



Georgia-Pacific

*Georgia-Pacific Crossett LLC
Consumer Products*

Crossett Paper Operations
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May 25, 2017

Mr. Richard Healey
NPDES Enforcement Section
Arkansas Department of Environmental Quality
5901 Northshore Drive
North Little Rock, AR 72118-5317

RE: Best Management Practices (BMP) Annual Report for 2016;
NPDES Permit AR0001210

Dear Mr. Healey:

Pursuant to 40 CFR 430.03 (i)(4) the Georgia-Pacific Crossett Paper Operation is submitting its annual report of daily wastewater monitoring for the 2016 report year. The attached summary and detail sheets include the number and dates of exceedances of our action levels and actions taken in response. As documented in 40 CFR 430.03(i)(3), these action level exceedances are not permit violations.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

If you have any questions or need additional information, please contact Sarah Ross, our Environmental Manager, at (870) 567-8670.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael L. Hohnadel".

Michael L. Hohnadel
Vice President of Manufacturing

Attachments

BEST MANAGEMENT PRACTICES PLAN

MONITORING RESULTS - ANNUAL REPORT SUMMARY

Number	Date	Action Level Exceeded		Incident Description, Corrective Action or Other Action Taken
		LAL	UAL	
1	30-Jan-16	X		There was no evidence of a release from the pulp mill on this day. TOC measurements downstream were well below the target range. Due to a sheet break on the C3 paper machine, excess fiber was discharged to the P1 process sewer. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
2	14-Feb-16	X		There was no evidence of a release from the pulp mill area. TOC measurements both upstream and downstream were well below the target range. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
3	21-Feb-16	X		Excess fiber was sent to the sewer from the C3 paper machine during startup. This event caused no treatment issues with the wastewater treatment system.
4	8-Mar-16 & 9-Mar-16	X	X	Severe flooding during a major rain event led to unprecedented flows to the wastewater treatment system. This event was reported to the agency on March 9, 2016.
5	27-Apr-16		X	When starting up the evaporators, condensate discharged to the evaporator sump which exceeded the capacity of the sump pump and spilled over into the P2 process sewer. This event is typical of an evaporator start-up and caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
6	7-May-16 & 8-May-16		X	During the Annual Mill Maintenance Outage many of the storage tanks and process vessels are cleaned in order to conduct the required maintenance activities and tank inspections. Efforts were made to run tank volumes at minimum levels prior to shutdown and/or recover material to the maximum extent possible. Part II. 12 of the NPDES permit allows these essential maintenance activities. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
7	19-May-16		X	During startup from the annual outage there were issues with the new process controls which interfered with the operators ability to make changes to the process. It is believed that during this time some spent pulping liquors were discharged to the sewer. The issue was corrected immediately upon discovery. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
8	21-May-16 & 22-May-16		X	The chute leading to the knot tank in the pulp mill plugged causing knots and weak black liquor to overflow. The operators worked to unplug the chute as quickly as possible. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.

BEST MANAGEMENT PRACTICES PLAN

MONITORING RESULTS - ANNUAL REPORT SUMMARY

Number	Date	Action Level Exceeded		Incident Description, Corrective Action or Other Action Taken
		LAL	UAL	
9	27-May-16	X		Excess fiber was sent to the P1 sewer from the C3 paper machine and from the North Broke chest associated with the C3 paper machine during shutdown and startup due to an unplanned event. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
10	28-Jun-16	X		There was no evidence of a release from the pulp mill area. TOC measurements both upstream and downstream were well below the target range. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
11	16-Aug-16	X		There were no operational issues noted on this day; however, a very large storm event producing 2.6" of rain caused the flow in the P1 sewer to be more than twice the normal flow rate. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
12	1-Nov-16	X		The valve that diverts liquor to the Filter Feed Tank when the Black Liquor Fill Tank is full, failed due to an air line leak causing liquor to back up and overflow. The valve was repaired and the issue was corrected. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
13	4-Nov-16	X		The C3 paper machine lost approximately 150 gallons of coating. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
14	7-Nov-16	X		The C3 paper machine was taken down to repair the size press roll. Approximately 450 gallons of coating was released to the P1 process sewer in addition to excess fiber loss. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
15	14-Nov-16	X		There was no evidence of a release from the pulp mill area. TOC measurements both upstream and downstream were well below the target range. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
16	18-Nov-16	X		There was no evidence of a release from the pulp mill on this day. The south broke chest associated with the C3 paper machine did overflow fiber. The majority of this material was picked up via vacuum truck. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.
17	16-Dec-16	X		Condensate and weak wash were diverted to the P2 sewer while the Pre-Evaporators and Caustic plant were out of service. This is standard procedure. This event caused no treatment issues with the wastewater treatment system, and the system operated well within all permit limits.

