

BEFORE THE MISSOURI DEPARTMENT OF NATURAL RESOURCES

In the Matter of:)
)
 Confluence Rivers Utility)
 Operating Company, Inc.) **Order No. 2019-WPCB-1582**
)
 Proceeding under the)
 Missouri Clean Water Law and)
 Sections 640.100 to 640.140, RSMo)

ABATEMENT ORDER ON CONSENT

NOTICE TO RECIPIENTS OF ABATEMENT ORDERS ON CONSENT

The issuing of this Abatement Order on Consent (AOC) No. 2019-WPCB-1582, by the Missouri Department of Natural Resources (Department), is a formal administrative action by the State of Missouri and is being issued because the Department anticipates that Confluence Rivers Utility Operating Company, Inc. (Respondent) will be in violation of the Missouri Clean Water Law (MCWL) and the Missouri Safe Drinking Water Law and Regulations (MSDWL&R) upon the Respondent's acquisition of the wastewater treatment facilities (WWTFs) and public water systems (PWSs) known as or currently serving Auburn Lake, Calvey Brook Estates, Castlereagh Estates Subdivision, Gladlo Water and Sewer, Lake Virginia Subdivision East, Villa Ridge Estates, The Willows Utility Company, Roy-L Utilities, Kuhle H2O, Evergreen Lakes, Eugene, and Port Perry Service Company. This AOC is issued under the authorities of Sections 644.056, and 644.079, 640.130.3, and 640.131, Revised Statutes of Missouri (RSMo). Failure to comply with this AOC is, by itself, a violation of Section 644.076.1, RSMo or Section 640.131, RSMo, which may trigger penalties and other forms of relief. Litigation may occur without further notice if there is not compliance with the requirements of this AOC. This AOC does not

SCHEDULE CWS 3

constitute a waiver or a modification of any requirements for the MCWL and its implementing regulations, or the MSDWL&R, all of which remain in full force and effect. Compliance with the terms of this AOC shall not relieve the Respondent of liability for, or preclude the Department from, initiating an administrative or judicial enforcement action to recover civil or administrative penalties for any future violations of the MCWL or MSDWL&R, or to seek injunctive relief, pursuant to Chapters 640 and 644, RSMo.

FINDINGS OF FACT

1. The Respondent received approval from the Public Service Commission to begin acquiring the WWTFs and PWSs on February 24, 2019.

2. The Respondent, originally formed on August 11, 2016, is a domestic, for-profit business in good standing with the Missouri Secretary of State, and anticipates purchasing the WWTFs and PWSs set forth below pending execution of this AOC.

3. The Auburn Lake WWTF consists of an extended aeration sludge plant along with chlorine disinfection followed by dechlorination. The WWTF has a design population equivalent of 900, and a design flow of 90,280 gallons per day (gpd), and is located in Lincoln County, Missouri. Effluent from the WWTF discharges to a tributary to Big Creek, subject to the conditions and requirements of Missouri State Operating Permit No. MO-0129356, which became effective on August 1, 2017, and expires on July 31, 2022.

4. The Calvey Brook Estates WWTF consists of a recirculating AdvanTex filter with no disinfection. The collection system consists of a low pressure collection system with homeowner-maintained septic tanks and pumps. The WWTF has a design population equivalent of 133, a design flow of 10,000 gpd, an actual flow of 1,900 gpd, and is located in Franklin County, Missouri. Effluent from the WWTF discharges to a tributary to Little Calvey Creek,

subject to the conditions and requirements of Missouri State Operating Permit No.

MO-0130095 (Calvey Brook Estates Permit), which was issued on July 10, 2018, and expires on June 30, 2023.

5. On September 25, 2017, Department staff inspected the Calvey Brook Estates WWTF and found the fencing inadequate to restrict entry to the facility by children, livestock, and unauthorized persons as well as to protect the facility from vandalism.

6. Discharge Monitoring Reports (DMRs) submitted by the previous owner of the Calvey Brook Estates WWTF indicate that effluent produced by the WWTF violated the permitted effluent limitations. See Exhibit A of this AOC for a list of effluent violations.

7. On February 19, 2019, the Department received an application for a construction permit for construction of improvements to achieve compliance with final permitted effluent limitations for the Calvey Brook Estates WWTF.

