December 2011
FACT SHEET
Authorization to Discharge under the
National Pollutant Discharge Elimination System for the
Navajo Tribal Utility Authority (NTUA) – Navajo Townsite
NPDES Permit No. NN0030335

Applicant address: Navajo Tribal Utility Authority ("NTUA")
P.O. Box 587
Fort Defiance, Arizona 86504

Applicant Contact: Harry L. Begaye, Technical Assistant
(928) 729-6208

Facility Address: 0.5 miles west of Navajo Pine High School
West of Black Creek Wash in Navajo, NM

Facility Contact: Philemon Allison, District Manager
(928) 729-6140

I. Summary

The NTUA was issued a National Pollutant Discharge Elimination System ("NPDES") Permit (No. NN0030335) on December 23, 2006, for its Navajo Townsite wastewater treatment lagoon facility ("WWTF"), pursuant to the U.S. Environmental Protection Agency ("U.S. EPA") regulations set forth in Title 40, Code of Federal Regulations ("CFR") Part 122.21. The permit was effective December 23, 2006, through midnight, December 22, 2011. NTUA applied to U.S. EPA Region 9 for reissuance on August 16, 2011. This fact sheet is based on information provided by the applicant through its application and discharge data submittal, along with the appropriate laws and regulations.

Pursuant to Section 402 of the Clean Water Act ("CWA"), the U.S. EPA is proposing issuance of the NPDES permit renewal to NTUA Navajo Townsite ("permittee") for the discharge of treated domestic wastewater to receiving waters named Black Creek, a tributary to Puerco River, an eventual tributary to the Little Colorado River, a water of the United States.

II. Description of Facility

The NTUA Navajo Townsite wastewater treatment lagoons are located 0.5 miles west of Navajo Pine High School, west of Black Creek Wash in Navajo New Mexico. The wastewater facility serves a population of approximately 3,160 (students, personnel, and residents), and receives only domestic sewage with a design flow of 0.32 million gallons per day (MGD). The new wastewater treatment plant has an average daily discharge rate of 0.07 MGD.

The Navajo Townsite WWTF is considered a Publicly-Owned Treatment Works ("POTW"). The treatment facility consists of three facultative cells. The design capacities for Cell #1, Cell #2 and Cell #3 are 7.5, 6.7, and 7.1 million gallons, respectively. Pretreatment of

wastewater consists of a bar screen with a two-inch opening, a grit chamber, a Parshall Flume with an ultrasonic flow meter, a lift station and a splitter box that directs flow in succession from Cell #1 to Cell #2 and Cell #3. The pretreatment facility is located east of the lagoons across from Black Creek. Disinfection includes a Parshall flume with an ultrasonic flow meter, gas chlorination, contact chamber and an 8-inch pipe to Outfall No. 001. Treated effluent will be intermittently discharged to Black Creek (ephemeral), a tributary to the Puerco River (ephemeral), a tributary to the Little Colorado River. Sampling and monitoring under the proposed permit shall be performed at Outfall No. 001 prior to discharge.

Since chlorination is used for disinfection, dechlorination is necessary in order to meet discharge limitations for chlorine. On May 22, 2007, the Navajo Nation EPA ("NNEPA") conducted a compliance evaluation inspection (CEI) and noted erosion and operating problems at the cells. In addition, the May 2007 inspection report noted that review of the Discharge Monitoring Reports ("DMRs") from August 2005 to March 2007 indicated the Townsite facility had exceeded the discharge limitations eighty-eight (88) times for Total Residual Chlorine ("TRC"), Biochemical Oxygen Demand ("BOD_5"), Total Suspended Solids ("TSS") and/or percent (%) removal efficiency for TSS.

On June 30, 2011, NNEPA conducted another CEI and was informed by NTUA that the lagoon cells turned over during freezing temperatures. In addition, NNEPA found no dechlorination treatment provided at the plant and no discharge was observed at Outfall No. 001. The permit requires chlorination and dechlorination of the effluent prior to discharge. The facility compliance history is discussed further in details in Section IV.B.4.