Annual BMP Action Level Tracking Report

Lower Action Level

P1 **52,000**

P2 **46,000**

Upper Action Level

P1 **61,000**

P2 **53,000**

Date	P1			P2		
	Flow MGD	TOC mg/L	TOC Mass lb/d	Flow MGD	TOC mg/L	TOC Mass lb/d
1-Jan-16	15.2	286.8	36357	7.0	369.3	21560
2-Jan-16	14.4	273.1	32798	7.2	269.4	16177
3-Jan-16	13.8	174.6	20095	7.4	305.8	18873
4-Jan-16	15.8	295.6	38952	7.5	239.9	15006
5-Jan-16	15.8	215.5	28397	8.4	148.5	10403
6-Jan-16	16.4	181.0	24756	7.6	269.9	17107
7-Jan-16	17.4	184.0	26701	7.4	193.1	11917
8-Jan-16	18.7	237.9	37102	8.0	195.5	13044
9-Jan-16	17.1	264.3	37693	7.6	210.0	13311
10-Jan-16	16.8	351.3	49221	7.4	280.3	17299
11-Jan-16	17.5	238.7	34838	7.5	196.0	12260
12-Jan-16	17.6	233.3	34245	7.3	272.9	16615
13-Jan-16	13.6	163.0	18488	7.5	228.3	14280
14-Jan-16	13.7	243.1	27776	8.4	396.0	27742
15-Jan-16	15.2	288.4	36560	8.4	298.6	20919
16-Jan-16	15.3	246.5	31454	7.8	242.3	15762
17-Jan-16	15.5	337.4	43616	7.3	233.6	14222
18-Jan-16	15.9	283.4	37581	7.3	214.9	13084
19-Jan-16	14.8	336.8	41572	7.6	232.8	14756
20-Jan-16	15.0	336.3	42071	7.9	251.7	16584
21-Jan-16	18.3	235.6	35958	9.6	262.5	21017
22-Jan-16	15.8	283.8	37397	8.0	299.1	19956
23-Jan-16	16.1	287.1	38550	7.5	222.2	13899
24-Jan-16	15.8	314.0	41376	7.7	269.7	17320
25-Jan-16	16.6	337.7	46753	8.0	258.8	17267
26-Jan-16	12.4	271.2	28046	8.3	306.7	21230
27-Jan-16	12.1	180.8	18245	7.8	323.2	21025
28-Jan-16	16.7	328.6	45767	7.5	266.3	16657
29-Jan-16	15.4	363.7	46712	7.6	252.5	16004
30-Jan-16	16.3	385.3	52378	7.5	265.5	16607
31-Jan-16	16.0	363.6	48519	7.5	250.8	15688
1-Feb-16	15.8	365.1	48110	7.5	233.4	14599
2-Feb-16	15.5	266.4	34438	8.0	313.3	20903
3-Feb-16	15.7	316.6	41455	7.8	300.1	19522
4-Feb-16	16.6	258.5	35788	8.1	178.9	12085
5-Feb-16	10.2	141.4	12029	8.8	503.3	36938
6-Feb-16	10.5	101.2	8862	9.1	585.5	44436
7-Feb-16	15.1	309.1	38926	7.9	322.2	21228
8-Feb-16	15.7	258.7	33874	7.1	153.5	9089
9-Feb-16	14.2	303.3	35919	7.4	195.7	12078
10-Feb-16	14.1	326.4	38383	7.6	246.0	15592
11-Feb-16	15.2	233.0	29537	8.0	235.3	15699
12-Feb-16	15.3	384.6	49076	7.4	263.5	16262

