

November 17, 2008

Mark Yardley, Public Works Director City of Alma 811 Fayetteville Ave. Alma, AR 72921

AFIN: 17-00059 NPDES Permit No.: AR0021466

Dear Mr. Yardley:

On October 21 and 22, 2008, I performed a routine compliance sampling inspection of the waste water treatment facility in accordance with the provisions of the Federal Clean Water Act, the Arkansas Water and Air Pollution Control Act, and the regulations promulgated thereunder. This inspection revealed the following violations:

- 1. In regard to Operation and Maintenance, a freeboard violation was observed in pond five which is the equalization pond. Estimated freeboard a time of inspection was less than 18 inches. According to the Ten State Standards, freeboard elevation should be at least 24 inches in order to prevent the pond from overflowing.
- 2. After reviewing the August 2008 Discharge Monitoring Report, a permit excursion was noted in regard to the monthly average concentration and the 7-day average concentration for Total Suspended Solids. Your facility reported 35.1 mg/l, while the permit limit is 30.0 mg/l for the monthly average. The facility also reported 84.0 mg/l for the 7-day average and the permit limit is 45.0 mg/l. Although this violation was reported to the Department, the facility must take all reasonable measures to eliminate any future permit excursions.
- 3. Facility operator was unable to provide any documentation to verify that the facility was in compliance with Storm Water Pollution Prevention Plan requirements of the permit.
- 4. Samples collected during the inspection revealed a permit excursion in regard to the 7-day average for Total Suspended Solids. Arkansas Department of Environmental Quality lab reported 50.0 mg/l which exceeds the permit limit of 45.0 mg/l. The facility must continue to take all necessary measures to eliminate any future permit excursions.

Yardley, City of Alma November 17, 2008 Page 2

The above items require your immediate attention. Please submit a written response to these findings to the Water Division Enforcement Section of this Department.

Water Division Enforcement Section Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

This response should contain detailed documentation describing the course of action taken to correct the items noted. This corrective action should be completed as soon as possible, and the written response is due by December 10, 2008.

For additional information you may contact the Enforcement Section by telephone at 501-682-0639 or by fax at 501-682-0910.

If I can be of any assistance, please contact me at 479-452-4822 ext. 11.

Sincerely,

Jeff Tyler

District 4 Field Inspector

Water Division

cc: Water Division Enforcement Branch

Water Division Permits Branch

		ADEQ Water NPDES In	nspec	tion		AFIN:	17-00	059					Perr	nit #: AR	00214	166
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	67	ection Work Days 0 0 0 69	j	Facility E	Evaluation 3	ı Katın	ıg	71 B	I N	ì	A N 73			74 75		Reserved
							Sect	tion B:	Faci	ility I) Data					
incli City	Name and Location of Facility Inspected (For industrial users discharging to POTW, also include POTW name and NPDES permit number) City of Alma POTW Section B: Facility Data Entry Time/Date 0930 / October 21, 2008 March 01, 2008															
		ck Road 72921									Exit Time 1610 / O 0845 / O	ctobe	er 21,			Permit Expiration Date February, 28 2013
		On-Site Representative(s)/Tondren / Operator, / 47				umber	(s)								Co	ner Facility Data ordinates:
Ma 811	Name, Address of Responsible Official/Title/Phone and Fax Number Mark Yardley / Public Works Director / 479-632-2254 / fax 479-632-5136 811 Fayetteville Ave. Alma, AR 72921 Outfall 001 N 35'26'43" W 94'09'33"									35°26′43"						
				(S =							ring Inspe factory, N		Evalu	ated)		
S	Permi	it	S	1	Measurer	•			M		rations &				S	Sample Procedures
S	Recor	ds/Reports	S	Self-M	Ionitorin	g Prog	gram		N	Slud	lge Handli	ng/Di	sposal	l	U	SWPPP
S	Facili	ty Site Review	S	Comp	liance Sc	hedule	es		N	Pret	reatment				N	Multimedia
S	Efflue	ent/Receiving Waters	S	Labor					N		m Water				N	Other:
											ch additio					
	1. In regard to operation and maintenance, one aerator was not in operation in pond three. It was documented in the log and the part was ordered. The equalization pond (pond five) appeared to have a freeboard violation. At time of inspection, it was estimated to be less than 18 inches. Ten State Standards requires the freeboard elevation to be at least 24 inches.															
	2. Facility was unable to provide documentation which confirmed compliance with the SWPPP requirements of the permit.															
		average concentration f	for T	otal Sus	spended	Solid	ls. Facil	lity re	port	ted 35	5.1mg/l, f	or th	e moi	nthly ave	rage	the monthly average and 7-day and the permit limit is 30mg/l. s notified in regard to this
	4.	violation.	ng the	e inspec	tion rev	ealed	a perm	it vio	latio	on in	regard to	the '	7-day	average	of TS	SS. ADEQ lab reported 50.0
Nor			_	ու ուու	01 45.0		gency/O	_				ie Wi	uiiii]	hei iiiit III	mits.	Date
Jeff	nc(s) an Tyler	d Signature(s) of Inspector(s	s)			A	R Dept	of E	nvir	onme	ax ental Qua 52 4827	lity-/	/Ft. Si	mith/ 479)-	November 17, 2008