III. Basis of Proposed Permit Requirements

A. Applicable Technology-Based Effluent Limitations

Section 301 of the CWA established a required performance level, referred to as "secondary treatment," that all POTWs were required to meet by July 1, 1977. Federal secondary treatment effluent standards for POTWs are contained in Section 301(b)(1)(B) of the CWA. Implementing regulations for Section 301(b)(1)(B) are found at 40 CFR Part 133. The CWA requires POTWs to meet performance-based requirements based on available wastewater treatment technology. These technology-based effluent limits apply to all municipal wastewater treatment plants, and identify the minimum level of effluent quality attainable by secondary treatment in terms of BOD_5 and TSS. The requirements contained in the draft permit are necessary to prevent violations of applicable treatment standards.

B. Navajo Nation Surface Water Quality Standards

In accordance with 40 CFR 122.44(d), the need for discharge limitations for all pollutants that may impact applicable water quality criteria and water quality standards must be evaluated. As part of this evaluation, discharge limitations are based on application of the water quality standards. USEPA approved the 1999 Navajo Nation Surface Water Quality Standards ("NNSWQS"), on March 23, 2006. The NNSWQS

were revised in 2007 and approved by the EPA on March 26, 2009. A *draft* 2010 NNSWQS revision is currently under review by NNEPA and USEPA. The approved 1999 Navajo Nation water quality standards, the 2007 revision and the *draft* 2010 revisions will be used on a best professional judgment ("BPJ") basis for purposes of developing water quality based effluent limitations. The requirements contained in the proposed permit are necessary to prevent violations of applicable water quality standards.

IV. Determination of Effluent Limitations, Monitoring, and Reporting Requirements

A. Federal Secondary Treatment Effluent Discharge Limitations

The proposed permit contains discharge limitations for biochemical oxygen demand (BOD_5), total suspended solids (TSS) and priority toxic pollutants. For both BOD_5 and TSS, the arithmetic means of values, by weight, for effluent samples collected in a period of 30 consecutive calendar days cannot exceed 15 percent of the arithmetic mean of values, by weight, for influent samples collected at approximately the same times during the same period.

Discharge Parameter	Units	Average Monthly	Average Weekly	Maximum Daily	Monitoring Frequency
Flow [1]	MGD	-- [2]	n/a	-- [2]	Instantaneous
BOD_5 [3]	mg/l	30	45	n/a	Monthly
	kg/day	36	54	n/a	
TSS [3]	mg/l	30	45	n/a	Monthly
	kg/day	36	54	n/a	
Priority Pollutants [4]	mg/l	--[2]	n/a	--[2]	Once/1st Quarter during Year 5

NOTES:

1. No flow limit is set at this time but influent and effluent flows must be monitored and reported. The monitoring frequency is once/month.

2. Monitoring and reporting required. No limitation is set at this time.

3. Under 40 CFR Section 133.102(a) and (b), the discharge limits for BOD_5 and TSS shall not exceed a monthly average of 30 mg/l and a weekly average of 45 mg/l. The mass limits are calculated based upon the 0.32 MGD design flow.

4. Priority Pollutants: In the first year of the permit, the permittee shall monitor for the full list of priority pollutants in the Code of Federal Register (CFR) at 40 CFR Part 423, Appendix A. No limit is set at this time. Should the results reveal levels below the Navajo Nation Surface Water Quality Standards and EPA's National Water Quality Criteria for priority pollutants, monitoring will no longer be required for the remainder of the permit cycle.

B. Water Quality Based Effluent Limitations ("WQBELs")

Water quality-based effluent limitations, or WQBELS, are required in NPDES permits when the permitting authority determines that a discharge causes, has the

reasonable potential to cause, or contributes to an excursion above any water quality standard. (40 CFR 122.44(d)(1)).