Annual BMP Action Level Tracking Report

Lower Action Level

P1 **52,000**

P2 **46,000**

Upper Action Level

P1 **61,000**

P2 **53,000**

Date	P1			P2		
	Flow MGD	TOC mg/L	TOC Mass lb/d	Flow MGD	TOC mg/L	TOC Mass lb/d
13-Feb-16	15.3	345.3	44061	7.8	352.6	22937
14-Feb-16	16.4	399.7	54669	7.9	240.2	15826
15-Feb-16	17.4	357.8	51923	9.8	231.7	18937
16-Feb-16	14.3	367.5	43829	8.2	257.6	17617
17-Feb-16	15.5	328.9	42517	7.8	290.0	18865
18-Feb-16	14.3	376.1	44854	8.5	209.9	14880
19-Feb-16	15.1	384.2	48384	8.0	251.9	16807
20-Feb-16	15.3	403.9	51538	7.5	240.3	15031
21-Feb-16	17.6	394.5	57906	8.6	219.2	15722
22-Feb-16	15.8	375.2	49441	8.2	230.6	15770
23-Feb-16	16.4	279.9	38284	8.9	189.3	14051
24-Feb-16	15.2	316.5	40122	8.3	227.3	15734
25-Feb-16	14.0	329.4	38461	7.9	239.3	15767
26-Feb-16	11.4	215.5	20489	5.7	288.3	13705
27-Feb-16	13.8	323.6	37244	8.4	195.4	13689
28-Feb-16	14.6	403.6	49144	7.2	245.6	14748
29-Feb-16	14.7	411.3	50425	7.4	284.9	17583
1-Mar-16	15.2	345.8	43836	7.5	229.6	14361
2-Mar-16	13.5	386.1	43471	7.5	214.3	13404
3-Mar-16	14.7	367.0	44993	7.4	219.6	13553
4-Mar-16	14.4	388.6	46669	7.0	264.3	15430
5-Mar-16	14.7	325.8	39942	7.3	267.7	16298
6-Mar-16	15.1	332.3	41848	7.1	347.4	20571
7-Mar-16	16.0	345.3	46077	7.3	342.7	20864
8-Mar-16	24.2	271.1	54716	11.5	206.3	19786
9-Mar-16	46.1	206.7	79471	14.5	150.0	18140
10-Mar-16	19.7	248.5	40828	10.2	175.5	14929
11-Mar-16	14.9	299.8	37255	8.9	265.0	19670
12-Mar-16	14.9	321.7	39976	8.4	267.7	18754
13-Mar-16	15.3	311.8	39786	8.8	318.7	23390
14-Mar-16	13.2	388.6	42780	8.9	610.3	45300
15-Mar-16	14.1	296.2	34831	8.3	268.3	18572
16-Mar-16	13.7	306.3	34997	7.8	352.1	22905
17-Mar-16	14.8	307.0	37894	8.4	296.7	20786
18-Mar-16	13.5	351.8	39609	8.0	241.0	16080
19-Mar-16	14.5	306.7	37089	7.9	251.2	16551
20-Mar-16	11.7	287.1	28015	8.7	329.2	23886
21-Mar-16	10.3	253.8	21802	8.4	306.7	21486
22-Mar-16	10.7	188.6	16830	8.2	274.0	18738
23-Mar-16	9.2	206.3	15829	8.2	221.7	15162
24-Mar-16	9.6	381.1	30512	8.6	201.3	14438
25-Mar-16	10.9	342.0	31090	7.3	261.1	15896
26-Mar-16	11.3	350.3	33013	7.6	280.1	17754

