed incorporated into and become enforceable under this Order and Respondent shall immediately implement compliance measures, as approved.

38. If required by the EPA pursuant to Paragraph 37, above, the Respondent shall within forty-five (45) days of receipt of any written comments from EPA regarding either a Plan and/or Schedule, make modifications and changes to it as directed by EPA, and resubmit the Plan and/or Schedule to the EPA, with a copy to the IDNR. Upon request, the EPA may grant, in writing, a longer period of time for resubmission of such documents.

39. Review, comment or approval of a Plan or Schedule by the EPA does not relieve Respondent of the responsibility to comply with its NPDES permit, the CWA, applicable state law, or this Order.

Quarterly Reporting

40. Beginning January 28, 2012, Respondent shall submit information and reports regarding actions taken in response to this Order to EPA on a quarterly basis (January 28, April 28, July 28, and October 28), with a copy to IDNR, until Respondent is notified by the EPA that the reporting may cease or that this Order is terminated pursuant to Paragraph 50, below, as follows:

- a) a copy of MORs for the City of Hull and for Formosa Food submitted to the IDNR within the reporting period;
- b) for the Compliance Plans and Schedules, a description, with dates, of activities completed under this Order within the reporting period, the results achieved, and a brief list of the activities planned for the next reporting quarter; and
- c) for the Monitoring Plan, a table, or tables, as needed, clearly showing the date and location of each sample collected, and the sample results. In addition, supporting documentation shall be submitted showing the sample collection and preservation process, chain of custody information, and copies of the analytical results for all sampling required pursuant to this Order.

Certification

41. All submissions made by Respondent to the EPA pursuant to the requirements of this Order shall contain the following certification signed by an authorized official, as described at 40 CFR § 122.2:

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate,

and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing submissions of false information,

Submittals

42. All documents required by this Order to be submitted to the EPA shall be sent by certified mail, return receipt requested, to the following:

Mr. Robert Bryant
Water Enforcement Branch
Water, Wetlands and Pesticides Division
U.S. Environmental Protection Agency
901 North 5th Street
Kansas City, Kansas 66101.

43. All documents required for submittal to IDNR shall be hand delivered or sent by certified mail, return receipt requested, to the following:

Dennis Ostwinkle, Supervisor
IDNR Field Office #6
1023 West Madison Street
Washington, Iowa 52353-1623

Ken Hessenius, Supervisor
IDNR Field Office #2
1900 North Grand Ave, Suite E17
Spencer, Iowa 51301

V. General Provisions

Effect of Compliance with the Terms of This Order for Compliance

44. Compliance with the terms of this Order shall not relieve Respondent of liability for, or preclude EPA from initiating, an enforcement action to recover penalties for any violations of the CWA, or to seek additional injunctive relief, pursuant to Section 309 of the CWA, 33 U.S.C. § 1319.

45. Respondent shall comply with all other applicable laws, regulations, standards, and requirements contained in any applicable local, state, and federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards, or requirements that may become effective during the term of this Order.

46. This Order does not constitute a waiver or a modification of any requirements of the CWA, 33 U.S.C. § 1251 et seq., all of which remain in full force and effect. EPA retains the right to seek any and all remedies available under Section 309 of the Act, 33 U.S.C. § 1319, for any violation cited in this Order. Issuance of this Order shall not be deemed an election by EPA to forgo any civil or criminal action to seek penalties, fines, or other appropriate relief under the Act for any violation whatsoever.

Access and Requests for Information

47. Nothing in this Order shall limit EPA's right to obtain access to, and/or to inspect Respondent's facility, and/or to request additional information from Respondent, pursuant to the authority of Section 308 of the CWA, 33 U.S.C. § 1318 and/or any other authority.

Severability

48. If any provision or authority of this Order, or the application of this Order to Respondent, is held by federal judicial authority to be invalid, the application to Respondent of the remainder of this Order shall remain in full force and effect and shall not be affected by such a holding.

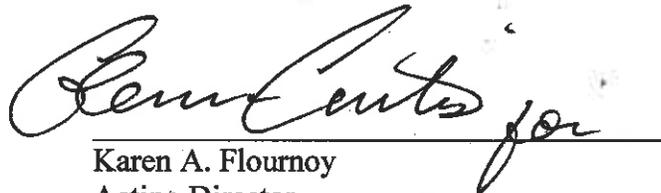
Effective Date

49. The terms of this Order shall be effective and enforceable against Respondent upon its receipt of an executed copy of the Order.

Termination

50. This Order shall remain in effect until a written notice of termination is issued by an authorized representative of the EPA. Such notice shall not be given until all of the requirements of this Order have been met.

Issued this 26 day of October, 2011.