Agency/Office/Phone and Fax Numbers

Signature of Reviewer

Date

ADEQ Water NPDES Inspection	AFIN: 17-00059	Permit #: AR0021466

SECTION A: PERMIT VERIFICATION	
PERMIT SATISFACTORILY ADDRESSES OBSERVATIONS	☑S □M □U □NA □NE
DETAILS:	
CORRECT NAME AND MAILING ADDRESS OF PERMITTEE:	⊠y □n □na □ne
2. NOTIFICATION GIVEN TO EPA/STATE OF NEW DIFFERENT OR INCREASED DISCHARGES:	□Y □N ☑NA □NE
NUMBER AND LOCATION OF DISCHARGE POINTS AS DESCRIBED IN PERMIT:	Øy □n □na □ne
4. ALL DISCHARGES ARE PERMITTED:	Øy □n □na □ne
SECTION B: RECORDKEEPING AND REPORTING EVALUATION	
RECORDS AND REPORTS MAINTAINED AS REQUIRED BY PERMIT	☑S □M □U □NA □NE
DETAILS:	
ANALYTICAL RESULTS CONSISTENT WITH DATA REPORTED ON DMRS:	☑Y □N □NA □NE
2. SAMPLING AND ANALYSES DATA ADEQUATE AND INCLUDE:	⊠s □m □u □na □ne
a. DATES AND TIME(S) OF SAMPLING:	Øy □n □na □ne
b. EXACT LOCATION(S) OF SAMPLING:	☑Y □N □NA □NE
c. NAME OF INDIVIDUAL PERFORMING SAMPLING:	☑Y □N □NA □NE
d. ANALYTICAL METHODS AND TECHNIQUES:	Øy □n □na □ne
e. RESULTS OF CALIBRATIONS:	Øy □n □na □ne
f. RESULTS OF ANALYSES:	Øy □n □na □ne
g. DATES AND TIMES OF ANALYSES:	☑Y □N □NA □NE
h. NAME OF PERSON(S) PERFORMING ANALYSES:	☑Y □N □NA □NE
3. LABORATORY EQUIPMENT CALIBRATION AND MAINTENANCE RECORDS ADEQUATE:	⊠s □m □u □na □ne
4. PLANT RECORDS INCLUDE SCHEDULES, DATES OF EQUIPMENT MAINTENANCE AND REPAIR:	⊠s □m □u □na □ne
5. EFFLUENT LOADINGS CALCULATED USING DAILY EFFLUENT FLOW AND DAILY ANALYTICAL DATA:	Øy □n □na □ne
SECTION C: OPERATIONS AND MAINTENANCE	
TREATMENT FACILITY PROPERLY OPERATED AND MAINTAINED	│ □S ☑M □U □NA □NE
DETAILS: One aerator was not in operation in pond three, it was noted in the maintenance	ce log and part ordered.
1. TREATMENT UNITS PROPERLY OPERATED:	⊠s □m □u □na □ne
2. TREATMENT UNITS PROPERLY MAINTAINED: Freeboard violation was observed in pond five.	□S ☑M □U □NA □NE
3. STANDBY POWER OR OTHER EQUIVALENT PROVIDED:	☑S ☐M ☐U ☐NA ☐NE
4. ADEQUATE ALARM SYSTEM FOR POWER OR EQUIPMENT FAILURES AVAILABLE:	☑S ☐M ☐U ☐NA ☐NE
5. ALL NEEDED TREATMENT UNITS IN SERVICE:	Øs □m □u □na □ne
6. ADEQUATE NUMBER OF QUALIFIED OPERATORS PROVIDED: 1 Class III and 1 Class I	ØS OM OU ONA ONE
7. SPARE PARTS AND SUPPLIES INVENTORY MAINTAINED:	Øs □m □u □na □ne
8. OPERATION AND MAINTENANCE MANUAL AVAILABLE:	ØY ON ONA ONE
9. STANDARD OPERATING PROCEDURES AND SCHEDULES ESTABLISHED:	ØY ON ONA ONE
10. PROCEDURES FOR EMERGENCY TREATMENT CONTROL ESTABLISHED:	ØY ON ONA ONE
11. HAVE BYPASSES/ <u>OVERFLOWS</u> OCCURRED AT THE PLANT OR IN THE <u>COLLECTION SYSTEM</u> IN THE LAST YEAR:	ØY □N □NA □NE
12. IF SO, HAS THE REGULATORY AGENCY BEEN NOTIFIED: Monthly SSO report	ØY ON ONA ONE
13. HAS CORRECTIVE ACTION BEEN TAKEN TO PREVENT ADDITIONAL BYPASSES/OVERFLOWS:	ØY ON ONA ONE
14. HAVE ANY HYDRAULIC OVERLOADS OCCURRED AT THE TREATMENT PLANT:	OY ØN ONA ONE
15. IF SO, DID PERMIT VIOLATIONS OCCUR AS A RESULT:	□Y □N ☑NA □NE

