



October 15, 2019

Reference No. 058502

Mr. Zachary Sasnow  
U.S. Environmental Protection Agency, Region 5  
Remediation Branch  
Land, Chemicals, and Redevelopment Division  
77 West Jackson Blvd., LR 16J  
Chicago, Illinois  
U.S.A. 60604

**Transmitted Via Email**

Dear Mr. Sasnow:

**Re: Semi-Annual Progress Report (April 1, 2019 to September 30, 2019)  
Performance Based Administrative Order on Consent  
RCRA Corrective Action  
Saginaw Nodular Iron, 2100 Veterans Memorial Parkway, Saginaw, MI  
U.S. EPA ID No. MID 041 793 340**

In accordance with the Performance-Based Administrative Order on Consent (Docket No. RCRA-05-2011-0023) between the U.S. Environmental Protection Agency Region 5 (U.S. EPA) and Revitalizing Auto Communities Environmental Response Trust (RACER), please find the attached semi-annual progress report for the period April 1, 2019 to September 30, 2019. Please note that on June 27, 2018, U.S. EPA approved the reduction in frequency of progress reporting from quarterly to semi-annually.

Please contact me if you would like to discuss this matter further.

Yours truly,

GHD

John-Eric Pardys, P. Eng.

JEP/kf/6

Encl. Attachment A – Semi-Annual Progress Report (April 1, 2019 to September 30, 2019)

cc: Rick Parson, EGLE (via e-mail)  
Saginaw Public Library (Public Information Repository)  
David Favero, RACER (via e-mail)  
Michael Tomka, GHD (via e-mail)

# Attachment A

## Attachment A

### Work Performed this Semi-Annual Period

The following work was performed during the semi-annual period April 1, 2019 to September 30, 2019 for the Nodular facility:

- Prepared and submitted semi-annual progress report on April 15, 2019 for the period October 1, 2018 to March 31, 2019.
- Conducted Site walk and meeting with new U.S. EPA Project Manager on April 4, 2019 to provide an overview of the Site.
- Received confirmation from EGLE on April 15, 2019 that no permit is needed from EGLE for the proposed PCB-impacted sediment removal from the Secondary Pond
- Solicited bids for the removal of PCB-impacted sediment from the Secondary Pond and selected a contractor.
- Conducted Site walk with bidders on April 30, 2019
- Conducted pre-mobilization activities associated with the removal of PCB-impacted sediment from the Secondary Pond including, marking out the extents of the excavation, characterizing sediment, and conducting geotechnical testing on the sediments.
- Submitted responses on May 29, 2019 to comments received during the April 4, 2019 meeting with U.S. EPA. Received additional comments from U.S. EPA on June 4, 2019 and submitted responses on July 15, 2019
- Received comments from U.S. EPA on the ecological risk assessments for the North Ditch and wetland area within IU G on June 4, 2019. In response, presented additional information related to ecological risks associated with the North Ditch and the wetland area in IU G to U.S. EPA on September 6, 2019
- Submitted amendment to the approved draft IM Work Plan to Remove PCB-impacted sediments from the Secondary Pond to U.S. EPA on July 16, 2019. Received minor comments from U.S. EPA on August 5, 2019 and revised and resubmitted the final amendment on August 19, 2019.
- Initiated activities associated with the removal of PCB-impacted sediments from the Secondary Pond including: Site setup (access roads, decontamination pad/staging area setup, trailer), installation of berm to separate the east side of the Secondary Pond from the west, dewatering the western portion of the Secondary Pond, installation of sheet pile, removal, stabilization, and off-Site disposal of sediments from Area 1
- Updated and re-submitted a memorandum to EGLE regarding Secondary Pond discharge control measures on August 21, 2019
- Submitted Additional North Ditch Sediment Sampling Work Plan on September 11, 2019. U.S. EPA provided comments on September 19, 2019 to which responses were prepared and submitted on September 26, 2019. U.S. EPA review of the submittal is in progress.
- Submitted Scope of Work to evaluate potential impacts of slag on surrounding soils in IU I on September 19, 2019. U.S. EPA provided comments on September 24, 2019 and responses are being prepared.