When determining whether an effluent discharge causes, has the reasonable potential to cause, or contributes to an excursion above narrative or numeric criteria, the permitting authority shall use procedures which account for existing controls on point and nonpoint sources of pollution, the variability of the pollutant or pollutant parameter in the effluent, the sensitivity of the species to toxicity testing (when evaluating whole effluent toxicity) and where appropriate, the dilution of the effluent in the receiving water [40 CFR 122.44 (d)(1)(ii)].

EPA evaluated the reasonable potential to discharge toxic pollutants according to guidance provided in the *Technical Support Document for Water Quality-Based Toxics Control* (TSD) (Office of Water Enforcement and Permits, U.S. EPA, March 1991) and the *U.S. EPA NPDES Permit Writers Manual* (Office of Water, U.S. EPA, December 1996). These factors include:

1. Applicable standards, designated uses and impairments of receiving water
2. Dilution in the receiving water
3. Type of industry
4. History of compliance problems and toxic impacts
5. Existing data on toxic pollutants - Reasonable Potential analysis

1. Applicable standards, designated uses and impairments of receiving water

The designated uses of the receiving water (Black Creek, a tributary to Puerco River, a tributary to the Little Colorado River) as defined by the 2007 NNSWQS and *draft* 2010 NNSWQS revisions, are primary and secondary human contact, fish consumption, aquatic and wildlife habitat, and livestock watering (Table 205.1, page 22.)

2. Dilution in the receiving water

Discharge from Outfall 001 flows to Black Creek, which may have no natural flow during certain times of the year. Therefore, no dilution of the effluent has been considered in the development of water quality based effluent limits applicable to the discharge.

3. Type of industry

Typical pollutants of concern in untreated and treated domestic wastewater include ammonia, nitrate, oxygen demand, pathogens, temperature, pH, oil and grease, and solids. Chlorine is of concern due to treatment plant disinfection operations and therefore, dechlorination is necessary to minimize impact on water quality based effluent limits.

4. History of compliance problems and toxic impacts

Review of DMRs from January 2009 to July 2011 indicated numerous exceedances in Total Residual Chlorine ("TRC"), Biochemical Oxygen Demand ("BOD_5"), Total Suspended Solids ("TSS") and/or percent (%) removal efficiency for BOD_5, and *E. coli*. A table of the limit exceedances is found on pages 9 to 14 of this fact sheet.

5. Existing data on toxic pollutants

No existing data is available on toxic pollutants.

C. Rationale for WQBELs

Effluent Parameter	Units	Average Monthly	Average Weekly	Maximum Daily	Monitoring Frequency
E. Coli [1]	CFU/100 ml	126	--	235	Once/month
Total Residual Chlorine[2]	mg /l	--	--	11	Once/month
Total Ammonia[3] (as N)	mg/l	--	--	--	Once/month
TDS[4]	mg/l	--	--	--	Once/quarter
pH [5]	std unit	between 6.5 to 9.0			Once/month
Temperature [6]	deg F	--	--	--	Once/month

NOTES:

1. ***E. Coli*.** In the proposed permit, the monthly geometric mean of *E. coli* bacteria shall not exceed 126/100 ml and 235/100 ml as a single sample maximum. These limits are based on the NNSWQS for primary human contact (page 14 of the 2007 NNSWQS and *draft* 2010 NNSWQS revisions). The proposed permit requires disinfection of the effluent prior to discharge.

2. **Total Residual Chlorine.** If chlorination is used for disinfection of the effluent, dechlorination is also necessary prior to discharge. No single sample shall exceed 11 mg/l based on the NNSWQS for protection of aquatic & wildlife habitat and livestock watering (Table 206.1, page 32 of the 2007 NNSWQS and *draft* 2010 NNSWQS revisions.)

