

Brian A. Knutsen, WSBA No. 38806
KAMPMEIER & KNUTSEN, PLLC
1300 SE Stark Street, Suite 202
Portland, Oregon 97214
Telephone: (503) 841-6515
Email: brian@kampmeierknutsen.com

Erica L. Proulx, WSBA No. 60155
KAMPMEIER & KNUTSEN, PLLC
705 Second Avenue, Suite 901
Seattle, Washington 98104
Telephone: (206) 739-5184
Email: erica@kampmeierknutsen.com

Attorneys for Plaintiff Columbia Riverkeeper

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

COLUMBIA RIVERKEEPER, a
Washington non-profit corporation,

Plaintiff,

v.

CITY OF QUINCY, a municipal
corporation,

Defendant.

Case No. 2:24-cv-00378

COMPLAINT

I. INTRODUCTION.

1. This action is a citizen suit brought under section 505 of the Clean Water Act (“CWA”), 33 U.S.C. § 1365, as amended. Plaintiff Columbia Riverkeeper (“Riverkeeper”) seeks declaratory and injunctive relief, the imposition

1 of civil penalties, and an award of costs, including attorneys' and expert witness
2 fees, for Defendant the City of Quincy's ("Quincy") repeated and ongoing
3 violations of the terms and conditions of its National Pollutant Discharge
4 Elimination System ("NPDES") permit authorizing discharges of pollutants from
5 Quincy's facility to waters of the United States.
6
7

8 **II. JURISDICTION AND VENUE.**

9 2. This Court has jurisdiction pursuant to section 505(a) of the CWA, 33
10 U.S.C. § 1365(a) (CWA citizen suit provision), and 28 U.S.C. § 1331 (federal
11 question). Quincy is in violation of an "effluent standard or limitation" as defined
12 by section 505(f) of the CWA, 33 U.S.C. § 1365(f). The requested relief is
13 authorized by sections 309(d) and 505 of the CWA, 33 U.S.C. §§ 1319(d) and
14 1365, and 28 U.S.C. §§ 2201 and 2202.
15
16

17 3. Riverkeeper has satisfied the jurisdictional requirements for bringing
18 this lawsuit. In accordance with section 505(b)(1)(A) of the CWA, 33 U.S.C.
19 § 1365(b)(1)(A), by certified letter dated and postmarked August 26, 2024,
20 Riverkeeper notified Quincy of its alleged violations of its NPDES permit and the
21 CWA and of Riverkeeper's intent to sue for those violations ("Notice Letter").
22 Riverkeeper also notified the Administrator of the United States Environmental
23 Protection Agency ("EPA"), the Administrator of EPA Region 10, and the Director
24 of the Washington State Department of Ecology ("Ecology") of its intent to sue
25
26
27
28

1 Quincy by mailing a copy of the Notice Letter to those officials on August 26,
2 2024. A copy of the Notice Letter is attached to this Complaint as Exhibit 1.

3
4 4. At the time of the filing of this Complaint, more than sixty days have
5 passed since Riverkeeper mailed the Notice Letter in the manner described in the
6 preceding paragraph. The violations complained of are continuing or reasonably
7 likely to recur. At the time of the filing of this Complaint, neither EPA nor Ecology
8 has commenced any action constituting diligent prosecution to redress the
9 violations alleged in the Notice Letter. Quincy is in ongoing violation of its
10 NPDES permit and the CWA.
11

12
13 5. Venue is appropriate in this District under section 505(c)(1) of the
14 CWA, 33 U.S.C. § 1365(c)(1), because the source of the violations complained of
15 is located in this District, in Grant County, Washington.
16

17 6. A copy of this Complaint will be served on the Attorney General of
18 the United States, the Administrator of EPA, and the Administrator of EPA Region
19 10, as required by section 505(c)(3) of the CWA, 33 U.S.C. § 1365(c)(3), and 40
20 C.F.R. § 135.4.
21

22 **III. PARTIES.**

23
24 7. Plaintiff Columbia Riverkeeper is a non-profit corporation organized
25 under section 501(c)(3) of the Internal Revenue Code and registered in the State of
26 Washington. The mission of Riverkeeper is to restore and protect the water quality
27
28

1 of the Columbia River and all life connected to it, from the headwaters to the
2 Pacific Ocean. To achieve these objectives, Riverkeeper implements scientific,
3 educational, and legal programs aimed at protecting water quality and habitat in the
4 Columbia River Basin. This lawsuit is part of Riverkeeper's effort to improve
5 water quality in the Columbia River Basin for purposes including recreation,
6 habitat quality, and subsistence, recreational, and commercial fishing.
7
8 Riverkeeper's principal place of business is in Hood River, Oregon. Riverkeeper
9 brings this Complaint on behalf of itself and its member(s). Riverkeeper and its
10 members are "citizens" as defined by section 505(g) of the Act, 33 U.S.C.
11
12 § 1365(g).
13

14 8. Riverkeeper has representational standing to bring this action.
15
16 Riverkeeper is a membership organization with over 16,000 members, some of
17 whom are injured by violations of the CWA at Quincy's facility discussed herein.
18
19 Members of Riverkeeper use and enjoy the waters and the surrounding areas that
20 are adversely affected by Quincy's discharges. Riverkeeper's members use these
21 areas for, *inter alia*, fishing, swimming, hiking, walking, photography, boating,
22 and observing wildlife. The environmental, health, aesthetic, scientific, cultural,
23 spiritual, health, and/or recreational interests of Riverkeeper's members have been,
24 are being, and will be adversely affected by Quincy's NPDES permit and CWA
25 violations addressed herein, and by the members' reasonable concerns related to
26
27
28

1 the effects of the violations and pollutant discharges. Quincy has consistently
2 violated the conditions of its NPDES permit and exceeded the permit's numeric
3 effluent limits. Riverkeeper and its members have serious concerns about the
4 impacts of Quincy's operations and wastewater discharges on the affected
5 waterbodies, including Potholes Reservoir and the Columbia River. Riverkeeper's
6 members' uses of the impacted watersheds are thereby diminished, adversely
7 affected, and suppressed. These injuries are fairly traceable to Quincy and
8 Quincy's activities and violations described herein, and the relief sought in this
9 lawsuit can redress the injuries to Riverkeeper's and its members' interests.

13 9. Riverkeeper also has organizational standing to bring this action.
14 Riverkeeper has been actively engaged in a variety of educational and advocacy
15 efforts to improve water quality and to address sources of water quality
16 degradation in the Columbia River and its tributaries. Quincy has failed to fulfill its
17 monitoring, recordkeeping, and reporting requirements, among others, necessary
18 for compliance with its NPDES permit. As a result, Riverkeeper is deprived of
19 information that supports its ability to serve its members by disseminating
20 information and taking appropriate action. Riverkeeper's efforts to educate and
21 advocate for greater environmental protection for the benefit of its members is
22 thereby obstructed. For these and other reasons, Riverkeeper's organizational
23 interests have been adversely affected by Quincy's violations of its NPDES
24
25
26
27
28

1 permits and the CWA. These injuries are fairly traceable to Quincy and Quincy's
2 activities and violations described herein, and the relief sought in this lawsuit can
3 redress the injuries to Riverkeeper's interests.
4

5 10. Defendant the City of Quincy is a municipal corporation organized
6 and existing under the laws of the State of Washington. Quincy owns and operates
7 the Quincy Industrial Wastewater Treatment Facility located at or about 18605
8 Road 9 NW and/or 201 12th Ave. SW, Quincy, Washington 98848 (hereinafter
9 "the Facility"). Quincy's Facility discharges treated wastewater associated with
10 industrial activity, and pollutants contained therein, to Bureau of Reclamation
11 conveyances that discharge to Potholes Reservoir, which is a tributary of the
12 Columbia River, and/or to the Columbia River.
13
14
15

16 IV. LEGAL BACKGROUND.

17 11. Congress enacted the Clean Water Act to "restore and maintain the
18 chemical, physical, and biological integrity of the Nation's waters." 33 U.S.C.
19 § 1251(a).
20

21 12. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the
22 discharge of pollutants by any person unless authorized under certain provisions of
23 the CWA, including an NPDES permit issued pursuant to section 402 of the CWA,
24 33 U.S.C. § 1342.
25
26
27
28

1 13. The State of Washington has established a federally-approved state
2 NPDES program administered by Ecology. Wash. Rev. Code § 90.48.260; Wash.
3 Admin. Code ch. 173–220. This program was approved by the Administrator of
4 EPA pursuant to section 402(b) of the CWA, 33 U.S.C. § 1342(b).

6 14. Section 505(a) of the CWA, 33 U.S.C § 1365(a), provides that any
7 citizen may commence a civil action against any person alleged to be in violation
8 of an effluent standard or limitation. Section 505(f), 33 U.S.C. § 1365(f), defines
9 “effluent standard or limitation” to include an NPDES permit or condition of an
10 NPDES permit. *See* 33 U.S.C. § 1341.

13 V. FACTS.

14 15. Ecology issued NPDES permit No. WA0021067, which became
15 effective on January 1, 2019, was amended on March 2, 2021, and has an
16 expiration date of December 31, 2022 (the “Permit”). The Permit has been
17 administratively extended and remains in effect. The Permit authorizes discharges
18 of treated wastewater from the Facility and it imposes terms and conditions,
19 including numeric effluent limits on discharges of wastewater, monitoring and
20 sampling requirements, and reporting and recordkeeping requirements.

21 16. When issued, the Permit identified Quincy and an outside operator of
22 the Facility as co-permittees. That outside operator ended its operations at the
23
24
25
26
27
28

1 Facility and transferred any responsibilities under the Permit to Quincy on or about
2 January 8, 2024. Quincy is now the Permit's sole permittee.

3
4 17. Quincy discharges treated wastewater to Bureau of Reclamation
5 conveyances that discharge to Potholes Reservoir, which is a tributary of the
6 Columbia River, and/or to the Columbia River.

