UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I - NEW ENGLAND
OFFICE OF ECOSYSTEM PROTECTION
ONE CONGRESS STREET
BOSTON, MASSACHUSETTS 02114-2023

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES

DATE OF PUBLIC NOTICE:

NPDES PERMIT NO.: MA0101508

NAME AND ADDRESS OF APPLICANT:

City of Chicopee
Department of Public Works
80 Medina Street
Chicopee, Massachusetts 01013

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

Chicopee Water Pollution Control Facility
80 Medina Street
Chicopee, MA 01013

RECEIVING WATERS: Connecticut River, Chicopee River, Cooley Brook, and Willimansett Brook (Connecticut River Basin MA-34)

CLASSIFICATION: Class B, all

I. Proposed Action, Type of Facility, and Discharge Location

The above named applicant has applied to the U.S. Environmental Protection Agency for re-issuance of its National Pollutant Discharge Elimination System (NPDES) permit to discharge into the designated receiving water. The applicant is engaged in the collection and treatment of domestic and industrial wastewater. The discharges are from a secondary wastewater treatment facility to the Connecticut River, and from 22 Combined Sewer Overflows (CSOs) to the Connecticut River, Chicopee River, and Willimansett Brook as listed in Permit Attachment D (there are 34 regulators contributing to the 22 discharge pipes). The draft permit also authorizes the discharge of storm water to Cooley Brook, from an oil/water separator (Outfall 011).

II. Description of the Discharge

A quantitative description of the wastewater treatment plant discharge in terms of significant effluent parameters based on recent monitoring data is shown in **Attachment A** of this fact sheet.

III. Limitations and Conditions

The effluent limitations of the draft permit and monitoring requirements may be found in the draft NPDES permit.

IV. Facility and Process Description

The City of Chicopee Water Pollution Control Facility (WPCF) is a 15.5 million gallon per day (MGD) secondary wastewater treatment facility located in Chicopee, Massachusetts, serving a population of 56,600. There are currently 22 Combined Sewer Overflows (CSOs) in the collection system, which discharge flow from 34 regulators. These are further discussed in Section VII. Nineteen industrial users contribute wastewater to the facility.

The plant currently receives wet weather flows up to 40 MGD. Influent flows up to 25 MGD receive full secondary treatment. Influent flows greater than 25 MGD receive primary treatment, bypass secondary treatment via the "fast track" pipe without receiving disinfection, and are re-combined with secondary effluent prior to discharge to the Connecticut River. See process diagram, Fact Sheet Attachment - **Figure A**. The other secondary bypass pipe shown on the schematic is not used because it is a gate and not an inverted wier. The facility can not control the amount of flow and would bypass on dry days. The City has recently been awarded a State Revolving Fund (SRF) grant to install chlorination on primary effluent that bypasses secondary treatment.

The treatment plant unit operations are as follows; upon entering the plant, wastewater passes through a bar screen, followed by an aerated grit chamber, three comminutors, eight rectangular primary settling tanks, and a Parshall flume for flow measurement. Flow is then pumped to the secondary treatment facilities, which consists of two trains of pure oxygen activated sludge reactors, four square secondary sedimentation tanks, and chlorination facilities.

Flow from the chlorine contact tanks normally discharges by gravity to the Connecticut River via outfall 010. During high river stages effluent flow is pumped through outfall 010 via a 32 MGD capacity pumping station.

Primary and waste activated sludge is dewatered by belt filter presses. Sludge is dewatered each workday, and by operating two shifts, Monday through Thursday, and one shift Friday through Sunday, 60 tons of filter cake at 24-30% solids is processed and transported by New England Organics Company. The City also has two multiple hearth sludge incinerators which have been off line since 1985. The permit does not authorize the use of the incinerators.

Emergency backup power is provided by either generators on site or a trailer mounted portable unit that connects to a transfer switch at the smaller pump stations.

Facility Upgrades

Since the 1995 permit issuance, the following upgrades have occurred:

- Automatic rag rack in the influent structure in 2002.
- Removal of a one-meter filter press and addition of a 3000 dry pound per hour centrifuge.
- Fast track secondary by-pass to increase combined sewer flows to 40 MGD to primary treatment.
- Construction of a chlorination and dechlorination facility for secondary bypass and increased effluent pumping capacity is planned for 2004 bidding, and construction in 2005.

V. Permit Basis and Explanation of POTW Effluent Limitation Derivation.

Overview of Federal and State Regulations

Under Section 301(b)(1) of the Clean Water Act ("CWA"), publicly owned treatment works ("POTWs") were required to achieve effluent limitations based upon secondary treatment by July 1, 1977. The secondary treatment requirements are set forth at 40 C.F.R. Part 133.102. In addition, Section 301(b)(1)(c) of the CWA requires that effluent limitations based on water quality considerations be established for point source discharges when such limitations are necessary to meet state or federal water quality standards that are applicable to the designated receiving water.

Pursuant to 40 C.F.R. § 122.44 (d)(1), permittees must achieve water quality standards established under Section 303 of the Clean Water Act (CWA), including state narrative criteria for water quality. Additionally, under 40 C.F.R. § 122.44 (d)(1)(i), "Limitations must control all pollutants or pollutant parameters which the Director determines are or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any state water quality standard."

When determining whether a discharge causes, or has the reasonable potential to cause or contribute to an in-stream excursion above a narrative or numeric criterion, the permitting authority shall use procedures which account for existing controls on point and non-point sources of pollution, and where appropriate, consider the dilution of the effluent in the receiving water.

Water Quality Standards and Designated Use

The Connecticut River, the Chicopee River, Willimansett Brook, and Cooley Brook have been classified as Class B at the points of discharge according to the tables in the Massachusetts Surface Water Quality Standards, 314 Code of Massachusetts Regulations ("CMR"), Section 4.06. Section 4.05(3)(b) of The Massachusetts Surface Water Quality Standards describes Class B waters as having the following uses: *as a habitat for fish, other aquatic life, and wildlife, and for primary and secondary contact recreation. Where designated they shall be suitable as a source of public water supply with appropriate treatment. They shall be suitable for irrigation and other agricultural uses and for compatible industrial cooling and process uses. These waters shall have consistently good aesthetic value.*

Section 303(d) of the Federal Clean Water Act (CWA) requires states to identify those waterbodies that are not expected to meet surface water quality standards after the implementation of technology-based controls and, as such require the development of total maximum daily loads (TMDL).

The 1998, 303(d) report, in conjunction with the Massachusetts Year 2002 Integrated List of Waters (published September 2003), state that Connecticut River Segment MA34-05, Holyoke Dam, Holyoke/South Hadley to Connecticut state line, Longmeadow/Agawam (15.9 miles), is not attaining water quality standards for priority organics, pathogens, and suspended solids. The Chicopee River is not attaining water quality standards for pathogens in both Segment MA36-24 from the Wilbraham Pumping Station to Chicopee Falls (Miles 11.7 - 3.0) and Segment MA36-25 from Chicopee Falls to the confluence of the Connecticut River, Chicopee (Miles 3.0 - 0.0).

Primary and Secondary Contact Recreational Use While the communities of Chicopee, Holyoke, Springfield, and West Springfield are implementing CSO pollution abatement strategies, multiple CSOs currently discharge to this segment of the Connecticut River. The large volume and number of CSOs contributing pathogens in untreated combined sewage to this segment of the Connecticut River impairs the *Primary Contact Recreational Use*. In addition, because of these discharges, the Secondary Contact Recreational Use is assessed as partial support for this segment of the Connecticut River.

POTW limitations

Available Dilution

Water quality based limitations are established with the use of a calculated available dilution. Title 314 CMR 4.03(3)(a) requires that effluent dilution be calculated based on the receiving water 7Q10. The 7Q10 is the lowest observed mean river flow for 7 consecutive days, recorded over a 10 year recurrence interval. Additionally, the plant design flow is used to calculate available effluent dilution as required by 40 CFR §122.45(b).

The secondary plant design flow is 15.5 MGD or 28.1 Cubic Feet Per Second (CFS) as stated in Section A.6.a of the permit application. Attachment B of the current permit Fact Sheet lists the 7Q10 flow of the Connecticut River as 1,235 MGD. The 7Q10 flow in the current permit fact sheet was adjusted to account for the additional drainage area and contributing streams between the river gage and the Chicopee Treatment Plant.

Design flow dilution:

$$\frac{\text{plant design flow + 7Q10 river flow}}{\text{plant design flow}}$$

$$\frac{15.5 \text{ MGD} + 1{,}235 \text{ MGD}}{15.5 \text{ MGD}} = 81$$

Flow - The flow limit is based on the 15.5 MGD design flow of the secondary treatment plant as required by 40 CFR §122.45(b). The flow limit is now expressed as an annual average, rather than a monthly average as in the current permit. This change is being made to all POTW permits in Massachusetts at the request of MADEP. The purpose of this change is to allow some variation in POTW flows in response to wet weather, and in recognition that the flow rate used as the monthly average is in most cases presented in the treatment plant planning documents as an annual average.

As part of this change in how flow limits are written, MADEP and EPA agreed that mass limitations for BOD and TSS should be included as permit conditions to ensure that existing controls on mass discharges of BOD and TSS were maintained, in order to prevent degradation of the receiving water.

Conventional Pollutants

Biochemical Oxygen Demand (BOD_5) and Total Suspended Solids (nonfilterable) (TSS) - The draft permit includes proposed average monthly and average weekly BOD_5 and TSS limitations which are based on the secondary treatment requirements set forth at 40 C.F.R. §133.102(a)(1), (2), (3), and 40 CFR § 122.45(f). The concentration limits have been carried forward from previous permit for monthly average and the weekly average.

The MADEP shall no longer require a daily maximum BOD_5 or TSS limit as a certification requirement under the provisions of Section 401(d) of the CWA. The daily maximum limit shall be replaced with a reporting requirement.

BOD_5 and TSS Mass Loading Calculations:

Calculations of maximum allowable loads for average monthly and average weekly BOD_5 and TSS are based on the following equation.

L = C x DF x 8.34 Where,
L = Maximum allowable load in lbs/day
C = Maximum allowable effluent concentration for reporting period in mg/l
Reporting periods are average monthly and weekly.
DF = Design flow of facility in MGD
8.34 = Factor to convert effluent concentration in mg/l and design flow in MGD to lbs/day.

(Concentration limit) [30] X 8.34 (Constant) X 15.5 (design flow) = 3,878 lbs/day
1,745 kgs/day

(Concentration limit) [45] X 8.34 (Constant) X 15.5 (design flow) = 5,817 lbs/day
2,618 kgs/day

These BOD and TSS limits apply to the secondary effluent at the end of the pipe. The POTW, with the approval of MADEP and EPA has constructed a high-flow maximization bypass of secondary treatment at the treatment plant to reduce CSO volumes. This by-pass is not disinfected and is under review by EPA and MADEP in the draft Long Term Control Plan. Use of the bypass of secondary treatment is authorized in an Administrative Order. At present the permittee performs a mathematically calculated effluent on BOD and Suspended Solids concentration in regards to the by-pass during rain events. These calculated results are reported on the monthly DMRs.