8. The Gladlo Water and Sewer WWTF consists of a three-cell lagoon with chlorine disinfection with a design population equivalent of 237, a design flow of 23,680 gpd, and is located in Phelps County, Missouri. Effluent from the WWTF discharges to a tributary to Little Prairie Community Lake, subject to the conditions and requirements of Missouri State Operating Permit No. MO-0084191 (Gladlo Permit), which was effective on January 1, 2016, and expires on December 31, 2020.

9. On September 26, 2013, staff conducted an inspection of the Gladlo Water and Sewer WWTF and found the facility out of compliance due to permitted effluent limitation violations, the security fence and gate not being adequately installed to restrict entrance to the facility by unauthorized personnel, and warning signs not visible from all directions.

10. DMRs submitted by the previous owner indicate that effluent produced by the Gladlo Water and Sewer WWTF violated the permitted effluent limitations. See Exhibit A of this AOC for a list of effluent violations.

11. On August 10, 2018, the Department issued Construction Permit No. CP0001981 for construction of improvements at the Gladlo Water and Sewer WWTF to achieve compliance with final permitted effluent limitations.

12. The Willows Utility Company WWTF consists of an extended air plant, with sand filters, chlorination, and dechlorination, a design population equivalent of 926, a design flow of 100,000 gpd, an actual flow of 52,000 gpd, and is located in Greene County, Missouri. Effluent from the WWTF discharges to a tributary to Pond Creek, subject to the conditions and requirements of Missouri State Operating Permit No. MO-0052281 (Willows Permit), which was effective on June 1, 2017, and expires on June 30, 2021.

13. DMRs submitted by the previous owner indicate that effluent produced by the Willows Utility Company WWTF violated the permitted effluent limitations. See Exhibit A of this AOC for a list of effluent violations.

14. The Castlereagh Estates Subdivision WWTF is an extended air plant with a design population equivalent of 277, a design flow of 27,700 gpd, an actual flow of 14,000 gpd, and is located in St. Louis County, Missouri. Effluent from the WWTF discharges to a tributary to Mill Creek, subject to the conditions and requirements of Missouri State Operating Permit No. MO-0084484 (Castlereagh Estates Subdivision Permit), which was effective on November 1, 2012, and expired on October 31, 2017. To date the Department has not received an application to renew the Castlereagh Estates Subdivision Permit.

15. On August 11 and 12, 2015, Department staff inspected the Castlereagh Estates Subdivision WWTF and found the facility out of compliance with permitted effluent limits. Department staff documented additional violations of the MCWL at Castlereagh Estates Subdivision, including failure to submit progress reports and make appropriate upgrades, failure to operate and maintain facilities to comply with the MCWL and applicable permit conditions, failure to submit annual permit fees, and failure to clearly mark the outfall.

16. DMRs submitted by the previous owner indicate that effluent produced by the Castlereagh Estates Subdivision WWTF violated the permitted effluent limitations. See Exhibit A of this AOC for a list of effluent violations.

17. On August 7, 2018, the Department issued Construction Permit No. CP0001974 for construction of improvements at the Castlereagh Estates Subdivision WWTF to achieve compliance with final permitted effluent limitations.

18. The Lake Virginia Subdivision East WWTF consists of a two-cell lagoon with a design population equivalent of 96, a design flow of 9,600 gpd, an actual flow of 1,150 gpd, and is located in Jefferson County, Missouri. Effluent from the WWTF discharges to a tributary to Joachim Creek, subject to the conditions and requirements of Missouri State Operating Permit No. MO-0101672, which was effective on June 1, 2018, and expires on September 30, 2021.

19. On March 8, 2017, Department staff inspected the Lake Virginia Subdivision East WWTF and observed that the WWTF did not have dechlorination equipment, failed to provide a lockable gate and adequate fence to restrict unauthorized access, and failed to maintain the inner berm slopes of the lagoon to be less than a three to one.

20. On January 17, 2019, the Department issued Construction Permit No. CP0002005 for construction of improvements at the Lake Virginia Subdivision East WWTF to achieve compliance with final permitted effluent limitations.

21. The Villa Ridge Estates WWTF consists of an extended air plant and chlorine disinfection with a design population equivalent of 666, a design flow of 66,600 gpd, an actual flow of 24,900 gpd, and is located in Franklin County, Missouri. Effluent from the WWTF discharges to a tributary to Pin Oak Creek, subject to the conditions and requirements of Missouri State Operating Permit No. MO-0038237 (Villa Ridge Estates Permit), which was effective on August 1, 2018, and expires on June 30, 2020.