Annual BMP Action Level Tracking Report

Lower Action Level

P1 **52,000**

P2 **46,000**

Upper Action Level

P1 **61,000**

P2 **53,000**

Date	P1			P2		
	Flow MGD	TOC mg/L	TOC Mass lb/d	Flow MGD	TOC mg/L	TOC Mass lb/d
27-Mar-16	14.1	318.7	37477	8.1	278.9	18841
28-Mar-16	14.4	410.8	49335	8.3	289.2	20019
29-Mar-16	14.2	393.5	46601	7.2	320.3	19233
30-Mar-16	14.5	408.1	49352	9.9	277.5	22912
31-Mar-16	14.9	414.5	51508	8.5	438.6	31092
1-Apr-16	13.4	343.6	38399	7.7	381.6	24506
2-Apr-16	13.9	360.0	41733	6.8	297.2	16855
3-Apr-16	15.1	377.3	47515	7.5	305.3	19097
4-Apr-16	15.1	393.8	49593	7.2	338.6	20332
5-Apr-16	15.2	295.1	37409	7.1	295.3	17486
6-Apr-16	14.9	324.2	40287	7.7	531.9	34158
7-Apr-16	14.0	261.8	30568	7.4	265.3	16373
8-Apr-16	13.4	301.7	33717	6.7	322.0	17993
9-Apr-16	14.4	295.6	35500	7.0	358.9	20953
10-Apr-16	15.7	312.1	40866	7.5	287.3	17971
11-Apr-16	20.8	229.7	39847	10.4	210.8	18284
12-Apr-16	15.8	344.2	45356	7.8	288.7	18781
13-Apr-16	15.9	295.1	39132	7.2	308.2	18507
14-Apr-16	15.6	306.2	39838	7.2	325.8	19564
15-Apr-16	16.6	341.1	47223	7.4	324.8	20045
16-Apr-16	16.0	314.3	41940	7.4	271.0	16725
17-Apr-16	15.8	297.6	39215	7.2	363.0	21797
18-Apr-16	15.6	202.1	26294	8.1	300.9	20327
19-Apr-16	14.9	367.7	45693	7.6	350.8	22235
20-Apr-16	15.4	326.0	41870	8.2	301.3	20605
21-Apr-16	14.8	286.0	35302	7.2	338.2	20308
22-Apr-16	14.7	297.6	36485	7.0	402.7	23510
23-Apr-16	14.3	321.7	38367	7.2	347.3	20855
24-Apr-16	14.4	280.1	33639	7.5	329.6	20616
25-Apr-16	15.1	254.4	32038	7.8	279.0	18150
26-Apr-16	14.5	351.6	42519	7.0	345.2	20153
27-Apr-16	15.8	300.0	39532	8.6	1116.0	80044
28-Apr-16	14.7	332.5	40764	7.0	314.0	18331
29-Apr-16	16.9	283.9	40015	8.9	252.4	18735
30-Apr-16	16.9	278.4	39239	9.3	282.5	21911
1-May-16	16.2	269.7	36439	7.6	279.0	17684
2-May-16	16.5	221.2	30439	8.4	228.5	16008
3-May-16	13.2	290.0	31926	8.9	426.1	31628
4-May-16	16.2	255.5	34520	7.4	191.2	11800
5-May-16	14.6	350.3	42654	8.6	229.0	16425
6-May-16	16.2	309.9	41870	8.0	258.7	17260
7-May-16	17.6	297.7	43698	8.4	787.8	55190
8-May-16	15.2	187.0	23706	9.5	1188.0	94125

Annual BMP Action Level Tracking Report

Lower Action Level

P1 **52,000**

P2 **46,000**

Upper Action Level

P1 **61,000**

P2 **53,000**

Date	P1			P2		
	Flow MGD	TOC mg/L	TOC Mass lb/d	Flow MGD	TOC mg/L	TOC Mass lb/d
9-May-16	12.0	51.6	5164	8.3	558.8	38681
10-May-16	7.4	41.0	2530	8.7	155.1	11254
11-May-16	5.5	18.8	862	6.2	93.1	4811
12-May-16	2.6	51.8	1123	1.1	123.4	1132
13-May-16	1.2	39.8	405	3.2	78.4	2092
14-May-16	5.0	34.9	1455	7.3	115.5	7032
15-May-16	6.1	34.7	1764	6.1	65.0	3306
16-May-16	6.0	40.3	2019	8.1	83.1	5610
17-May-16	8.3	57.5	3977	8.1	136.5	9221
18-May-16	13.2	318.2	35030	9.3	454.4	35244
19-May-16	14.9	360.3	44773	8.4	980.2	68669
20-May-16	16.0	333.7	44529	8.3	247.7	17146
21-May-16	18.1	449.0	67778	7.3	332.8	20262
22-May-16	17.6	379.8	55749	7.5	333.5	20860
23-May-16	16.9	289.4	40790	8.3	309.1	21397
24-May-16	15.2	325.8	41301	7.7	267.1	17153
25-May-16	17.0	216.4	30681	9.0	228.4	17144
26-May-16	16.3	382.7	51961	8.1	240.7	16260
27-May-16	17.9	368.4	54997	8.6	232.7	16690
28-May-16	16.8	292.0	40913	8.3	335.2	23203
29-May-16	15.9	356.1	47221	7.1	278.4	16485
30-May-16	16.5	314.1	43223	8.4	285.3	19987
31-May-16	16.7	269.7	37563	8.6	246.0	17644
1-Jun-16	17.6	225.2	33056	8.8	258.2	18950
2-Jun-16	14.9	310.7	38609	8.5	236.2	16744
3-Jun-16	14.6	336.3	40949	10.1	231.4	19492
4-Jun-16	17.3	318.6	45968	10.3	230.7	19818
5-Jun-16	15.0	338.9	42396	9.8	204.7	16731
6-Jun-16	14.7	315.2	38643	8.6	214.3	15370
7-Jun-16	15.5	240.7	31115	9.4	227.0	17796
8-Jun-16	13.5	353.3	39778	9.4	224.8	17623
9-Jun-16	14.7	358.8	43988	9.3	243.5	18886
10-Jun-16	15.1	274.1	34519	8.4	282.5	19791
11-Jun-16	15.4	315.7	40547	8.7	274.6	19924
12-Jun-16	13.0	283.7	30759	9.3	257.0	19933
13-Jun-16	13.6	167.9	19044	11.5	164.2	15748
14-Jun-16	21.8	269.8	49053	12.7	344.5	36489
15-Jun-16	15.1	330.8	41659	10.3	244.4	20994
16-Jun-16	14.9	323.9	40250	8.9	236.5	17554
17-Jun-16	15.1	342.6	43145	8.2	255.8	17558
18-Jun-16	15.1	357.3	44996	7.7	264.7	16999
19-Jun-16	16.9	282.2	39775	8.8	233.1	17108
20-Jun-16	15.4	331.1	42525	8.0	242.2	16160

