BEFORE THE

OHIO ENVIRONMENTAL PROTECTION AGENCY

In the matter of:

Elsea, Inc. 2015 Stone Ridge Drive Circleville, Ohio 43113 Respondent	: : : : :	**Director's Final Findings and Orders**

PREAMBLE

It is agreed by the parties hereto as follows:

I. JURISDICTION

These Director's Final Findings and Orders (Orders) are issued to Elsea, Inc. (Respondent) pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency (Ohio EPA) under Ohio Revised Code (ORC) §§ 6111.03 and 3745.01.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and its assigns and successors in interest liable under Ohio law. No change in ownership or operation relating to Respondent's Facility, as hereinafter defined, shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapter 6111. and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA has determined the following findings:

1. Respondent owns and operates the Carousel Mobile Home Park and its associated wastewater treatment plant (WWTP) located at 20544 US Route 23 North, Chillicothe, Ross County, Ohio. Carousel Mobile Home Park and its WWTP are hereinafter collectively referred to as the "Facility."

2. Respondent's extended aeration WWTP, serving approximately 89 mobile homes, consists of a trash trap, aeration basin, sand filters, pump station, and a chlorinator.

3. Respondent's Facility discharges "sewage," "industrial waste," and/or "other wastes," as those terms are defined in ORC § 6111.01, to an unnamed ditch to Kinnikinnick Creek. The unnamed ditch and Kinnikinnick Creek constitute "waters of the state" as defined by ORC § 6111.01.

4. Respondent holds an effective National Pollutant Discharge Elimination System (NPDES) permit, No. OPV00008*ED, which authorizes Respondent to discharge from the Facility to waters of the state. This permit became effective June 1, 2000, and has an expiration date of May 31, 2005.

5. Respondent's WWTP was designed to treat and discharge on an average daily basis, at outfall number OPV00008 001, 18,000 gallons per day (GPD) of wastewater flow. The average flow per day at the Facility is approximately 12,000 GPD.

6. ORC § 6111.04 prohibits any person from causing pollution or causing any sewerage, industrial waste or other waste to be placed in any location where they cause pollution to waters of the state, except if such discharges occur in accordance with a NPDES permit issued by the Director.

7. ORC § 6111.07(A) prohibits any person from violating, or failing to perform, any duty imposed by ORC §§ 6111.01 to 6111.08, or violating any order, rule, or term or condition of a permit issued by the Director pursuant to those sections.

8. On May 29, 1998, September 10, 1998, April 9, 1999, September 9, 1999, March 9, 2001, May 18, 2001, April 26, 2002, May 16, 2003, and September 16, 2003, Ohio EPA inspected the Facility. These inspections revealed that the WWTP was in poor operating condition and was discharging inadequately treated sewage into waters of the state. On July 15, 2004, Ohio EPA performed another inspection at the Facility and found beneficial improvements had been made to the WWTP collection system, however, continued problems were observed at the WWTP final settling tank and sandfilters.

9. Respondent has, on at least the dates outlined in the chart attached hereto as Attachment I and incorporated by reference as if fully rewritten herein, exceeded the final effluent limitations in its NPDES permit, No. OPV00008*ED, numerous times from September 2000 through June 2004. Respondent's failure to comply with the final effluent limitations of its NPDES permit is a violation of the permit and ORC §§ 6111.04 and 6111.07.

10. On at least September 10, 1998, April 9, 1999, September 9, 1999, May 18, 2001, April 26, 2002, May 16, 2003, September 16, 2003, July 15, 2004, and July 19, 2004, Respondent violated Part III of its NPDES permit, No. OPV00008*ED, by bypassing or diverting wastewater from the WWTP. Respondent's failure to comply with this provision of its NPDES permit is a violation of the permit, ORC §§ 6111.04 and 6111.07, and OAC Rule 3745-1-04.

11. These Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any existing treatment works or sewer system. Any such construction or modification is subject to the permit to install (PTI) requirements of ORC §§ 6111.44 and 6111.45 and OAC Chapter 3745-42.

12. This document does not modify NPDES permit No. OPV00008*ED or any successor permit. The purpose of this document is to correct Respondent's noncompliance with NPDES permit number OPV00008*ED, and not to alter said permit.

13. The Director recognizes that until the date specified in the schedule of compliance for WWTP improvements in the Orders below, Respondent will likely discharge pollutants in excess of those authorized in its currently effective NPDES permit, No. OPV00008*ED, or any successor permit. The purpose of the effluent limitations and monitoring requirements that are attached to these Orders as Attachment II is to assess compliance with these Orders and not to authorize discharges of pollutants in excess of the permissive discharges specified under Respondent's currently effective or successor NPDES permit. Attachment II is incorporated by reference herein as if fully rewritten.

14. Each day of violation cited above represents a separate violation of ORC §§ 6111.04 and 6111.07.

15. The Director has given consideration to, and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and its relation to the benefits to the people of the state to be derived from such compliance in accomplishing the purposes of ORC Chapter 6111.

V. ORDERS

1. Respondent shall achieve compliance with the final effluent limitations of its currently effective NPDES permit, No. OPV00008*ED and any successor permit, as expeditiously as practicable, but not later than the following schedule:

   a. Within two (2) months of the effective date of these Orders, Respondent shall submit to Ohio EPA for approval a WWTP study with a plan for any WWTP improvements necessary to achieve and maintain consistent compliance with its NPDES permit and any successor permit;

   b. Within six (6) months of the effective date of these Orders, Respondent shall submit to Ohio EPA a complete PTI application, with approvable detail plans for any necessary WWTP improvements;

   c. Within six (6) months of the Director's issuance of a PTI, Respondent shall initiate construction of any approved WWTP improvements; and

d. Within twelve (12) months of the Director's issuance of a PTI, Respondent shall complete construction of any approved WWTP improvements and achieve compliance with the final effluent limitations in its NPDES permit or any successor permit.