7
8 18. Quincy has violated the terms and conditions of its Permit. Quincy's
9 violations of the Permit are set forth in section II of the Notice Letter, attached
10 hereto as Exhibit 1 at 2–8, and are hereby incorporated by reference. In particular,
11 and among the other violations described in the Notice Letter, Quincy has violated
12 the Permit by exceeding the Permit's numeric effluent limitations, failing to
13 properly monitor and report discharges, and failing to properly operate and
14 maintain all facilities or systems of treatment control to achieve compliance with
15 the terms and conditions of the Permit.

16
17
18 **Violations of Numeric Effluent Limitations.**

19
20 19. The Permit requires that Quincy's wastewater discharges comply with
21 numeric effluent limits. The Permit includes two sets of effluent limits, one that
22 applies during the summer season of April through October and one that applies
23 during the winter season of November through March. These include effluent
24 limits on biochemical oxygen demand ("BOD₅"), dissolved oxygen, total
25
26
27
28

1 suspended solids (“TSS”), ammonia, flow, temperature, chlorine, fecal coliform,
2 and pH.

3
4 20. Quincy has repeatedly violated, and continues to violate, these
5 effluent limitations. These Permit requirements and Quincy’s violations thereof are
6 described in section II.A and Appendix A of the Notice Letter, attached hereto as
7 Exhibit 1 at 2–5 and Appendix A, and all allegations therein are hereby
8 incorporated by reference. Further, attached hereto as Exhibit 2 is a table
9 identifying violations of the Permit’s numeric effluent limitations reported by
10 Quincy since the Notice Letter was issued.
11
12

13 **Violations of Discharge Monitoring and Reporting Requirements.**

14 21. The Permit establishes discharge monitoring and reporting
15 requirements for discharges from Quincy’s Facility. The Permit requires that
16 Quincy summarize, report, and submit discharge monitoring data each monthly
17 monitoring period to Ecology on Discharge Monitoring Reports (“DMRs”).
18 Quincy has violated these conditions. These Permit requirements and Quincy’s
19 violations thereof are described in section II.B of the Notice Letter, attached hereto
20 as Exhibit 1 at 5, and all allegations therein are hereby incorporated by reference.
21
22
23

24 **Violations of the Noncompliance Reporting Requirements.**

25 22. The Permit requires Quincy to take certain actions each time it is
26 unable to comply with conditions of the Permit, including to report noncompliance
27
28

1 to Ecology and to take certain measures to stop the noncompliance. Quincy has
2 repeatedly violated these requirements by failing to timely notify Ecology of
3 noncompliance, failing to timely submit complete reports for noncompliance, and
4 failing to take the required responsive actions. These Permit requirements and
5 Quincy's violations thereof are described in section II.C of the Notice Letter,
6 attached hereto as Exhibit 1 at 5–6, and all allegations therein are hereby
7 incorporated by reference.
8

9
10 **Violations of the Operations and Maintenance Manual Requirements.**
11

12 23. The Permit requires Quincy to, at all times, properly operate and
13 maintain all facilities or systems of treatment or control that are installed to achieve
14 compliance with the terms and conditions of the Permit. Quincy has violated the
15 Permit by failing to, at all times, properly operate and maintain all facilities or
16 systems of treatment or control that are installed to achieve compliance with the
17 terms and conditions of the Permit. These violations have occurred each and every
18 day during the last five years and sixty days, as evidenced in part by Quincy's
19 repeated exceedances of the Permit's numeric effluent limits. These Permit
20 conditions and Quincy's violations thereof are described in section II.D of the
21 Notice Letter, attached hereto as Exhibit 1 at 6–8, and all allegations therein are
22 hereby incorporated by reference.
23
24
25
26
27
28

1 24. The Permit requires Quincy to prepare and implement an Operations
2 and Maintenance (“O&M”) Manual intended to ensure compliance with the Permit
3 that meets specific requirements. Quincy must submit the O&M Manual to
4 Ecology by October 31, 2020, review the O&M Manual annually and provide
5 confirmation of review yearly by February 15 to Ecology, submit to Ecology for
6 review and approval any substantial changes or updates to the O&M Manual, keep
7 the O&M Manual at the Facility, and follow the O&M Manual at all times.
8

9 25. Quincy has violated the Permit by failing to timely develop and/or
10 implement an O&M Manual that meets the Permit’s requirements. These Permit
11 conditions and Quincy’s violations thereof are described in section II.D of the
12 Notice Letter, attached hereto as Exhibit 1 at 6–8, and all allegations therein are
13 hereby incorporated by reference.
14
15
16

17 26. Discharges from Quincy’s Facility contribute to the polluted
18 conditions of the waters of the United States, including Potholes Reservoir and the
19 Columbia River. Discharges from Quincy’s Facility contribute to the ecological
20 impacts that result from the polluted condition of these waters and to Riverkeeper’s
21 and its members’ injuries resulting therefrom.
22
23

24 27. The vicinity of the Facility’s discharges are used by the citizens of
25 Washington and Oregon and visitors, as well as at least one of Riverkeeper’s
26 members, for activities including swimming, boating, biking, fishing and nature
27
28

1 watching. Riverkeeper's members also derive aesthetic benefits from the receiving
2 waters. Riverkeeper's and its members' enjoyment of these activities and waters is
3 diminished by the polluted state of the receiving waters and by Quincy's
4 contributions to such a polluted state.
5

6 28. A significant penalty should be imposed against Quincy under the
7 penalty factors set forth in section 309(d) of the CWA, 33 U.S.C. § 1319(d).
8

9 29. Quincy's violations were avoidable had Quincy been diligent in
10 overseeing the Facility's operations and maintenance.
11

12 30. Quincy has benefited economically as a consequence of its violations
13 and its failure to timely implement improvements at the Facility.
14

15 VI. CAUSE OF ACTION.

16 31. Riverkeeper hereby alleges and incorporates by reference all of the
17 preceding paragraphs and the allegations in section II of the Notice Letter, attached
18 hereto as Exhibit 1 at 2–8.
19

20 32. Quincy's violations of the Permit described herein and in the Notice
21 Letter constitute violations of an "effluent standard or limitation" as defined by
22 section 505(f) of the CWA, 33 U.S.C. § 1365(f).
23

24 33. Upon information and belief, these violations committed by Quincy
25 are continuing or are reasonably likely to continue to recur. Any and all additional
26 violations of the Permit that occur after the date of Riverkeeper's Notice Letter, but
27
28

1 before a final decision in this action, should be considered continuing violations
2 subject to this Complaint.
3

4 **VII. RELIEF REQUESTED.**

5 Wherefore, Riverkeeper respectfully requests that this Court grant the
6 following relief:
7

8 A. Declare that Quincy has violated and continues to be in violation of
9 the Permit and the Clean Water Act, as alleged herein;
10

11 B. Enjoin Quincy from operating the Facility in a manner that results in
12 further violations of the Permit;

13 C. Order Quincy to immediately implement an Operations and
14 Maintenance Manual that complies with the Permit;
15

16 D. Order Quincy to provide Riverkeeper, for a period beginning on the
17 date of the Court's Order and running for one year after Quincy achieves
18 compliance with all of the conditions of the Permit, with copies of all reports and
19 other documents that Quincy submits to or receives from Ecology and/or EPA
20 regarding Quincy's coverage under the Permit, at the same time those documents
21 are submitted to or received from Ecology and/or EPA;
22
23

24 E. Order Quincy to take specific actions to remediate the environmental
25 harm caused by its violations;
26
27
28

1 F. Grant such other preliminary and/or permanent injunctive relief as
2 Riverkeeper may from time to time request during the pendency of this case;
3

4 G. Order Quincy to pay civil penalties as authorized by sections 309(d)
5 and 505(a) of the CWA, 33 U.S.C. §§ 1319(d) and 1365(a), and 40 C.F.R. § 19.
6

7 H. Award Riverkeeper its litigation expenses, including costs and
8 reasonable attorneys' and expert witness fees, as authorized by section 505(d) of
9 the CWA, 33 U.S.C. § 1365(d), or as otherwise authorized by law; and
10

11 I. Award such other relief as this Court deems appropriate.

12 RESPECTFULLY SUBMITTED this 4th day of November 2024.

13 KAMPMEIER & KNUTSEN, PLLC
14

15 By: s/ Brian A. Knutsen
16 Brian A. Knutsen, WSBA No. 38806
17 1300 SE Stark Street, Suite 202
18 Portland, Oregon 97214
19 Telephone: (503) 841-6515
20 Email: brian@kampmeierknutsen.com

21 By: s/ Erica L. Proulx
22 Erica L. Proulx, WSBA No. 60155
23 705 Second Avenue, Suite 901
24 Seattle, Washington 98104
25 Telephone: (206) 739-5184
26 Email: erica@kampmeierknutsen.com

27 *Attorneys for Plaintiff Columbia Riverkeeper*
28

EXHIBIT 1

KAMPMEIER & KNUTSEN PLLC
ATTORNEYS AT LAW

BRIAN A. KNUTSEN
Licensed in Oregon & Washington
503.841.6515
brian@kampmeierknutsen.com

August 26, 2024

Via CERTIFIED MAIL—Return Receipt Requested

Mayor Paul Worley
P.O. Box 338
Quincy, WA 98848

City Administrator Pat Haley
P.O. Box 338
Quincy, WA 98848

Managing Agent
Woodard & Curran, Inc.
2055 Sugarloaf Circle, Suite 175
Duluth, GA 30097

Managing Agent
Woodard & Curran, Inc.
P.O. Box 1249
Quincy, WA 98848

Managing Agent
Industrial Wastewater Treatment Facility
201 12th Ave. SW
Quincy, WA 98848

Managing Agent
Industrial Wastewater Treatment Facility
18605 Road 9 NW
Quincy, WA 98848

Re: NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT

Dear Mayor Worley, City Administrator Haley, and Managing Agents:

This letter provides you with 60 days of notice of Columbia Riverkeeper's intent to file a citizen suit against the City of Quincy, Washington and Woodard & Curran, Inc. (collectively, the "Permittees") under section 505 of the Clean Water Act ("CWA"), 33 U.S.C § 1365, for the violations described below.