Eighty-Five Percent (85%) BOD_5 and TSS Removal Requirement - the provisions of 40 CFR §133.102(3) require that the 30 day average percent removal for BOD_5 and TSS be not less than 85% as a monthly average. There are special considerations for combined sewer systems found at 40 CFR §133.103 which state: *(a) Combined sewers. Treatment works subject to this part may not be capable of meeting the percentage removal requirements established under Secs. 133.102(a)(3) and 133.102(b)(3), or Secs. 133.105(a)(3) and 133.105(b)(3) during wet weather where the treatment works receive flows from combined sewers (i.e., sewers which are designed to transport both storm water and sanitary sewage). For such treatment works, the decision must be made on a case-by-case basis as to whether any attainable percentage removal level can be defined, and if so, what the level should be.*

The current permit suspended the 85% removal requirement. EPA shall continue to suspend the 85% removal requirement. EPA shall revisit the percent removal requirements at the next permit reissuance.

Settleable Solids - The 1995 permit required daily monitoring for settleable solids, and required the permittee to report the weekly average and daily maximum of each month. Low levels of this pollutant do not represent a water quality concern, but are intended as a measure of operational control for the facility. A review of the Discharge Monitoring Reports indicate that the discharge occasional contains settle solids in measurable amounts. For this reason, the monitoring requirement has been retained in this draft permit.

pH - The draft permit includes pH limitations which are required by state water quality standards, and are at least as stringent as pH limitations set forth at 40 C.F.R. §133.102(c). Tittle 314, Code of Massachusetts regulations, Part 4.05(3)(b)(3) states that the pH for Class B waters shall be in range of 6.5 to 8.3 standard units (S.U.). The limit is carried forward from the current permit.

In a June 6, 2002 letter, the permittee requested that the range of pH limits be reduced because the discharge is occasionally lower than 6.5 due to natural causes and the nature of the secondary treatment process. The Unox pure oxygen secondary treatment system yields dissolved oxygen concentrations which causes the production of carbonic acid as a byproduct. Also, acid rain contributions from storm water runoff and the limited buffering capacity of the drinking water supply contribute to low influent pH. Due to this, the POTW can experience pH excursions of the 6.5 lower limit. As these conditions cannot be controlled by the POTW, the permittee requested the lower limit be established as 5.8.

The pH limits in the draft permit have been set at a range of 6.0 to 8.3 S.U. The lower limit is established in accordance with the secondary treatment regulations at 40 CFR Part 133.102(c). EPA and MADEP believe that discharges at this limit will not cause or contribute to violations of water quality standards, and do not constitute backsliding or degradation of receiving waters. According to 40 CFR Part 133.102(c), this limit cannot be further lowered unless the permittee *demonstrates that (1) inorganic chemicals are not added to the waste stream as part of the treatment process; and (2) contributions from industrial sources do not cause the pH of the effluent to be less than 6.0 or greater than 9.0* (see 40 CFR Part 133.102(c)). The upper limit remains at 8.3 S.U. since it has been consistently achieved.

Fecal Coliform Bacteria - The draft permit includes fecal coliform bacteria limitations which are required by state water quality standards, Tittle 314, CMR, Part 4.05(b)(4)(b) for class B waters.

Toxic Pollutants

A review of treatment facility effluent Discharge Monitoring Report data submitted to date was conducted to determine if there is a reasonable potential for the discharge of any pollutants to cause or contribute to an exceedance of State Water Quality Standards. Where such a "reasonable potential" or an actual exceedance exists, 40 CFR §122.44(d)(1)(i) requires that the pollutant be limited. The reasonable potential analysis is calculated using EPA's Quality Criteria for Water, as adopted by the DEP into the state water quality standards, and as revised in the Federal Register: December 27, 2002 (Volume 67, Number 249). Additionally, EPA conducted a review of chemical specific effluent concentration data for toxic pollutants submitted in the permit application, the pretreatment annual reports, and whole effluent toxicity reports. All effluent concentrations were below the "reasonable potential" threshold for which permit limits are required.

Total Residual Chlorine (TRC) - The draft permit includes total residual chlorine limitations which are based on state water quality standards. Chlorine compounds produced by the chlorination of wastewater can be extremely toxic to aquatic life. The water quality standards established for chlorine are 19 ug/l daily maximum (Criterion Maximum Concentration) and 11 ug/l (Criterion Continuous Concentration) monthly average in the receiving water. Given a dilution factor of 81, the total residual chlorine limitations have been calculated as 1.5 mg/l daily

maximum and 0.89 mg/l monthly average.

Total Residual Chlorine Limitations:

(acute criteria x dilution factor) = Acute (Maximum Daily Limit)
(19 ug/l x 81) = 1539 ug/l = 1.5 mg/l

(chronic criteria x dilution) = Chronic (Monthly Average Limit)
(11 ug/l x 81) = 891 ug/l = 0.89 mg/l

The monthly average TRC limit has been established as 0.89 mg/l, but the maximum daily TRC limit has been established as 1.0 mg/l based on a Best Professional Judgement decision that this value is the maximum concentration allowable. These limits remain unchanged from the current permit.

Whole Effluent Toxicity (WET) - Under Section 301(b)(1)(C) of the CWA, discharges are subject to effluent limitations based on water quality standards. The Massachusetts Surface Water Quality Standards include the following narrative statement and requires that EPA criteria established pursuant to Section 304(a)(1) of the CWA be used as guidance for interpretation of the following narrative criteria: All surface waters shall be free from pollutants in concentrations or combinations that are toxic to humans, aquatic life or wildlife.

National studies conducted by the EPA have demonstrated that domestic sources, as well as industrial sources, contribute toxic constituents to POTWs. These constituents include metals, chlorinated solvents, aromatic hydrocarbons and others. Based on the potential for toxicity from domestic and industrial contributions, the state narrative water quality criterion, the level of dilution at the discharge location, and in accordance with EPA national and regional policy and 40 C.F.R. § 122.44(d), the draft permit includes a whole effluent acute toxicity (LC50) limitation. (See also "Policy for the Development of Water Quality-Based Permit Limitations for Toxic Pollutants", 49 Fed. Reg. 9016 March 9, 1984, and EPA's "Technical Support Document for Water Quality-Based Toxics Control", September, 1991.)

The Massachusetts Department of Environmental Protection's Division of Watershed Management has a current toxics policy which requires toxicity testing for all major dischargers such as the City of Chicopee WPCF. In addition, EPA recognizes that toxicity testing is required to assure that the synergistic effect of the pollutants in the discharge does not cause toxicity, even though the pollutants may be at low concentrations in the effluent. Thus, the draft permit includes a whole effluent toxicity limitation requirement for the outfall 010, to assure that the facility does not discharge combinations of toxic compounds into the Connecticut River in amounts which would affect aquatic or human life.

The September 25, 1990 NPDES permit required WET testing for two aquatic species, daphnia and Fathead Minnow. Since violations showed that the Fathead Minnow was the more sensitive species, the daphnia species was eliminated during the 1995 reissuance and WET testing for the Fathead Minnow continues at four times per year. Testing was instructed to be conducted on the second Tuesday of the months of May, August, November and February.

In a June 6, 2002 letter, the permittee submitted a request for a reduction WET test frequency from four per year to biannually. A review of the WET data listed in Fact Sheet Attachment A shows no toxicity in the last 16 test dates. EPA has reduced the WET test frequency in the draft permit from four to twice per year.

The draft permit includes requirements for quarterly 48 hour Acute toxicity tests using the species Pimphales promelas (fathead minnow). The tests must be performed in accordance with the test procedures and protocols specified in **Permit Attachment A**. The tests will be conducted twice per year, during the second week of May and August. The LC_{50} of $\geq$100% is established by EPA/MADEP policy for facilities with greater than 20:1 and less than 100:1 dilution.

Monitoring Frequency - The current 1995 permit requires daily monitoring for BOD_5, TSS, Settleable Solids, pH, and three times per day for Chlorine. In a June 6, 2002 letter, the permittee requested a reduction in frequency from once per day to five per week for BOD_5, TSS, Settleable Solids, and pH. In addition, the permitte requested that chlorine be sampled three times per day during the week, and once per day on the weekend and holidays. After viewing the DMR data listed in Fact Sheet Atttachment A, EPA has reduced the monitoring frequency in this draft permit for BOD_5, TSS, Settleable Solids, pH to five times per week. The monitoring for chlorine has been reduced to three times per day, Monday through Friday, and once per day on weekends and holidays.

VI. Industrial Pretreatment Program

The permittee is required to administer a pretreatment program based on the authority granted under 40 CFR §122.44(j), 40 CFR Part 403 and section 307 of the Act. The Permittee's pretreatment program received EPA approval on June 24, 1985 and, as a result, appropriate pretreatment program requirements were incorporated into the previous permit which were consistent with that approval and federal pretreatment regulations in effect when the permit was issued.

The Federal Pretreatment Regulations in 40 CFR Part 403 were amended in October 1988, and again in July 1990. Those amendments established new requirements for implementation of pretreatment programs. Upon reissuance of this NPDES permit, the permittee is obligated to modify its pretreatment program to be consistent with current Federal Regulations. Those activities that the permittee must address include, but are not limited to, the following: (1) develop and enforce EPA approved specific effluent limits (technically-based local limits); (2) revise the local sewer-use ordinance or regulation, as appropriate, to be consistent with Federal

Regulations; (3) develop an enforcement response plan; (4) implement a slug control evaluation program; (5) track significant noncompliance for industrial users; and (6) establish a definition of and track significant industrial users.

These requirements are necessary to ensure continued compliance with the POTW's NPDES permit and its sludge use or disposal practices.

In addition to the requirements described above, the draft permit requires the permittee to submit to EPA in writing, within 180 days of the permit's effective date, a description of proposed changes to permittee's pretreatment program deemed necessary to assure conformity with current federal pretreatment regulations. These requirements are included in the draft permit to ensure that the pretreatment program is consistent and up-to-date with all pretreatment requirements in effect. Lastly, the permittee must continue to submit, annually by March 1, a pretreatment report detailing the activities of the program for the twelve month period ending 60 days prior to the due date.

VII. Combined Sewer Overflows (CSOs)

1. **Background**

As mentioned previously, there are currently 22 Combined Sewer Overflows (CSOs) from the collection system, which discharge overflow from 34 regulators. Since the last permitting action, CSO numbers 023 and 039 were eliminated and the discharge from regulator 026-II was also eliminated. Two new CSOs, numbered 042 and 043, which were discovered since the last permit was issued have been added to the draft permit.