2. Upon the effective date of these Orders, pursuant to the requirements of its currently effective NPDES permit, No. OPV00008*ED, Respondent shall eliminate any unauthorized bypasses and/ or discharges from its Facility.

3. Within fourteen (14) days of each of the deadlines listed in Orders No. 1.c. and 1.d., Respondent shall submit written notification and documentation of compliance with said Orders to Ohio EPA.

4. Within fourteen (14) days of receipt of notification from Ohio EPA, Respondent shall provide Ohio EPA with a written response addressing any comments or deficiencies and/ or submit any additional information requested with regard to the any of the submittals required by Orders No. 1 and 3.

5. If WWTP improvements are necessary and pursued in accordance with Order No. 1, until the date specified in the schedule listed in Order No. 1.d. in which Respondent's WWTP is able to attain compliance with final effluent limitations in its currently effective NPDES permit, No. OPV00008*ED or any successor permit, Respondent shall properly operate and maintain its existing WWTP to achieve the best quality effluent possible. Compliance with the effluent limitations and monitoring requirements contained in Attachment II of these Orders shall constitute compliance with this Order.

6. Within thirty (30) days after the effective date of these Orders, Respondent shall pay Ohio EPA the amount of $7,500.00 in settlement of Ohio EPA's claims for civil penalties, which may be assessed pursuant to ORC Chapter 6111. Payment shall be made by an official check made payable to "Treasurer, State of Ohio" for $7,500.00. The official check shall be submitted to Ohio EPA, Office of Fiscal Administration, P.O. Box 1049, Columbus, Ohio 43216-1049, together with a letter identifying the Respondent. A photo copy of the check shall be sent to Ohio EPA's Southeast District Office as indicated in Section X of these Orders.

VI. TERMINATION

Respondent's obligations under these Orders shall terminate when Respondent certifies in writing and demonstrates to the satisfaction of Ohio EPA that Respondent has performed all obligations under these Orders and the Chief of Ohio EPA's DSW acknowledges, in writing, the termination of these Orders. If Ohio EPA does not agree that all obligations have been performed, then Ohio EPA will notify Respondent of the obligations that have not been performed, in which case Respondent shall have an opportunity to address any such deficiencies and seek termination as described above.

The certification shall contain the following attestation: "I certify that the information contained in or accompanying this certification is true, accurate and complete." This certification shall be submitted by Respondent to Ohio EPA and shall be signed by a responsible official of Respondent. For purposes of these Orders, a responsible official is as defined in OAC Rule 3745-33-03(D)(1) for a corporation.

VII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to the operation of Respondent's Facility.

VIII. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

IX. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

X. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio Environmental Protection Agency
Southeast District Office, Division of Surface Water
2195 Front Street
Logan, Ohio 43138
Attn: Enforcement Unit Supervisor

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

XI. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XII of these Orders.

XII. WAIVER

In order to resolve disputed claims, without admission of fact, violation or liability, and in lieu of further enforcement action by Ohio EPA for only the violations specifically cited in these Orders, Respondent consents to the issuance of these Orders and agrees to comply with these Orders. Compliance with these Orders shall be a full accord and satisfaction for Respondent's liability for the violations specifically cited herein.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIII. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XIV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

Ohio Environmental Protection Agency

Christopher Jones, Director — Date: 1-7-05

IT IS SO AGREED:

Elsea, Inc.

Signature — Date: 12-27-04

Asa Elsea - President
Printed or Typed Name and Title

ATTACHMENT I
NPDES Permit No. OPV00008*ED Effluent Limitation Violations
September 2000 - June 2004

Outfall	Date	Parameter	Reported	Units	Permit Limit
September 2000:					
001	9/1/2000	CBOD 5 day	47	mg/l	10.0
001	9/1/2000	Total Suspended Solids	156	mg/l	12.0
001	9/1/2000	Nitrogen, Ammonia	8.5333	mg/l	2.0
001	9/8/2000	CBOD 5 day	19	mg/l	15.0
001	9/15/2000	CBOD 5 day	62	mg/l	15.0
001	9/15/2000	Total Suspended Solids	228	mg/l	18.0
001	9/22/2000	CBOD 5 day	60	mg/l	15.0
001	9/22/2000	Total Suspended Solids	230	mg/l	18.0
October 2000:					
001	10/1/2000	CBOD 5 day	66	mg/l	15.0
001	10/1/2000	CBOD 5 day	74.5	mg/l	10.0
001	10/1/2000	Total Suspended Solids	178.5	mg/l	12.0
001	10/1/2000	Total Suspended Solids	242	mg/l	18.0
001	10/1/2000	Nitrogen, Ammonia	4.8	mg/l	2.0
001	10/4/2000	Dissolved Oxygen	4	mg/l	5.0
001	10/8/2000	CBOD 5 day	90	mg/l	15.0
001	10/8/2000	Total Suspended Solids	218	mg/l	18.0
001	10/11/2000	Dissolved Oxygen	4.6	mg/l	5.0
001	10/15/2000	CBOD 5 day	32	mg/l	15.0
001	10/15/2000	Total Suspended Solids	88	mg/l	18.0
001	10/18/2000	Dissolved Oxygen	4.3	mg/l	5.0
001	10/22/2000	CBOD 5 day	110	mg/l	15.0
001	10/22/2000	Total Suspended Solids	166	mg/l	18.0
001	10/26/2000	Dissolved Oxygen	4.2	mg/l	5.0
November 2000:					
001	11/1/2000	CBOD 5 day	20	mg/l	15.0
001	11/1/2000	Total Suspended Solids	128.8	mg/l	12.0
001	11/1/2000	Total Suspended Solids	184	mg/l	18.0
001	11/1/2000	CBOD 5 day	42.2	mg/l	10.0
001	11/15/2000	CBOD 5 day	90	mg/l	15.0
001	11/15/2000	Total Suspended Solids	212	mg/l	18.0
001	11/15/2000	Dissolved Oxygen	3.2	mg/l	5.0
001	11/19/2000	Dissolved Oxygen	4.2	mg/l	5.0
001	11/28/2000	Dissolved Oxygen	3.9	mg/l	5.0
December 2000:					
001	12/1/2000	CBOD 5 day	120	mg/l	15.0
001	12/1/2000	Total Suspended Solids	88.33	mg/l	12.0
001	12/1/2000	Total Suspended Solids	214	mg/l	18.0
001	12/1/2000	Total Suspended Solids	2.8559	mg/kg	0.82
001	12/1/2000	Total Suspended Solids	6.8039	mg/kg	1.23
001	12/1/2000	CBOD 5 day	2.00403	mg/kg	0.68
001	12/1/2000	CBOD 5 day	61.6667	mg/l	10.0
001	12/1/2000	CBOD 5 day	3.8153	mg/kg	1.02
001	12/15/2000	CBOD 5 day	32.5	mg/l	15.0
001	12/15/2000	CBOD 5 day	1.0984	mg/kg	1.02
001	12/15/2000	Total Suspended Solids	25.5	mg/l	18.0