The City of Quincy, Washington owns the Quincy Wastewater Treatment Facility located at or about 18605 Road 9 NW, Quincy, Washington 98848 ("Facility") and Woodard & Curran, Inc. operates the Facility. The Facility receives process wastewater from potato and vegetable processors Lamb Weston, Amway, and Quincy Foods, and discharges treated wastewater to conveyances included within the Bureau of Reclamation's Federal Columbia Basin Irrigation Project that discharge to Potholes Reservoir, which is a tributary of the Columbia River.

The Washington Department of Ecology ("Ecology") issued the Permittees a National Pollutant Discharge Elimination System ("NPDES") permit for the Facility dated December 3, 2018, effective January 1, 2019, amended on March 2, 2021, with an expiration date of December 31, 2022, under NPDES No. WA0021067 ("Permit"). The Permit has been

administratively extended and remains in effect. The Permittees have violated and continue to violate the terms and conditions of the Permit with respect to the operations of, and discharges of pollutants from, the Facility.

I. COLUMBIA RIVERKEEPER'S COMMITMENT TO PROTECTING A FISHABLE AND SWIMMABLE COLUMBIA RIVER.

Columbia Riverkeeper's mission is to restore and protect the water quality of the Columbia River and all life connected to it, from the headwaters to the Pacific Ocean. Columbia Riverkeeper is a non-profit organization with members who live, recreate, and work throughout the Columbia River basin, including near and downstream of the Facility's discharges.

Threats facing the Columbia River are severe by any measure. *See Columbia River Basin State of the River Report for Toxics*, Environmental Protection Agency, Region 10 (January 2009) (available online at: https://www.epa.gov/sites/production/files/documents/columbia_state_of_the_river_report_jan2009.pdf). In fact, the vast majority of rivers and streams in Washington fail to meet basic state water quality standards for pollutants such as toxics and temperature. *See* State of Washington 303(d) List (available online at: <https://ecology.wa.gov/Water-Shorelines/Water-quality/Water-improvement/Assessment-of-state-waters-303d>). Water quality standards are designed to protect designated uses, including aquatic life, fishing, swimming, and drinking water.

This Notice of Intent to Sue the Permittees is part of Columbia Riverkeeper's effort to improve water quality in the Columbia River Basin for purposes including swimming, habitat quality, and subsistence, recreational, and commercial fishing. Columbia Riverkeeper has serious concerns about the impacts of the Permittees' operations and pollution discharges on Potholes Reservoir and the Columbia River. As discussed below, the Permittees have repeatedly discharged contaminants in excess of the Permit's effluent limitations and have failed to develop and implement an operations and maintenance manual as required to ensure compliance with the Permit. The Permittees' operations and pollution discharges from the Facility degrade water quality in the Columbia River Basin and may contribute to conditions that place the health of those who use the Columbia River at risk.

II. THE PERMITTEES' VIOLATIONS OF THE PERMIT.

A. Violations of Numeric Effluent Limitations.

Condition S1.A of the Permit requires that the Permittees' wastewater discharges comply with numeric effluent limits. The Permit includes two sets of effluent limits, one that applies during the summer season of April through October and one that applies during the winter season of November through March. The following two tables, located in Condition S1.A of the Permit, identify the applicable numeric effluent limits.

Effluent Limits: Outfall 001 – End of Treatment Effluent (Discharge from re-aeration basin) (Summer Season – April through October) Latitude: 47.213962 Longitude: -119.889066		
Parameter	Average Monthly ^a	Maximum Daily ^b
Flow	---	3.23 Million gallons per day (MGD)
Biochemical Oxygen Demand (5-day) (BOD ₅)	51.1 milligrams/liter (mg/L) 1,705 pounds/day (lbs/day)	95.2 mg/L 3,176 lbs/day
Total Suspended Solids (TSS)	49 mg/L; 1,320 lbs/day	107 mg/L; 2,882 lbs/day
Total Ammonia Nitrogen	1.19 mg/L; 39.8 lbs/day	2.39 mg/L; 79.8 lbs/day
Temperature	---	22.5°C
Total Residual Chlorine	8.4 micrograms/liter (µg/L)	18.9 µg/L
Total Dissolved Solids (TDS)	---	2,000 mg/L
Parameter	Minimum	Maximum
pH	6.5 standard units	8.5 s.u.
Dissolved Oxygen	8.0 mg/L	---
Parameter	Monthly Geometric Mean	---
Fecal Coliform Bacteria ^{c,d}	50 organisms/100 milliliter (mL)	---
^a	Average Monthly effluent limit means the highest allowable average of daily discharges over a calendar month. To calculate the discharge value to compare to the limit, you add the value of each daily discharge measured during a calendar month and divide this sum by the total number of daily discharges measured.	
^b	Maximum Daily effluent limit is the highest allowable daily discharge. The daily discharge is the average discharge of a pollutant measured during a calendar day. For pollutants with limits expressed in units of mass, calculate the daily discharge as the total mass of the pollutant discharged over the day. This does not apply to pH or temperature.	
^c	Ecology provides directions to calculate the monthly geometric mean in publication No. 04-10-020, Information Manual for Treatment Plant Operators available at https://fortress.wa.gov/ecy/publications/documents/0410020.pdf .	
^d	No more than 10 percent of all samples obtained for calculating the geometric mean can exceed 100 organisms/100 mL.	

Effluent Limits: Outfall 001 – End of Treatment Effluent (Discharge from re-aeration basin) (November through March) Latitude: 47.213962 Longitude: -119.889066		
Parameter	Average Monthly ^a	Maximum Daily ^b
Flow	---	3.23 Million gallons per day (MGD)
Biochemical Oxygen Demand (5-day) (BOD5)	65 mg/L; 2,168 lbs/day	130 mg/L; 4,337 lbs/day
Total Suspended Solids (TSS)	38 mg/L; 1,024 lbs/day	81 mg/L; 2,182 lbs/day
Total Ammonia Nitrogen	1.45 mg/L; 48.2 lbs/day	2.90 mg/L; 96.7 lbs/day
Total Residual Chlorine	8.4 µg/L	18.9 µg/L
Total Dissolved Solids (TDS)	---	2,000 mg/L
Parameter	Minimum	Maximum
pH	6.5 s.u.	8.5 s.u.
Dissolved Oxygen	8.0 mg/L	---
Parameter	Monthly Geometric Mean	---
Fecal Coliform Bacteria ^{c,d}	50/100 mL	---
^a	Average Monthly effluent limit means the highest allowable average of daily discharges over a calendar month. To calculate the discharge value to compare to the limit, you add the value of each daily discharge measured during a calendar month and divide this sum by the total number of daily discharges measured.	
^b	Maximum Daily effluent limit is the highest allowable daily discharge. The daily discharge is the average discharge of a pollutant measured during a calendar day. For pollutants with limits expressed in units of mass, calculate the daily discharge as the total mass of the pollutant discharged over the day. This does not apply to pH or temperature.	
^c	Ecology provides directions to calculate the monthly geometric mean in publication No. 04-10-020, Information Manual for Treatment Plant Operators available at https://fortress.wa.gov/ecy/publications/documents/0410020.pdf .	
^d	No more than 10 percent of all samples obtained for calculating the geometric mean can exceed 100 organisms/100 mL.	

The Permittees have repeatedly violated these numeric effluent limits imposed by Condition S1.A of the Permit. These violations are identified in the table attached hereto as Appendix A.

B. Violations of the Discharge Monitoring Reporting Requirements.

Condition S3.A of the Permit requires that the Permittees summarize, report, and submit discharge monitoring data each monthly monitoring period on discharge monitoring reports (“DMRs”) provided by Ecology. The DMRs must be submitted by the 15th day of the following month. The Permittees have violated these requirements by failing to timely submit complete and accurate DMRs during the following monitoring periods: May 2020, June 2020, July 2020, December 2020, September 2023, and October 2023.

C. Violations of the Noncompliance Reporting Requirements.

Condition S3.F.1 of the Permit requires that the Permittees take the following actions when they violate or are unable to comply with any Permit Condition: (1) immediately take action to stop, contain, and clean up unauthorized discharges or otherwise stop the noncompliance and correct the problem; and (2) if applicable, immediately repeat sampling and analysis and submit the results to Ecology within 30 days.

As documented in the table attached hereto as Appendix A, the Permittees have repeatedly exceeded the Permit’s numeric effluent limitations and thereby made unauthorized discharges. *See* Permit, Condition S1.A (“The Permittee is authorized to discharge industrial wastewater . . . subject to complying with the following [numeric effluent] limits.”). The Permittees have violated the requirements of Condition S3.F.1 by failing to immediately take action to stop and contain unauthorized discharges, to otherwise stop the noncompliance, and to correct the problem for each unauthorized discharge documented in the table attached hereto as Appendix A.

Condition S3.F.a of the Permit requires that the Permittees immediately report to Ecology any failure of the disinfection system. Condition S3.F.b of the Permit requires that the Permittees report any of the following events to Ecology via telephone within 24 hours of becoming aware of the event:

1. Any noncompliance that may endanger health or the environment, unless previously reported under immediate reporting requirements.
2. Any unanticipated bypass that causes an exceedance of any effluent limit in the permit (See Part S4.B., “Bypass Procedures”).
3. Any upset that causes an exceedance of an effluent limit in the permit (See G.15, “Upset”).
4. Any violation of a maximum daily or instantaneous maximum discharge limit for any of the pollutants in Section S1.A of this permit.
5. Any overflow prior to the treatment works, whether or not such overflow endangers health or the environment or exceeds any effluent limit in the permit.

This requirement does not include industrial process wastewater overflows to impermeable surfaces which are collected and routed to the treatment works.