Combined Sewer Overflows (CSOs) are overflows from a combined sewer system that are discharged into a receiving water without going to the headworks of a publicly owned treatment works (POTWs). CSOs occur when the flow in the combined sewer system exceeds interceptor or regulator capacity. CSOs are distinguished from bypasses which are "intentional diversions of waste streams from any portion of a treatment facility" (40 CFR §122.41(m)).

Flows in combined sewers can be classified into two categories: wet weather flow and dry weather flow. Wet weather flow is a combination of domestic, commercial, and industrial sewage, infiltration from groundwater, and storm water flow including snow melt. Dry weather flow is the flow in a combined sewer that results from domestic sewage, groundwater infiltration and commercial industrial wastes with no contribution from storm water runoff or storm water induced infiltration.

Dry weather overflows from CSOs are illegal. They must be reported immediately to EPA and the MADEP and eliminated as expeditiously as possible.

The objectives of the National CSO Control Policy are:

1) To ensure that if the CSO discharges occur, they are only as a result of wet weather,

2) To bring all wet weather CSO discharge points into compliance with the technology based requirements of the CWA and applicable federal and state water quality standards, and

3) To minimize water quality, aquatic biota, and human health impacts from wet weather flows.

2. **Effluent Standards**

CSOs are point sources subject to NPDES permit requirements for both water quality based and technology based requirements but are not subject to secondary treatment regulations applicable to publicly owned treatment works.

Section 301(b)(1)(C) of the Clean Water Act (CWA) of 1977 mandated compliance with water quality standards by July 1, 1977. Technology based permit limits must be established for best conventional pollutant control technology (BCT) and best available technology economically achievable (BAT) based on best professional judgment (BPJ) in accordance with Section 301(b) and Section 402(a) of the Water Quality Act Amendments of 1987 (WQA).

3. **Conditions for Discharge**

The draft permit prohibits dry weather discharges from the CSOs listed in Attachment D of the draft permit. During wet weather, the discharges must not cause any exceedance of water quality standards. Dry weather discharges must be reported immediately to EPA and the MADEP. Wet weather discharges must be monitored and reported as specified in the permit.

In its permit application the City asked that the draft permit include language which clarified the definition of dry weather overflows. The City is concerned that: 1) there may be precipitation-caused surges of flow in the collection system for up to 2 hours after the end of the precipitation event, which should be considered wet weather even though precipitation has ended and 2) despite its best efforts to inspect all CSO regulators following storm events, some regulators may have small overflows after precipitation has ceased due to storm related debris. The City is especially concerned regarding its leaping weir regulators, since a small amount of debris may form a "bridge" to allow flows into the overflow, and these diversion cannot be seen until after the wet weather flows have subsided. In response to these concerns EPA has included the definitions of wet and dry weather flow into the draft permit. It is clear that wet weather flows included storm water runoff and dry weather flows do not. Therefore, an overflow that includes storm water runoff is a wet weather overflow, regardless of whether there is precipitation at the time. This should address the permittee's first concern.

EPA has not addressed the second concern in the permit. If the City locates and corrects occasional small overflows shortly after wet weather flows subside we believe that EPA or MADEP would exercise enforcement discretion and not initiate enforcement action.

4. **Nine Minimum Controls (NMC)**

The permittee must comply with BPJ derived BCT/BAT controls, which at a minimum include the following: (1) proper operation and maintenance of the sewer system and outfalls; (2) maximum use of the collection systems for storage; (3) review pretreatment programs to assure CSO impacts are minimized; (4) maximization of flow to the POTW for treatment; (5) prohibition of dry weather overflows; (6) control of solid and floatable materials in the discharge; (7) pollution prevention programs which focus on contaminant reduction activities; (8) public notification to ensure that the public receives adequate notification of CSO occurrences and CSO impacts; and (9) monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.

5. **Nine Minimum Controls Documentation**

The permittee submitted documentation for the Nine Minimum Controls entitled *Nine Minimum Controls (NMC) Compliance Report, Department of Public Works, City of Chicopee, Massachusetts*, dated March 16, 1998. The draft permit requires continued implementation of the NMCs and requires an annual report which includes a description of changes to the NMC program.

6. **Reopener/Additional CSO Control Measures**

The draft permit requires an annual certification, **no later than January 15th of each year**, that states that all discharges from combined sewer outfalls were recorded, and other appropriate records and reports maintained for the previous calendar year.

The permit may be modified or reissued upon the approval of a long-term CSO control plan which was submitted to EPA in December 2001. Such modification may include performance standards for the selected controls, a post construction water quality assessment program, monitoring for compliance with water quality standards, and a reopener clause to be used in the event that the selected CSO controls fail to meet water quality standards. Section 301(b)(1)(C) requires that a permit include limits that may be necessary to protect water quality standards.

7. **Required Treatment**

EPA's national CSO policy ("CSO policy"), which was published in the Federal Register on April 19, 1994 (59 FR 18688), states: ***Permittees with CSOs are responsible for developing and implementing long-term CSO control plans that will ultimately result in compliance with the requirements of the CWA.*** *The long-term plans should consider the site-specific nature of CSOs and evaluate the cost effectiveness of a range of control options/strategies. The development of a long-term CSO control plan and its subsequent implementation should also be coordinated with the NPDES authority and state authority responsible for reviewing and revising the State's WQS* [Water Quality Standards].

The selected controls should be designed to allow cost effective expansion or cost effective retrofitting if additional controls are subsequently determined necessary to meet WQS, including designated uses.

EPA issued an administrative order to the City on June 3, 1999 which required, among other things, the completion of a CSO Long-Term Control Plan (LTCP).

The City submitted a draft CSO LTCP during December 2001. The recommended plan has a total cost of 142 million dollars; approximately 130 million dollars of that cost will be for sewer separation projects; the remaining projects include a 9.1 million dollar satellite CSO treatment facility serving outfall 24, and 2 million dollars to upgrade the treatment plant to provide disinfection of flow bypassing secondary treatment and providing effluent pumping capacity for 40 MGD. EPA plans to require implementation of the necessary CSO abatement facilities through an appropriate enforcement mechanism, rather than in the NPDES permit; and anticipates phasing the construction of the recommended projects to maximize the environmental benefit of projects. Specific requirements regarding the operation of the CSO-related bypass of secondary treatment at the POTW will also be included in an enforcement mechanism.

OUTFALL 011

As discussed previously, this outfall discharges treated storm water, and is not a CSO. The existing permit established quarterly monitoring requirements for Flow, TSS, BOD, Oil and Grease, and pH. In addition, the existing 1995 permit listed this same outfall as number 041 on the list of authorized CSOs in Fact Sheet permit Attachment A.

In a June 6, 2002 letter, the permittee requested that the effluent monitoring which was imposed on Outfall 011 be eliminated due to: (1) monitoring showed minimal discharges of pollutants, and (2) the logistics of sampling during a storm event, while getting permission from the Westover Air Reserve base in advance.

EPA reviewed the data that was collected and has determined that future sampling of the storm water is not needed. However, the permittee shall perform a visual inspection of outfall 011 on a quarterly basis and shall perform routine maintenance on outfall 011 on an annual basis.

This draft permit has added monitoring requirements for outfall 011 in Part I.E., has removed outfall 011 from the list of authorized discharges in Permit Attachment D, and has removed outfall 041 which represents the same outfall.

VIII. UNAUTHORIZED DISCHARGES; BYPASSES

The draft permit prohibits bypasses unless all of the following conditions occur: (1) bypass was unavoidable to prevent loss of life, severe injury, or severe property damage; (2) there were no feasible alternatives to the bypass (e.g., adequate backup equipment, auxiliary treatment facilities, maintenance, etc.); and (3) the permittee submitted notice of the need for an anticipated bypass at least 10 days prior to the bypass, within 24 hours from the time the permittee became aware of the discharges to be followed by a written submission within 5 days of discovery.

As described in Section VII.1, CSO are not considered bypasses. As also noted in this fact sheet, EPA has authorized, in an administrative order, the bypass of secondary treatment facilities under certain high flow conditions. This authorization is considered an important mitigation measure to reduce the discharge through CSOs pending completion of CSO abatement facilities. The draft permit does not specifically authorize the "CSO-related bypass" since such discharge may only be authorized in a NPDES permit following completion of a final CSO LTCP which includes a demonstration by the permittee that there are no feasible alternatives to the bypass.

Pursuant to 40 C.F.R. § 122.41(e), the draft permit also requires the permittee to operate and improve its POTW and total sewer system to minimize the discharge of pollutants from bypasses or CSOs. The draft permit requires that the Chicopee WPCF minimize infiltration/inflow to its separate sewer system.

The permittee is authorized to discharge only in accordance with the terms and conditions of this permit and only from Outfall 010 and outfalls listed in Permit Attachment D. Discharges of wastewater from any other point sources are not authorized under this permit, but shall be reported in accordance with Part II.B.4 (Bypass) of this permit.

IX. SLUDGE CONDITIONS

Section 405(d) of the CWA requires that EPA develop technical regulations regarding the use and disposal of sewage sludge. These regulations are found at 40 CFR part 503 and apply to any facility engaged in the treatment of domestic sewage. The CWA further requires that these conditions be implemented through permits. The sludge conditions in the draft permit are intended to implement these regulations.

New England Organics Company disposes sludge for the City of Chicopee. The City generates approximately 1588 dry tons annually (Section B.1, Application Form 2-S). Domestic sludges which are disposed of in municipal solid waste landfills are in compliance with Part 503 regulations provided the sludge meets the quality criteria of the landfill and the landfill meets the requirements of 40 CFR Part 258.

The draft permit requires that sewage sludge use and disposal practices meet the CWA Section 405(d) Technical Standards. In addition, EPA New England has included with the draft permit a 72-page Sludge Compliance Guidance document for use by the permittee in determining their appropriate sludge conditions for their chosen method of sludge disposal.

The permittee is also required to submit to EPA an annual report containing the information specified in the Sludge Compliance Guidance Document for the permittee's chosen method of sludge disposal.

XI. ANTIBACKSLIDING

Anti-backsliding as defined at 40 CFR §122.44(l)(1) requires reissued permits to contain limitations as stringent or more stringent than those of the previous permit unless the circumstances allow application of one of the defined exceptions to this regulation. Anti-backsliding does not apply when changes to limits are based on new information not available at the time of the previous permit reissuance (40 CFR §122.44(l)(2)(i)(B)(1)) or when limits are changed as a result of material and substantial additions or alterations to the permitted facility which occurred after permit issuance which justify the application of less stringent limitations, as defined at 40 CFR § 122.44(l)(2)(i)(A). The treatment has increased the wet weather capacity of the primary treatment and disinfection system. These represent "material and substantial additions or alterations".