Annual BMP Action Level Tracking Report

Lower Action Level

P1 **52,000**

P2 **46,000**

Upper Action Level

P1 **61,000**

P2 **53,000**

Date	P1			P2		
	Flow MGD	TOC mg/L	TOC Mass lb/d	Flow MGD	TOC mg/L	TOC Mass lb/d
21-Jun-16	14.5	325.5	39363	8.5	227.6	16135
22-Jun-16	15.4	319.8	41074	9.2	219.6	16849
23-Jun-16	16.5	305.1	41985	9.1	215.0	16317
24-Jun-16	15.4	354.6	45543	9.1	236.1	17919
25-Jun-16	15.4	371.9	47765	8.5	274.4	19452
26-Jun-16	15.2	316.7	40147	9.4	275.3	21582
27-Jun-16	15.1	318.9	40160	8.2	280.1	19155
28-Jun-16	16.9	378.2	53306	9.3	496.8	38533
29-Jun-16	15.3	292.8	37362	8.8	211.7	15537
30-Jun-16	16.7	292.1	40683	8.6	215.9	15485
1-Jul-16	15.7	344.3	45082	8.8	196.3	14407
2-Jul-16	16.5	348.7	47985	9.4	226.3	17741
3-Jul-16	16.5	336.3	46278	9.1	215.0	16317
4-Jul-16	15.8	291.0	38346	9.5	202.5	16044
5-Jul-16	16.6	352.6	48815	8.8	186.7	13702
6-Jul-16	14.7	288.5	35370	9.6	240.0	19215
7-Jul-16	16.3	138.0	18760	9.4	101.8	7981
8-Jul-16	16.3	278.0	37792	8.8	229.1	16814
9-Jul-16	16.2	279.7	37790	8.4	245.5	17199
10-Jul-16	19.9	248.2	41193	10.5	216.5	18959
11-Jul-16	15.5	265.1	34269	7.9	256.3	16887
12-Jul-16	15.7	269.2	35249	8.8	236.6	17365
13-Jul-16	15.9	204.9	27171	8.8	222.3	16315
14-Jul-16	16.3	214.1	29105	8.6	232.1	16647
15-Jul-16	14.8	209.5	25859	9.2	231.0	17724
16-Jul-16	16.8	254.2	35616	8.4	238.7	16722
17-Jul-16	14.0	210.1	24531	10.0	214.7	17906
18-Jul-16	12.5	212.5	22153	10.6	163.5	14454
19-Jul-16	12.4	158.0	16340	9.7	240.9	19488
20-Jul-16	13.1	243.8	26636	9.5	236.2	18714
21-Jul-16	13.6	229.6	26042	9.0	241.8	18150
22-Jul-16	14.3	238.8	28480	9.6	214.6	17128
23-Jul-16	13.3	318.1	35284	8.6	229.7	16418
24-Jul-16	16.2	216.7	29278	9.9	229.0	18908
25-Jul-16	15.6	324.7	42245	8.8	260.1	19089
26-Jul-16	18.6	284.3	44102	10.8	235.8	21239
27-Jul-16	22.3	279.3	51945	11.5	194.7	18674
28-Jul-16	16.8	300.6	42118	8.8	198.3	14554
29-Jul-16	13.6	262.2	29740	9.4	232.0	18188
30-Jul-16	16.7	243.0	33845	9.4	200.5	15718
31-Jul-16	16.2	255.9	34574	9.3	198.1	15365
1-Aug-16	16.5	247.1	34003	9.2	243.1	18653
2-Aug-16	15.7	272.1	35628	9.2	187.6	14394