22. On June 2 and 6, 2017, Department staff inspected the Villa Ridge Estates WWTF and found the facility out of compliance because they caused pollution to waters of the state, discharged water contaminants and wastewater sludge into waters of the state, operated a WWTF which discharged into waters of the state, and failed to meet design requirements for aerial stream crossings.

23. DMRs submitted by the previous owner indicate that effluent produced by the Villa Ridge Estates WWTF violated the permitted effluent limitations. See Exhibit A of this AOC for a list of effluent violations.

24. On December 21, 2018, the Department issued Construction Permit No. CP0001985 for construction of improvements at the Villa Ridge Estates WWTF to achieve compliance with final permitted effluent limitations.

25. The Roy-L Utilities WWTF consists of a single-cell lagoon with chlorination and dechlorination disinfection system on the outfall. The WWTF has a design population equivalent of 200, a design flow of 19,999 gpd, an actual flow of 3,300 gpd, and is located in Montgomery

County, Missouri. Effluent from the WWTF discharges to a tributary to Bear Creek, subject to the conditions and requirements of Missouri State Operating Permit No. MO-0087211 (Roy-L Permit), which was effective on August 1, 2016, and expires on June 30, 2019.

26. DMRs submitted by the previous owner indicate that effluent produced by the Roy-L Utilities WWTF violated the permitted effluent limitations. See Exhibit A of this AOC for a list of effluent violations.

27. On August 1, 2018, the Department issued Construction Permit No. CP0001977 for construction of improvements at the Roy-L Utilities WWTF to achieve compliance with final permitted effluent limitations.

28. The Port Perry Service Company WWTF consists of a four-cell, no-discharge lagoon that uses land application with a design population equivalent of 740, a design flow of 740,000 gpd, an actual flow of 10,000 gpd, and is located in Perry County, Missouri. The lagoon contains an emergency discharge outfall that discharges to a tributary to Nations Creek, subject to the conditions and requirements of Missouri State Operating Permit No. MO-G823126, which was issued on November 1, 2018, and expires on August 24, 2022.

29. The PWS known as Kuhle H20, identification number MO3036153, is located in Boone County. The system serves groundwater year-round to an estimated 450 customers through 100 connections.

30. The PWS known as Evergreen Lakes, identification number MO6036134, is located in Franklin County. The system serves groundwater year-round to an estimated 150 customers through 53 connections.

31. The PWS known as The Willows Utility Company, identification number MO5048099, is located in Greene County. The system serves groundwater year-round to an estimated 275 customers through 210 connections.

32. The PWS known as Gladlo, identification number MO3036151, is located in Phelps County. The system serves groundwater year-round to an estimated 150 customers through 71 connections.

33. The PWS known as Auburn Lake, identification number MO6031409, is located in Lincoln County. The system serves groundwater year-round to an estimated 0 customers through 1 connection. The Auburn Lake PWS is not currently activated as a PWS.

34. The PWS known as Calvey Brook Estates, identification number MO6031385, is located in Franklin County. The system serves groundwater year-round to an estimated 25 customers through 1 connection. The Calvey Brook Estates PWS is not currently activated as a PWS.

35. The PWS known as Eugene, identification number MO3010257, is located in Cole County. The system serves groundwater year-round to an estimated 220 customers through 45 connections. There was one routine monitoring violation in March 2018 and returned to compliance in April 2018.

36. The PWS known as Roy-L Utilities, identification number MO6251710, is located in Montgomery County. The system serves groundwater year-round to an estimated 30 customers through 1 connection. There was one Boil Water Order issued September 25, 2018, lifted September 27, 2018, and returned to compliance.

37. The PWS known as Port Perry Service Company, identification number MO4036132, is located in Perry County. The system serves groundwater year-round to an estimated 793 customers through 356 connections.

38. Big Creek, Little Calvey Creek, Mill Creek, Little Prairie Community Lake, Joachim Creek, Pin Oak Creek, Pond Creek, Bear Creek, Nations Creek, and their tributaries are waters of the state as the term is defined by Section 644.016(27), RSMo.

39. Domestic wastewater is a water contaminant as the term is defined by Section 644.016(24), RSMo.

40. Sections 644.051.2 and 644.076.1, RSMo, and 10 CSR 20-6.010(1)(A) and (5)(A), make it unlawful to operate, use, construct, or maintain a water contaminant source that discharges to a waters of the state without an operating permit.