3. **Total Ammonia.** In accordance with the 2007 NNSWQS for acute and chronic ammonia limits for protection of aquatic and wildlife habitat, the proposed permit contains effluent limitations for total ammonia. The ammonia limits are temperature and pH dependent and are listed in Table 206.2 and Table 206.3 (pages 36-37 of 2007 NNSWQS and *draft* 2010 NNSWQS revisions.)

4. **Total Dissolved Solids.** No limit is proposed but the regulations at 40 CFR 122.44(i) set forth requirements for monitoring as determined to be necessary. This requirement is consistent with the previous permit.

5. **pH.** To ensure adherence to the minimum and maximum pH levels designated by the Navajo Nation for the receiving water, monthly pH monitoring is required in the permit for protection of primary and secondary human contact and protection of aquatic & wildlife habitat and livestock watering (page 14 of 2007 NNSWQS and *draft* 2010 NNSWQS revisions.) In order to support the Navajo Nation's established Ammonia standards, which vary with the pH of the effluent, pH monitoring is to be performed concurrently with ammonia monitoring.

6. **Temperature.** Also to support the Navajo Nation's established Ammonia standards and their dependence on temperature, monthly temperature monitoring is to be performed concurrently with ammonia monitoring.

V. Reporting

The proposed permit requires discharge data obtained during the previous three months to be summarized on monthly DMR forms and reported quarterly. If there is no discharge for the month, report "C" in the No Discharge box on the DMR form for that month. These reports are due January 28, April 28, July 28, and October 28 of each year. Duplicate signed copies of these, and all other reports required herein, shall be submitted to the U.S. EPA and the Navajo Nation EPA.

VI. General Standards

The proposed permit sets general standards that are narrative water quality standards contained in the Navajo Nation Water Quality Standards, Section 203. These general standards are set forth in Section B. General Discharge Specifications of the permit.

VII. Permit Reopeners

A. At this time, there is no reasonable potential to establish any other water quality-based limits. Should any monitoring indicate that the discharge cause, has the reasonable potential to cause, or contributes to excursion above a water quality criterion, the permit may be reopened for the imposition of water quality-based limits and/or whole effluent toxicity limits. The proposed permit may be modified, in accordance with 40 CFR 122 and 124, to include appropriate conditions or effluent limits, monitoring, or other conditions to implement new regulations, including U.S. EPA-approved new Tribal water quality standards; or to address new information indicating the presence of effluent toxicity or the reasonable potential for the discharge to cause or contribute to exceedances of water quality standards.

B. In accordance with 40 CFR 122.44(c), EPA may promptly modify or revoke and reissue any permit issued to a treatment works treating domestic sewage

(including "sludge only facilities") to incorporate any applicable standard for sewage sludge use or disposal promulgated under section 405(d) of the CWA, if the standard for sewage sludge use or disposal is more stringent than any requirements for sludge use or disposal in the permit, or controls a pollutant or practice not limited in the permit.

VIII. Biosolids Requirements

The permittee shall submit a report 60 days prior to disposal of biosolids. The report shall discuss the quantity of biosolids produced, the treatment applied to biosolids including process parameters, disposal methods, and, if land applied, analyses for Arsenic, Cadmium, Chromium, Copper, Lead, Mercury, Molybdenum, Nickel, Zinc, and Selenium, and organic-N, ammonium-N, and nitrate-N, all expressed in mg/kg biosolids on a 100% dry weight basis. The permittee shall comply with all standards for biosolids use and disposal at Section 405(d) of the CWA, and 40 CFR Parts 257, 258 and 503.

IX. Threatened and Endangered Species and Critical Habitat

A. Background:

Section 7 of the Endangered Species Act (ESA) of 1973 requires Federal agencies such as EPA to ensure, in consultation with the U.S. Fish and Wildlife Service (FWS), that any actions authorized, funded or carried out by the Agency are not likely to jeopardize the continued existence of any Federally-listed endangered or threatened species or adversely modify or destroy critical habitat of such species.