Outfall	Date	Parameter	Reported	Units	Permit Limit
January 2001:					
001	1/1/2001	CBOD 5 day	20	mg/l	10.0
001	1/1/2001	Total Suspended Solids	1.0448	mg/kg	0.82
001	1/1/2001	Total Suspended Solids	29.5	mg/l	12.0
001	1/1/2001	CBOD 5 day	.714	mg/kg	0.68
001	1/8/2001	CBOD 5 day	31	mg/l	15.0
001	1/8/2001	Total Suspended Solids	31	mg/l	18.0
001	1/8/2001	CBOD 5 day	1.1147	mg/kg	1.02
001	1/8/2001	CBOD 5 day	31	mg/l	15.0
001	1/8/2001	Total Suspended Solids	31	mg/l	18.0
001	1/22/2001	Total Suspended Solids	28	mg/l	18.0
001	1/22/2001	Total Suspended Solids	28	mg/l	18.0
February 2001:					
001	2/1/2001	CBOD 5 day	62	mg/l	15.0
001	2/1/2001	Total Suspended Solids	2.6715	mg/kg	0.82
001	2/1/2001	CBOD 5 day	1.5958	mg/kg	1.02
001	2/1/2001	CBOD 5 day	1.1272	mg/kg	0.68
001	2/1/2001	Total Suspended Solids	101	mg/l	12.0
001	2/1/2001	Total Suspended Solids	182	mg/l	18.0
001	2/1/2001	Total Suspended Solids	4.6843	mg/kg	1.23
001	2/1/2001	CBOD 5 day	41	mg/l	10.0
001	2/15/2001	CBOD 5 day	20	mg/l	15.0
001	2/15/2001	Total Suspended Solids	20	mg/l	18.0
March 2001:					
001	3/1/2001	CBOD 5 day	16	mg/l	10.0
001	3/1/2001	Total Suspended Solids	3.131	mg/kg	0.82
001	3/1/2001	Total Suspended Solids	80	mg/l	12.0
001	3/8/2001	Total Suspended Solids	24	mg/l	18.0
001	3/22/2001	CBOD 5 day	17	mg/l	15.0
001	3/22/2001	Total Suspended Solids	5.5079	mg/kg	1.23
001	3/22/2001	Total Suspended Solids	136	mg/l	18.0
April 2001:					
001	4/1/2001	CBOD 5 day	32	mg/l	10.0
001	4/1/2001	Total Suspended Solids	34	mg/l	12.0
001	4/1/2001	CBOD 5 day	1.0053	mg/kg	0.68
001	4/1/2001	Total Suspended Solids	1.0681	mg/kg	0.82
001	4/22/2001	CBOD 5 day	32	mg/l	15.0
001	4/22/2001	Total Suspended Solids	34	mg/l	18.0
May 2001:					
001	5/1/2001	Fecal Coliform	10000	#/100ml	1000
001	5/1/2001	CBOD 5 day	.6813	mg/kg	0.68
001	5/1/2001	Total Suspended Solids	18	mg/l	12.0
001	5/1/2001	Nitrogen, Ammonia	.5942	mg/kg	0.14
001	5/1/2001	Nitrogen, Ammonia	15.5	mg/l	2.0
001	5/1/2001	CBOD 5 day	17.5	mg/l	10.0
001	5/8/2001	Total Suspended Solids	20	mg/l	18.0
001	5/8/2001	Nitrogen, Ammonia	.2044	mg/kg	0.20
001	5/8/2001	CBOD 5 day	20	mg/l	15.0
001	5/22/2001	CBOD 5 day	1.1355	mg/l	1.02
001	5/22/2001	Fecal Coliform	10000	#/100ml	2000