41. Sections 644.051.1(3) and 644.076.1, RSMo, make it unlawful to violate permitted effluent limitations as contained in Part "A" of the Permit, or any other condition listed in the Permit.

42. On February 14, 2019, the Public Service Commission issued Order No. WM-2018-0116, Approving Stipulation And Agreement And Granting Certificates Of Convenience And Necessity with an effective date of February 24, 2019.

STATEMENT OF ANTICIPATED VIOLATIONS

43. The Department and the Respondent acknowledge that the Respondent is acquiring nine WWTFs with histories of MCWL violations or that require improvements, and nine PWSs with histories of MSDWL&R violations or that require improvements. The Department and the Respondent anticipate that after the Respondent's acquisition of these WWTFs and PWSs, the WWTFs and PWSs will continue to accrue violations of the MCWL and

MSDWL&R of the same kind as the violations listed below, or violations that are a consequence of the existing conditions of the WWTFs and PWSs, until the Respondent completes upgrades to the WWTFs and PWSs as set forth in the compliance schedule and plan described in Paragraphs 51 through 72 below. Anticipated violations of the MCWL and its implementing regulations are as follows:

44. Failed to comply with the effluent limits contained in Table A of the Villa Ridge Estates Permit, Willows Permit, Gladlo Permit, Castlereagh Estates Subdivision Permit, Roy-L Permit, and Calvey Brook Estates Permit, in violation of Sections 644.051.1(3) and 644.076.1, RSMo;

45. Caused pollution of tributaries to Big Creek, Little Calvey Creek, Mill Creek, Little Prairie Community Lake, Joachim Creek, Pin Oak Creek, Pond Creek, Nations Creek, and Bear Creek or other waters of the state, or placed or caused or permitted to be placed water contaminants in a location where it is reasonably certain to cause pollution of waters of the state, in violation of Sections 644.051.1(1) and 644.076.1, RSMo; and

46. Since November 1, 2017, operated, used or maintained the wastewater contaminant source at Castlereagh Estates Subdivision without a Missouri State Operating Permit, in violations of Sections 644.051.2 and 644.076.1, RSMo and 10 CSR 20-6010(1)(A).

AGREEMENT

47. The Department and the Respondent desire to amicably resolve all disputes or claims that could arise against the Respondent after acquiring the WWTFs and PWSs for any and all past violations of the MCWL and MSDWL&R, including but not limited to penalties proposed in or arising from violations of the MCWL, its implementing regulations, and the

MSDWL&R, as well as future anticipated violations that may occur during the time period from Respondent's acquisition of the WWTF and PWS set forth above until this AOC expires.

48. The provisions of this AOC shall apply to and be binding upon the parties executing this AOC, their agents, subsidiaries, affiliates, and lessees, including officers, agents, servants, corporations and any persons acting under, through, or for the parties agreeing hereto. Any changes in ownership or corporate status, including but not limited to, any transfer of assets, or real estate, or personal property, shall not affect the responsibilities of the Respondent under this AOC.

49. The Department and the Respondent agree that by entering into this AOC, the Respondent is not admitting liability. This AOC shall not be deemed to be an admission of liability for any purpose whatsoever.

50. Immediately upon assuming responsibility to operate the WWTFs and PWSs, the Respondent agrees to make all efforts in good faith to operate the WWTFs and PWSs in compliance with applicable permits, the MCWL, its implementing regulations, and the MSDWL&R.

51. Within 15 days of the purchase date for each WWTF or PWS, the Respondent is ordered and agrees to submit an application to transfer all effective permits to the Respondent.

52. Within 15 days of the purchase date for each WWTF or PWS that has an active construction permit, the Respondent is ordered and agrees to submit an Application For Transfer Of Construction Permit (Department Form No.780-2156).

53. Within 15 days of the purchase date of the Castlereagh Estates Subdivision WWTF, the Respondent is ordered and agrees to submit to the Department an application for renewal of the Castlereagh Estates Subdivision Permit.

54. Within 30 days of acquisition for each PWS, Respondent is ordered and agrees to submit a completed PTD transfer application (Department Form No. 780-2139).

55. Within 120 days after acquisition of the Roy- L Utilities WWTF, the Respondent is ordered and agrees to complete construction of improvements, according to Department-approved plans and specifications that will allow effluent produced by the WWTF to comply with final permitted effluent limitations.

56. Within 120 days after acquisition of Roy-L Utilities PWS, the Respondent is ordered and agrees to install a booster pump and a chlorine analyzer.