Karen A. Flournoy
Acting Director
Water, Wetlands and Pesticides Division



Patricia Gillispie Miller
Senior Counsel
Office of Regional Counsel

CERTIFICATE OF SERVICE

I certify that on the date noted below I hand delivered the original and one true copy of this Findings of Violation and Order for Compliance to the Regional Docket Clerk, United States Environmental Protection Agency, 901 North 5th Street, Kansas City, Kansas 66101.

I further certify that on the date noted below I sent by certified mail, return receipt requested, a true and correct copy of the signed original Findings of Violation and Order for Compliance to:

Roger Vis
Mayor, City of Hull
1133 Maple Street
Hull, Iowa 51239.

I certify that on the date noted below I sent by first class mail a true and correct copy of the signed original Findings of Violation and Order for Compliance to:

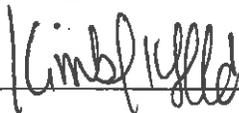
Lonni Westphal
Water/Wastewater Superintendent
1133 Maple Street
Hull, Iowa 51239

Dennis Ostwinkle, Supervisor
IDNR Field Office #6
1023 West Madison Street
Washington, Iowa 52353-1623

Ken Hassenius, Supervisor
IDNR Field Office #3
1900 North Grand Ave, Suite E17
Spencer, Iowa 51301

OCT 27 2011

Date



Appendix A - EPA Docket No. CWA-07-2011-0112

City of Hull NPDES Effluent Violations

Ammonia, as N (NH₃)

Limits January - February	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	14 mg/l	22 mg/l	72 lb/d	109 lb/d
January-2007	18.06			
1/31/2007		23.1		
February-2007	26.21			
2/1/2007		23.4		
2/7/2007		24.2		
2/8/2007		24.5		
2/14/2007		26.3		
2/15/2007		26.5		
2/21/2007		28		
2/22/2007		27.7		
2/28/2007		29.1		
Limits March - June	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	12.0 mg/l	18.0 mg/l	61 lb/d	91 lb/d
March-2007	26.3		99.5	
3/1/2007		28.8		
3/7/2007		29.7		
3/8/2007		29.8		
3/14/2007		25.9		136.08
3/15/2007		26.9		137.52
3/21/2007		24.2		110.8
3/22/2007		23.2		99.45
3/28/2007		24.1		124.01
3/29/2007		24.2		96.47
April-2007	18.44		105.12	
4/4/2007		23.5		167.18
4/5/2007		22.8		163.91
Limits September - December	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	12.0 mg/l	18.0 mg/l	61 lb/d	91 lb/d
9/20/2007		18.1		
December-2007	12.05			
Limits January - February	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	14 mg/l	22 mg/l	72 lb/d	109 lb/d
January-2008	22.35			
1/16/2008		23.2		
1/17/2008		23.1		
1/23/2008		23.5		
1/24/2008		23.5		
1/30/2008		26.6		
1/31/2008		26.9		
February-2008	32.11			
2/6/2008		29.1		
2/7/2008		30.1		
2/13/2008		29.8		
2/14/2008		30.2		
2/20/2008		33.3		

3/23/2009		27.2		
3/24/2009		27.7		
3/30/2009		27		96.8
3/31/2009		26.9		
April-2009	23.6		76.4	
4/6/2009		25.5		
4/7/2009		24.8		
4/13/2009		25.9		
4/14/2009		25.5		
4/20/2009		23.4		
4/21/2009		23.2		
4/27/2009		20.2		
4/28/2009		20.3		
Limits January - February	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	14 mg/l	22 mg/l	72 lb/d	109 lb/d
January-2010	14.58			
2/25/2010		26.2		
2/26/2010		28.1		
Limits March - June	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	12.0 mg/l	18.0 mg/l	61 lb/d	91 lb/d
March-2010	17.6		101.8	
3/16/2010		27.7		149.9
3/17/2010		27.6		358.6
3/23/2010		24.5		136.3
3/24/2010		24.1		122.4
3/30/2010		21.4		
3/31/2010		21.3		
April-2010	16.4			
4/5/10		20.7		
4/7/2010		20.6		
4/13/2010		18.2		
Limits July - August	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	8.7 mg/l	13.0 mg/l	44 lb/d	66 lb/d
August-2010			45	
Dmax				110.92
Limits September - December	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	12.0 mg/l	18.0 mg/l	61 lb/d	91 lb/d
December-2010	14.61			
Limits January - February	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	14 mg/l	22 mg/l	72 lb/d	109 lb/d
January-2011	20.48			
Dmax		22.8		
February-2011	23.11			
Dmax		23.8		
Limits March - June	Concentration		Mass	
	30 d Avg	Dmax	30 d Avg	Dmax
	12.0 mg/l	18.0 mg/l	61 lb/d	91 lb/d
March-2011	18.71		73.35	
Dmax		21.4		
April-2011	12.65			