- Initiated preparation of joint EGLE/U.S. Army Corp wetland/floodplain permit application for the completion of a PCB-impacted soil removal in IU G wetlands.
- Submitted monthly electronic discharge monitoring reports for the NPDES permit. There was one discharge in April and 2 discharge events in June from Outfall 022A (North Ditch), all associated with rainfall events. There were no exceedances of discharge limits from Outfall 022A. There were 15 discharge days in September from Outfall 024A (eastern portion of Secondary Pond) to support the removal of PCB-impacted sediment. There were a few exceedances of discharge limits for CBOD and data is still pending. Discharge was stopped following receipt of two consecutive laboratory readings of CBOD above discharge limits.
- Completed periodic inspections for SWPPP and collected level measurements of secondary pond and North Ditch.

#### Data Available During this Reporting Period

- NPDES discharge sampling results for the discharges in March, April, and June are provided in Attachment A.1. NPDES discharge sampling will be posted electronically per EGLE’s requirement by October 20, 2019 for discharges in September 2019. A copy of the September electronic discharge monitoring reports will be provided in the next semi-annual progress report.

#### Problems Encountered

None.

#### Summary of Problem Resolution

None.

#### Estimated Percent Complete and Information Summary for Selected Activities

Task		Estimated % Complete
1.	<b>IU G – Former Nodular Iron Plant OM&amp;M</b>	
	<p><u>Annual EI Sampling (8-years completed to date by RACER, 2-years completed by MLC, and 3-years completed by GMC).</u> (Estimated percent complete assumes the EI monitoring program is replaced with a revised groundwater monitoring program upon approval of the CMS by U.S. EPA, anticipated to occur in 2020.)</p> <ul style="list-style-type: none"> <li>• 2011 EI sampling was completed in November 2011 and reporting was submitted to U.S. EPA April 18, 2012.</li> <li>• 2012 EI sampling was completed in November 2012 and reporting was submitted to U.S. EPA March 11, 2013.</li> <li>• 2013 EI Sampling was completed in November 2013 and reporting was submitted to U.S. EPA February 13, 2014.</li> <li>• 2014 EI sampling was completed in November 2014 and reporting was submitted to U.S. EPA February 10, 2015.</li> <li>• 2015 EI sampling was completed in November 2015 and reporting was submitted to U.S. EPA February 10, 2016.</li> <li>• 2016 EI sampling was completed in November 2016 and reporting was submitted to U.S. EPA January 4, 2017.</li> <li>• 2017 EI sampling was completed in May 2017 and reporting was submitted to U.S. EPA December 8, 2017.</li> </ul>	95%