XII. ANTIDEGRADATION

The Massachusetts Antidegradation Policy is found at Title 314 CMR 4.04. All existing uses of the, and must be protected. This draft permit is being reissued with similar parameter coverage and no change in outfall location. The plant wet weather expansion captures additional untreated combined sewer overflows discharged to the Connecticut and Chicopee Rivers. The increased plant discharge of previously untreated effluent will result in a net decrease in direct and indirect pollutant loadings to the Connecticut and Chicopee Rivers. The capture and treatment of flows from the Cooley and Willimansett Brooks will likewise provide a net improvement to the Connecticut and Chicopee Rivers. The public is invited to participate in the antidegradation finding through the permit public notice procedures.

XIII. ESSENTIAL FISH HABITAT

Under the 1996 Amendments (PL 104-267) to the Magnuson-Stevens Fishery Conservation and Management Act (16 U.S.C. § 1801 et seq.(1998)), EPA is required to consult with the National Marine Fisheries Service (NMFS) if EPA's action or proposed actions that it funds, permits, or undertakes, "may adversely impact any essential fish habitat," 16 U.S.C. § 1855(b). The Amendments broadly define "essential fish habitat" (EFH) as: "waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity," 16 U.S.C. § 1802(10). "Adverse impact" means any impact which reduces the quality and/or quantity of EFH, 50 C.F.R. § 600.910(a). Adverse effects may include direct (e.g., contamination or physical disruption), indirect (e.g., loss of prey, reduction in species' fecundity), site-specific or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions. Id.

Essential fish habitat is only designated for fish species (Atlantic Salmon) for which federal Fisheries Management Plans exist. 16 U.S.C. § 1855(b)(1)(A). EFH designations for New England were approved by the U.S. Department of Commerce on March 3, 1999.

The Connecticut and Chicopee Rivers in the vicinity of Chicopee are designated essential fish habitat (EFH) for Atlantic Salmon. Based on the CSO long term control planning, as well as effluent limitations and other permit requirements identified in this Fact Sheet that are designed to be protective of all aquatic species, including those with designated EFH, EPA has determined that a formal EFH consultation with NMFS is not required because the proposed discharge will not adversely impact EFH.

XIV. COASTAL ZONE MANAGEMENT (CZM) CONSISTENCY REVIEW

40CFR §122.49 (d) states: *The Coastal Zone Management Act, 16 U.S.C. 1451 et seq. section 307(c) of the Act and implementing regulations (15 CFR part 930) prohibit EPA from issuing a permit for an activity affecting land or water use in the coastal zone until the applicant certifies that the proposed activity complies with the State Coastal Zone Management program, and the State or its designated agency concurs with the certification (or the Secretary of Commerce overrides the State's nonconcurrence).*

The Chicopee discharges are not within the defined CZM boundaries and is not subject to CZM continency review.

XV. ENDANGERED SPECIES ACT CONSULTATION

Section 7(a) of the Endangered Species Act of 1973, as amended (“Act") grants authority to and imposes requirements upon Federal agencies regarding endangered or threatened species of fish, wildlife, or plants (“listed species") and habitat of such species that has been designated as critical (“critical habitat").

Section 7(a)(2) of the Act requires every Federal agency, in consultation with and with the assistance of the Secretary of the Interior, to insure that any action it authorizes, funds, or carries out, in the United States or upon the high seas, is not likely to jeopardize the continued existence of any listed species or results in the destruction or adverse modification of critical habitat. The National Marine Fisheries Service (NMFS) administers Section 7 consultations for marine species.

The Shortnose Sturgeon (*Acipenser brevirostrum*) and the Dwarf Wedgemussel (*Alasmidonta Heterodon*) are categorized as Federally Listed Endangered. This information was obtained from the Endangered Species List, on EPA’s web page.
http://www.epa.gov/OW-OWM.html/esalst2.htm

XVI. MONITORING AND REPORTING

The permittee is obligated to monitor and report sampling results to EPA and the MADEP within the time specified within the permit. The effluent monitoring requirements have been established to yield data representative of the discharge by the authority under Section 308(a) of the CWA in accordance with 40 CFR 122.41(j), 122.44, and 122.48.

The remaining general and special conditions of the permit are based on the NPDES regulations 40 CFR Parts §122 through §125 and consist primarily of management requirements common to all permits.

XVII. STATE PERMIT CONDITIONS

The NPDES Permit is issued jointly by the U. S. Environmental Protection Agency and the Massachusetts Department of Environmental Protection under federal and state law, respectively. As such, all the terms and conditions of the permit are, therefore, incorporated into and constitute a discharge permit issued by the MADEP Commissioner who designates signature authority to the Director of the Division of Watershed Management pursuant to M.G.L. Chap. 21, §43.

XVIII. GENERAL CONDITIONS

The general conditions of the permit are based on 40 C.F.R. Parts 122, Subparts A and D and 40 C.F.R. § 124, Subparts A, D, E, and F and are consistent with management requirements common to other permits.

XIX. STATE CERTIFICATION REQUIREMENTS

The staff of the Massachusetts Department of Environmental Protection ("MADEP") has reviewed the draft permit. EPA has requested permit certification by the State pursuant to 40 C.F.R. § 124.53 and expects that the draft permit will be certified.

XX. PUBLIC COMMENT PERIOD AND PROCEDURES FOR FINAL DECISION

All persons, including applicants, who believe any condition of the draft permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period, to **Jonathan Britt, the U.S. EPA, One Congress Street, Suite 1100, Mail Code CPE, Boston, Massachusetts 02114-2023 and Paul Hogan, Department of Environmental Protection, Division of Watershed Management, 627 Main Street, 2nd Floor, Worcester, MA 01608.** Any person, prior to such date, may submit a request in writing for a public hearing to consider the draft permit to EPA and the State Agency. Such requests shall state the nature of the issues proposed to be raised in the hearing. Public hearings may be held after at least thirty days public notice whenever the Regional Administrator finds that response to this notice indicates a significant public interest. In

reaching a final decision on the draft permit, the Regional Administrator will respond to all significant comments and make these responses available to the public at EPA's Boston office.

Following the close of the comment period, and after a public hearing, if such hearing is held, the Regional Administrator of EPA and the Director of DEP/DWM will issue a final permit decision and forward a copy of the final decision to the applicant and each person who has submitted written comments or requested notice.

XXI. EPA CONTACT

Additional information concerning the draft permit may be obtained between the hours of 9:00 a.m. and 5:00 p.m., Monday through Friday, excluding holidays from:

Jonathan Britt
US Environmental Protection Agency
Office of Ecosystem Protection
One Congress Street
Suite 1100 (CPE)
Boston, Massachusetts 02114-2023
Telephone: 617-918-1563
fax: 617-918-0563
e-mail: britt.jonathan@epa.gov

October 20, 2004
Date

Linda M. Murphy, Director*
Office of Ecosystem Protection
U.S. Environmental Protection Agency

* Comments should be addressed to both Jonathan Britt and Paul Hogan, not Linda M. Murphy.

ATTACHMENT B
City Of Chicopee MA0101508
Summary Of NPDES Permit Reporting Dates

Permit Page	Requirement and Dates
3-4	Whole Effluent Toxicity Test results are due, **March 31st and September 30th of each year.**
6	Within **120 days of the effective date of this permit**, the permittee shall prepare and submit a written technical evaluation to the EPA analyzing the need to revise local limits.
7	**By March 1st of each year**, the permittee will submit an annual report describing pretreatment program activities.
8	The permittee shall develop and implement a plan to control infiltration and inflow (I/I) to the separate sewer system. The plan shall be **submitted to EPA and MA DEP within six months of the effective date of this permit**.
9	A summary report of all actions taken to minimize I/I during the previous calendar year shall be **submitted to EPA and the MA DEP annually, by the anniversary date of the effective date of this permit**.
12	**Within 3 months of the effective date of this permit**, the permittee will submit a CSO monitoring plan to EPA and MADEP for approval... The permittee shall install and maintain identification signs...
12	**By April 30 of 2004 and by April 30 each year thereafter,** the permittee shall submit a report which includes the following information; a. Activation frequency and discharge volume for each CSO during the previous calendar year...
15	The permittee shall submit an **annual report** containing the information specified in the sludge guidance **on or before February 19.**
15	Monitoring results obtained during the previous month shall be summarized for **each month** and reported on separate Discharge Monitoring Report Form(s) postmarked **no later than the 15th day of the month following the effective date of the permit.**

Figure A

Water flow diagram from Application

ATTACHMENT A
City Of Chicopee MA0101508
Discharge Monitoring Report Data

PIPE: 010A TREATMENT PLANT EFFLUENT Parameter: BOD, 5-DAY UNITS: MG/L

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
11/30/95				0	0	14	15.5	24	0	0	0
12/31/95				0	0	17	19.7	38	0	0	0
01/31/96				0	0	22	27	42	0	0	0
02/29/96				0	0	23	23	42	0	0	0
03/31/96				0	0	24	31	43	0	0	0
04/30/96				0	0	25	26.8	33	0	0	0
05/31/96				0	0	18	21	30	0	0	0
06/30/96				0	0	21	23.4	33	0	0	0
07/31/96				0	0	18	22	43	0	0	0
08/31/96				0	0	20	22	41	0	0	0
09/30/96				0	0	18	20.3	25	0	0	0
10/31/96				0	0	14	16	22	0	0	0
11/30/96				0	0	21	27	45	0	0	0
12/31/96				0	0	19	26	41	0	0	0
01/31/97				0	0	21	21.5	27	0	0	0
02/28/97				0	0	24	27	42	0	0	0
03/31/97				0	0	21	25	37	0	0	0
04/30/97				0	0	15	17.5	36	0	0	0
05/31/97				0	0	12	15	21	0	0	0
06/30/97				0	0	11	13	21	0	0	0
07/31/97				0	0	15	18	25	0	0	0
08/31/97				0	0	18	24	40	0	0	0
09/30/97				0	0	14	22	42	0	0	0
10/31/97				0	0	18	21.3	52	0	0	4
11/30/97				0	0	14	22	25	0	0	0
12/31/97				0	0	20	24	40	0	0	0
06/30/01				0	0	8	12.2	27	0	0	0
01/31/98				0	0	22	28	36	0	0	0
02/28/98				0	0	21	21.4	25	0	0	0
03/31/98				0	0	22	23	31	0	0	0
04/30/98				0	0	22	25	46	0	0	0
05/31/98				0	0	20	25	35	0	0	0