Condition S3.F.c of the Permit requires that the Permittees submit a written report for any event that must be reported under Condition S3.F.a or S3.F.b within 5 days of becoming aware of the event. The report must contain the following:

1. A description of the noncompliance and its cause.
2. The period of noncompliance, including exact dates and times.
3. The estimated time the Permittee expects the noncompliance to continue if not yet corrected.
4. Steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.
5. If the noncompliance involves an overflow prior to the treatment works, an estimate of the quantity (in gallons) of untreated overflow.

The Permittees have violated these requirements by failing to timely report to Ecology each event that must be reported under Conditions S3.F.a and S3.F.b of the Permit during the last five years, including for each violation of a maximum daily or instantaneous maximum discharge limit identified in the table attached hereto as Appendix A. The Permittees have further violated these requirements by failing to timely submit complete and accurate written reports containing all information required by Condition S3.F.c of the Permit for each reportable event under Conditions S3.F.a and S3.F.b of the Permit during the last five years, including for each violation of a maximum daily or instantaneous maximum discharge limit identified in the table attached hereto as Appendix A.

D. Violations of Requirements for Operations and Maintenance Manual.

Condition S4 of the Permit requires that the Permittees at all times properly operate and maintain all facilities or systems of treatment or control that are installed to achieve compliance with the terms and conditions of the Permit. To effectuate this, Condition S4.A of the Permit requires the Permittees prepare an Operations and Maintenance (“O&M”) Manual. Condition S4.A.a of the Permit provides that the O&M Manual must meet the requirements of WAC 173-240-150; be submitted to Ecology by October 31, 2020; be reviewed annually, with confirmation of review provided annually by February 15 to Ecology; be submitted to Ecology for review and approval for any substantial changes or updates; be kept at the facility; and be followed by the Permittees at all times.

Condition S4.A.b of the Permit provides that, in addition to the requirements of WAC 173-240-150, the O&M Manual must be consistent with the guidance in Table G1-3 in the ‘Criteria for Sewage Works Design’ (Orange Book) 2008, and must include the following:

1. A revised narrative for Sections 1 – 7, and Appendix A and B that consolidates all of the information in the updates submitted to Ecology during the current permit cycle.

2. Emergency procedures for anaerobic digester, SBR, or disinfection shutdown and cleanup in the event of a wastewater system upset or failure.
3. A review of system components which if failed could pollute surface water or could impact human health. Provide a procedure for a routine schedule of checking the function of these components.
4. Wastewater system maintenance procedures that contribute to the generation or alteration of the characteristics of the process wastewater (e.g., Sequencing Batch Reactor (SBR) dewatering; digester dewatering; chlorine contact basin clean-up).
5. Any directions to maintenance staff when cleaning, or maintaining other equipment or performing other tasks which are necessary to protect the operation of the wastewater system (for example, defining maximum allowable discharge rate for draining a tank, blocking all floor drains before beginning the overhaul of a stationary engine).
6. Wastewater sampling protocols and procedures for compliance with the sampling and reporting requirements in the wastewater discharge permit.
7. Minimum staffing adequate to operate and maintain the treatment processes and carry out compliance monitoring required by the permit.
8. Treatment plant process control monitoring schedule.
9. The operation and maintenance of the anaerobic digester and gas-flare system.
 - a. The leak detection plan for the digester.
 - b. The definition of a leak as measured at the leak detection system monitoring well, and for the frequency of 'routine' monitoring.
10. The leak detection plan for the SBRs.
11. The leak detection plan for the brine ponds that includes the definition of a leak as measured at the leak detection standpipe at each pond.
12. A Solid Waste Plan that includes the management and disposal of SBR and digester waste solids. The solid waste control plan must:
 - a. Follow Ecology's guidance for preparing a solid waste control plan located online at <https://fortress.wa.gov/ecy/publications/publications/0710024.pdf>.
 - b. Include at a minimum a description, source, generation rate, and disposal methods of these solid wastes.
 - c. Not conflict with local or state solid waste regulations.

Condition S4.A.c of the Permit requires that the Permittees include a Treatment System Operating Plan ("TSOP") in the initial chapter of the O&M Manual. The TSOP must not conflict with the O&M Manual and must include the following information:

1. A baseline operating condition, which describes the operating parameters and procedures, used to meet the effluent limits of S1 at the production levels used in developing these limits.
2. In the event of production rates, which are below the baseline levels used to establish these limits, the plan must describe the operating procedures and conditions needed to maintain design treatment efficiency. The monitoring and reporting must be described in the plan.

3. In the event of an upset, due to plant maintenance activities, severe stormwater events, start ups or shut downs, or other causes, the plan must describe the operating procedures and conditions employed to mitigate the upset. The monitoring and reporting must be described in the plan.
4. A description of any regularly scheduled maintenance or repair activities at the facility which would affect the volume or character of the wastes discharged to the wastewater treatment system and a plan for monitoring and treating/controlling the discharge of maintenance-related materials (such as cleaners, degreasers, solvents, etc.).

The Permittees have violated the requirements of Condition S4 of the Permit by failing to, at all times, properly operate and maintain all facilities or systems of treatment or control that are installed to achieve compliance with the terms and conditions of the Permit. These violations have occurred each and every day during the last five years, as evidenced (in part) by the repeated exceedances of the Permit's numeric effluent limits documented in the table attached hereto as Appendix A.

Upon information and belief, the Permittees are in violation of the Permit requirements discussed above because they have not developed and/or have not fully implemented or followed an O&M Manual that meets each requirement of Conditions S4.A.b and S4.A.c of the Permit identified above. These violations have occurred each and every day during the last five years. The Permittees have violated the requirements of Condition S4.A.a.2 of the Permit by failing to review the O&M Manual each year since and including 2019 and by failing to timely confirm each such review to Ecology.

III. PARTY GIVING NOTICE OF INTENT TO SUE.

The full name, address, and telephone number of the party giving notice is:

Columbia Riverkeeper
2621 Wasco Street, Suite A
Hood River, OR 97031
(541) 387-3030

IV. ATTORNEYS REPRESENTING COLUMBIA RIVERKEEPER.

The attorneys representing Columbia Riverkeeper in this matter are:

Teryn Yazdani, Staff Attorney
Columbia Riverkeeper
1125 S.E. Madison Street, Suite 103A
Portland, Oregon 97214
(503) 933-7636
teryn@columbiariverkeeper.org

Brian A. Knutsen
Kampmeier & Knutsen, PLLC
1300 S.E. Stark Street, Suite 202
Portland, Oregon 97214
(503) 841-6515
brian@kampmeierknutsen.com

V. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Columbia Riverkeeper based on its review of the public record. These violations are ongoing. Columbia Riverkeeper intends to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

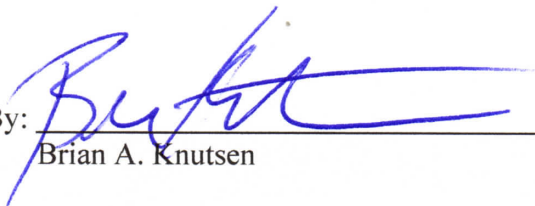
Under Section 309(d) of the CWA, 33 U.S.C. § 1319(d), the Permittees are subject to a separate daily penalty assessment for each violation. The current maximum daily penalty assessment for each violation is \$66,712. 40 C.F.R. § 19.4. In addition to civil penalties, Columbia Riverkeeper will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 U.S.C. § 1365(a) and (d), and such other relief as is permitted by law. Section 505(d) of the CWA, 33 U.S.C. § 1365(d), further authorizes prevailing parties to recover costs, including attorney's fees.

Columbia Riverkeeper believes that this Notice of Intent to Sue sufficiently states grounds for filing suit. Columbia Riverkeeper intends, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against the City of Quincy, Washington and Woodard & Curran, Inc. under Section 505(a) of the CWA for the violations described herein.

Columbia Riverkeeper is willing to discuss effective remedies for the violations described in this letter and settlement terms during the 60-day notice period. If you wish to pursue such discussions without litigation, we suggest you initiate those discussions within ten (10) days of receiving this Notice so that a meeting can be arranged and negotiations may be completed promptly. Columbia Riverkeeper does not intend to delay the filing of a complaint if discussions are ongoing at the end of the notice period. If you believe that any of the allegations in this Notice are incorrect or based on incomplete information in the public record, please bring those facts to our attention.

Thank you for your prompt attention to this matter.