Task		Estimated % Complete
	<ul style="list-style-type: none"> <li>2018 EI sampling was completed in November 2018 and reporting was submitted to U.S. EPA February 15, 2019.</li> </ul>	
	<p><u>Additional delineation of impacts in soil</u></p> <ul style="list-style-type: none"> <li>Work plan for additional delineation of manganese and PCB impacts in soil in the south portion of IU G submitted to U.S. EPA on February 27, 2015 and approved by U.S. EPA on March 2, 2015.</li> <li>Additional delineation of manganese and PCB impacts was completed during March and April 2015. A summary of the investigation was submitted to U.S. EPA on May 8, 2015.</li> <li>Work plan for additional delineation of PCB impacts in soil above 10 mg/kg in the south portion of IU G submitted to U.S. EPA on July 15, 2015 and approved by U.S. EPA on July 30, 2015.</li> <li>Additional delineation of PCB impacts above 10 mg/kg was completed in August 2015. A summary of the additional investigation of manganese and PCB impacts was submitted to U.S. EPA on February 15, 2017. U.S. EPA approved via a March 8, 2017 email the report and the recommendation to address the PCB impacts through deed restrictions as an interim measure.</li> </ul>	95%
	<p><u>Ammonia concentrations above MDEQ Groundwater Surface Water Interface Criteria</u></p> <ul style="list-style-type: none"> <li>Ammonia in groundwater evaluation was submitted to U.S. EPA on April 6, 2015 and to MDEQ on April 8, 2015.</li> </ul>	85%
	<p><u>Ecological Screening Assessment – Isolated Wetlands</u></p> <ul style="list-style-type: none"> <li>Conducted ecological risk assessment on some isolated wetlands formed in the 2012 time period in IU G and submitted the evaluation to U.S. EPA on January 4, 2019. The assessment concluded that there is minimal risk to ecological receptors and no further activity is required. U.S. EPA provided comments on the assessment and requested that RACER conduct a PCB-impacted surface soil removal and disposal. Permitting to complete the work was initiated.</li> </ul>	50%
2.	<b>IU H – WWTP Closure</b>	
	<p><u>Secondary Pond</u></p> <ul style="list-style-type: none"> <li>Characterization Study on Secondary Pond completed in June of 2011.</li> <li>Emergency overflow for secondary pond installed on March 13, 2012. The emergency overflow was lowered approximately 6 feet on June 23, 2016.</li> <li>DEQ issued NPDES permit for the Site on August 24, 2012.</li> <li>MDEQ modified NPDES sampling requirements with most of the requested changes in RACER's January 8, 2015 request. As a result of the lowering of the emergency overflow, the modification to the NPDES sampling requirements were rescinded.</li> <li>Additional Characterization Studies for Secondary Pond and Lagoon 5 were completed in March 2016, May 2016, August 2016, and September 2017. A summary of the September 2017 investigation results were submitted to U.S. EPA on November 6, 2017. A sediment pore water sampling Work Plan was submitted to U.S. EPA on January 29, 2018 and was approved by U.S. EPA on March 2, 2018. Sampling was conducted on April 17, 2018. The results were presented to U.S. EPA on May 11, 2018 and a memorandum summarizing the results was submitted on June 3, 2018. U.S. EPA provided comments on the pore water sample results on June 13,</li> </ul>	70%

Task		Estimated % Complete
	<p>2018 and responses to comments were provided to U.S. EPA on July 3, 2018, U.S. EPA provided email approval on September 17, 2018 to proceed with removal of PCBs &gt;50 ppm in Secondary Pond sediments and following the removal, to allow the Secondary Ponds to naturalize, and to implement appropriate institutional controls to prevent hydrologic connection between the pond and on the pond and nearby surface water.</p> <ul style="list-style-type: none"> <li>• NPDES renewal application was prepared and submitted April 2, 2016. Comments on the application were received and responded to on July 12 and 29, 2016. A modification to the application (addition of new outfall through the eastern portion of the northern Secondary Pond berm, referred to as outfall 24) was submitted December 22, 2016. A draft of the permit was provided on July 14, 2017. Comments on the permit were provided to MDEQ on July 24, 2017. Comments were reviewed with MDEQ and a revised submission was made on September 20, 2017. MDEQ requested additional information on November 6, 2017, which was provided on November 6 and December 18, 2017. MDEQ requested on February 8, 2018 that a sample of the secondary pond be collected and submitted for analysis. The results were submitted to MDEQ on March 12, 2018. After a public review period, a new NPDES permit was issued and then became effective July 1, 2018.</li> <li>• A Draft Interim Measures Work Plan for the removal of PCB-impacted sediment was submitted to U.S. EPA on December 19, 2018, which was approved in principle by U.S. EPA on February 14, 2019. U.S. EPA requested additional detail on the work once bids had been received from the contractors. An amendment to the draft Work Plan was submitted to U.S. EPA on July 16, 2019 and was approved with comments on August 5, 2019. A final copy of the executed amendment was distributed on August 20, 2019.</li> <li>• Activities associated with the removal of PCB-impacted sediment were initiated in August 2019 and included: Site setup (access roads, decontamination pad/staging area setup, trailer), installation of berm to separate the east side of the Secondary Pond from the west, dewatering the western portion of the Secondary Pond, installation of sheet pile, removal, stabilization, and off-Site disposal of sediments from Area 1.</li> <li>• Discharge of water under NPDES permit to facilitate expected work in the Secondary Pond.</li> </ul>	
	<p><u>Primary Basins</u></p> <ul style="list-style-type: none"> <li>• Work plan for stabilizing primary settling basins submitted to U.S. EPA on July 31, 2012 and Work Plan approved by U.S. EPA on September 18, 2012.</li> <li>• Primary settling basin stabilization work was completed June 20, 2013. A construction completion report was submitted to U.S. EPA on September 4, 2013.</li> </ul>	100%