06/30/98	0	0	11	15.8	27	0	0	0
07/15/98	0	0	11	15.8	27	0	0	0
07/31/98	0	0	11	12.1	20	0	0	0
08/31/98	0	0	15	17	37	0	0	0
09/30/98	0	0	16	20.5	30	0	0	0
10/31/98	0	0	19	24	32	0	0	0
11/30/98	0	0	22	28.3	63	0	0	26
12/31/98	0	0	18	19	29	0	0	0
01/31/99	0	0	33	39	82	10	0	64
02/28/99	0	0	29	42	52	0	0	4
03/31/99	0	0	18	28	33	0	0	0
04/30/99	0	0	12	13.8	24	0	0	0
05/31/99	0	0	13	14.8	32	0	0	0
06/30/99	0	0	14	15	31	0	0	0
07/31/99	0	0	11	14.7	24	0	0	0
08/31/99	0	0	9.0	11	16	0	0	0
09/30/99	0	0	11	13	33	0	0	0
10/31/99	0	0	13	17	33	0	0	0
11/30/99	0	0	14	15.4	36	0	0	0
12/31/99	0	0	14	17.7	24	0	0	0
01/31/00	0	0	18	19.8	26	0	0	0
02/29/00	0	0	20	27	52	0	0	4
03/31/00	0	0	15	19	35	0	0	0
04/30/00	0	0	13	13.7	25	0	0	0
05/31/00	0	0	12	13.5	21	0	0	0
06/30/00	0	0	12	13.3	29	0	0	0
07/31/00	0	0	14	16.3	25	0	0	0
08/31/00	0	0	9	13.2	32	0	0	0
09/30/00	0	0	11	11.71	20	0	0	0
10/31/00	0	0	11	14	19	0	0	0
11/30/00	0	0	16	18.91	54	0	0	8
12/31/00	0	0	15	22.7	51	0	0	2
01/31/01	0	0	17	24	39	0	0	0
02/28/01	0	0	17	18.1	30	0	0	0
03/31/01	0	0	15	17.5	24	0	0	0
04/30/01	0	0	11	13.75	26	0	0	0
05/31/01	0	0	12	13.43	27	0	0	0
07/31/01	0	0	10	13.67	29	0	0	0
09/30/01	0	0	13	13.57	24	0	0	0
08/31/01	0	0	14	18.43	40	0	0	0
10/31/01	0	0	14	15.29	21	0	0	0
11/30/01	0	0	15	22.14	27	0	0	0
12/31/01	0	0	21	28	33	0	0	0
01/31/02	0	0	27	33	67	0	0	34
02/28/02	0	0	18	21.4	28	0	0	0

03/31/02	0	0	15	17.6	30	0	0	0
04/30/02	0	0	16	19	29	0	0	0
05/31/02	0	0	17	23	40	0	0	0
06/30/02	0	0	16	18	26	0	0	0
07/31/02	0	0	16	19	34	0	0	0
08/31/02	0	0	20	21.7	48	0	0	0
09/30/02	0	0	21	23.5	31	0	0	0
10/31/02	0	0	20	24.9	38	0	0	0
11/30/02	0	0	21	26	45	0	0	0
12/31/02	0	0	18	23.4	26	0	0	0
01/31/03	0	0	23	24.3	75	0	0	50
02/28/03	0	0	21	25	59	0	0	18
03/31/03	0	0	26	34.4	133	0	0	166
04/30/03	0	0	16	19.4	30	0	0	0
05/31/03	0	0	20	21.43	44	0	0	0
06/30/03	0	0	14	16	31	0	0	0
07/31/03	0	0	20	25	53	0	0	6
08/31/03	0	0	26	29.6	50	0	0	0
09/30/03	0	0	25	30	39	0	0	0
10/31/03	0	0	16	18	29	0	0	0
11/30/03	0	0	16	20	36	0	0	0
12/31/03	0	0	15	16.7	25	0	0	0
01/31/04	0	0	20	23.3	40	0	0	0

PIPE: 010A TREATMENT PLANT EFFLUENT PARAMETER: PH UNITS: SU

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
11/30/95				0	0	6.3		7.7	3	0	0
12/31/95				0	0	6.3		6.8	3	0	0
01/31/96				0	0	6.3		7.0	3	0	0
02/29/96				0	0	6.3		7	3	0	0
03/31/96				0	0	6.4		7	2	0	0
04/30/96				0	0	6.1		6.8	6	0	0
05/31/96				0	0	6.2		6.8	5	0	0
06/30/96				0	0	6.2		7.3	5	0	0
07/31/96				0	0	5.9		6.7	9	0	0
08/31/96				0	0	6.0		6.6	8	0	0
09/30/96				0	0	6.1		6.8	6	0	0
10/31/96				0	0	6.2		6.7	5	0	0
11/30/96				0	0	6.2		7.0	5	0	0
12/31/96				0	0	6.3		7.0	3	0	0
01/31/97				0	0	6.3		6.8	3	0	0

02/28/97	0	0	6.3	6.9	3	0	0
03/31/97	0	0	6.3	6.7	3	0	0
04/30/97	0	0	6.1	6.7	6	0	0
05/31/97	0	0	6.6	7.0	0	0	0
06/30/97	0	0	6.0	6.6	8	0	0
07/31/97	0	0	5.7	6.8	12	0	0
08/31/97	0	0	6.0	6.7	8	0	0
09/30/97	0	0	6.2	6.5	5	0	0
10/31/97	0	0	5.9	6.9	9	0	0
11/30/97	0	0	6.1	6.9	6	0	0
12/31/97	0	0	6.3	6.6	3	0	0
06/30/01	0	0	6.4	7.3	2	0	0
01/31/98	0	0	6.3	6.9	3	0	0
02/28/98	0	0	6.4	6.9	2	0	0
03/31/98	0	0	6.5	6.8	0	0	0
04/30/98	0	0	6.4	6.7	2	0	0
05/31/98	0	0	6.3	7.0	3	0	0
06/30/98	0	0	6.3	7.0	3	0	0
07/15/98	0	0	6.3	7.0	3	0	0
07/31/98	0	0	6.1	7.1	6	0	0
08/31/98	0	0	6.1	7.0	6	0	0
09/30/98	0	0	6.3	6.8	3	0	0
10/31/98	0	0	6.3	6.8	3	0	0
11/30/98	0	0	6.3	6.7	3	0	0
12/31/98	0	0	6.2	6.8	5	0	0
01/31/99	0	0	6.1	6.9	6	0	0
02/28/99	0	0	5.9	6.9	9	0	0
03/31/99	0	0	5.9	6.8	9	0	0
04/30/99	0	0	6.1	6.8	6	0	0
05/31/99	0	0	6.5	6.9	0	0	0
06/30/99	0	0	6.3	6.8	3	0	0
07/31/99	0	0	6.3	6.7	3	0	0
08/31/99	0	0	6.2	7.0	5	0	0
09/30/99	0	0	6.3	6.9	3	0	0
10/31/99	0	0	6.2	7.0	5	0	0
11/30/99	0	0	6.1	6.7	6	0	0
12/31/99	0	0	6.0	6.9	8	0	0
01/31/00	0	0	5.9	6.6	9	0	0
02/29/00	0	0	6.0	6.7	8	0	0
03/31/00	0	0	6.2	7.1	5	0	0
04/30/00	0	0	6.0	7.0	8	0	0
05/31/00	0	0	6.3	6.9	3	0	0
06/30/00	0	0	6.4	7.0	2	0	0
07/31/00	0	0	6.3	6.9	3	0	0
08/31/00	0	0	6.3	7.1	3	0	0

09/30/00	0	0	6.3	7.1	3	0	0
10/31/00	0	0	6.4	7.0	2	0	0
11/30/00	0	0	6.1	6.8	6	0	0
12/31/00	0	0	6.3	6.9	3	0	0
01/31/01	0	0	6.1	6.9	6	0	0
02/28/01	0	0	6.1	7.1	6	0	0
03/31/01	0	0	6.3	7.0	3	0	0
04/30/01	0	0	6.3	6.8	3	0	0
05/31/01	0	0	6.2	7.2	5	0	0
07/31/01	0	0	6.4	7.4	2	0	0
09/30/01	0	0	6.4	6.8	2	0	0
08/31/01	0	0	6.4	6.9	2	0	0
10/31/01	0	0	6.4	6.8	2	0	0
11/30/01	0	0	6.4	6.8	2	0	0
12/31/01	0	0	6.3	6.9	3	0	0
01/31/02	0	0	6.5	7.2	0	0	0
02/28/02	0	0	6.5	7.0	0	0	0
03/31/02	0	0	6.3	6.8	3	0	0
04/30/02	0	0	6.5	7.2	0	0	0
05/31/02	0	0	6.3	6.9	3	0	0
06/30/02	0	0	6.4	6.8	2	0	0
07/31/02	0	0	6.3	7.0	3	0	0
08/31/02	0	0	6.4	6.9	2	0	0
09/30/02	0	0	6.5	7.0	0	0	0
10/31/02	0	0	6.5	7.0	0	0	0
11/30/02	0	0	6.5	7.0	0	0	0
12/31/02	0	0	6.5	6.8	0	0	0
01/31/03	0	0	6.4	7.1	2	0	0
02/28/03	0	0	6.3	6.8	3	0	0
03/31/03	0	0	6.4	7.0	2	0	0
04/30/03	0	0	6.5	6.9	0	0	0
05/31/03	0	0	6.5	6.9	0	0	0
06/30/03	0	0	6.5	7.1	0	0	0
07/31/03	0	0	6.5	6.9	0	0	0
08/31/03	0	0	6.5	7.0	0	0	0
09/30/03	0	0	6.6	6.9	0	0	0
10/31/03	0	0	6.4	6.9	2	0	0
11/30/03	0	0	6.3	7.0	3	0	0
12/31/03	0	0	6.2	7.0	5	0	0
01/31/04	0	0	6.2	6.9	5	0	0

PIPE: 010A TREATMENT PLANT EFFLUENT PARAMETER: SOLIDS, TOTAL SUSPENDED UNITS: MG/L

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
11/30/95				0	0	21	23.8	36	0	0	0
12/31/95				0	0	20	21.4	29	0	0	0
01/31/96				0	0	23	26	50	0	0	0
02/29/96				0	0	20	25	57	0	0	14
03/31/96				0	0	15	18	24	0	0	0
04/30/96				0	0	15	16.6	36	0	0	0
05/31/96				0	0	13	17.7	20	0	0	0
06/30/96				0	0	15	20.2	33	0	0	0
07/31/96				0	0	14	15.4	30	0	0	0
08/31/96				0	0	18	23	38	0	0	0
09/30/96				0	0	22	27.6	40	0	0	0
10/31/96				0	0	17	20	33	0	0	0
11/30/96				0	0	33	49	110	10	9	120
12/31/96				0	0	26	33	45	0	0	0
01/31/97				0	0	23	26	47	0	0	0
02/28/97				0	0	30	42	87	0	0	74
03/31/97				0	0	21	24	31	0	0	0
04/30/97				0	0	17	19.3	30	0	0	0
05/31/97				0	0	15	18	38	0	0	0
06/30/97				0	0	17	20	29	0	0	0
07/31/97				0	0	31	36.3	65	3	0	30
08/31/97				0	0	24	53	55	0	18	10
09/30/97				0	0	21	36	50	0	0	0
10/31/97				0	0	20	23.8	84	0	0	68
11/30/97				0	0	19	29	33	0	0	0
12/31/97				0	0	25	31	42	0	0	0
06/30/01				0	0	9	11.07	26	0	0	0
01/31/98				0	0	25	32.5	39	0	0	0
02/28/98				0	0	23	25	35	0	0	0
03/31/98				0	0	22	30.4	53	0	0	6
04/30/98				0	0	16.8	18.8	28	0	0	0
05/31/98				0	0	17	26	64	0	0	28
06/30/98				0	0	13	14.7	41	0	0	0
07/15/98				0	0	13	14.7	41	0	0	0
07/31/98				0	0	11	13.4	24	0	0	0
08/31/98				0	0	12	15	22	0	0	0
09/30/98				0	0	19	25.7	58	0	0	16
10/31/98				0	0	22	28	62	0	0	24
11/30/98				0	0	28	34	52	0	0	4