KAMPMEIER & KNUTSEN, PLLC

By: 
Brian A. Knutsen

CERTIFICATE OF SERVICE

I, Brian A. Knutsen, declare under penalty of perjury of the laws of Washington and the United States that I am counsel for Columbia Riverkeeper and that on August 26, 2024, I caused copies of the foregoing Notice of Intent to Sue Under the Clean Water Act to be served on the following by depositing them with the United States Postal Service, certified mail, return receipt requested, postage prepaid:

Mayor Paul Worley
P.O. Box 338
Quincy, WA 98848

City Administrator Pat Haley
P.O. Box 338
Quincy, WA 98848

Managing Agent
Woodard & Curran, Inc.
2055 Sugarloaf Circle, Suite 175
Duluth, GA 30097

Managing Agent
Woodard & Curran, Inc.
P.O. Box 1249
Quincy, WA 98848

Managing Agent
Industrial Wastewater Treatment Facility
201 12th Ave. SW
Quincy, WA 98848

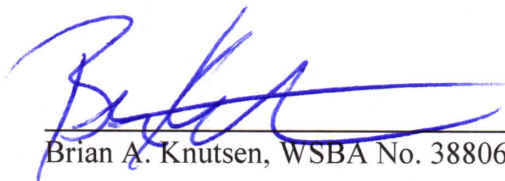
Managing Agent
Industrial Wastewater Treatment Facility
18605 Road 9 NW
Quincy, WA 98848

Director Laura Watson
Washington Department of Ecology
P.O. Box 47600
Olympia, WA 98504-7600

Administrator Michael S. Regan
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., N.W.
(Mail Code 1001 A)
Washington, D.C. 20460

Regional Administrator Casey Sixkiller
U.S. Environmental Protection Agency, Region 10
1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Cogency Global, Inc.
Registered Agent for Woodard and Curran, Inc.
1780 Barnes Blvd. SW
Tumwater, WA 98512-0410



Brian A. Knutsen, WSBA No. 38806

APPENDIX A

Violations of Numeric Effluent Limitations					
Date	Parameter	Limit Type	Unit	Sample Result	Limit
6/19/20	Ammonia	Maximum Daily	mg/L	60.6	2.39
6/19/20	Ammonia	Maximum Daily	lbs/day	627.9	79.8
June 2020	Ammonia	Monthly Average	mg/L	15.4225	1.19
June 2020	Ammonia	Monthly Average	lbs/day	163.2	39.8
7/10/20	Ammonia	Maximum Daily	mg/L	13.3	2.39
7/10/20	Ammonia	Maximum Daily	lbs/day	242.4	79.8
7/19/20	Ammonia	Maximum Daily	mg/L	13.7	2.39
7/19/20	Ammonia	Maximum Daily	lbs/day	283.1	79.8
July 2020	Ammonia	Monthly Average	mg/L	5.686	1.19
July 2020	Ammonia	Monthly Average	lbs/day	110.84	39.8
9/4/20	Ammonia	Maximum Daily	mg/L	11.8	2.39
9/4/20	Ammonia	Maximum Daily	lbs/day	317.9	79.8
Sept. 2020	Ammonia	Monthly Average	mg/L	4.7	1.19
Sept. 2020	Ammonia	Monthly Average	lbs/day	121.433	39.8
10/11/20	Ammonia	Maximum Daily	mg/L	11.9	2.39
10/11/20	Ammonia	Maximum Daily	lbs/day	320.6	79.8
10/16/20	Total Suspended Solids	Maximum Daily	mg/L	170	107
10/16/20	Total Suspended Solids	Maximum Daily	lbs/day	4475	2882
Oct. 2020	Ammonia	Monthly Average	mg/L	3.222	1.19
Oct. 2020	Ammonia	Monthly Average	lbs/day	83.68	39.8
12/19/20	Ammonia	Maximum Daily	mg/L	3.21	2.9
1/9/21	Ammonia	Maximum Daily	mg/L	11.5	2.9
Jan. 2021	Ammonia	Monthly Average	mg/L	3.2525	1.45
3/26/21	Ammonia	Maximum Daily	mg/L	6.2	2.9
3/26/21	Ammonia	Maximum Daily	lbs/day	158.5	96.7
Mar. 2021	Ammonia	Monthly Average	mg/L	2.23	1.45
Mar. 2021	Ammonia	Monthly Average	lbs/day	56.525	48.2
4/3/21	Ammonia	Maximum Daily	mg/L	6.29	2.39
4/3/21	Ammonia	Maximum Daily	lbs/day	169.4	79.8
11/21/21	Flow	Maximum Daily	mgd	4.5	3.23
11/22/21	Flow	Maximum Daily	mgd	4.5	3.23
11/23/21	Flow	Maximum Daily	mgd	4.13	3.23
11/24/21	Flow	Maximum Daily	mgd	4.24	3.23
11/25/21	Flow	Maximum Daily	mgd	4.6	3.23
11/26/21	Flow	Maximum Daily	mgd	4.03	3.23
11/27/21	Flow	Maximum Daily	mgd	4.32	3.23

1/3/23	Flow	Maximum Daily	mgd	4.34	3.23
1/5/23	Flow	Maximum Daily	mgd	3.35	3.23
1/6/23	Flow	Maximum Daily	mgd	3.25	3.23
1/14/23	Flow	Maximum Daily	mgd	3.61	3.23
1/15/23	Flow	Maximum Daily	mgd	3.53	3.23
1/16/23	Flow	Maximum Daily	mgd	3.53	3.23
1/20/23	Flow	Maximum Daily	mgd	3.44	3.23
1/21/23	Flow	Maximum Daily	mgd	3.68	3.23
1/22/23	Flow	Maximum Daily	mgd	3.46	3.23
1/23/23	Flow	Maximum Daily	mgd	3.72	3.23
1/24/23	Flow	Maximum Daily	mgd	3.67	3.23
1/25/23	Flow	Maximum Daily	mgd	3.49	3.23
1/26/23	Flow	Maximum Daily	mgd	3.36	3.23
1/26/23	Dissolved Oxygen	Minimum	mg/L	7.9	8.0
1/27/23	Flow	Maximum Daily	mgd	3.33	3.23
1/28/23	Flow	Maximum Daily	mgd	3.28	3.23
1/29/23	Flow	Maximum Daily	mgd	3.38	3.23
1/30/23	Flow	Maximum Daily	mgd	3.51	3.23
1/31/23	Flow	Maximum Daily	mgd	3.45	3.23
2/1/23	Flow	Maximum Daily	mgd	3.44	3.23
2/5/23	Flow	Maximum Daily	mgd	3.44	3.23
2/11/23	Flow	Maximum Daily	mgd	3.31	3.23
2/12/23	Flow	Maximum Daily	mgd	3.45	3.23
2/15/23	Flow	Maximum Daily	mgd	3.83	3.23
2/19/23	Flow	Maximum Daily	mgd	3.24	3.23
2/26/23	Flow	Maximum Daily	mgd	3.25	3.23
2/28/23	Flow	Maximum Daily	mgd	3.43	3.23
3/5/23	Flow	Maximum Daily	mgd	3.39	3.23
3/12/23	Flow	Maximum Daily	mgd	3.24	3.23
3/13/23	Flow	Maximum Daily	mgd	3.71	3.23
3/15/23	Flow	Maximum Daily	mgd	3.32	3.23
5/2/23	pH	Maximum	SU	8.7 ¹	8.5
5/16/23	Dissolved Oxygen	Minimum	mg/L	7.3	8.0
5/17/23	Dissolved Oxygen	Minimum	mg/L	7.2	8.0
5/18/23	Temperature	Maximum Daily	°C	23	22.5

¹ Potentially incorrectly reported as permittee reported “8.7” as the maximum result but “7.8” for the date sampled.

5/19/23	Temperature	Maximum Daily	°C	23.6	22.5
5/20/23	Temperature	Maximum Daily	°C	23.6	22.5
5/21/23	Temperature	Maximum Daily	°C	23.5	22.5
5/27/23	Dissolved Oxygen	Minimum	mg/L	7.3	8.0
5/28/23	Dissolved Oxygen	Minimum	mg/L	1.6	8.0
5/29/23	Dissolved Oxygen	Minimum	mg/L	2.2	8.0
5/30/23	Dissolved Oxygen	Minimum	mg/L	2.2	8.0
6/6/23	BOD ₅	Maximum Daily	mg/L	140 ²	95.2
6/13/23	Temperature	Maximum Daily	°C	24	22.5
6/26/23	Temperature	Maximum Daily	°C	23.4	22.5
6/27/23	Temperature	Maximum Daily	°C	23.7	22.5
6/28/23	Temperature	Maximum Daily	°C	24.1	22.5
6/29/23	Temperature	Maximum Daily	°C	23.7	22.5
6/30/23	Temperature	Maximum Daily	°C	22.8	22.5
June 2023	Fecal Coliform	Monthly Geo. Mean	organism s/100 mL	183.8	50
7/9/23	Temperature	Maximum Daily	°C	23.8	22.5
7/10/23	Temperature	Maximum Daily	°C	22.8	22.5
7/14/23	Temperature	Maximum Daily	°C	23.1	22.5
7/15/23	Temperature	Maximum Daily	°C	23.6	22.5
7/16/23	Temperature	Maximum Daily	°C	24.2	22.5
7/17/23	Temperature	Maximum Daily	°C	22.7	22.5
7/20/23	Temperature	Maximum Daily	°C	23.3	22.5
7/20/23	Ammonia	Maximum Daily	mg/L	19.5	2.39
7/20/23	Ammonia	Maximum Daily	lbs/day	466.7	79.8
7/21/23	Temperature	Maximum Daily	°C	25.2	22.5
7/22/23	Temperature	Maximum Daily	°C	23.1	22.5
7/23/23	Temperature	Maximum Daily	°C	23.1	22.5
7/24/23	Temperature	Maximum Daily	°C	24.1	22.5
7/25/23	Temperature	Maximum Daily	°C	23.7	22.5
7/26/23	Temperature	Maximum Daily	°C	22.6	22.5
7/27/23	Temperature	Maximum Daily	°C	23.4	22.5
7/28/23	Temperature	Maximum Daily	°C	23.6	22.5
7/28/23	Ammonia	Maximum Daily	mg/L	23.3	2.39
7/28/23	Ammonia	Maximum Daily	lbs/day	524.7	79.8
7/29/23	Temperature	Maximum Daily	°C	23.9	22.5

² Potentially incorrectly reported as the maximum as the dated samples do not repeat this number.