Task		Estimated % Complete
	<p><u>North Ditch</u></p> <ul style="list-style-type: none"> <li>• Sampling and Analysis Plan for the North Ditch submitted to U.S. EPA on April 26, 2013 and was approved by U.S. EPA on July 8, 2013.</li> <li>• North Ditch Investigation and additional monitoring completed the week of July 15, 2013. The results of the investigation were submitted to U.S. EPA on October 23, 2013.</li> <li>• Stabilization Alternative Evaluation and Recommendation for the North Ditch was submitted to U.S. EPA on February 26, 2014.</li> <li>• Obtain necessary permits/agreements to perform stabilization work <ul style="list-style-type: none"> <li>– Joint permit was received on August 19, 2015.</li> <li>– Floodplain permit application was prepared and submitted to the City of Saginaw on May 4, 2015.</li> <li>– Other permits needed include: County of Saginaw soil erosion and sedimentation control permit.</li> <li>– Other agreements: access from adjacent property owners.</li> </ul> </li> <li>• Conducted ecological risk assessment on the North Ditch consistent with the approach for the Secondary Pond, as an alternative to implementing the stabilization work, and submitted the evaluation to U.S. EPA on March 14, 2019. The assessment concluded that no further activity was required in the North Ditch, beyond some additional sampling for black carbon. U.S. EPA provided comments on the assessment and agreed that additional sampling should be completed.</li> <li>• An Additional North Ditch Sediment Sampling Work Plan was submitted on September 11, 2019 to U.S. EPA. U.S. EPA provided comments on September 19, 2019 to which responses were prepared and submitted on September 26, 2019. U.S. EPA's review of the plan is in progress.</li> </ul>	50%
<b>3.</b>	<b>IU I- Area Closure</b>	
	<p><u>Classified Sand Pile</u></p> <ul style="list-style-type: none"> <li>• Removed all classified sand pile as part of the primary basin stabilization work in 2013.</li> </ul>	100%
	<p><u>Slag Area</u></p> <ul style="list-style-type: none"> <li>• During a Site inspection in April 2019, two small areas in the southern portion of IU were identified as having slag. On September 19, 2019 a Scope of Work was submitted to U.S. EPA to evaluate potential impacts of slag on surrounding soils in IU I. U.S. EPA provided comments on September 24, 2019 and responses are being prepared.</li> </ul>	15%
<b>4.</b>	<b>IU I – Staging Area OM&amp;M</b>	<b>NA</b>
	<ul style="list-style-type: none"> <li>• No activities proposed or pending at this time.</li> </ul>	



Task		Estimated % Complete
	<ul style="list-style-type: none"> <li>• Submitted Summary of WMU status to U.S. EPA on January 22, 2015 and to MDEQ on January 26, 2015. MDEQ approved the closure of Nodular Iron Oil House RCRA Hazardous Waste Area in a letter dated May 8, 2016.</li> <li>• Respond to comments from U.S. EPA (when received) on the Supplemental RFI and CMP – To be determined (TBD).</li> <li>• Prepare and Record Declaration of Restrictive Covenant – TBD.</li> <li>• Prepare Corrective Measures Implementation Plan – TBD.</li> <li>• Prepare Final Remedy Construction Completion Report – TBD.</li> <li>• Prepare Request for RCRA Corrective Action Complete with Controls – TBD.</li> </ul>	
	<p>Other Related Reporting</p> <ul style="list-style-type: none"> <li>• Submit monthly DMRs.</li> </ul>	On-going

### Summary of Contacts with Interested Parties

- There are periodic discussions with local representatives regarding the status of remediation at the Site and potential redevelopment possibilities and options.