12/31/98	0	0	25	25	49	0	0	0
01/31/99	0	0	58	84	300	93	87	500
02/28/99	0	0	37	72	154	23	60	208
03/31/99	0	0	22	33	41	0	0	0
04/30/99	0	0	18	23.8	39	0	0	0
05/31/99	0	0	17	22.3	64	0	0	28
06/30/99	0	0	15	13.4	45	0	0	0
07/31/99	0	0	14	20.3	46	0	0	0
08/31/99	0	0	12	15.1	18	0	0	0
09/30/99	0	0	18	26	82	0	0	64
10/31/99	0	0	20	34	64	0	0	28
11/30/99	0	0	24	32.7	111	0	0	122
12/31/99	0	0	20	22.1	30	0	0	0
01/31/00	0	0	27	31.1	49	0	0	0
02/29/00	0	0	29	38	102	0	0	104
03/31/00	0	0	17	23	45	0	0	0
04/30/00	0	0	13	15.8	27	0	0	0
05/31/00	0	0	14	14.6	22	0	0	0
06/30/00	0	0	12	14.7	31	0	0	0
07/31/00	0	0	14	15.4	36	0	0	0
08/31/00	0	0	11	15.1	35	0	0	0
09/30/00	0	0	12	13.43	20	0	0	0
10/31/00	0	0	16	18.23	27	0	0	0
11/30/00	0	0	19	21.57	53	0	0	6
12/31/00	0	0	20	27.4	96	0	0	92
01/31/01	0	0	18	22.7	52	0	0	4
02/28/01	0	0	18	21.5	38	0	0	0
03/31/01	0	0	15	19.29	27	0	0	0
04/30/01	0	0	13	13.86	17	0	0	0
05/31/01	0	0	14	20	32	0	0	0
07/31/01	0	0	10	15	32	0	0	0
09/30/01	0	0	15	16.79	36	0	0	0
08/31/01	0	0	16	17.64	30	0	0	0
10/31/01	0	0	13	14.14	24	0	0	0
11/30/01	0	0	13	15.64	22	0	0	0
12/31/01	0	0	16	19.9	29	0	0	0
01/31/02	0	0	21	25.7	68	0	0	36
02/28/02	0	0	18	20.4	36	0	0	0
03/31/02	0	0	12	14.6	28	0	0	0
04/30/02	0	0	14	18	29	0	0	0
05/31/02	0	0	14	24	45	0	0	0
06/30/02	0	0	12	13	28	0	0	0
07/31/02	0	0	17	19	30	0	0	0
08/31/02	0	0	16	24.7	43	0	0	0
09/30/02	0	0	15	15.8	25	0	0	0

10/31/02	0	0	16	21.7	42	0	0	0
11/30/02	0	0	20	23.5	60	0	0	20
12/31/02	0	0	18	22.9	32	0	0	0
01/31/03	0	0	23	32.9	148	0	0	196
02/28/03	0	0	20	29	88	0	0	76
03/31/03	0	0	18	24.7	96	0	0	92
04/30/03	0	0	13	13.6	20	0	0	0
05/31/03	0	0	21	36	162	0	0	224
06/30/03	0	0	15	16.14	34	0	0	0
07/31/03	0	0	14	17	37	0	0	0
08/31/03	0	0	17	19.9	44	0	0	0
09/30/03	0	0	20	25	45	0	0	0
10/31/03	0	0	13	14.4	33	0	0	0
11/30/03	0	0	15	19.6	39	0	0	0
12/31/03	0	0	16	18	33	0	0	0
01/31/04	0	0	16	17.1	23	0	0	0

PIPE: 010A TREATMENT PLANT EFFLUENT PARAMETER: SOLIDS, SETTLEABLE UNITS: ML/L

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
11/30/95				0	0		0.08	0.2	0	0	0
12/31/95				0	0		0.19	1.0	0	0	0
01/31/96				0	0		0.26	1.28	0	0	0
02/29/96				0	0		0.17	0.5	0	0	0
03/31/96				0	0		0.09	0.2	0	0	0
04/30/96				0	0		0.1	0.35	0	0	0
05/31/96				0	0		0.08	0.28	0	0	0
06/30/96				0	0		0.05	0.05	0	0	0
07/31/96				0	0		0.14	0.65	0	0	0
08/31/96				0	0		0.1	0.3	0	0	0
09/30/96				0	0		0.1	0.25	0	0	0
10/31/96				0	0		0.08	1.26	0	0	0
11/30/96				0	0		6.0	35	0	0	0
12/31/96				0	0		1.96	8	0	0	0
01/31/97				0	0		3.1	21	0	0	0
02/28/97				0	0		0.15	1.8	0	0	0
03/31/97				0	0		0.31	0.8	0	0	0
04/30/97				0	0		0.61	4.0	0	0	0
05/31/97				0	0		0.6	0.1	0	0	0
06/30/97				0	0		0.05	0.1	0	0	0
07/31/97				0	0		0.47	3.0	0	0	0
08/31/97				0	0		0.09	0.1	0	0	0

09/30/97	0	0	0.08	0.18	0	0	0
10/31/97	0	0	0.32	1.30	0	0	0
11/30/97	0	0	0.19	0.5	0	0	0
12/31/97	0	0	0.24	1.05	0	0	0
06/30/01	0	0	0.16	0.63	0	0	0
01/31/98	0	0	0.45	2.5	0	0	0
02/28/98	0	0	0.42	2.5	0	0	0
03/31/98	0	0	30.4	2.5	0	0	0
04/30/98	0	0	0.09	0.3	0	0	0
05/31/98	0	0	0.07	0.15	0	0	0
06/30/98	0	0	0.1	0.1	0	0	0
07/15/98	0	0	0.1	0.1	0	0	0
07/31/98	0	0	0.05	0.05	0	0	0
08/31/98	0	0	0.13	0.3	0	0	0
09/30/98	0	0	0.13	0.4	0	0	0
10/31/98	0	0	0.39	2.28	0	0	0
11/30/98	0	0	0.25	1.05	0	0	0
12/31/98	0	0	0.16	0.63	0	0	0
01/31/99	0	0	0.87	5.6	0	0	0
02/28/99	0	0	0.36	2.05	0	0	0
03/31/99	0	0	0.1	0.2	0	0	0
04/30/99	0	0	0.11	0.3	0	0	0
05/31/99	0	0	0.07	0.18	0	0	0
06/30/99	0	0	0.06	0.13	0	0	0
07/31/99	0	0	0.28	1.7	0	0	0
08/31/99	0	0	0.21	1.02	0	0	0
09/30/99	0	0	0.15	0.2	0	0	0
10/31/99	0	0	0.07	0.1	0	0	0
11/30/99	0	0	0.07	0.18	0	0	0
12/31/99	0	0	0.21	1.0	0	0	0
01/31/00	0	0	0.12	0.55	0	0	0
02/29/00	0	0	0.06	0.08	0	0	0
03/31/00	0	0	0.07	0.18	0	0	0
04/30/00	0	0	0.09	0.15	0	0	0
05/31/00	0	0	0.07	0.1	0	0	0
06/30/00	0	0	0.06	0.1	0	0	0
07/31/00	0	0	0.07	0.1	0	0	0
08/31/00	0	0	0.05	0.1	0	0	0
09/30/00	0	0	0.14	0.55	0	0	0
10/31/00	0	0	0.06	0.10	0	0	0
11/30/00	0	0	0.1	0.2	0	0	0
12/31/00	0	0	0.26	1.53	0	0	0
01/31/01	0	0	0.06	0.1	0	0	0
02/28/01	0	0	0.07	0.2	0	0	0
03/31/01	0	0	0.07	0.13	0	0	0

04/30/01	0	0	0.07	0.18	0	0	0
05/31/01	0	0	0.07	0.18	0	0	0
07/31/01	0	0	0.05	0.18	0	0	0
09/30/01	0	0	0.08	0.15	0	0	0
08/31/01	0	0	0.31	1.5	0	0	0
10/31/01	0	0	0.08	0.15	0	0	0
11/30/01	0	0	0.06	0.1	0	0	0
12/31/01	0	0	0.06	0.1	0	0	0
01/31/02	0	0	0.06	1.0	0	0	0
02/28/02	0	0	0.07	0.13	0	0	0
03/31/02	0	0	0.07	0.1	0	0	0
04/30/02	0	0	0.06	0.1	0	0	0
05/31/02	0	0	0.06	0.08	0	0	0
06/30/02	0	0	0.08	0.2	0	0	0
07/31/02	0	0	0.06	0.18	0	0	0
08/31/02	0	0	0.09	0.2	0	0	0
09/30/02	0	0	0.09	0.2	0	0	0
10/31/02	0	0	0.1	0.4	0	0	0
11/30/02	0	0	0.06	0.13	0	0	0
12/31/02	0	0	0.06	0.1	0	0	0
01/31/03	0	0	0.22	0.25	0	0	0
02/28/03	0	0	0.08	0.13	0	0	0
03/31/03	0	0	0.05	0.05	0	0	0
04/30/03	0	0	0.05	0.05	0	0	0
05/31/03	0	0	0.05	0.08	0	0	0
06/30/03	0	0	0.1	0.4	0	0	0
07/31/03	0	0	0.08	0.28	0	0	0
08/31/03	0	0	0.11	0.35	0	0	0
09/30/03	0	0	0.13	0.6	0	0	0
10/31/03	0	0	0.06	0.1	0	0	0
11/30/03	0	0	0.06	0.1	0	0	0
12/31/03	0	0	0.06	0.1	0	0	0
01/31/04	0	0	0.05	0.1	0	0	0