7/30/23	Temperature	Maximum Daily	°C	23.4	22.5
July 2023	Fecal Coliform	Maximum	% of samples exceed. 100/100 mL	43	10
July 2023	Ammonia	Monthly Average	mg/L	10.99	1.19
July 2023	Ammonia	Monthly Average	lbs/day	255	39.8
8/1/23	Temperature	Maximum Daily	°C	22.7	22.5
8/2/23	Temperature	Maximum Daily	°C	23.1	22.5
8/3/23	Temperature	Maximum Daily	°C	23.1	22.5
8/4/23	Temperature	Maximum Daily	°C	23.4	22.5
8/5/23	Temperature	Maximum Daily	°C	23.1	22.5
8/6/23	Temperature	Maximum Daily	°C	23.8	22.5
8/7/23	Temperature	Maximum Daily	°C	25.5	22.5
8/7/23	Dissolved Oxygen	Minimum	mg/L	7.2	8.0
8/8/23	Dissolved Oxygen	Minimum	mg/L	7.0	8.0
8/8/23	Temperature	Maximum Daily	°C	25.0	22.5
8/9/23	Temperature	Maximum Daily	°C	26.5	22.5
8/10/23	Temperature	Maximum Daily	°C	25.8	22.5
8/10/23	Dissolved Oxygen	Minimum	mg/L	6.4	8.0
8/11/23	Dissolved Oxygen	Minimum	mg/L	6.2	8.0
8/11/23	Temperature	Maximum Daily	°C	25.8	22.5
8/12/23	Dissolved Oxygen	Minimum	mg/L	6.8	8.0
8/13/23	Dissolved Oxygen	Minimum	mg/L	7.7	8.0
8/13/23	Temperature	Maximum Daily	°C	23.7	22.5
8/14/23	Temperature	Maximum Daily	°C	23.8	22.5
8/15/23	Temperature	Maximum Daily	°C	24.9	22.5
8/15/23	Dissolved Oxygen	Minimum	mg/L	7.9	8.0
8/16/23	Dissolved Oxygen	Minimum	mg/L	7.9	8.0
8/16/23	Temperature	Maximum Daily	°C	24.5	22.5
8/17/23	Temperature	Maximum Daily	°C	25.3	22.5
8/18/23	Temperature	Maximum Daily	°C	27	22.5
8/18/23	Flow	Maximum Daily	mgd	3.26	3.23
8/19/23	Temperature	Maximum Daily	°C	23.6	22.5
8/20/23	Temperature	Maximum Daily	°C	23.8	22.5
8/21/23	Temperature	Maximum Daily	°C	24.1	22.5
8/22/23	Temperature	Maximum Daily	°C	23.8	22.5

8/22/23	Flow	Maximum Daily	mgd	3.42	3.23
8/23/23	Flow	Maximum Daily	mgd	3.46	3.23
8/23/23	Temperature	Maximum Daily	°C	23.9	22.5
8/23/23	Dissolved Oxygen	Minimum	mg/L	7.2	8.0
8/24/23	Temperature	Maximum Daily	°C	26.5	22.5
8/25/23	Temperature	Maximum Daily	°C	26.5	22.5
8/25/23	Flow	Maximum Daily	mgd	3.48	3.23
8/25/23	BOD ₅	Maximum Daily	mg/L	649	95.2
8/25/23	BOD ₅	Maximum Daily	lbs/day	23,490.94	3176
8/25/23	Ammonia	Maximum Daily	mg/L	15.9	2.39
8/25/23	Ammonia	Maximum Daily	lbs/day	575.5	79.8
8/25/23	Dissolved Oxygen	Minimum	mg/L	7.1	8.0
8/26/23	Dissolved Oxygen	Minimum	mg/L	5.9	8.0
8/26/23	Flow	Maximum Daily	mgd	3.94	3.23
8/26/23	Temperature	Maximum Daily	°C	26.4	22.5
8/27/23	Temperature	Maximum Daily	°C	27	22.5
8/27/23	Flow	Maximum Daily	mgd	4.54	3.23
8/27/23	Dissolved Oxygen	Minimum	mg/L	5.8	8.0
8/28/23	Dissolved Oxygen	Minimum	mg/L	5.9	8.0
8/28/23	Flow	Maximum Daily	mgd	4.54	3.23
8/28/23	Temperature	Maximum Daily	°C	26.8	22.5
8/28/23	Total Suspended Solids	Maximum Daily	lbs/day	4158	2882
8/28/23	Ammonia	Maximum Daily	mg/L	26.9	2.39
8/28/23	Ammonia	Maximum Daily	lbs/day	1085.8	79.8
8/29/23	Ammonia	Maximum Daily	mg/L	34.6	2.39
8/29/23	Ammonia	Maximum Daily	lbs/day	427.1	79.8
8/29/23	Total Suspended Solids	Maximum Daily	mg/L	205	107
8/29/23	Flow	Maximum Daily	mgd	4.49	3.23
8/29/23	Temperature	Maximum Daily	°C	27	22.5
8/30/23	Ammonia	Maximum Daily	mg/L	76.38	2.39
8/30/23	Ammonia	Maximum Daily	lbs/day	2165.8	79.8
8/30/23	Temperature	Maximum Daily	°C	26.3	22.5
8/31/23	Temperature	Maximum Daily	°C	24.2	22.5
Aug. 2023	Ammonia	Monthly Average	mg/L	19.8238	1.19
Aug. 2023	Ammonia	Monthly Average	lbs/day	547.288	39.8
Aug. 2023	Total Suspended Solids	Monthly Average	mg/L	68.6667	49
Aug. 2023	Total Suspended Solids	Monthly Average	lbs/day	1734.67	1320

Aug. 2023	BOD ₅	Monthly Average	mg/L	135.286	51
Aug. 2023	BOD ₅	Monthly Average	lbs/day	4368.22	1705
9/1/23	Temperature	Maximum Daily	°C	24.4	22.5
9/1/23	Flow	Maximum Daily	mgd	3.8	3.23
9/1/23	Dissolved Oxygen	Minimum	mg/L	7.8	8.0
9/1/23	Ammonia	Maximum Daily	mg/L	28.9	2.39
9/1/23	Ammonia	Maximum Daily	lbs/day	915.9	79.8
9/2/23	Dissolved Oxygen	Minimum	mg/L	6.9	8.0
9/2/23	Temperature	Maximum Daily	°C	24.8	22.5
9/2/23	Flow	Maximum Daily	mgd	3.86	3.23
9/3/23	Temperature	Maximum Daily	°C	25.3	22.5
9/3/23	Flow	Maximum Daily	mgd	3.41	3.23
9/4/23	Temperature	Maximum Daily	°C	24.9	22.5
9/4/23	Flow	Maximum Daily	mgd	3.41	3.23
9/5/23	Temperature	Maximum Daily	°C	23.8	22.5
9/5/23	Flow	Maximum Daily	mgd	3.4	3.23
9/6/23	Temperature	Maximum Daily	°C	23.8	22.5
9/6/23	Flow	Maximum Daily	mgd	3.4	3.23
9/7/23	Temperature	Maximum Daily	°C	23.7	22.5
9/7/23	Flow	Maximum Daily	mgd	3.39	3.23
9/8/23	Temperature	Maximum Daily	°C	23.3	22.5
9/8/23	Flow	Maximum Daily	mgd	3.37	3.23
9/9/23	Temperature	Maximum Daily	°C	23.8	22.5
9/9/23	Flow	Maximum Daily	mgd	3.37	3.23
9/10/23	Temperature	Maximum Daily	°C	24.2	22.5
9/10/23	Flow	Maximum Daily	mgd	3.35	3.23
9/11/23	Temperature	Maximum Daily	°C	24.4	22.5
9/11/23	Flow	Maximum Daily	mgd	3.33	3.23
9/12/23	Temperature	Maximum Daily	°C	24.5	22.5
9/12/23	Flow	Maximum Daily	mgd	3.31	3.23
9/12/23	Dissolved Oxygen	Minimum	mg/L	7.4	8.0
9/13/23	Temperature	Maximum Daily	°C	23.9	22.5
9/13/23	Temperature	Maximum Daily	°C	22.7	22.5
9/14/23	Temperature	Maximum Daily	°C	23.5	22.5
9/15/23	Temperature	Maximum Daily	°C	24.2	22.5
9/16/23	Temperature	Maximum Daily	°C	24.5	22.5
9/16/23	Dissolved Oxygen	Minimum	mg/L	7.8	8.0

9/17/23	Dissolved Oxygen	Minimum	mg/L	7.8	8.0
9/17/23	Temperature	Maximum Daily	°C	24.7	22.5
9/18/23	Temperature	Maximum Daily	°C	24.1	22.5
9/19/23	Temperature	Maximum Daily	°C	23.9	22.5
9/20/23	Temperature	Maximum Daily	°C	22.7	22.5
9/28/23	Ammonia	Maximum Daily	mg/L	8.87	2.39
9/28/23	Ammonia	Maximum Daily	lbs/day	233	79.8
Sept. 2023	Ammonia	Monthly Average	mg/L	4.3	1.19
Sept. 2023	Ammonia	Monthly Average	lbs/day	129.38	39.8
10/4/23	Temperature	Maximum Daily	°C	22.7	22.5
10/10/23	Flow	Maximum Daily	mgd	4.08	3.23
10/11/23	Flow	Maximum Daily	mgd	4.5	3.23
10/11/23	Temperature	Maximum Daily	°C	23.2	22.5
10/12/23	Flow	Maximum Daily	mgd	4.54	3.23
10/13/23	Flow	Maximum Daily	mgd	4.55	3.23
10/14/23	Flow	Maximum Daily	mgd	4.55	3.23
10/15/23	Flow	Maximum Daily	mgd	4.34	3.23
10/16/23	pH	Maximum	SU	8.7	8.5
10/17/23	pH	Maximum	SU	8.6	8.5
10/24/23	Flow	Maximum Daily	mgd	4.04	3.23
10/25/23	Flow	Maximum Daily	mgd	4.39	3.23
10/26/23	Flow	Maximum Daily	mgd	4.54	3.23
10/27/23	Flow	Maximum Daily	mgd	4.55	3.23
10/28/23	Flow	Maximum Daily	mgd	4.52	3.23
10/29/23	Flow	Maximum Daily	mgd	4.55	3.23
10/30/23	Flow	Maximum Daily	mgd	4.55	3.23
2/1/2024	pH	Maximum	SU	8.55	8.5
2/1/2024	Dissolved Oxygen	Minimum	mg/L	4.78	8.0
2/11/2024	Dissolved Oxygen	Minimum	mg/L	5.26	8.0
2/12/2024	Dissolved Oxygen	Minimum	mg/L	4.71	8.0
2/12/2024	pH	Minimum	SU	5.63	6.5
2/13/2024	Ammonia	Maximum Daily	mg/L	6.3	2.9
2/13/2024	Ammonia	Maximum Daily	lbs/day	167.7	96.7
2/17/2024	pH	Minimum	SU	5.39	6.5
2/17/2024	Dissolved Oxygen	Minimum	mg/L	7.17	8.0
2/18/2024	Dissolved Oxygen	Minimum	mg/L	5.92	8.0
2/23/2024	pH	Minimum	SU	4.78	6.5