### Projected Work for Next Reporting Period (October 1, 2019 through March 31, 2020)

- Complete removal and off-Site disposal of PCB-impacted sediment from the Secondary Pond and prepare closure documentation.
- Conduct annual EI monitoring event and prepare and submit letter summarizing results
- Finalize submission of additional groundwater sampling results.
- Finalize preparation of the 2020 Annual Environmental Action Budget Request.
- Conduct additional investigation of the North Ditch sediments, summarize results, and re-evaluate the need for further action and remedial action alternatives, if necessary.
- Conduct characterization of surficial soil in two areas in the southern portion of IU I with surficial slag and prepare a memorandum to summarize the results and any additional activity, if necessary.
- Annual SWPPP review and certification.
- Prepare and submit NPDES renewal application
- Obtain permits necessary to conduct removal of PCB-impacted surficial soil in the southern portion of IU G.
- Conduct PCB-impacted surficial soil removal and disposal.
- Provide support to U.S. EPA during its preparation of a Statement of Basis and the Final Decision process.
- Review current monitoring well network and prepare proposal for well abandonments.
- Complete periodic Site inspections per the SWPPP and measure water levels in the Secondary Pond.
- Perform discharge events from secondary pond, if necessary, and complete any necessary monitoring required by the NPDES permit.

# **Attachment A.1**

## **EDMR Reports**

No Discharge

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq	Sample Type
Flow 50050 Final Effluent (1)	Sample Measurement	<input type="text" value="0.1325"/>	<input type="text" value="0.1325"/>	****	****	****	****	Weekly	Report Total Daily Flow
	Permit Requirement	(Report) Maximum Monthly Average	(Report) Maximum Daily	****	****	****	****	Weekly	Report Total Daily Flow
Total Suspended Solids 00530 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="4"/>	<input type="text" value="4"/>	mg/L	See Permit Requirements	3-Portion Composite
	Permit Requirement	****	****	****	35 Maximum Monthly Average	70 Maximum Daily		See Permit Requirements	3-Portion Composite
Outfall Observation 84130 Final Effluent (1)	Sample Measurement	<input type="text" value="Yes"/>	****	****	****	****	****	Weekly	Visual
	Permit Requirement	(Report) Yes/No	****	****	****	****	****	Weekly	Visual
pH 00400 Final Effluent (1)	Sample Measurement	****	****	<input type="text" value="7.7"/>	****	<input type="text" value="7.7"/>	SU	Weekly	Grab
	Permit Requirement	****	****	6.5 Minimum Daily	****	9.0 Maximum Daily		Weekly	Grab
Turbidity 00070 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="*g"/>	<input type="text" value="*g"/>	NTU	See Permit Requirements	Grab
	Permit Requirement	****	****	****	80 Maximum Monthly Average	160 Maximum Daily		See Permit Requirements	Grab

General Report  
Comments

No Discharge

Parameter	Flow 50050	Total Suspended Solids 00530	Outfall Observation 84130	pH 00400	pH 00400	Turbidity 00070
Stage	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)
Limit	(Report) MGD	70 mg/L	(Report) yes/no	6.5 SU	9.0 SU	160 NTU
Stat Base	Maximum Daily	Maximum Daily	Yes/No	Minimum Daily	Maximum Daily	Maximum Daily
3/1/2019						
3/2/2019						
3/3/2019						
3/4/2019						
3/5/2019						
3/6/2019						
3/7/2019						
3/8/2019						
3/9/2019						
3/10/2019						
3/11/2019						
3/12/2019						
3/13/2019						
3/14/2019						
3/15/2019	0.1325	4	yes	7.7	7.7	*G
3/16/2019						
3/17/2019						
3/18/2019						
3/19/2019						
3/20/2019						