Outfall	Date	Parameter	Reported	Units	Permit Limit
May 2001 (cont.):					
001	5/22/2001	Nitrogen, Ammonia	.9841	mg/kg	0.20
001	5/22/2001	Fecal Coliform	10000	#/100ml	2000
001	5/22/2001	CBOD 5 day	1.1355	mg/kg	1.02
001	5/22/2001	Nitrogen, Ammonia	.9841	mg/l	0.20
June 2001:					
001	6/1/2001	Total Suspended Solids	38	mg/l	18.0
001	6/1/2001	CBOD 5 day	36	mg/l	15.0
001	6/1/2001	Nitrogen, Ammonia	13.2	mg/l	3.0
001	6/1/2001	Nitrogen, Ammonia	14.2	mg/l	2.0
001	6/1/2001	Nitrogen, Ammonia	.2565	mg/kg	0.14
001	6/1/2001	Nitrogen, Ammonia	.2598	mg/kg	0.20
001	6/1/2001	CBOD 5 day	23	mg/l	10.0
001	6/1/2001	Total Suspended Solids	29	mg/l	12.0
001	6/1/2001	Fecal Coliform	10000	#/100ml	1000
001	6/15/2001	Total Suspended Solids	20	mg/l	18.0
001	6/15/2001	Nitrogen, Ammonia	15.2	mg/l	3.0
001	6/15/2001	Fecal Coliform	10000	#/100ml	2000
001	6/15/2001	Nitrogen, Ammonia	.2531	mg/kg	0.20
001	6/21/2001	Chlorine, Total Residual	.1	mg/l	0.019
July 2001:					
001	7/1/2001	Total Suspended Solids	1.2301	mg/kg	0.82
001	7/1/2001	Fecal Coliform	2600	#/100ml	1000
001	7/1/2001	Nitrogen, Ammonia	1.6336	mg/kg	0.14
001	7/1/2001	CBOD 5 day	16	mg/l	10.0
001	7/1/2001	CBOD 5 day	2.2634	mg/kg	0.68
001	7/1/2001	Nitrogen, Ammonia	16.4	mg/l	2.0
001	7/8/2001	Fecal Coliform	2600	#/100ml	2000
001	7/8/2001	Nitrogen, Ammonia	21.6	mg/l	3.0
001	7/8/2001	Nitrogen, Ammonia	1.0628	mg/kg	0.20
001	7/22/2001	Total Suspended Solids	1.7714	mg/kg	1.23
001	7/22/2001	Nitrogen, Ammonia	2.2044	mg/kg	0.20
001	7/22/2001	Nitrogen, Ammonia	11.2	mg/l	3.0
001	7/22/2001	CBOD 5 day	3.9364	mg/kg	1.02
001	7/22/2001	CBOD 5 day	20	mg/l	15.0
August 2001:					
001	8/1/2001	Total Suspended Solids	63	mg/l	12.0
001	8/1/2001	Nitrogen, Ammonia	.6048	mg/kg	0.14
001	8/1/2001	Nitrogen, Ammonia	9.4	mg/l	2.0
001	8/1/2001	CBOD 5 day	2.3164	mg/kg	0.68
001	8/1/2001	CBOD 5 day	36	mg/l	10.0
001	8/1/2001	Total Suspended Solids	4.0537	mg/kg	0.82
001	8/1/2001	Fecal Coliform	10000	#/100ml	1000
001	8/15/2001	Total Suspended Solids	38	mg/l	18.0
001	8/15/2001	Total Suspended Solids	2.4451	mg/kg	1.23
001	8/15/2001	CBOD 5 day	1.1582	mg/kg	1.02
001	8/15/2001	Nitrogen, Ammonia	6.5	mg/l	3.0
001	8/15/2001	Nitrogen, Ammonia	.4182	mg/kg	0.20
001	8/15/2001	CBOD 5 day	18	mg/l	15.0
001	8/22/2001	Total Suspended Solids	88	mg/l	18.0
001	8/22/2001	Total Suspended Solids	5.6624	mg/kg	1.23

Outfall	Date	Parameter	Reported	Units	Permit Limit
August 2001 (cont.):					
001	8/22/2001	Nitrogen, Ammonia	.7914	mg/kg	0.20
001	8/22/2001	Nitrogen, Ammonia	12.3	mg/kg	3.0
001	8/22/2001	CBOD 5 day	3.4746	mg/kg	1.02
001	8/22/2001	CBOD 5 day	54	mg/l	15.0
001	8/22/2001	Fecal Coliform	10000	#/100ml	2000
September 2001:					
001	9/1/2001	Total Suspended Solids	.8327	mg/kg	0.82
001	9/1/2001	Nitrogen, Ammonia	1.3972	mg/kg	0.14
001	9/1/2001	Fecal Coliform	10000	#/100ml	1000
001	9/1/2001	Nitrogen, Ammonia	17.25	mg/l	2.0
001	9/8/2001	Nitrogen, Ammonia	13.8	mg/l	3.0
001	9/8/2001	Nitrogen, Ammonia	1.4625	mg/kg	0.20
001	9/22/2001	Fecal Coliform	10000	#/100ml	2000
001	9/22/2001	Nitrogen, Ammonia	1.3319	mg/kg	0.20
001	9/22/2001	Nitrogen, Ammonia	20.7	mg/l	3.0
October 2001:					
001	10/1/2001	CBOD 5 day	10.5	mg/l	10.0
001	10/1/2001	Nitrogen, Ammonia	18.3	mg/l	3.0
001	10/1/2001	Nitrogen, Ammonia	.9697	mg/kg	0.20
001	10/1/2001	Nitrogen, Ammonia	.8028	mg/kg	0.14
001	10/1/2001	Nitrogen, Ammonia	13.35	mg/l	2.0
001	10/1/2001	CBOD 5 day	.7267	mg/kg	0.68
001	10/15/2001	CBOD 5 day	1.1355	mg/kg	1.02
001	10/15/2001	Nitrogen, Ammonia	.6359	mg/kg	0.20
001	10/15/2001	Nitrogen, Ammonia	8.4	mg/l	3.0
November 2001:					
001	11/1/2001	Total Suspended Solids	37	mg/l	18.0
001	11/1/2001	CBOD 5 day	31	mg/l	15.0
001	11/1/2001	CBOD 5 day	2.112	mg/kg	1.02
001	11/1/2001	CBOD 5 day	1.1696	mg/kg	0.68
001	11/1/2001	CBOD 5 day	18	mg/l	10.0
001	11/1/2001	Total Suspended Solids	2.3732	mg/kg	0.82
001	11/1/2001	Total Suspended Solids	43	mg/l	12.0
001	11/1/2001	Total Suspended Solids	2.5208	mg/kg	1.23
001	11/15/2001	Total Suspended Solids	49	mg/l	18.0
001	11/15/2001	Total Suspended Solids	2.2256	mg/kg	1.23
December 2001:					
001	12/1/2001	Total Suspended Solids	23	mg/l	18.0
001	12/1/2001	Total Suspended Solids	18.5	mg/l	12.0
001	12/1/2001	Total Suspended Solids	1.7411	mg/kg	1.23
001	12/1/2001	Total Suspended Solids	1.4005	mg/kg	0.82
001	12/1/2001	CBOD 5 day	10.5	mg/l	10.0
001	12/1/2001	CBOD 5 day	.7949	mg/kg	0.68
January 2002:					
001	1/1/2002	Total Suspended Solids	49	mg/l	12.0
001	1/1/2002	CBOD 5 day	72	mg/l	10.0
001	1/1/2002	CBOD 5 day	5.8024	mg/kg	0.68
001	1/1/2002	Total Suspended Solids	4.0348	mg/kg	0.82
001	1/8/2002	Total Suspended Solids	44	mg/l	18.0