Since the issuance of NPDES permits by EPA is a Federal action, consideration of a permitted discharge and its effect on any federally-listed species is appropriate. The proposed NPDES permit authorizes the discharge of treated domestic wastewater into Black Creek, a tributary to Puerco River, an eventual tributary to the Little Colorado River, a water of the United States.

The information below is listed in the Navajo Nation's Department of Fish & Wildlife Natural Heritage Program (NHP) database. The FWS has deferred all of its survey and information collection in the Navajo Nation to the Navajo Nation NHP.

EPA received new species information from NHP on October 3, 2011. NHP identified no federally-listed species or threatened species are known to occur on or near the project site. For species of concern with potential to occur on the 7.5 minute Buell Park, Arizona/New Mexico quadrangle(s) containing the project boundaries, NHP identified federally-listed species as follows.

- Mountain Plower (*Charadrius montanus*), ESA threatened
- Mexican Spotted Owl (*Strix occidentalis lucida*), ESA endangered
- Black-footed Ferret (*Mustela nigripe*), ESA endangered
- Southwestern Willow Flycatcher (*Empidonax traillii extimus*), ESA endangered

· Rhizome Fleabane (*Lesquerella navajoensis*), ESA threatened

B. EPA's Finding:

This permit authorizes the discharge of treated wastewater in conformance with the federal secondary treatment regulations and the Navajo Nation Surface Water Quality Standards. These standards are applied in the permit both as numeric and narrative limits. The standards are designed to protect aquatic species, including threatened and endangered species, and any discharge in compliance with these standards should not adversely impact any threatened and endangered species.

EPA believes that effluent released in compliance with this permit will have no effect on any federally-listed threatened or endangered species or its critical habitat that may be present in the vicinity of the discharge. The treatment facility has been in existence for some time, and no new construction or modifications will be made to it due to the proposed NPDES permit. Therefore, no requirements specific to the protection of endangered species are proposed in the permit. EPA may decide that changes to the permit may be warranted based on receipt of new information. A re-opener clause has been included should new information become available to indicate that the requirements of the permit need to be changed.

X. Administrative Information -- Public Notice, Public Comments, and Requests for Public Hearings

In accordance with 40 CFR 124.10, public notice shall be given by the U.S. EPA Director that a draft NPDES permit has been prepared by mailing a copy of the notice to the permit applicant and other Federal and State agencies, and through publication of a notice in a daily or weekly newspaper within the area affected by the facility. The public notice shall allow at least 30 days for public comment on the draft permit.

In accordance with 40 CFR 124.11 and 12, during the public comment period, any interested person may submit written comments on the draft permit, and may request a public hearing if no hearing has already been scheduled. A request for public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. In accordance with 40 CFR 124.13, all persons must raise all reasonably ascertainable issues and submit all reasonably available arguments supporting their position within thirty (30) days from the date of the public notice. Comments may be received either in person or mailed to:

U.S. Environmental Protection Agency, Region 9
NPDES Permits Office (WTR-5)
Attn: Linh Tran
75 Hawthorne Street
San Francisco, CA 94105
Telephone: (415) 972-3511

Interested persons may obtain further information, including copies of the draft permit,

fact sheet/statement of basis, and the permit application, by contacting Linh Tran (WTR-5) at the U.S. EPA address, above. Copies of the administrative record (other than those which U.S. EPA maintains as confidential) are available for public inspection between 8:00 a.m. and 4:30 p.m., Monday through Friday (excluding federal holidays).

In accordance with 40 CFR 124.12, the U.S. EPA Director shall hold a public hearing when, on the basis of requests, a significant degree of public interest in the draft permit exists. The Director may also hold a public hearing when, for instance, such a hearing might clarify one or more issues involved in the permit decision. Public notice of such hearing shall be given as specified in 40 CFR 124.10.