Annual BMP Action Level Tracking Report

Lower Action Level

P1 **52,000**

P2 **46,000**

Upper Action Level

P1 **61,000**

P2 **53,000**

Date	P1			P2		
	Flow MGD	TOC mg/L	TOC Mass lb/d	Flow MGD	TOC mg/L	TOC Mass lb/d
3-Aug-16	17.1	258.1	36809	9.3	214.0	16598
4-Aug-16	16.9	269.6	37999	9.7	232.6	18817
5-Aug-16	17.6	257.5	37797	9.8	204.8	16739
6-Aug-16	16.7	263.9	36755	9.3	204.4	15854
7-Aug-16	16.0	278.3	37136	9.6	217.1	17382
8-Aug-16	15.3	262.0	33432	10.1	197.9	16670
9-Aug-16	15.6	249.3	32435	9.4	196.3	15389
10-Aug-16	14.7	235.7	28896	9.6	168.9	13523
11-Aug-16	14.9	263.9	32794	9.9	233.3	19263
12-Aug-16	15.0	310.5	38844	8.9	218.3	16204
13-Aug-16	16.5	253.3	34857	9.2	190.4	14609
14-Aug-16	17.0	283.1	40138	9.8	212.6	17376
15-Aug-16	17.0	264.7	37529	9.5	232.2	18397
16-Aug-16	28.1	258.7	60627	12.2	192.0	19536
17-Aug-16	19.5	237.2	38576	11.7	197.2	19242
18-Aug-16	16.5	244.5	33646	11.0	165.3	15165
19-Aug-16	15.7	243.8	31923	9.6	165.8	13275
20-Aug-16	16.5	216.2	29751	9.9	159.9	13202
21-Aug-16	16.6	264.0	36549	11.1	145.3	13451
22-Aug-16	17.7	239.0	35281	10.4	200.6	17399
23-Aug-16	14.4	162.8	19552	9.6	156.3	12514
24-Aug-16	15.4	299.8	38505	9.5	350.0	27731
25-Aug-16	16.0	296.1	39512	9.5	258.1	20449
26-Aug-16	16.5	252.7	34774	9.0	216.8	16273
27-Aug-16	16.8	272.6	38195	8.7	221.9	16101
28-Aug-16	16.4	275.5	37682	8.4	223.5	15658
29-Aug-16	16.8	208.3	29185	9.6	173.3	13875
30-Aug-16	15.8	283.9	37410	8.5	258.0	18290
31-Aug-16	14.2	303.4	35931	8.2	366.5	25064
1-Sep-16	15.8	214.0	28199	8.6	495.9	35568
2-Sep-16	15.4	297.9	38261	8.2	263.8	18041
3-Sep-16	16.3	264.2	35916	8.2	279.8	19135
4-Sep-16	16.5	288.3	39673	8.7	257.3	18669
5-Sep-16	16.4	312.1	42688	8.6	270.8	19423
6-Sep-16	15.7	297.6	38967	9.2	380.8	29218
7-Sep-16	14.9	216.4	26891	9.8	381.3	31164
8-Sep-16	12.5	156.5	16315	9.3	205.6	15947
9-Sep-16	14.3	268.5	32022	8.5	344.7	24436
10-Sep-16	19.0	279.1	44226	9.3	301.4	23377
11-Sep-16	16.3	294.2	39994	8.4	275.6	19307
12-Sep-16	16.4	276.5	37819	8.6	258.8	18562
13-Sep-16	16.3	214.8	29200	8.4	296.7	20786
14-Sep-16	15.2	239.7	30386	8.5	283.6	20104