Outfall	Date	Parameter	Reported	Units	Permit Limit
January 2002 (cont.):					
001	1/8/2002	Total Suspended Solids	3.1643	mg/kg	1.23
001	1/8/2002	CBOD 5 day	78	mg/l	15.0
001	1/8/2002	CBOD 5 day	5.6094	mg/kg	1.02
001	1/22/2002	Total Suspended Solids	54	mg/l	18.0
001	1/22/2002	Total Suspended Solids	4.9054	mg/kg	1.23
001	1/22/2002	CBOD 5 day	5.9954	mg/kg	1.02
001	1/22/2002	CBOD 5 day	66	mg/l	15.0
March 2002:					
001	3/1/2002	Total Suspended Solids	16	mg/l	12.0
001	3/1/2002	Total Suspended Solids	2.1196	mg/kg	0.82
001	3/1/2002	CBOD 5 day	21.5	mg/l	10.0
001	3/1/2002	CBOD 5 day	2.3675	mg/kg	0.68
001	3/8/2002	CBOD 5 day	16	mg/l	15.0
001	3/22/2002	Total Suspended Solids	26	mg/l	18.0
001	3/22/2002	CBOD 5 day	27	mg/l	15.0
001	3/22/2002	CBOD 5 day	4.19	mg/kg	1.02
001	3/22/2002	Total Suspended Solids	4.0348	mg/kg	1.23
April 2002:					
001	4/1/2002	Total Suspended Solids	14.5	mg/l	12.0
001	4/8/2002	Total Suspended Solids	21	mg/l	18.0
May 2002:					
001	5/1/2002	Fecal Coliform	10000	#/100ml	1000
001	5/1/2002	CBOD 5 day	1.2301	mg/kg	0.68
001	5/1/2002	CBOD 5 day	19	mg/l	10.0
001	5/1/2002	Nitrogen, Ammonia	1.1041	mg/kg	0.14
001	5/1/2002	Nitrogen, Ammonia	22.15	mg/l	2.0
001	5/14/2002	Chlorine, Total Residual	.1	mg/l	0.019
001	5/15/2002	CBOD 5 day	30	mg/l	15.0
001	5/15/2002	CBOD 5 day	2.1575	mg/kg	1.02
001	5/15/2002	Nitrogen, Ammonia	1.1219	mg/kg	0.20
001	5/15/2002	Nitrogen, Ammonia	15.6	mg/l	3.0
001	5/20/2002	Chlorine, Total Residual	.1	mg/l	0.019
001	5/22/2002	Fecal Coliform	10000	#/100ml	2000
001	5/22/2002	Nitrogen, Ammonia	1.0863	mg/kg	0.20
001	5/22/2002	Nitrogen, Ammonia	28.7	mg/l	3.0
June 2002:					
001	6/1/2002	Total Suspended Solids	74	mg/l	12.0
001	6/1/2002	Nitrogen, Ammonia	20.5	mg/l	2.0
001	6/1/2002	Nitrogen, Ammonia	2.0818	mg/kg	0.14
001	6/1/2002	CBOD 5 day	5.4201	mg/kg	0.68
001	6/1/2002	Total Suspended Solids	6.673	mg/kg	0.82
001	6/1/2002	CBOD 5 day	61	mg/l	10.0
001	6/1/2002	Fecal Coliform	10000	#/100ml	1000
001	6/8/2002	Total Suspended Solids	2.5208	mg/kg	1.23
001	6/8/2002	Nitrogen, Ammonia	1.8486	mg/kg	0.20
001	6/8/2002	Nitrogen, Ammonia	13.2	mg/l	3.0
001	6/8/2002	CBOD 5 day	1.6805	mg/kg	1.02
001	6/18/2002	Dissolved Oxygen	4.8	mg/l	5.0
001	6/22/2002	Total Suspended Solids	130	mg/l	18.0