ADEQ Water NPDES Inspection	AFIN: 17-00059	Permit #: AR0021466

SI	ECTION D: SAMPLING	
	ERMITTEE SAMPLING MEETS PERMIT REQUIREMENTS	☑S ☐M ☐U ☐NA ☐NE
	ETAILS:	
1.	SAMPLES TAKEN AT SITE(S) SPECIFIED IN PERMIT:	⊠y □n □na □ne
2.	LOCATIONS ADEQUATE FOR REPRESENTATIVE SAMPLES:	⊠y □n □na □ne
3.	FLOW PROPORTIONED SAMPLES OBTAINED WHEN REQUIRED BY PERMIT:	⊠y □n □na □ne
4.	SAMPLING AND ANALYSES COMPLETED ON PARAMETERS SPECIFIED IN PERMIT:	⊠y □n □na □ne
5.	SAMPLING AND ANALYSES PERFORMED AT FREQUENCY SPECIFIED IN PERMIT:	⊠y □n □na □ne
6.	SAMPLE COLLECTION PROCEDURES ADEQUATE:	✓Y □N □NA □NE
a	a. SAMPLES REFRIGERATED DURING COMPOSITING:	⊠y □n □na □ne
b	D. PROPER PRESERVATION TECHNIQUES USED:	⊠y □n □na □ne
C	: CONTAINERS AND SAMPLE HOLDING TIMES CONFORM TO 40 CFR 136:	⊠y □n □na □ne
7.	IF MONITORING IS PERFORMED MORE OFTEN THAN REQUIRED ARE RESULTS REPORTED ON THE DMR:	□Y □N ☑NA □NE
SI	ECTION E: FLOW MEASUREMENT	
	ERMITTEE FLOW MEASUREMENT MEETS PERMIT REQUIREMENTS	ØS OM OU ONA ONE
	ETAILS:	
1.	PRIMARY FLOW MEASUREMENT DEVICE PROPERLY INSTALLED AND MAINTAINED: TYPE OF DEVICE: 3' rect. Weir w/ end	d contr.
2.	FLOW MEASURED AT EACH OUTFALL AS REQUIRED:	✓Y □N □NA □NE
3.	SECONDARY INSTRUMENTS (TOTALIZERS, RECORDERS, ETC.) PROPERLY OPERATED AND MAINTAINED:	ØY □N □NA □NE
4.	CALIBRATION FREQUENCY ADEQUATE: Date of last calibration (4-1-08)	✓Y □N □NA □NE
5.	RECORDS MAINTAINED OF CALIBRATION PROCEDURES:	⊠Y □N □NA □NE
6.	CALIBRATION CHECKS DONE TO ASSURE CONTINUED COMPLIANCE: one per month	Øy □n □na □ne
7.	FLOW ENTERING DEVICE WELL DISTRIBUTED ACROSS THE CHANNEL AND FREE OF TURBULENCE:	☑Y □N □NA □NE
8.	FLOW MEASUREMENT EQUIPMENT ADEQUATE TO HANDLE EXPECTED RANGE OF FLOW RATES:	✓Y □N □NA □NE
9.	HEAD MEASURED AT PROPER LOCATION:	✓Y □N □NA □NE
SI	ECTION F: LABORATORY	
	ERMITTEE LABORATORY PROCEDURES MEET PERMIT REQUIREMENTS	ØS OM OU ONA ONE
	TAILS:	
1.	EPA APPROVED ANALYTICAL PROCEDURES USED (40 CFR 136.3 FOR LIQUIDS, 503.8(B) FOR SLUDGES) :	⊠Y □N □NA □NE
2.	IF ALTERNATIVE ANALYTICAL PROCEDURES ARE USED, PROPER APPROVAL HAS BEEN OBTAINED:	□Y □N ☑NA □NE
3.	SATISFACTORY CALIBRATION AND MAINTENANCE OF INSTRUMENTS AND EQUIPMENT:	☑Y □N □NA □NE
4.	QUALITY CONTROL PROCEDURES ADEQUATE:	✓Y □N □NA □NE
5.	DUPLICATE SAMPLES ARE ANALYZED ≥10% OF THE TIME:	✓Y □N □NA □NE
6.	SPIKED SAMPLES ARE ANALYZED ≥10% OF THE TIME:	✓Y □N □NA □NE
7.	COMMERCIAL LABORATORY USED:	✓Y □N □NA □NE
	a. LAB NAME: <u>Data Testing</u> <u>American Interplex</u>	
	b. LAB ADDRESS: 3434 Country Club Ave. Ft. Smith 8600 Kanis Road Little Rock	
	: PARAMETERS PERFORMED: TSS,CBOD,FC,NH3-N Biomonitoring	
8.	BIOMONITORING PROCEDURES ADEQUATE:	☑Y □N □NA □NE
	a. PROPER ORGANISMS USED:	ØY □N □NA □NE
	p. PROPER DILUTION SERIES FOLLOWED:	☑Y □N □NA □NE
	: PROPER TEST METHODS AND DURATION:	ØY □N □NA □NE
	I. RETESTS AND/OR TRE PERFORMED AS REQUIRED:	□Y □N □NA ☑NE
		I. III IIIA IIII