010A TREATMENT PLANT EFFLUENT FLOW, IN CONDUIT OR THRU TREATMENT PLANT UNITS: MGD

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
11/30/95		10.7		0	0				0	0	0
12/31/95		8.4		0	0				0	0	0
01/31/96		10.8		0	0				0	0	0
02/29/96		12		0	0				0	0	0
03/31/96		10.7		0	0				0	0	0
04/30/96		14.0		0	0				0	0	0
05/31/96		13.6		0	0				0	0	0
06/30/96		9.5		0	0				0	0	0
07/31/96		9.6		0	0				0	0	0
08/31/96		7.7		0	0				0	0	0
09/30/96		10.2		0	0				0	0	0
10/31/96		10.8		0	0				0	0	0
11/30/96		10.7		0	0				0	0	0
12/31/96		15		0	0				0	0	0
01/31/97		11.5		0	0				0	0	0
02/28/97		11.1		0	0				0	0	0
03/31/97		10.4		0	0				0	0	0
04/30/97		13.4		0	0				0	0	0
05/31/97		11.0		0	0				0	0	0
06/30/97		8.5		0	0				0	0	0
07/31/97		10.2		0	0				0	0	0
08/31/97		9.1		0	0				0	0	0
09/30/97		7.8		0	0				0	0	0
10/31/97		7.4		0	0				0	0	0
11/30/97		9.8		0	0				0	0	0
12/31/97		8.8		0	0				0	0	0
06/30/01		11.3		0	0				0	0	0
01/31/98		11.5		0	0				0	0	0
02/28/98		10.8		0	0				0	0	0
03/31/98		13.8		0	0				0	0	0
04/30/98		12.5		0	0				0	0	0
05/31/98		12.5		0	0				0	0	0
06/30/98		11.6		0	0				0	0	0
07/15/98		11.6		0	0				0	0	0
07/31/98		9.6		0	0				0	0	0
08/31/98		7.7		0	0				0	0	0
09/30/98		7.3		0	0				0	0	0
10/31/98		8.3		0	0				0	0	0
11/30/98		7.6		0	0				0	0	0
12/31/98		7.1		0	0				0	0	0

01/31/99	9.8	0	0	0	0	0
02/28/99	11.6	0	0	0	0	0
03/31/99	11.9	0	0	0	0	0
04/30/99	9.5	0	0	0	0	0
05/31/99	8.4	0	0	0	0	0
06/30/99	7.4	0	0	0	0	0
07/31/99	6.9	0	0	0	0	0
08/31/99	6.8	0	0	0	0	0
09/30/99	11.2	0	0	0	0	0
10/31/99	10.1	0	0	0	0	0
11/30/99	9.0	0	0	0	0	0
12/31/99	9.3	0	0	0	0	0
01/31/00	8.6	0	0	0	0	0
02/29/00	9.7	0	0	0	0	0
03/31/00	12.3	0	0	0	0	0
04/30/00	12.4	0	0	0	0	0
05/31/00	11.3	0	0	0	0	0
06/30/00	13.5	0	0	0	0	0
07/31/00	10.7	0	0	0	0	0
08/31/00	10.7	0	0	0	0	0
09/30/00	9.0	0	0	0	0	0
10/31/00	8.0	0	0	0	0	0
11/30/00	8.0	0	0	0	0	0
12/31/00	8.6	0	0	0	0	0
01/31/01	7.6	0	0	0	0	0
02/28/01	9.0	0	0	0	0	0
03/31/01	12.5	0	0	0	0	0
04/30/01	14.5	0	0	0	0	0
05/31/01	11.0	0	0	0	0	0
07/31/01	8.2	0	0	0	0	0
09/30/01	7.8	0	0	0	0	0
08/31/01	8.0	0	0	0	0	0
10/31/01	6.4	0	0	0	0	0
11/30/01	6.1	0	0	0	0	0
12/31/01	6.7	0	0	0	0	0
01/31/02	6.4	0	0	0	0	0
02/28/02	6.8	0	0	0	0	0
03/31/02	7.9	0	0	0	0	0
04/30/02	8.2	0	0	0	0	0
05/31/02	9.8	0	0	0	0	0
06/30/02	9.2	0	0	0	0	0
07/31/02	7.1	0	0	0	0	0
08/31/02	6.8	0	0	0	0	0
09/30/02	7.0	0	0	0	0	0
10/31/02	7.6	0	0	0	0	0

11/30/02	9.0	0	0				0	0	0
12/31/02	9.4	0	0				0	0	0
01/31/03	9.4	0	0				0	0	0
02/28/03	9.5	0	0				0	0	0
03/31/03	12.2	0	0				0	0	0
04/30/03	12.3	0	0				0	0	0
05/31/03	11.7	0	0				0	0	0
06/30/03	13.0	0	0				0	0	0
07/31/03	9.3	0	0				0	0	0
08/31/03	8.3	0	0				0	0	0
09/30/03	10.0	0	0				0	0	0
10/31/03	10.7	0	0				0	0	0
11/30/03	10.9	0	0				0	0	0
12/31/03	12.3	0	0				0	0	0
01/31/04	11.0	0	0				0	0	0

PIPE: 010A TREATMENT PLANT EFFLUENT PARAMETER: CHLORINE, TOTAL RESIDUAL UNITS: MG/L

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
04/30/96				0	0			0.88	0	0	0
05/31/96				0	0			0.89	0	0	0
06/30/96				0	0			0.85	0	0	0
07/31/96				0	0			0.86	0	0	0
08/31/96				0	0			0.86	0	0	0
09/30/96				0	0			0.85	0	0	0
10/31/96				0	0			0.80	0	0	0
04/30/97				0	0			0.83	0	0	0
05/31/97				0	0			0.88	0	0	0
06/30/97				0	0			0.86	0	0	0
07/31/97				0	0			0.91	0	0	2
08/31/97				0	0			0.53	0	0	0
09/30/97				0	0			0.69	0	0	0
10/31/97				0	0			0.88	0	0	0
04/30/98				0	0			0.63	0	0	0
05/31/98				0	0			0.76	0	0	0
06/30/98				0	0			0.83	0	0	0
07/15/98				0	0			0.83	0	0	0
07/31/98				0	0			0.86	0	0	0
08/31/98				0	0			0.82	0	0	0
09/30/98				0	0			1.04	0	0	17
10/31/98				0	0			0.88	0	0	0
06/30/01				0	0		0.6	0.73	0	0	0

04/30/99	0	0	0.6	0.79	0	0	0
05/31/99	0	0	0.67	0.75	0	0	0
06/30/99	0	0	0.65	0.74	0	0	0
07/31/99	0	0	0.66	0.77	0	0	0
08/31/99	0	0	0.62	0.8	0	0	0
09/30/99	0	0	0.66	0.84	0	0	0
10/31/99	0	0	0.6	0.76	0	0	0
04/30/00	0	0	0.65	0.8	0	0	0
05/31/00	0	0	0.66	0.86	0	0	0
06/30/00	0	0	0.62	0.76	0	0	0
07/31/00	0	0	0.64	0.77	0	0	0
08/31/00	0	0	0.65	0.89	0	0	0
09/30/00	0	0	0.7	0.85	0	0	0
10/31/00	0	0	0.73	0.79	0	0	0
04/30/01	0	0	0.65	0.8	0	0	0
05/31/01	0	0	0.6	0.8	0	0	0
07/31/01	0	0	0.65	0.79	0	0	0
09/30/01	0	0	0.59	0.83	0	0	0
08/31/01	0	0	0.59	0.84	0	0	0
10/31/01	0	0	0.66	0.79	0	0	0
04/30/02	0	0	0.61	0.71	0	0	0
05/31/02	0	0	0.63	0.87	0	0	0
06/30/02	0	0	0.59	0.72	0	0	0
07/31/02	0	0	0.57	0.67	0	0	0
08/31/02	0	0	0.6	0.89	0	0	0
09/30/02	0	0	0.6	0.79	0	0	0
10/31/02	0	0	0.61	0.86	0	0	0
04/30/03	0	0	0.63	0.79	0	0	0
05/31/03	0	0	0.61	0.72	0	0	0
06/30/03	0	0	0.61	0.73	0	0	0
07/31/03	0	0	0.71	0.86	0	0	0
08/31/03	0	0	0.68	0.84	0	0	0
09/30/03	0	0	0.7	0.84	0	0	0
10/31/03	0	0	0.64	0.74	0	0	0

PIPE: 010A TREATMENT PLANT EFFLUENT PARAMETER: COLIFORM, FECAL GENERAL UNITS: #/100ML

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
04/30/96				0	0	3.5	138	250	0	0	0
05/31/96				0	0	3.1	23.3	540	0	0	35
06/30/96				0	0	3.5	46	900	0	0	125
07/31/96				0	0	1.9	16	16	0	0	0
08/31/96				0	0	3.3	19.4	373	0	0	0
09/30/96				0	0	3.5	52	52	0	0	0
10/31/96				0	0	7.9	40	40	0	0	0
04/30/97				0	0	3.2	200	200	0	0	0
05/31/97				0	0	3.2	89	89	0	0	0
06/30/97				0	0	2.7	25	25	0	0	0
07/31/97				0	0	2.4	40	40	0	0	0
08/31/97				0	0	2.95	35	35	0	0	0
09/30/97				0	0	2.4	15	46	0	0	0
10/31/97				0	0	3.2	10	10	0	0	0
06/30/01				0	0	3.72	16	16	0	0	0
04/30/98				0	0	3.0	160	1200	0	0	200
05/31/98				0	0	3.9	90	90	0	0	0
06/30/98				0	0	3.6	20	400	0	0	0
07/15/98				0	0	3.6	20	400	0	0	0
07/31/98				0	0	2.6	36	36	0	0	0
08/31/98				0	0	2.7	62	62	0	0	0
09/30/98				0	0	3.7	132	132	0	0	0
10/31/98				0	0	6.5	24	24	0	0	0
04/30/99				0	0	3.5	22.7	510	0	0	27
05/31/99				0	0	3.1	30	222	0	0	0
06/30/99				0	0	2.8	96	96	0	0	0
07/31/99				0	0	3.3	83	83	0	0	0
08/31/99				0	0	1.0	103	103	0	0	0
09/30/99				0	0	2.8	30	30	0	0	0
10/31/99				0	0	3.5	30	30	0	0	0
04/30/00				0	0	3.7	35.5	1200	0	0	200
05/31/00				0	0	2.4	21	21	0	0	0
06/30/00				0	0	2.7	22	22	0	0	0
07/31/00				0	0	4.3	240	240	0	0	0
08/31/00				0	0	2.7	17.4	300	0	0	0
09/30/00				0	0	2.9	68	68	0	0	0
10/31/00				0	0	14.8	198	198	0	0	0
04/30/01				0	0	19.9	88	88	0	0	0
05/31/01				0	0	3.58	13	13	0	0	0

07/31/01	0	0	3.76	7	7	0	0	0
09/30/01	0	0	1.6	2	2	0	0	0
08/31/01	0	0	23	28	256	0	0	0
10/31/01	0	0	1.41	1	1	0	0	0
04/30/02	0	0	3.18	26	26	0	0	0
05/31/02	0	0	6	6	48	0	0	0
06/30/02	0	0	28	88	88	0	0	0
07/31/02	0	0	14	48	48	0	0	0
08/31/02	0	0	8.12	29	29	0	0	0
09/30/02	0	0	2.84	13	13	0	0	0
10/31/02	0	0	6.75	77	77	0	0	0
04/30/03	0	0	19.03	141	600	0	0	50
05/31/03	0	0	2.59	4	4	0	0	0
06/30/03	0	0	4.02	26	26	0	0	0
07/31/03	0	0	58	515	1000	0	29	150
08/31/03	0	0	18	83	83	0	0	0
09/30/03	0	0	17	185	185	0	0	0
10/31/03	0	0	5.1	13	13	0	0	0