Outfall	Date	Parameter	Reported	Units	Permit Limit
June 2002 (cont.):					
001	6/22/2002	Fecal Coliform	10000	#/100ml	2000
001	6/22/2002	Nitrogen, Ammonia	2.3149	mg/kg	0.20
001	6/22/2002	Nitrogen, Ammonia	27.8	mg/l	3.0
001	6/22/2002	CBOD 5 day	9.1597	mg/kg	1.02
001	6/22/2002	CBOD 5 day	110	mg/l	15.0
001	6/22/2002	Total Suspended Solids	10.8251	mg/kg	1.23
001	6/24/2002	Dissolved Oxygen	3.4	mg/l	5.0
July 2002:					
001	7/1/2002	Dissolved Oxygen	4.8	mg/l	5.0
001	7/1/2002	Total Suspended Solids	7.4035	mg/kg	0.82
001	7/1/2002	Fecal Coliform	10000	#/100ml	1000
001	7/1/2002	CBOD 5 day	74	mg/l	10.0
001	7/1/2002	Nitrogen, Ammonia	1.8594	mg/kg	0.14
001	7/1/2002	Nitrogen, Ammonia	31.05	mg/l	2.0
001	7/1/2002	CBOD 5 day	4.1673	mg/kg	0.68
001	7/1/2002	Total Suspended Solids	72	mg/l	12.0
001	7/8/2002	Total Suspended Solids	132	mg/l	18.0
001	7/8/2002	Total Suspended Solids	14.489	mg/kg	1.23
001	7/8/2002	Nitrogen, Ammonia	2.7331	mg/kg	0.20
001	7/8/2002	Nitrogen, Ammonia	24.9	mg/l	3.0
001	7/8/2002	CBOD 5 day	5.8175	mg/kg	1.02
001	7/8/2002	CBOD 5 day	53	mg/l	15.0
001	7/10/2002	Dissolved Oxygen	2.9	mg/l	5.0
001	7/20/2002	Dissolved Oxygen	4.1	mg/l	5.0
001	7/30/2002	Dissolved Oxygen	4.4	mg/l	5.0
August 2002:					
001	8/1/2002	Total Suspended Solids	15	mg/l	12.0
001	8/1/2002	Total Suspended Solids	.863	mg/kg	0.82
001	8/1/2002	Nitrogen, Ammonia	2.85	mg/l	2.0
001	8/1/2002	CBOD 5 day	11	mg/l	10.0
001	8/1/2002	Fecal Coliform	10000	#/100ml	1000
001	8/1/2002	Nitrogen, Ammonia	.1641	mg/kg	014
September 2002:					
001	9/1/2002	Total Suspended Solids	30	mg/l	12.0
001	9/1/2002	CBOD 5 day	23.5	mg/l	10.0
001	9/1/2002	Nitrogen, Ammonia	15.75	mg/l	2.0
001	9/1/2002	Nitrogen, Ammonia	1.1923	mg/kg	0.14
001	9/1/2002	CBOD 5 day	1.779	mg/kg	0.68
001	9/1/2002	Total Suspended Solids	1.1355	mg/l	0.82
001	9/1/2002	Total Suspended Solids	2.271	mg/kg	0.82
001	9/8/2002	Total Suspended Solids	60	mg/l	18.0
001	9/8/2002	Nitrogen, Ammonia	1.1923	mg/kg	0.20
001	9/8/2002	Nitrogen, Ammonia	31.5	mg/l	3.0
001	9/8/2002	CBOD 5 day	1.779	mg/kg	1.02
001	9/8/2002	CBOD 5 day	47	mg/l	15.0
001	9/8/2002	Total Suspended Solids	2.271	mg/kg	1.23
001	9/11/2002	Dissolved Oxygen	3.2	mg/l	5.0
October 2002:					
001	10/1/2002	Nitrogen, Ammonia	4.95	mg/l	2.0

Outfall	Date	Parameter	Reported	Units	Permit Limit
October 2002 (cont.):					
001	10/1/2002	Nitrogen, Ammonia	.1554	mg/kg	0.14
001	10/8/2002	Nitrogen, Ammonia	3.2	mg/l	3.0
November 2002:					
001	11/1/2002	CBOD 5 day	.7532	mg/kg	0.68
001	11/22/2002	Total Suspended Solids	1.2491	mg/kg	1.23
001	11/22/2002	CBOD 5 day	1.0825	mg/kg	1.02
December 2002:					
001	12/1/2002	Total Suspended Solids	1.26041	mg/kg	0.82
001	12/1/2002	CBOD 5 day	1.20363	mg/kg	0.68
001	12/1/2002	CBOD 5 day	12	mg/l	10.0
January 2003:					
001	1/1/2003	Total Suspended Solids	1.07494	mg/kg	0.82
001	1/1/2003	CBOD 5 day	.88569	mg/kg	0.68
001	1/1/2003	CBOD 5 day	42	mg/l	10.0
001	1/1/2003	Total Suspended Solids	43.5	mg/l	12.0
001	1/15/2003	Dissolved Oxygen	3.2	mg/l	5.0
001	1/15/2003	Total Suspended Solids	77	mg/l	18.0
001	1/15/2003	CBOD 5 day	1.18092	mg/kg	1.02
001	1/15/2003	CBOD 5 day	78	mg/l	15.0
February 2003:					
001	2/1/2003	Total Suspended Solids	2.05904	mg/kg	0.82
001	2/1/2003	CBOD 5 day	1.27176	mg/kg	0.68
001	2/1/2003	CBOD 5 day	21	mg/l	10.0
001	2/1/2003	Total Suspended Solids	34	mg/l	12.0
001	2/8/2003	CBOD 5 day	30	mg/l	15.0
001	2/8/2003	Total Suspended Solids	3.028	mg/kg	1.23
001	2/8/2003	CBOD 5 day	1.8168	mg/kg	1.02
001	2/8/2003	Total Suspended Solids	50	mg/l	18.0
March 2003:					
001	3/1/2003	CBOD 5 day	31.5	mg/l	10.0
001	3/1/2003	CBOD 5 day	2.17827	mg/kg	0.68
001	3/1/2003	Total Suspended Solids	41.	mg/l	12.0
001	3/1/2003	Total Suspended Solids	2.84632	mg/kg	0.82
001	3/8/2003	CBOD 5 day	47.	mg/l	15.0
001	3/8/2003	CBOD 5 day	3.02422	mg/kg	1.02
001	3/8/2003	Total Suspended Solids	60.	mg/l	18.0
001	3/8/2003	Total Suspended Solids	3.8607	mg/kg	1.23
001	3/12/2003	Dissolved Oxygen	4.8	mg/l	5.0
April 2003:					
001	4/1/2003	CBOD 5 day	18.	mg/l	15.0
001	4/1/2003	CBOD 5 day	2.38455	mg/kg	1.02
001	4/1/2003	CBOD 5 day	25.	mg/l	10.0
001	4/1/2003	CBOD 5 day	3.49356	mg/kg	0.68
001	4/1/2003	Total Suspended Solids	2.1196	mg/kg	1.23
001	4/1/2003	Total Suspended Solids	12.5	mg/l	12.0
001	4/1/2003	Total Suspended Solids	1.70704	mg/kg	0.82
001	4/15/2003	CBOD 5 day	32.	mg/l	15.0
001	4/15/2003	CBOD 5 day	4.60256	mg/kg	1.02