Parameter	Flow 50050	Total Suspended Solids 00530	Outfall Observation 84130	pH 00400	pH 00400	Turbidity 00070
Stage	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)
Limit	(Report) MGD	70 mg/L	(Report) yes/no	6.5 SU	9.0 SU	160 NTU
Stat Base	Maximum Daily	Maximum Daily	Yes/No	Minimum Daily	Maximum Daily	Maximum Daily
3/21/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/22/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/23/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/24/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/25/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/26/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/27/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/28/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/29/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/30/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
3/31/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**General Report  
Comments**

No Discharge

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq	Sample Type
Flow 50050 Final Effluent (1)	Sample Measurement	<input type="text" value="0.0581"/>	<input type="text" value="0.0581"/>	****	****	****	****	Weekly	Report Total Daily Flow
	Permit Requirement	(Report) Maximum Monthly Average	(Report) Maximum Daily	****	****	****	****	Weekly	Report Total Daily Flow
Total Suspended Solids 00530 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="4"/>	<input type="text" value="4"/>	mg/L	See Permit Requirements	3-Portion Composite
	Permit Requirement	****	****	****	35 Maximum Monthly Average	70 Maximum Daily		See Permit Requirements	3-Portion Composite
Outfall Observation 84130 Final Effluent (1)	Sample Measurement	<input type="text" value="Yes"/>	****	****	****	****	****	Weekly	Visual
	Permit Requirement	(Report) Yes/No	****	****	****	****	****	Weekly	Visual
pH 00400 Final Effluent (1)	Sample Measurement	****	****	<input type="text" value="7.7"/>	****	<input type="text" value="7.7"/>	SU	Weekly	Grab
	Permit Requirement	****	****	6.5 Minimum Daily	****	9.0 Maximum Daily		Weekly	Grab
Turbidity 00070 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="*G"/>	<input type="text" value="*G"/>	NTU	See Permit Requirements	Grab
	Permit Requirement	****	****	****	80 Maximum Monthly Average	160 Maximum Daily		See Permit Requirements	Grab

General Report  
Comments

No Discharge

Parameter	Flow 50050	Total Suspended Solids 00530	Carbonaceous Biochemical Oxygen Demand (CBOD5) 80082	Ammonia Nitrogen (as N) 00610	Total Mercury 71900	Total Mercury 71900
Stage	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)
Limit	(Report) MGD	70 mg/L	39 mg/L	(Report) mg/L	(Report) ng/L	(Report) lbs/day
Stat Base	Maximum Daily	Maximum Daily	Maximum Daily	Maximum Daily	Maximum Daily	Maximum Daily
4/1/2019	****	****	****	****	****	****
4/2/2019	****	****	****	****	****	****
4/3/2019	****	****	****	****	****	****
4/4/2019	****	****	****	****	****	****
4/5/2019	****	****	****	****	****	****
4/6/2019	****	****	****	****	****	****
4/7/2019	****	****	****	****	****	****
4/8/2019	****	****	****	****	****	****
4/9/2019	****	****	****	****	****	****
4/10/2019	****	****	****	****	****	****
4/11/2019	****	****	****	****	****	****
4/12/2019	****	****	****	****	****	****
4/13/2019	****	****	****	****	****	****
4/14/2019	****	****	****	****	****	****
4/15/2019	****	****	****	****	****	****
4/16/2019	****	****	****	****	****	****
4/17/2019	****	****	****	****	****	****
4/18/2019	****	****	****	****	****	****
4/19/2019	****	****	****	****	****	****