PIPE: 010T WET TEST RESULTS PARAMETER: LC50 STAT 48HR ACU PIMEPHALES UNITS: PER-CENT

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
12/31/95	8			0	0				0	0	0
03/31/96				0	0	52			48	0	0
03/31/97				0	0	39			61	0	0
06/30/97				0	0	68			32	0	0
09/30/97				0	0	72			28	0	0
12/31/97				0	0	100			0	0	0
06/30/01				0	0	100			0	0	0
06/30/96	8			0	0				0	0	0
09/30/96	8			0	0				0	0	0
12/31/96	8			0	0				0	0	0
03/31/98				0	0	68			32	0	0
06/30/98				0	0	6.25			94	0	0
09/30/98				0	0	100			0	0	0
12/31/98				0	0	>100			0	0	0
03/31/99				0	0	71			29	0	0
06/30/99				0	0	100			0	0	0
09/30/99				0	0	63			37	0	0
12/31/99				0	0	100			0	0	0
03/31/00				0	0	100			0	0	0
06/30/00				0	0	100			0	0	0
09/30/00				0	0	100			0	0	0
12/31/00				0	0	100			0	0	0
03/31/01				0	0	100			0	0	0
09/30/01				0	0	100			0	0	0
12/31/01				0	0	100			0	0	0
03/31/02				0	0	100			0	0	0
06/30/02				0	0	100			0	0	0
09/30/02				0	0	100			0	0	0
12/31/02				0	0	100			0	0	0
03/31/03				0	0	100			0	0	0
06/30/03				0	0	>100			0	0	0
09/30/03				0	0	100			0	0	0
12/31/03				0	0	100			0	0	0

PIPE: 011A PASS THRU OIL/WATER SEPARATOR PARAMETER: BOD, 5-DAY UNITS: MG/L

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
03/31/96				0	0			4.8	0	0	0
06/30/96				0	0			5	0	0	0
09/30/96	E			0	0				0	0	0
12/31/96				0	0			3	0	0	0
03/31/97				0	0			10	0	0	0
06/30/97				0	0			3.9	0	0	0
09/30/97				0	0			<4	0	0	0
12/31/97				0	0			<4	0	0	0
06/30/01				0	0			12	0	0	0
03/31/98	H			0	0				0	0	0
06/30/98				0	0			22	0	0	0
07/15/98				0	0			22	0	0	0
09/30/98				0	0			8.8	0	0	0
12/31/98				0	0			<4	0	0	0
03/31/99				0	0			19	0	0	0
06/30/99				0	0			12	0	0	0
09/30/99				0	0			<2.5	0	0	0
12/31/99				0	0			<2.5	0	0	0
03/31/00				0	0			4.2	0	0	0
06/30/00				0	0			5.6	0	0	0
09/30/00				0	0			1.5	0	0	0
12/31/00				0	0			8.9	0	0	0
03/31/01				0	0			<3.0	0	0	0
09/30/01				0	0			6	0	0	0
12/31/01				0	0			4	0	0	0
03/31/02				0	0			4	0	0	0
06/30/02				0	0			3	0	0	0
09/30/02				0	0			2	0	0	0
12/31/02				0	0			7	0	0	0
03/31/03	E			0	0				0	0	0
06/30/03				0	0			<5	0	0	0
09/30/03				0	0			3	0	0	0
12/31/03				0	0			3	0	0	0

PIPE:011A PASS THRU OIL/WATER SEPARATOR PARAMETER: PH UNITS: SU

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
03/31/96				0	0			7.1	0	0	0
06/30/96				0	0			9.3	0	0	0
09/30/96	E			0	0				0	0	0
12/31/96				0	0			5.7	0	0	0
03/31/97				0	0			6.25	0	0	0
06/30/97				0	0			7.3	0	0	0
09/30/97				0	0			5.36	0	0	0
12/31/97				0	0			6.2	0	0	0
06/30/01				0	0			5.98	0	0	0
03/31/98				0	0			6.03	0	0	0
06/30/98				0	0			6.3	0	0	0
07/15/98				0	0			6.3	0	0	0
09/30/98				0	0			6.6	0	0	0
12/31/98				0	0			6.97	0	0	0
03/31/99				0	0			5.6	0	0	0
06/30/99				0	0			6.93	0	0	0
09/30/99				0	0			5.95	0	0	0
12/31/99				0	0			7.92	0	0	0
03/31/00				0	0			6.41	0	0	0
06/30/00				0	0			6.56	0	0	0
09/30/00				0	0			5.92	0	0	0
12/31/00				0	0			7.2	0	0	0
03/31/01				0	0			6.32	0	0	0
09/30/01				0	0			6.56	0	0	0
12/31/01				0	0			6.28	0	0	0
03/31/02				0	0			6.81	0	0	0
06/30/02				0	0			6.6	0	0	0
09/30/02				0	0			6.8	0	0	0
12/31/02				0	0			6.61	0	0	0
03/31/03	E			0	0				0	0	0
06/30/03				0	0			7.43	0	0	0
09/30/03				0	0			6.18	0	0	0
12/31/03				0	0			6.43	0	0	0

PIPE:011A PASS THRU OIL/WATER SEPARATOR PARAMETER: SOLIDS, TOTAL SUSPENDED UNITS: MG/L

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
03/31/96				0	0			3	0	0	0
06/30/96				0	0			4	0	0	0
09/30/96	E			0	0				0	0	0
12/31/96				0	0			3.4	0	0	0
03/31/97				0	0			44	0	0	0
06/30/97				0	0			13.5	0	0	0
09/30/97				0	0			7	0	0	0
12/31/97				0	0			2	0	0	0
06/30/01				0	0			17	0	0	0
03/31/98	H			0	0				0	0	0
06/30/98				0	0			51	0	0	0
07/15/98				0	0			51	0	0	0
09/30/98				0	0			31	0	0	0
12/31/98				0	0			11	0	0	0
03/31/99				0	0			15	0	0	0
06/30/99				0	0			66	0	0	0
09/30/99				0	0			4	0	0	0
12/31/99				0	0			5	0	0	0
03/31/00				0	0			26	0	0	0
06/30/00				0	0			25	0	0	0
09/30/00				0	0			7	0	0	0
12/31/00				0	0			11	0	0	0
03/31/01				0	0			12	0	0	0
09/30/01				0	0			9	0	0	0
12/31/01				0	0			2	0	0	0
03/31/02				0	0			8.5	0	0	0
06/30/02				0	0			3	0	0	0
09/30/02				0	0			16	0	0	0
12/31/02				0	0			5	0	0	0
03/31/03	E			0	0				0	0	0
06/30/03				0	0			33	0	0	0
09/30/03				0	0			1	0	0	0
12/31/03				0	0			0.5	0	0	0

PIPE: 011A PASS THRU OIL/WATER SEPARATOR PARAMETER: OIL & GREASE UNIT: MG/L

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
03/31/96				0	0			<5	0	0	0
06/30/96				0	0			<5	0	0	0
09/30/96	E			0	0				0	0	0
12/31/96				0	0			<7	0	0	0
03/31/97				0	0			<10	0	0	0
06/30/97				0	0			<7	0	0	0
09/30/97				0	0			<6	0	0	0
12/31/97				0	0			27	0	0	0
06/30/01				0	0			<1.4	0	0	0
03/31/98				0	0			6	0	0	0
06/30/98				0	0			6.0	0	0	0
07/15/98				0	0			6.0	0	0	0
09/30/98				0	0			<6	0	0	0
12/31/98				0	0			<1.4	0	0	0
03/31/99				0	0			1.4	0	0	0
06/30/99				0	0			2.6	0	0	0
09/30/99				0	0			<1.5	0	0	0
12/31/99				0	0			<1.4	0	0	0
03/31/00				0	0			1.6	0	0	0
06/30/00				0	0			1.4	0	0	0
09/30/00				0	0			1.4	0	0	0
12/31/00				0	0			1.4	0	0	0
03/31/01				0	0			<1.4	0	0	0
09/30/01				0	0			<1.4	0	0	0
12/31/01				0	0			1.5	0	0	0
03/31/02				0	0			1.6	0	0	0
06/30/02				0	0			1.4	0	0	0
09/30/02				0	0			1.4	0	0	0
12/31/02				0	0			<1.4	0	0	0
03/31/03	E			0	0				0	0	0
06/30/03				0	0			<1.4	0	0	0
09/30/03				0	0			2.6	0	0	0
12/31/03				0	0			0.75	0	0	0

PIPE:011A PASS THRU OIL/WATER SEPARATOR PARAMETER: FLOW, IN CONDUIT OR THRU TREATMENT PLANT UNITS: MGD

Monitoring Period Ending	No Disch Code	Monthly Avg	Daily Max	Percent Violation		Monthly Avg	Weekly Avg	Daily Max	Percent Violation		
03/31/96	E			0	0				0	0	0
06/30/96	E			0	0				0	0	0
09/30/96	E			0	0				0	0	0
12/31/96	E			0	0				0	0	0
03/31/97	E			0	0				0	0	0
06/30/97			1	0	0				0	0	0
09/30/97			0.5	0	0				0	0	0
12/31/97			0.003	0	0				0	0	0
06/30/01			<0.3	0	0				0	0	0
03/31/98			0.07200	0	0				0	0	0
06/30/98			0.524600	0	0				0	0	0
07/15/98			0.524600	0	0				0	0	0
09/30/98			0.005	0	0				0	0	0
12/31/98			0.9	0	0				0	0	0
03/31/99			4.2	0	0				0	0	0
06/30/99			0.003	0	0				0	0	0
09/30/99			0.005	0	0				0	0	0
12/31/99			0.005	0	0				0	0	0
03/31/00			0.005	0	0				0	0	0
06/30/00			1.8	0	0				0	0	0
09/30/00			1.5	0	0				0	0	0
12/31/00			0.07	0	0				0	0	0
03/31/01			3.66	0	0				0	0	0
09/30/01			0.406	0	0				0	0	0
12/31/01			0.3	0	0				0	0	0
03/31/02			0.3	0	0				0	0	0
06/30/02			0.3	0	0				0	0	0
09/30/02			0.3	0	0				0	0	0
12/31/02			0.3	0	0				0	0	0
03/31/03	E			0	0				0	0	0
06/30/03			3.539	0	0				0	0	0
09/30/03			<0.3	0	0				0	0	0
12/31/03			0.0429	0	0				0	0	0