2/24/2024	pH	Minimum	SU	5.11	6.5
2/24/24	Flow	Maximum Daily	mgd	3.24	3.23
2/27/2024	Ammonia	Maximum Daily	mg/L	3.8	2.9
2/27/2024	Ammonia	Maximum Daily	lbs/day	101.4	96.7
Mar. 2024	Ammonia	Monthly Average	mg/L	3	1.45
Mar. 2024	Ammonia	Monthly Average	lbs/day	71.1	48.2
4/1/2024	Chlorine	Maximum Daily	µg/L	66	18.9
4/2/2024	Chlorine	Maximum Daily	µg/L	163	18.9
4/10/2024	pH	Minimum	SU	6.3	6.5
4/10/2024	pH	Maximum	SU	8.8	8.5
4/13/2024	Dissolved Oxygen	Minimum	mg/L	7.4	8.0
4/14/2024	Dissolved Oxygen	Minimum	mg/L	7.9	8.0
4/15/2024	Dissolved Oxygen	Minimum	mg/L	7.8	8.0
4/16/2024	Dissolved Oxygen	Minimum	mg/L	6.9	8.0
4/16/2024	Ammonia	Maximum Daily	mg/L	19.6	2.39
4/16/2024	Ammonia	Maximum Daily	lbs/day	355.2	79.8
4/17/2024	Dissolved Oxygen	Minimum	mg/L	6.6	8.0
4/17/2024	pH	Maximum	SU	8.6	8.5
4/18/2024	Dissolved Oxygen	Minimum	mg/L	6.3	8.0
4/24/2024	pH	Maximum	SU	8.7	8.5
4/25/2024	pH	Maximum	SU	8.6	8.5
Apr. 2024	Chlorine	Monthly Average	µg/L	13.3	8.4
Apr. 2024	Ammonia	Monthly Average	mg/L	5	1.19
Apr. 2024	Ammonia	Monthly Average	lbs/day	82.91	39.8
5/10/2024	pH	Minimum	SU	4.59	6.5
5/14/2024	pH	Maximum	SU	8.64	8.5
5/15/2024	pH	Maximum	SU	8.67	8.5
5/16/2024	pH	Maximum	SU	8.66	8.5
5/25/2024	pH	Maximum	SU	8.65	8.5
5/26/2024	pH	Maximum	SU	10.14	8.5
5/3/2024	Dissolved Oxygen	Minimum	mg/L	7.82	8.0
5/5/2024	Dissolved Oxygen	Minimum	mg/L	7.51	8.0
5/6/2024	Dissolved Oxygen	Minimum	mg/L	5.64	8.0
5/7/2024	Dissolved Oxygen	Minimum	mg/L	5.92	8.0
5/8/2024	Dissolved Oxygen	Minimum	mg/L	4.42	8.0
5/9/2024	Dissolved Oxygen	Minimum	mg/L	3.12	8.0
5/10/2024	Dissolved Oxygen	Minimum	mg/L	3.26	8.0

5/12/2024	Dissolved Oxygen	Minimum	mg/L	7.79	8.0
5/16/2024	Dissolved Oxygen	Minimum	mg/L	7.9	8.0
5/24/2024	Dissolved Oxygen	Minimum	mg/L	7.97	8.0
May 2024	Total Suspended Solids	Monthly Average	mg/L	69	49
5/6/2024	Ammonia	Maximum Daily	mg/L	25.2	2.39
May 2024	Ammonia	Monthly Average	mg/L	13	1.19
5/6/2024	Ammonia	Daily Maximum	lbs/day	554.2	79.8
May 2024	Ammonia	Monthly Average	lbs/day	278.2	39.8
6/10/2024	pH	Minimum	SU	4.53	6.5
6/13/2024	pH	Minimum	SU	4.74	6.5
6/15/2024	pH	Minimum	SU	5.11	6.5
6/29/2024	pH	Minimum	SU	3.67	6.5
6/15/2024	pH	Maximum	SU	8.53	8.5
6/16/2024	pH	Maximum	SU	8.59	8.5
6/17/2024	pH	Maximum	SU	8.61	8.5
6/28/2024	pH	Maximum	SU	9/04	8.5
6/9/2024	Dissolved Oxygen	Minimum	mg/L	7.36	8.0
6/10/2024	Dissolved Oxygen	Minimum	mg/L	7.53	8.0
6/11/2024	Dissolved Oxygen	Minimum	mg/L	7.5	8.0
6/12/2024	Dissolved Oxygen	Minimum	mg/L	7.73	8.0
6/15/2024	Dissolved Oxygen	Minimum	mg/L	7.1	8.0
6/16/2024	Dissolved Oxygen	Minimum	mg/L	6.5	8.0
6/17/2024	Dissolved Oxygen	Minimum	mg/L	6.16	8.0
6/18/2024	Dissolved Oxygen	Minimum	mg/L	5.93	8.0
6/20/2024	Dissolved Oxygen	Minimum	mg/L	6.02	8.0
6/21/2024	Dissolved Oxygen	Minimum	mg/L	6.77	8.0
6/22/2024	Dissolved Oxygen	Minimum	mg/L	6.91	8.0
6/26/2024	Dissolved Oxygen	Minimum	mg/L	7.15	8.0
6/27/2024	Dissolved Oxygen	Minimum	mg/L	7.42	8.0
6/28/2024	Dissolved Oxygen	Minimum	mg/L	7.39	8.0
6/29/2024	Dissolved Oxygen	Minimum	mg/L	6.84	8.0
6/20/24	Temperature	Maximum Daily	°C	23.34	22.5
6/21/24	Temperature	Maximum Daily	°C	23.12	22.5
6/19/2024	Total Suspended Solids	Maximum Daily	mg/L	215	107
June 2024	Total Suspended Solids	Monthly Average	mg/L	76	49
6/19/2024	Total Suspended Solids	Maximum Daily	lbs/day	5556.8	2882
June 2024	Total Suspended Solids	Monthly Average	lbs/day	1801	1320

6/19/2024	Ammonia	Maximum Daily	mg/L	30.2	2.39
6/24/2024	Ammonia	Maximum Daily	mg/L	39.9	2.39
June 2024	Ammonia	Monthly Average	mg/L	18	1.19
6/19/2024	Ammonia	Daily Maximum	lbs/day	780.5	79.8
6/24/2024	Ammonia	Daily Maximum	lbs/day	647.9	79.8
June 2024	Ammonia	Monthly Average	lbs/day	357.2	39.8
7/9/2024	pH	Maximum	SU	8.53	8.5
7/12/2024	pH	Maximum	SU	8.52	8.5
7/13/2024	pH	Maximum	SU	8.56	8.5
7/29/2024	pH	Maximum	SU	8.58	8.5
7/5/2024	Dissolved Oxygen	Minimum	mg/L	7.98	8.0
7/7/2024	Dissolved Oxygen	Minimum	mg/L	7.78	8.0
7/8/2024	Dissolved Oxygen	Minimum	mg/L	7.2	8.0
7/9/2024	Dissolved Oxygen	Minimum	mg/L	7.04	8.0
7/10/2024	Dissolved Oxygen	Minimum	mg/L	4.78	8.0
7/11/2024	Dissolved Oxygen	Minimum	mg/L	6.47	8.0
7/12/2024	Dissolved Oxygen	Minimum	mg/L	4.64	8.0
7/13/2024	Dissolved Oxygen	Minimum	mg/L	4.64	8.0
7/14/2024	Dissolved Oxygen	Minimum	mg/L	7.68	8.0
7/15/2024	Dissolved Oxygen	Minimum	mg/L	7.93	8.0
7/17/2024	Dissolved Oxygen	Minimum	mg/L	7.93	8.0
7/22/2024	Dissolved Oxygen	Minimum	mg/L	7.77	8.0
7/24/2024	Dissolved Oxygen	Minimum	mg/L	7.02	8.0
7/25/2024	Dissolved Oxygen	Minimum	mg/L	7.09	8.0
7/26/2024	Dissolved Oxygen	Minimum	mg/L	7.11	8.0
7/27/2024	Dissolved Oxygen	Minimum	mg/L	4.54	8.0
7/28/2024	Dissolved Oxygen	Minimum	mg/L	3.79	8.0
7/29/2024	Dissolved Oxygen	Minimum	mg/L	4.28	8.0
7/30/2024	Dissolved Oxygen	Minimum	mg/L	6.82	
7/31/2024	Dissolved Oxygen	Minimum	mg/L	4.43	8.0
7/5/2024	Temperature	Maximum Daily	°C	23.11	22.5
7/6/2024	Temperature	Maximum Daily	°C	23.16	22.5
7/7/2024	Temperature	Maximum Daily	°C	24	22.5
7/8/2024	Temperature	Maximum Daily	°C	24.61	22.5
7/9/2024	Temperature	Maximum Daily	°C	25.8	22.5
7/10/2024	Temperature	Maximum Daily	°C	25.59	22.5
7/11/2024	Temperature	Maximum Daily	°C	23.44	22.5