Outfall	Date	Parameter	Reported	Units	Permit Limit
April 2003 (cont.):					
001	4/15/2003	Total Suspended Solids	1.29447	mg/kg	1.23
May 2003:					
001	5/1/2003	CBOD 5 day	92.	mg/l	10.0
001	5/1/2003	CBOD 5 day	1.8168	mg/kg	0.68
001	5/1/2003	Fecal Coliform	10000.	#/100 ml	1000
001	5/1/2003	Nitrogen, Ammonia (NH3)	20.9	mg/l	2.0
001	5/1/2003	Nitrogen, Ammonia (NH3)	.6302	mg/kg	0.14
001	5/1/2003	Total Suspended Solids	57.5	mg/l	12.0
001	5/1/2003	Total Suspended Solids	1.07873	mg/kg	0.82
001	5/8/2003	CBOD 5 day	64.	mg/l	15.0
001	5/8/2003	CBOD 5 day	3.6336	mg/kg	1.02
001	5/8/2003	Nitrogen, Ammonia (NH3)	22.2	mg/l	3.0
001	5/8/2003	Nitrogen, Ammonia (NH3)	1.26041	mg/kg	0.20
001	5/8/2003	Total Suspended Solids	38.	mg/l	18.0
001	5/8/2003	Total Suspended Solids	2.15745	mg/kg	1.23
001	5/13/2003	Dissolved Oxygen	3.8	mg/l	5.0
001	5/21/2003	Dissolved Oxygen	4.7	mg/l	5.0
001	5/29/2003	Dissolved Oxygen	3.2	mg/l	5.0
June 2003:					
001	6/1/2003	CBOD 5 day	32.	mg/l	10.0
001	6/1/2003	CBOD 5 day	1.67297	mg/kg	0.68
001	6/1/2003	Nitrogen, Ammonia (NH3)	27.1	mg/l	2.0
001	6/1/2003	Nitrogen, Ammonia (NH3)	1.37433	mg/kg	0.14
001	6/1/2003	Total Suspended Solids	82.	mg/l	12.0
001	6/1/2003	Total Suspended Solids	4.36032	mg/kg	0.82
001	6/8/2003	CBOD 5 day	36.	mg/l	15.0
001	6/8/2003	CBOD 5 day	2.18016	mg/kg	1.02
001	6/8/2003	Nitrogen, Ammonia (NH3)	26.	mg/l	3.0
001	6/8/2003	Nitrogen, Ammonia (NH3)	1.57456	mg/kg	0.20
001	6/8/2003	Total Suspended Solids	100.	mg/l	18.0
001	6/8/2003	Total Suspended Solids	6.056	mg/kg	1.23
001	6/10/2003	Chlorine, Total Residual	.1	mg/l	0.019
001	6/10/2003	Dissolved Oxygen	4.8	mg/l	5.0
001	6/21/2003	Dissolved Oxygen	4.6	mg/l	5.0
001	6/30/2003	Dissolved Oxygen	3.7	mg/l	5.0
July 2003:					
001	7/1/2003	CBOD 5 day	41.5	mg/l	10.0
001	7/1/2003	CBOD 5 day	13.3515	mg/kg	0.68
001	7/1/2003	Nitrogen, Ammonia (NH3)	19.55	mg/l	2.0
001	7/1/2003	Nitrogen, Ammonia (NH3)	4.83477	mg/kg	0.14
001	7/1/2003	Total Suspended Solids	30.5	mg/l	12.0
001	7/1/2003	Total Suspended Solids	8.8323	mg/kg	0.82
001	7/8/2003	CBOD 5 day	16.	mg/l	15.0
001	7/8/2003	CBOD 5 day	1.09008	mg/kg	1.02
001	7/8/2003	Nitrogen, Ammonia (NH3)	16.8	mg/l	3.0
001	7/8/2003	Nitrogen, Ammonia (NH3)	1.14458	mg/kg	0.20
001	7/12/2003	Chlorine, Total Residual	.1	mg/l	0.019
001	7/17/2003	Dissolved Oxygen	3.2	mg/l	5.0
001	7/22/2003	CBOD 5 day	67.	mg/l	15.0
001	7/22/2003	CBOD 5 day	25.6131	mg/kg	1.02