Annual BMP Action Level Tracking Report

Lower Action Level

P1 **52,000**

P2 **46,000**

Upper Action Level

P1 **61,000**

P2 **53,000**

Date	P1			P2		
	Flow MGD	TOC mg/L	TOC Mass lb/d	Flow MGD	TOC mg/L	TOC Mass lb/d
15-Sep-16	16.6	323.1	44731	8.3	306.9	21244
16-Sep-16	16.1	293.6	39423	8.7	324.4	23538
17-Sep-16	15.9	272.2	36095	8.7	343.8	24945
18-Sep-16	16.4	240.5	32895	8.9	242.9	18029
19-Sep-16	15.0	277.3	34690	8.9	222.9	16545
20-Sep-16	14.9	220.8	27438	7.9	260.8	17183
21-Sep-16	14.8	222.6	27476	8.4	247.1	17311
22-Sep-16	15.3	226.1	28851	8.6	275.3	19746
23-Sep-16	14.5	313.8	37948	10.2	262.4	22322
24-Sep-16	15.4	327.1	42011	8.9	264.0	19596
25-Sep-16	15.0	245.8	30750	9.8	313.3	25607
26-Sep-16	15.3	275.9	35205	10.2	276.1	23487
27-Sep-16	14.7	319.2	39133	8.8	329.7	24197
28-Sep-16	16.3	364.0	49483	8.6	323.1	23174
29-Sep-16	16.9	331.4	46710	8.2	237.5	16242
30-Sep-16	16.6	345.3	47805	8.6	249.7	17909
1-Oct-16	16.4	291.6	39884	8.2	287.6	19668
2-Oct-16	14.6	281.4	34264	8.4	269.1	18852
3-Oct-16	16.1	310.3	41665	8.5	305.9	21685
4-Oct-16	16.0	318.6	42514	8.0	270.2	18028
5-Oct-16	15.4	324.1	41626	8.4	246.8	17290
6-Oct-16	16.8	324.2	45424	8.4	263.9	18488
7-Oct-16	17.1	350.9	50043	8.2	263.2	18000
8-Oct-16	16.8	326.4	45733	8.8	338.6	24851
9-Oct-16	17.6	291.4	42773	8.7	288.1	20904
10-Oct-16	17.2	302.7	43422	8.2	246.7	16871
11-Oct-16	15.4	285.3	36643	9.6	207.3	16597
12-Oct-16	17.4	251.0	36424	10.5	161.0	14099
13-Oct-16	14.2	363.0	42989	8.6	224.3	16088
14-Oct-16	17.8	326.7	48499	8.9	308.3	22884
15-Oct-16	15.9	291.6	38668	9.6	208.8	16717
16-Oct-16	17.8	283.8	42131	9.1	255.4	19383
17-Oct-16	17.9	303.3	45278	8.7	251.9	18277
18-Oct-16	17.5	351.8	51345	8.8	338.5	24843
19-Oct-16	17.1	358.0	51056	8.1	261.3	17652
20-Oct-16	17.7	334.6	49393	7.9	344.9	22724
21-Oct-16	14.2	281.0	33278	8.5	258.3	18311
22-Oct-16	14.4	195.0	23419	8.5	217.5	15419
23-Oct-16	17.9	317.1	47339	8.0	262.3	17501
24-Oct-16	17.6	330.4	48497	7.6	300.6	19053
25-Oct-16	18.1	314.6	47490	8.1	307.1	20746
26-Oct-16	16.0	383.5	51174	8.1	308.1	20813
27-Oct-16	16.8	319.2	44724	9.1	392.9	29819

Annual BMP Action Level Tracking Report

Lower Action Level

P1 **52,000**

P2 **46,000**

Upper Action Level

P1 **61,000**

P2 **53,000**

Date	P1			P2		
	Flow MGD	TOC mg/L	TOC Mass lb/d	Flow MGD	TOC mg/L	TOC Mass lb/d
28-Oct-16	16.5	311.2	42824	9.0	332.3	24942
29-Oct-16	16.9	271.5	38267	8.4	237.8	16659
30-Oct-16	17.0	273.9	38834	7.8	248.2	16146
31-Oct-16	14.7	265.5	32550	10.0	219.2	18281
1-Nov-16	17.0	387.2	54897	9.7	459.7	37189
2-Nov-16	16.8	261.4	36625	9.3	260.9	20236
3-Nov-16	17.8	321.5	47727	9.1	260.4	19763
4-Nov-16	18.1	351.5	53060	8.2	254.6	17412
5-Nov-16	18.0	341.2	51221	7.8	257.1	16725
6-Nov-16	17.8	278.7	41374	8.8	225.1	16521
7-Nov-16	17.3	367.8	53067	8.3	208.2	14412
8-Nov-16	16.1	355.2	47694	9.2	203.0	15576
9-Nov-16	16.9	360.3	50783	9.0	236.3	17737
10-Nov-16	16.7	352.5	49095	9.3	234.6	18196
11-Nov-16	16.0	320.8	42808	8.8	197.7	14510
12-Nov-16	17.6	302.1	44343	8.5	205.6	14575
13-Nov-16	17.9	326.6	48757	8.8	237.5	17431
14-Nov-16	17.6	363.7	53385	8.8	261.9	19221
15-Nov-16	16.8	312.6	43799	8.6	180.6	12953
16-Nov-16	12.9	282.6	30404	9.5	252.2	19982
17-Nov-16	16.8	330.9	46363	9.6	237.6	19023
18-Nov-16	18.3	343.3	52395	9.0	256.8	19275
19-Nov-16	16.8	285.1	39946	8.8	475.1	34869
20-Nov-16	16.3	283.8	38580	9.1	257.5	19543
21-Nov-16	16.7	281.2	39165	9.7	236.0	19092
22-Nov-16	18.7	324.5	50608	10.2	241.1	20510
23-Nov-16	17.1	252.9	36067	9.9	216.1	17843
24-Nov-16	16.5	246.7	33948	9.5	209.1	16567
25-Nov-16	15.6	263.5	34282	9.9	216.6	17830
26-Nov-16	15.2	253.1	32085	10.0	210.9	17589
27-Nov-16	15.4	253.2	32520	9.8	264.4	21610
28-Nov-16	19.9	264.1	43832	11.0	188.7	17311
29-Nov-16	13.7	253.6	28976	9.8	126.0	10298
30-Nov-16	12.6	307.5	32313	9.2	228.6	17540
1-Dec-16	13.9	213.0	24692	9.9	234.5	19362
2-Dec-16	14.5	292.8	35408	8.7	215.1	15607
3-Dec-16	16.2	249.7	33736	11.2	189.3	17682
4-Dec-16	15.0	262.6	32851	9.5	216.6	17161
5-Dec-16	16.8	188.1	26355	10.1	202.2	17032
6-Dec-16	14.7	240.7	29509	10.0	184.5	15387
7-Dec-16	14.8	328.9	40597	9.0	242.6	18210
8-Dec-16	15.6	276.5	35974	9.0	219.6	16483
9-Dec-16	13.0	204.6	22183	9.1	191.2	14511