ADEQ Water NPDES Inspection	AFIN: 17-00059	Permit #: AR0021466

SECTION	G: EFFLUEI	NT/RECEIVIN	IG WATERS	OBSERVATION	ONS					
	N VISUAL OBS					⊠s □m □	U DNA DNE			
DETAILS:			-							
OUTFALL #:	OIL SHEEN	GREASE	TURBIDITY	VISIBLE FOAM	FLOATING SOLIDS	COLOR	OTHER			
001	None	None	Light	Trace	Light	Light Green				
			5							
		<u> </u>	L	-1	1	1	1			
SECTION	H: SLUDGE	DISPOSAL								
	DISPOSAL MEE		REQUIREMEN	TS		⊠s □m □	U DNA DNE			
	There has not k				L					
	ANAGEMENT ADEQU					⊠s □м	□U □NA □NE			
2. SLUDGE R	ECORDS MAINTAINED	D AS REQUIRED BY 40	0 CFR 503:				□U ØNA □NE			
3. FOR LAND	APPLIED SLUDGE, TY	PE OF LAND APPLIE	D TO: (E.G., FOREST	, AGRICULTURAL, PUI	BLIC CONTACT SITE):					
SECTION	I: SAMPLIN	G INSPECTION	ON PROCED	URES						
	RESULTS WITH					□s □m ☑	U DNA DNE			
DETAILS:	7-day average 1	for TSS was 50.	.0 mg/l which e	xceeds the perr	nit requirements.					
	OBTAINED THIS INSPE		-	-	-	✓Y	□N □NA □NE			
2. TYPE OF S	AMPLE: GRAB:	☑COMPOSITE: N	METHOD: FREQUE	ENCY:						
4. FLOW PRO	PORTIONED SAMPLE	S OBTAINED:				✓Y	□N □NA □NE			
5. SAMPLE O	BTAINED FROM FACIL	LITY'S SAMPLING DE\	/ICE:			✓Y	□N □NA □NE			
6. SAMPLE R	EPRESENTATIVE OF	VOLUME AND NATUR	E OF DISCHARGE:			✓Y	□N □NA □NE			
7. SAMPLE S	PLIT WITH PERMITTER	E:				✓Y	□N □NA □NE			
8. CHAIN-OF-	CUSTODY PROCEDUI	RES EMPLOYED:				✓Y	□n □na □ne			
9. SAMPLES	COLLECTED IN ACCO	RDANCE WITH PERM	IT:			✓Y	□N □NA □NE			
SECTION	J: STORM V	VATER POLL	UTION PRE	VENTION PL	AN					
STORM W	ATER MANAG	EMENT MEET	S PERMIT RE	QUIREMENTS	3	□s □m ☑	U □NA □NE			
DETAILS:_	Facility was un	able to provide	any document	s in regard to th	ne SWPPP.					
1. SWPPP UP	DATED AS NEEDED:_	_ DATE OF LAST UP	DATE: NA			□Y	☑N □NA □NE			
2. SITE MAP I	NCLUDING ALL DISCH	HARGES AND SURFA	CE WATERS:			□Y	☑N □NA □NE			
3. POLLUTIO	N PREVENTION TEAM	IDENTIFIED:				□Y	☑N □NA □NE			
4. POLLUTIO	N PREVENTION TEAM	PROPERLY TRAINED):			□Y	☑N □NA □NE			