Outfall	Date	Parameter	Reported	Units	Permit Limit
July 2003 (cont.):					
001	7/22/2003	Nitrogen, Ammonia (NH3)	22.3	mg/l	3.0
001	7/22/2003	Nitrogen, Ammonia (NH3)	8.52496	mg/kg	0.20
001	7/22/2003	Total Suspended Solids	43.	mg/l	18.0
001	7/22/2003	Total Suspended Solids	16.4382	mg/kg	1.23
August 2003					
001	8/1/2003	CBOD 5 day	25.	mg/l	10.0
001	8/1/2003	Fecal Coliform	10000.	#/100 ml	1000
001	8/1/2003	Nitrogen, Ammonia (NH3)	29.55	mg/l	2.0
001	8/1/2003	Total Suspended Solids	28.	mg/l	12.0
001	8/8/2003	CBOD 5 day	22.	mg/l	15.0
001	8/8/2003	Nitrogen, Ammonia (NH3)	28.2	mg/l	3.0
001	8/8/2003	Total Suspended Solids	34.	mg/l	18.0
001	8/22/2003	CBOD 5 day	28.	mg/l	15.0
001	8/22/2003	Fecal Coliform	10000.	#/100 ml	2000
001	8/22/2003	Nitrogen, Ammonia (NH3)	30.9	mg/l	3.0
001	8/22/2003	Total Suspended Solids	22.	mg/l	18.0
001	8/26/2003	Dissolved Oxygen	3.5	mg/l	5.0
September 2003					
001	9/1/2003	CBOD 5 day	15.	mg/l	10.0
001	9/1/2003	Nitrogen, Ammonia (NH3)	23.15	mg/l	2.0
001	9/1/2003	Nitrogen, Ammonia (NH3)	.74943	mg/kg	0.14
001	9/1/2003	Total Suspended Solids	17.5	mg/l	12.0
001	9/4/2003	Dissolved Oxygen	4.8	mg/l	5.0
001	9/11/2003	Dissolved Oxygen	4.1	mg/l	5.0
001	9/15/2003	Nitrogen, Ammonia (NH3)	20.7	mg/l	3.0
001	9/15/2003	Nitrogen, Ammonia (NH3)	.6268	mg/kg	0.20
001	9/18/2003	Chlorine, Total Residual	.3	mg/l	0.019
October 2003					
001	10/1/2003	CBOD 5 day	29.	mg/l	10.0
001	10/1/2003	CBOD 5 day	.95761	mg/kg	0.68
001	10/1/2003	Fecal Coliform	10000.	#/100 ml	1000
001	10/1/2003	Nitrogen, Ammonia (NH3)	38.6	mg/l	2.0
001	10/1/2003	Nitrogen, Ammonia (NH3)	1.16881	mg/kg	0.14
001	10/1/2003	Total Suspended Solids	13.	mg/l	12.0
November 2003					
001	11/1/2003	Total Suspended Solids	0.95874	mg/kg	0.82
001	11/1/2003	CBOD 5 day	0.78766	mg/kg	0.68
001	11/8/2003	Total Suspended Solids	1.49053	mg/kg	1.23
001	11/8/2003	CBOD 5 day	1.21953	mg/kg	1.02
December 2003					
001	12/1/2003	CBOD 5 day	12.	mg/l	10.0
February 2004					
001	2/1/2004	Total Suspended Solids	15.	mg/l	12.0
001	2/1/2004	CBOD 5 day	.86298	mg/kg	0.68
001	2/1/2004	CBOD 5 day	19.	mg/l	10.0
001	2/8/2004	CBOD 5 day	19.	mg/l	15.0

March 2004					
001	3/1/2004	CBOD 5 day	11.	mg/l	10.0
001	3/8/2004	CBOD 5 day	16.	mg/l	15.0
April 2004					
001	4/1/2004	CBOD 5 day	12.	mg/l	10.0
May 2004					
001	5/1/2004	Nitrogen, Ammonia (NH3)	8.95	mg/l	2.0
001	5/1/2004	Nitrogen, Ammonia (NH3)	3.1	mg/l	3.0
001	5/1/2004	Nitrogen, Ammonia (NH3)	.46253	mg/kg	0.14
June 2004					
001	6/1/2004	Nitrogen, Ammonia (NH3)	2.05	mg/l	2.0
001	6/15/2004	Nitrogen, Ammonia (NH3)	4.	mg/l	3.0
July 2004					
001	7/28/2004	Chlorine, Total Residual	.02	mg/l	0.019

ATTACHMENT II

Interim Effluent Limitations and Monitoring Requirements for Outfall No. OPV00008 001

Effluent Characteristic	Discharge Limitations							Monitoring Requirements		
Parameter	Concentration Specified Units				Loading*kg/day			Measuring Frequency	Sampling Type	Monitoring Months
	Maximum	Minimum	Weekly	Monthly	Daily	Weekly	Monthly			
00010 - Water Temperature - C	-	-	-	-	-	-	-	1/Day	Grab	All
00083 - Color, Severity (1)	-	-	-	-	-	-	-	1/Day	Estimate	All
00300 - Dissolved Oxygen - mg/l	-	5.0	-	-	-	-	-	1/Day	Grab	All
00530 - Total Suspended Solids - mg/l	-	-	45	30	-	-	-	1/Week	Composite	All
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	2/Month	Composite	Winter
00610 - Nitrogen, Ammonia (NH3) - mg/l	-	-	-	-	-	-	-	2/Month	Composite	Summer
01350 - Odor, Severity (1)	-	-	-	-	-	-	-	1/Day	Estimate	All
01350 - Turbidity, Severity (1)	-	-	-	-	-	-	-	1/Day	Estimate	All
31616 - Fecal Coliform - #/100 ml	-	-	2000	1000	-	-	-	2/Month	Grab	Summer
50050 - Flow Rate - MGD	-	-	-	-	-	-	-	1/Day	Estimate	All
61941 - pH, Maximum - S.U.	9.0	-	-	-	-	-	-	1/Week	Grab	All
61942 - pH, Minimum - S.U.	-	6.5	-	-	-	-	-	1/Week	Grab	All
80082 - CBOD 5 day - mg/l	-	-	40	25	-	-	-	1/Week	Composite	All

1. If Respondent uses chlorine for disinfection, the Chlorine Residual (Reporting Code 50060) shall be maintained at a level not to exceed 0.5 mg/l and shall be monitored 1/week by grab sample**.

* The average effluent loading limitations are established using the following flow value: (not applicable).
** See Part II, Item H of NPDES permit (not applicable).

(1) If severity units are required for turbidity, odor, or color, use the following table to determine the value between 0 and 4 that is reported.

Reported Value*	Severity Description	Turbidity	Odor	Color
0	None	Clear	None	Colorless
1	Mild			
2	Moderate	Light Solids	Musty	Grey
3	Serious			
4	Extreme	Heavy Solids	Septic	Black

* Interpolate between the descriptive phrases.