Annual BMP Action Level Tracking Report

Lower Action Level

P1 **52,000**

P2 **46,000**

Upper Action Level

P1 **61,000**

P2 **53,000**

Date	P1			P2		
	Flow MGD	TOC mg/L	TOC Mass lb/d	Flow MGD	TOC mg/L	TOC Mass lb/d
10-Dec-16	13.8	190.6	21937	9.1	206.5	15672
11-Dec-16	15.9	256.1	33960	8.9	246.4	18289
12-Dec-16	15.3	271.2	34606	8.7	246.4	17878
13-Dec-16	15.6	290.7	37821	8.6	187.4	13441
14-Dec-16	12.9	275.9	29683	8.9	257.4	19106
15-Dec-16	12.4	125.2	12948	10.4	189.5	16436
16-Dec-16	14.6	181.6	22112	9.5	585.4	46381
17-Dec-16	16.6	284.7	39415	10.5	319.9	28014
18-Dec-16	15.9	306.9	40697	9.2	248.1	19036
19-Dec-16	16.3	285.5	38811	9.6	292.1	23387
20-Dec-16	16.9	299.8	42256	8.9	300.6	22312
21-Dec-16	16.7	328.7	45781	9.2	317.1	24330
22-Dec-16	16.8	332.8	46629	9.3	368.0	28543
23-Dec-16	17.1	363.7	51869	10.9	189.9	17263
24-Dec-16	13.5	437.5	49258	10.3	208.9	17893
25-Dec-16	14.4	284.3	34143	10.9	193.8	17618
26-Dec-16	20.3	277.2	46931	11.9	185.7	18430
27-Dec-16	13.1	266.8	29149	11.1	205.6	19033
28-Dec-16	14.6	425.9	51859	10.9	212.6	19327
29-Dec-16	14.8	411.5	50792	9.1	279.8	21235
30-Dec-16	13.1	286.1	31258	10.5	215.1	18836
31-Dec-16	17.3	311.2	44901	10.5	192.6	16866

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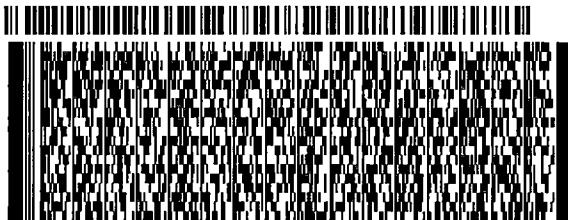
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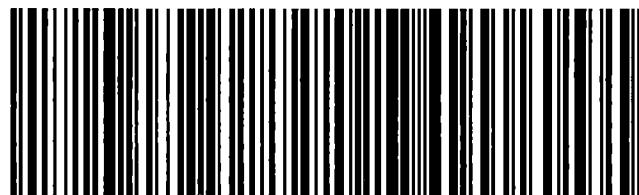
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