5. LIST OF PO	TENTIAL POLLUTANT	Γ SOURCES:				□Y	☑N □NA □NE			
6. LIST OF PO	TENTIAL SOURCES A	AND PAST SPILLS ANI	D LEAKS:			□Y	☑N □NA □NE			
7. ALL NON-S	TORM WATER DISCH	ARGES ARE AUTHOR	RIZED:			□Y	☑N □NA □NE			
8. LIST OF ST	RUCTURAL BMPS:					□Y	☑N □NA □NE			
9. LIST OF NO	ON-STRUCTURAL BMF	PS:					⊠n □na □ne			
10. BMPS PRC	PERLY OPERATED A	ND MAINTAINED:				□Y	⊠N □NA □NE			
11. INSPECTIO	ONS CONDUCTED AS I	REQUIRED:				□Y	⊠n □na □ne			

		FLOW CALCULATION	SHEET	
Date: 10- 2	21-08	Time: 0955		
Head in Inc	hes: NA	Feet: .37		
Type 9 Cize	of Drimon, Elo	w Magaurament Davisas		
	ar weir with end	w Measurement Device: contractions		
Nama & Mo	ndel of Seconda	ry Flow Measurement De	vice:	
Milltronics C		ry i low ivieasurement be	vice.	
Date of last	Calibration of S	Secondary Flow Device: A	unril 1 2008	
Date of last	Cambration of	secondary Flow Device. A	prii 1, 2006	
Recorded F	low at Date & T	ime Listed Above: 1.48	mgd (Facility Flow	w Meter)
Calculated	Flow at Date &	Time Listed Above: 1.4	17 mgd	
(Flow is calculated	ed using flow charts in	n: ISCO Open Channel Flow Measu	urement Handbook-5 th Edition, Table	# 10- <u>5</u>)
% Error =	Recorded Value	ue - Calculated Value	X 100	
70 21101 =	Ca	Iculated Value	X 100	
% Error =	1.48	- 1.417	X 100	
70 LIIOI =		1.417	X 100	
% Error =	.044	X 100		
/6 LIIOI =	1.417	X 100		
% Error =	.031	X 100		
0/ Error	2.4	0/		
% Error =	3.1	%		
Comments:	OK, within +	<u>/- 10%</u>		

DMR Calculation Check

Reporting Period: From 2008 August 01 To 2008 August 31

Year Month Day Year Month Day

Parameter Checked: TSS

	Loading Mass	Concentration Monthly			
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l		
Reported Value:	130	35.1	84.0		
Calculated Value:	130	35.1	84.0		
Permit Value:	438	30	45		

If calculated value does not equal reported value, explain: Equal, permit excursion was noted in regard to the monthly average and 7-day average for TSS. Excursion was reported to the Department.