7/12/2024	Temperature	Maximum Daily	°C	23.94	22.5
7/13/2024	Temperature	Maximum Daily	°C	25.37	22.5
7/14/2024	Temperature	Maximum Daily	°C	23.34	22.5
7/15/2024	Temperature	Maximum Daily	°C	23.79	22.5
7/16/2024	Temperature	Maximum Daily	°C	24.73	22.5
7/17/2024	Temperature	Maximum Daily	°C	23.81	22.5
7/18/2024	Temperature	Maximum Daily	°C	22.88	22.5
7/19/2024	Temperature	Maximum Daily	°C	25.39	22.5
7/20/2024	Temperature	Maximum Daily	°C	24.95	22.5
7/21/2024	Temperature	Maximum Daily	°C	24.99	22.5
7/22/2024	Temperature	Maximum Daily	°C	25.3	22.5
7/23/2024	Temperature	Maximum Daily	°C	25.93	22.5
7/25/2024	Temperature	Maximum Daily	°C	23.16	22.5
7/28/2024	Temperature	Maximum Daily	°C	22.84	22.5
7/29/2024	Temperature	Maximum Daily	°C	22.8	22.5
7/30/2024	Temperature	Maximum Daily	°C	22.56	22.5
7/31/2024	Temperature	Maximum Daily	°C	23.32	22.5
7/1/2024	Ammonia	Maximum Daily	mg/L	10.6	2.39
7/15/2024	Ammonia	Maximum Daily	mg/L	12.5	2.39
7/22/2024	Ammonia	Maximum Daily	mg/L	14.7	2.39
July 2024	Ammonia	Monthly Average	mg/L	7.86	1.19
7/1/2024	Ammonia	Daily Maximum	lbs/day	194.6656	79.8
7/15/2024	Ammonia	Daily Maximum	lbs/day	336.7275	79.8
7/22/2024	Ammonia	Daily Maximum	lbs/day	383.24	79.8
July 2024	Ammonia	Monthly Average	lbs/day	189.046	39.8

EXHIBIT 2

Violations of Numeric Effluent Limitations Reported Since Notice Letter					
Date	Parameter	Limit Type	Unit	Sample Result	Limit
Aug. 2024	BOD ₅ (Influent Loading Limit)	Monthly Average	lbs/day	98,424	74,000
8/19/2024	pH	Minimum	SU	5.94	6.5
8/20/2024	pH	Minimum	SU	2.4	6.5
8/21/2024	pH	Minimum	SU	4.68	6.5
8/22/2024	pH	Minimum	SU	2.25	6.5
8/23/2024	pH	Minimum	SU	1.25	6.5
8/24/2024	pH	Minimum	SU	3.39	6.5
8/25/2024	pH	Minimum	SU	4.82	6.5
8/18/2024	pH	Maximum	SU	13.04	8.5
8/19/2024	pH	Maximum	SU	14	8.5
8/20/2024	pH	Maximum	SU	14	8.5
8/21/2024	pH	Maximum	SU	14	8.5
8/22/2024	pH	Maximum	SU	14	8.5
8/23/2024	pH	Maximum	SU	14	8.5
8/24/2024	pH	Maximum	SU	10.32	8.5
8/25/2024	pH	Maximum	SU	12.16	8.5
8/26/2024	pH	Maximum	SU	14	8.5
8/27/2024	pH	Maximum	SU	14	8.5
8/28/2024	pH	Maximum	SU	14	8.5
8/29/2024	pH	Maximum	SU	14	8.5
8/30/2024	pH	Maximum	SU	12.25	8.5
8/31/2024	pH	Maximum	SU	9.36	8.5
8/1/2024	Dissolved Oxygen	Minimum	mg/L	4.43	8.0
8/2/2024	Dissolved Oxygen	Minimum	mg/L	7.18	8.0
8/3/2024	Dissolved Oxygen	Minimum	mg/L	7.4	8.0
8/5/2024	Dissolved Oxygen	Minimum	mg/L	7.2	8.0
8/6/2024	Dissolved Oxygen	Minimum	mg/L	7.5	8.0
8/7/2024	Dissolved Oxygen	Minimum	mg/L	7.77	8.0
8/8/2024	Dissolved Oxygen	Minimum	mg/L	7.82	8.0
8/19/2024	Dissolved Oxygen	Minimum	mg/L	6.18	8.0
8/1/2024	Temperature	Maximum Daily	°C	26.24	22.5
8/2/2024	Temperature	Maximum Daily	°C	27.16	22.5
8/3/2024	Temperature	Maximum Daily	°C	25.6	22.5
8/4/2024	Temperature	Maximum Daily	°C	25.32	22.5
8/5/2024	Temperature	Maximum Daily	°C	26.13	22.5

8/6/2024	Temperature	Maximum Daily	°C	25.07	22.5
8/7/2024	Temperature	Maximum Daily	°C	25.84	22.5
8/8/2024	Temperature	Maximum Daily	°C	27.09	22.5
8/9/2024	Temperature	Maximum Daily	°C	27.54	22.5
8/10/2024	Temperature	Maximum Daily	°C	26.94	22.5
8/18/2024	Temperature	Maximum Daily	°C	29.02	22.5
8/30/2024	Temperature	Maximum Daily	°C	23.26	22.5
8/31/2024	Temperature	Maximum Daily	°C	24.55	22.5
8/28/2024	Chlorine	Maximum Daily	µg/L	191	18.9
Aug. 2024	Chlorine	Monthly Average	µg/L	13	8.4
8/6/2024	BOD ₅	Maximum Daily	mg/L	190	95.2
Aug. 2024	BOD ₅	Monthly Average	mg/L	78	51.1
8/6/2024	BOD ₅	Maximum Daily	lbs/day	5118.26	3176
Aug. 2024	BOD ₅	Monthly Average	lbs/day	2055	1705
8/6/2024	Total Suspended Solids	Maximum Daily	mg/L	843	107
Aug. 2024	Total Suspended Solids	Monthly Average	mg/L	320	49
8/6/2024	Total Suspended Solids	Maximum Daily	lbs/day	22,708	2882
Aug. 2024	Total Suspended Solids	Monthly Average	lbs/day	8518	1320
8/6/2024	Ammonia	Maximum Daily	mg/L	24.7	2.39
Aug. 2024	Ammonia	Monthly Average	mg/L	14	1.19
8/6/2024	Ammonia	Daily Maximum	lbs/day	665.37	79.8
Aug. 2024	Ammonia	Monthly Average	lbs/day	352.03	39.8
Aug. 2023	Fecal Coliform	Monthly Geo. Mean	organisms/ 100 mL	56.9	50
9/6/2024	pH	Minimum	SU	6.41	6.5
9/1/2024	pH	Maximum	SU	9.37	8.5
9/2/2024	pH	Maximum	SU	8.88	8.5
9/3/2024	pH	Maximum	SU	8.8	8.5
9/4/2024	pH	Maximum	SU	9.02	8.5
9/5/2024	pH	Maximum	SU	9.32	8.5
9/6/2024	pH	Maximum	SU	9.03	8.5
9/7/2024	pH	Maximum	SU	8.69	8.5
9/8/2024	pH	Maximum	SU	8.65	8.5
9/9/2024	pH	Maximum	SU	8.62	8.5
9/10/2024	pH	Maximum	SU	9.08	8.5
9/11/2024	pH	Maximum	SU	9.44	8.5
9/12/2024	pH	Maximum	SU	9.33	8.5

9/2/2024	Dissolved Oxygen	Minimum	mg/L	7.58	8.0
9/3/2024	Dissolved Oxygen	Minimum	mg/L	7.58	8.0
9/12/2024	Dissolved Oxygen	Minimum	mg/L	6.78	8.0
9/13/2024	Dissolved Oxygen	Minimum	mg/L	5.39	8.0
9/15/2024	Dissolved Oxygen	Minimum	mg/L	6.04	8.0
9/16/2024	Dissolved Oxygen	Minimum	mg/L	6.64	8.0
9/17/2024	Dissolved Oxygen	Minimum	mg/L	5.89	8.0
9/22/2024	Dissolved Oxygen	Minimum	mg/L	4.54	8.0
9/23/2024	Dissolved Oxygen	Minimum	mg/L	4.3	8.0
9/24/2024	Dissolved Oxygen	Minimum	mg/L	5.86	8.0
9/25/2024	Dissolved Oxygen	Minimum	mg/L	7.57	8.0
9/26/2024	Dissolved Oxygen	Minimum	mg/L	7.34	8.0
9/27/2024	Dissolved Oxygen	Minimum	mg/L	6.67	8.0
9/28/2024	Dissolved Oxygen	Minimum	mg/L	6.66	8.0
9/29/2024	Dissolved Oxygen	Minimum	mg/L	6.76	8.0
9/30/2024	Dissolved Oxygen	Minimum	mg/L	7.09	8.0
9/1/2024	Temperature	Maximum Daily	°C	24.55	22.5
9/2/2024	Temperature	Maximum Daily	°C	24.47	22.5
9/3/2024	Temperature	Maximum Daily	°C	24.17	22.5
9/5/2024	Temperature	Maximum Daily	°C	23.28	22.5
9/6/2024	Temperature	Maximum Daily	°C	23.68	22.5
9/7/2024	Temperature	Maximum Daily	°C	23.11	22.5
9/18/2024	Temperature	Maximum Daily	°C	22.52	22.5
9/23/2024	Temperature	Maximum Daily	°C	22.99	22.5
9/24/2024	Temperature	Maximum Daily	°C	23.46	22.5
9/25/2024	Temperature	Maximum Daily	°C	23.24	22.5
9/16/2024	Total Suspended Solids	Maximum Daily	mg/L	220	107
Sept. 2024	Total Suspended Solids	Monthly Average	mg/L	83	49
9/16/2024	Total Suspended Solids	Maximum Daily	lbs/day	5062	2882
Sept. 2024	Total Suspended Solids	Monthly Average	lbs/day	1910	1320
9/16/2024	Ammonia	Maximum Daily	mg/L	8.1	2.39
Sept. 2024	Ammonia	Monthly Average	mg/L	2	1.19
9/16/2024	Ammonia	Daily Maximum	lbs/day	186.15	79.8
Sept. 2024	Ammonia	Monthly Average	lbs/day	55.62	39.8