Parameter	Flow 50050	Total Suspended Solids 00530	Carbonaceous Biochemical Oxygen Demand (CBOD5) 80082	Ammonia Nitrogen (as N) 00610	Total Mercury 71900	Total Mercury 71900
Stage	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)
Limit	(Report) MGD	70 mg/L	39 mg/L	(Report) mg/L	(Report) ng/L	(Report) lbs/day
Stat Base	Maximum Daily	Maximum Daily	Maximum Daily	Maximum Daily	Maximum Daily	Maximum Daily
4/20/2019	****	****	****	****	****	****
4/21/2019	****	****	****	****	****	****
4/22/2019	****	****	****	****	****	****
4/23/2019	****	****	****	****	****	****
4/24/2019	****	****	****	****	****	****
4/25/2019	****	****	****	****	****	****
4/26/2019	****	****	****	****	****	****
4/27/2019	****	****	****	****	****	****
4/28/2019	****	****	****	****	****	****
4/29/2019	****	****	****	****	****	****
4/30/2019	****	****	****	****	****	****

General Report  
Comments

No Discharge

Parameter	Quantity or Loading		Units	Quality or Concentration			Units	Sample Freq	Sample Type
Flow 50050 Final Effluent (1)	Sample Measurement	<input type="text" value="0.0122"/>	<input type="text" value="0.013"/>	MGD	****	****	****	Weekly	Report Total Daily Flow
	Permit Requirement	(Report) Maximum Monthly Average	(Report) Maximum Daily		****	****	****	Weekly	Report Total Daily Flow
Total Suspended Solids 00530 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="4"/>	<input type="text" value="4"/>	mg/L	See Permit Requirements	3-Portion Composite
	Permit Requirement	****	****	****	35 Maximum Monthly Average	70 Maximum Daily		See Permit Requirements	3-Portion Composite
Outfall Observation 84130 Final Effluent (1)	Sample Measurement	<input type="text" value="Yes"/>	****	yes/no	****	****	****	Weekly	Visual
	Permit Requirement	(Report) Yes/No	****		****	****	****	Weekly	Visual
pH 00400 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="7.5"/>	<input type="text" value="7.7"/>	SU	Weekly	Grab
	Permit Requirement	****	****	****	6.5 Minimum Daily	9.0 Maximum Daily		Weekly	Grab
Turbidity 00070 Final Effluent (1)	Sample Measurement	****	****	****	<input type="text" value="*G"/>	<input type="text" value="*G"/>	NTU	See Permit Requirements	Grab
	Permit Requirement	****	****	****	80 Maximum Monthly Average	160 Maximum Daily		See Permit Requirements	Grab

General Report  
Comments

No Discharge

Parameter	Flow 50050	Total Suspended Solids 00530	Outfall Observation 84130	pH 00400	pH 00400	Turbidity 00070
Stage	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)
Limit	(Report) MGD	70 mg/L	(Report) yes/no	6.5 SU	9.0 SU	160 NTU
Stat Base	Maximum Daily	Maximum Daily	Yes/No	Minimum Daily	Maximum Daily	Maximum Daily
6/1/2019						
6/2/2019						
6/3/2019						
6/4/2019						
6/5/2019						
6/6/2019	0.013	4	Yes	7.7	7.7	*G
6/7/2019						
6/8/2019						
6/9/2019						
6/10/2019						
6/11/2019						
6/12/2019						
6/13/2019						
6/14/2019	0.012	4	Yes	7.5	7.5	*G
6/15/2019						
6/16/2019						
6/17/2019						
6/18/2019						
6/19/2019						
6/20/2019						

Parameter	Flow 50050	Total Suspended Solids 00530	Outfall Observation 84130	pH 00400	pH 00400	Turbidity 00070
Stage	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)	Final Effluent (1)
Limit	(Report) MGD	70 mg/L	(Report) yes/no	6.5 SU	9.0 SU	160 NTU
Stat Base	Maximum Daily	Maximum Daily	Yes/No	Minimum Daily	Maximum Daily	Maximum Daily
6/21/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6/22/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6/23/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6/24/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6/25/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6/26/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6/27/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6/28/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6/29/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
6/30/2019	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

**General Report  
Comments**