DMR Calculation Check

Reporting Period: From 2008 August 01 To 2008 August 31

Year Month Day Year Month Day

Parameter Checked: NH3-N

	Loading Mass	Concentration Monthly				
	Mo. Avg lbs/day	Mo. Avg mg/l	7-day Avg mg/l			
Reported Value:	10.4	2.5	4.9			
Calculated Value:	10.4	2.5	4.9			
Permit Value:	72.9	5.0	7.5			

If calculated value does not equal reported value, explain: <u>Equal</u>

	Water Division NPDES Photographic Evidence Sheet									
Location:	Location: City of Alma POTW-2500 Orrick Road									
Photographo	er: J	: Jeff Tyler			Witness:	None				
Photo #	1	Of	2		Date:	10-21-08	Time:	1020		

Description: View of pond three and one aerator not in operation.



Photographer:		Jeff Ty	ler	Witness:	None		
Photo #	2	Of	2	Date:	10-21-08	Time:	1115

Description: Insufficient freeboard on east end of pond five which is the equalization pond.



Company Name

Company Address Phone: Fax:

- CERTIFICATE OF ANALYSIS -

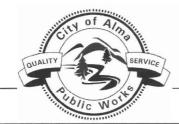
Attn: Phone: Ext: FAX:

Our Lab#: 2008-3077

Your Sample ID: City of Alma - Outfall Effluent

Sample C Report Date: 31-Oct-08

CBOD5 5-day Carbonaceous BOD 15.43 mg/L 10/22/2008 FC-MF Fecal coliform ~15 cfu/100 ml 10/22/2008 **FIELD** Dissolved oxygen 4.25 mg/L 10/21/2008 Field pH 6.54 SU 10/21/2008 °C Water temperature 18.0 10/21/2008 NH3-N-ISE Ammonia as nitrogen 4.37 mg/L 10/31/2008 TSS/TDS Total suspended solids 50.0 mg/L 10/22/2008





811 Fayetteville Ave. Alma, Arkansas 72921 (501) 632-2254 Fax (501) 632-5136

Water Division Enforcement Section Arkansas Dept of Environmental Quality 5301 Northshore Dr Little Rock, Arkansas 72118-5317 042620

December 08, 2008

Dear Mr. Tyler,

NPDES Permit AR0021466 Routine Compliance Inspection

In response to the October 21 and 22, 2008 routine compliance inspection I offer the following response to the listed violations.

- 1. Pond Five Freeboard: The current freeboard for pond five is 30 inches; within the required 24 inches. A comprehensive collection system flow monitoring program, to be completed by June 2009, should reveal the source of inflow/infiltration that contributes to excess stormwater storage needs. Identified collection system improvements/repairs will be completed as funding is available.
- 2. Discharge Monitoring Report TSS: This was addressed in the monthly non-compliance notification letter for August. The exceedances were attributed to a proliferation of algae in the non-aerated pond. An algaecide was added to the lagoons, which resulted in a reduction of algae growth and we are currently in compliance.
- 3. Storm Water Pollution Prevention Plan: A "No Exposure Certification" was approved by the ADEQ on 11-14-07. Tracking No. ARR000321 was established. A copy of the letter will be filed at the Alma Wastewater Plant for future reference.
- 4. Sampling TSS: Other compliance samples collected during that week were 18 mg/l, 38 mg/l, and 16 mg/l. When averaged with the reported 50 mg/l, the resulting 7 day average was 30.5, within the allowable limit of 45.0 mg/l.

Please accept my apologies for our failure to satisfy compliance during this period.

Thank you for your understanding. If you have any questions, please contact me at your convenience.

Yours sincerely,

Mark Yardley

Public Works Director

Mark Yardley

cc: File, Mayor, Operations Supervisor