57. Within 120 days after acquisition of Villa Ridge Estates WWTF, the Respondent is ordered and agrees to complete construction of improvements, according to Department-approved plans and specifications that will allow effluent produced by the WWTF to comply with final permitted effluent limitations.

58. Within 120 days after acquisition of Gladlo WWTF, the Respondent is ordered and agrees to complete construction of improvements, according to Department-approved plans and specifications that will allow effluent produced by the WWTF to comply with final permitted effluent limitations. Also within 120 days after acquisition of Gladlo PWS, the Respondent is ordered and agrees to complete necessary repairs and install a booster system to provide the system pressure.

59. Within 120 days after acquisition of Willows WWTF, the Respondent is ordered and agrees to complete construction of improvements, according to Department-approved plans and specifications that will allow effluent produced by the WWTF to comply with final permitted effluent limitations. Also within 120 days after acquisition of Willows PWS, the Respondent is ordered and agrees to maintain a minimum system pressure of 20 psi in

accordance with 10 CSR 60-4.080(8). The Respondent shall notify the Department of system pressures below 20 psi within 48 hours of each occurrence in accordance with 10 CSR 60-7.010(2). Also within 120 days after acquisition of Willows PWS, the Respondent is ordered and agrees to complete necessary repairs and install a chlorine analyzer.

60. Within 120 days after acquisition of Lake Virginia Subdivision East WWTF, the Respondent is ordered and agrees to complete construction of improvements, according to Department-approved plans and specifications that will allow effluent produced by the WWTF to comply with final permitted effluent limitations.

61. Within 120 days after issuance of a construction permit for Calvey Brook Estates WWTF, the Respondent is ordered and agrees to complete construction of improvements, according to Department-approved plans and specifications that will allow effluent produced by the WWTF to comply with final permitted effluent limitations.

62. Within 120 days after acquisition of Calvey Brook Estates PWS, the Respondent is ordered and agrees to replace the well house piping, install a remote monitoring system, and install a hand/on/off auto switch for the well head.

63. Within 120 days after acquisition of Castlereagh Estates Subdivision WWTF, the Respondent is ordered and agrees to complete construction of improvements, according to Department-approved plans and specifications that will allow effluent produced by the WWTF to comply with final permitted effluent limitations.

64. Within 120 days after acquisition of Kuhle H2O PWS, the Respondent is ordered and agrees to complete necessary repairs, reconstruct the well house, install a chlorine analyzer, and improve security measures around the well house.

65. Within 120 days after acquisition of Evergreen Lakes PWS, the Respondent is ordered and agrees to complete necessary repairs and install a chlorine analyzer.

66. Within 120 days after acquisition of Eugene PWS, the Respondent is ordered and agrees to complete necessary repairs to the storage tank and install well house piping.

67. Within 120 days after acquisition of Auburn Lake PWS, the Respondent is ordered and agrees to complete technical, managerial, and financial documentation and submit a complete permit to dispense application.

68. Within 120 days after acquisition of Port Perry WWTF, the Respondent is ordered and agrees to complete construction of improvements, according to Department-approved plans and specifications that will allow effluent produced by the WWTF to comply with final permitted effluent limitations.

69. Within 120 days after acquisition of Port Perry PWS, the Respondent is ordered and agrees to complete necessary repairs and install a chlorine analyzer.

70. Within 60 days of completion of construction for each of the WWTFs requiring construction, the Respondent is ordered and agrees to submit a Statement of Work Completed.

71. Within 60 days of completion of repairs and installation for each of the PWSs requiring repairs, the Respondent is ordered and agrees to submit written notification of completion to the Department.

72. This AOC shall terminate 90 days after upgrades to the WWTFs and PWSs are completed, or on March 30, 2020, whichever date occurs first.

73. The Department agrees not to bring, or cause to be brought, any civil action against the Respondent for penalties arising out of the above-referenced violations of the

MCWL, its implementing regulations, and the MSDWL&R, provided that the Respondent complies in good faith with the Department-approved compliance schedule and plan.

74. Upon completion of the compliance schedule and plan, the Respondent is ordered and agrees to obtain all necessary permits and approvals.