NPDES Permit Effluent Limitation Exceedences
January 2009 to July 2011

DATE	PARAMETER	LIMIT	RESULT	UNIT
January 2009	TRC, maximum	11.0	1000	µg/l
January 2009	TSS, monthly average	30	68.05	mg/l
January 2009	TSS, weekly average	45	77.5	mg/l
January 2009	TSS, percent removal	>85	79	%
February 2009	TRC, maximum	11.0	1000	µg/l
February 2009	BOD_5, monthly average, quality	30	45	mg/l
February 2009	TSS, monthly average	30	98.6	mg/l
February 2009	TSS, weekly average	45	98.6	mg/l
February 2009	TSS, percent removal	>85	64	%
February 2009	*E. coli*, geometric mean	126	<2419.6	#/100 ml
February 2009	*E. coli*, daily maximum	235	<2419.6	#/100 ml
March 2009	TRC, maximum	11.0	1000	µg/l
March 2009	BOD_5, monthly average, quality	30	55.55	mg/l
March 2009	BOD_5, weekly average	45	65.40	mg/l
March 2009	TSS, monthly average	30	99.20	mg/l

NPDES Permit Effluent Limitation Exceedences
January 2009 to July 2011 (cont'd)

DATE	PARAMETER	LIMIT	RESULT	UNIT
March 2009	TSS, weekly average	45	114	mg/l
March 2009	TSS, percent removal	>85	67.61	%
March 2009	*E. coli*, daily maximum	235	<2419.6	#/100 ml
April 2009	TRC, maximum	11.0	777	µg/l
April 2009	BOD_5, monthly average, quality	30	52	mg/l
April 2009	BOD_5, weekly average	45	52	mg/l
April 2009	BOD_5, percent removal	>85	75.04	%
April 2009	TSS, monthly average	30	92	mg/l
April 2009	TSS, weekly average	45	96	mg/l
April 2009	TSS, percent removal	>85	55.55	%
May 2009	TRC, maximum	11.0	700	µg/l
June 2009	TRC, maximum	11.0	770	µg/l
June 2009	pH, maximum	9	9.37	unit
June 2009	TSS, monthly average	30	53.40	mg/l
June 2009	TSS, weekly average	45	55.60	mg/l
June 2009	TSS, percent removal	>85	81.71	%
July 2009	TRC, maximum	11.0	700	µg/l
July 2009	pH, maximum	9	9.44	unit
July 2009	BOD_5, percent removal	>85	75.74	%
July 2009	TSS, monthly average	30	64.46	mg/l

NPDES Permit Effluent Limitation Exceedences
January 2009 to July 2011 (cont'd)

DATE	PARAMETER	LIMIT	RESULT	UNIT
July 2009	TSS, weekly average	45	70	mg/l
July 2009	TSS, percent removal	>85	81.71	%
August 2009	TRC, maximum	11.0	700	µg/l
August 2009	BOD_5, percent removal	>85	82.17	%
August 2009	TSS, monthly average	30	50.35	mg/l
August 2009	TSS, weekly average	45	55.4	mg/l
August 2009	TSS, percent removal	>85	23.79	%
September 2009	TRC, maximum	11.0	1000	µg/l
October 2009	TRC, maximum	11.0	1000	µg/l
October 2009	TSS, percent removal	>85	73.7	%
November 2009	TRC, maximum	11.0	1000	µg/l
November 2009	BOD_5, monthly average, quality	30	37	mg/l
November 2009	TSS, monthly average	30	33	mg/l
December 2009	TRC, maximum	11.0	1000	µg/l
December 2009	TSS, monthly average	30	36	mg/l
January 2010	TRC, maximum	11.0	1000	µg/l
January 2010	BOD_5, monthly average, quality	30	30.2	mg/l
January 2010	TSS, monthly average	30	50.60	mg/l
January 2010	TSS, weekly average	45	50.60	mg/l

NPDES Permit Effluent Limitation Exceedences
January 2009 to July 2011 (cont'd)

DATE	PARAMETER	LIMIT	RESULT	UNIT
January 2010	TSS, percent removal	>85	44.78	%
January 2010	*E. coli,* geometric mean	126	365.4	#/100 ml
January 2010	*E. coli,* daily maximum	235	365.4	#/100 ml
February 2010	TRC, maximum	11.0	1000	µg/l
February 2010	BOD_5, monthly average, quality	30	51	mg/l
February 2010	BOD_5, weekly average	45	51	mg/l
February 2010	BOD_5, percent removal	>85	84.02	%
February 2010	TSS, monthly average	30	62	mg/l
February 2010	TSS, weekly average	45	62	mg/l
February 2010	TSS, percent removal	>85	82.51	%
March 2010	TRC, maximum	11.0	770	µg/l
March 2010	BOD_5, monthly average, quality	30	invalidated	mg/l
March 2010	BOD_5, weekly average	45	invalidated	mg/l
March 2010	BOD_5, percent removal	>85	invalidated	%
March 2010	TSS, monthly average	30	59.30	mg/l
March 2010	TSS, weekly average	45	59.30	mg/l
March 2010	TSS, percent removal	>85	43.94	%
April 2010	TRC, maximum	11.0	1000	µg/l
April 2010	BOD_5, monthly average, quality	30	58.40	mg/l

NPDES Permit Effluent Limitation Exceedences
January 2009 to July 2011 (cont'd)

DATE	PARAMETER	LIMIT	RESULT	UNIT
April 2010	BOD_5, weekly average	45	58.40	mg/l
April 2010	TSS, monthly average	30	36	mg/l
April 2010	TSS, weekly average	45	45.50	mg/l
May 2010	TRC, maximum	11.0	1000	µg/l
May 2010	BOD_5, monthly average, quality	30	83.10	mg/l
May 2010	BOD_5, weekly average	45	83.10	mg/l
May 2010	BOD_5, percent removal	>85	77.27	%
May 2010	TSS, monthly average	30	70	mg/l
May 2010	TSS, weekly average	45	70	mg/l
May 2010	TSS, percent removal	>85	50	%
July 2010	TRC, maximum	11.0	1000	µg/l
August 2010	TRC, maximum	11.0	1000	µg/l
August 2010	BOD_5, monthly average, quality	30	30.50	mg/l
August 2010	BOD_5, percent removal	>85	84.04	%
August 2010	TSS, monthly average	30	38.35	mg/l
August 2010	TSS, weekly average	45	52	mg/l
September 2010	TRC, maximum	11.0	1000	µg/l
September 2010	TSS, percent removal	>85	72.22	%
October 2010	TRC, maximum	11.0	1000	µg/l
November 2010	TRC, maximum	11.0	1000	µg/l

NPDES Permit Effluent Limitation Exceedences
January 2009 to July 2011 (cont'd)

DATE	PARAMETER	LIMIT	RESULT	UNIT
December 2010	TRC, maximum	11.0	1000	µg/l
January 2011	TRC, maximum	11.0	1000	µg/l
February 2011	TRC, maximum	11.0	1000	µg/l
February 2011	*E. coli,* geometric mean	126	<2419.6	#/100 ml
February 2011	*E. coli,* daily maximum	235	<2419.6	#/100 ml
March 2011	TRC, maximum	11.0	1000	µg/l
March 2011	TSS, monthly average	30	75.10	mg/l
March 2011	TSS, weekly average	45	100	mg/l
March 2011	TSS, percent removal	>85	83.21	%
April 2011	TRC, maximum	11.0	1000	µg/l
April 2011	TSS, monthly average	30	59.25	mg/l
April 2011	TSS, weekly average	45	67.50	mg/l
May 2011	TRC, maximum	11.0	1000	µg/l
June 2011	TSS, monthly average	30	43.80	mg/l
June 2011	TSS, percent removal	>85	82	%
July 2011	TSS, monthly average	30	40.25	mg/l