SUBMISSIONS

75. All other documentation submitted to the Department for compliance with this AOC shall be submitted within the timeframes specified to:

Ms. Taylor Markway
Department of Natural Resources
Water Protection Program
Compliance and Enforcement Section
P.O. Box 176
Jefferson City, MO 65102-0176

OTHER PROVISIONS

76. Immediately upon becoming aware that a deadline or milestone as set forth in this AOC will not be completed by the required deadline, the Respondent shall notify the Department by telephone or electronic mail: i) identifying the deadline that will not be completed; ii) identifying the reason for failing to meet the deadline; and iii) proposing an extension to the deadline. Within five days of notifying the Department, the Respondent shall submit to the Department, for review and approval, a written request containing the same basic provisions of i, ii, and iii listed above. The Department may grant an extension if it deems appropriate. Failure to submit a written notice to the Department may constitute a waiver of the Respondent's right to request an extension and may be grounds for the Department to deny the Respondent an extension.

77. Compliance with this AOC resolves only the specific anticipated violations described herein, and this AOC shall not be construed as a waiver or modification or any other requirements of the MCWL, its implementing regulations, the MSDWL&R, or any other source of law. Nor does this AOC resolve any future violations of this AOC or any law or regulation after this AOC expires. Consistent with 10 CSR 20-3.010(5), this AOC shall not be construed as satisfying any claim by the state or federal government for natural resource damages.

78. Nothing in this AOC forgives the Respondent from future non-compliance with the laws of the State of Missouri, nor requires the Department or State of Missouri to forego pursuing by any legal means for any non-compliance with the laws of the State of Missouri. The terms stated herein constitute the entire and exclusive agreement of the parties. There are no other obligations of the parties, be they expressed or implied, oral or written, except those expressly set forth herein. The terms of this AOC supersede all previous memoranda of understanding, notes, conversations, and agreements, express or implied. This AOC may not be modified orally.

79. By signing this AOC, all signatories assert that they have read and understood the terms of this AOC, and that they have the authority to sign this AOC on behalf of their respective party.

80. The effective date of the AOC shall be the date the Department signs the AOC. The Department shall send a fully executed copy of this AOC to the Respondent for their records.

NOTICE OF APPEAL RIGHTS

81. By signing this AOC, the Respondent consents to its terms and waives any right to appeal or otherwise challenge the terms and conditions of this AOC, pursuant to Sections

621.250, 640.010, 640.013, 640.130, 640.131, 644.056.3, 644.079.2, 644.145, and Chapter 536, RSMo, and 10 CSR 20-1.020, 10 CSR 20-3.010, 10 CSR 20-6.020(5), 10 CSR 60-6.070(5), the Missouri Constitution, and any other source of law.

SIGNATORY AUTHORITY

Agreed to and Ordered on this 1st day of April, 2019



Mr. Josiah Cox, President
Confluence Rivers Utility Operating Company, Inc.

Agreed to and Ordered on this 2nd day of April, 2019



DEPARTMENT OF NATURAL RESOURCES
Chris Wieberg, Director
Water Protection Program

- c: General Counsel's Office
- Accounting Program
- Ms. Cindy Davies, Director, Southwest Regional Office
- Mr. Arthur Goodin, Director, Southeast Regional Office
- Ms. Dorothy Franklin, Director, St. Louis Regional Office
- Ms. Irene Crawford, Director, Northeast Regional Office
- Mr. Lance Dorsey, Compliance and Enforcement Section, Water Protection Program

Exhibit A: Limit value exceedances from Discharge Monitoring Data submitted by the WWTFs

Villa Ridge Estates WWTF				
Date	Parameter	Weekly Avg.	Monthly Avg.	Reported value
9/30/18	BOD	45	30	70
9/30/18	Total Suspended Solids	45	30	31
9/30/18	E.coli	1030 daily max	206	79,200
4/30/18	E. coli	1030 daily max	206	2,420
12/31/17	Total Suspended Solids	45	30	100
12/31/17	BOD	45	30	120
10/31/17	E. coli	1030 daily max	206	61,300
9/30/17	E. coli	1030 daily max	206	92,000
8/31/17	E. coli	1030 daily max	206	240,000
7/31/17	Total Suspended Solids	45	30	32
6/30/17	E. coli	1030 daily max	206	24,000

Willows Utility Company WWTF				
Date	Parameter	Weekly Avg.	Monthly Avg.	Reported value
8/31/18	E. coli	1030 daily max	206	1600
7/31/18	Nitrogen as Ammonia	5.4 daily max	1.3	1.63
4/30/18	E. coli	1030 daily max	206	(2,420 daily max) (124 monthly)
4/30/17	Nitrogen as Ammonia	5.9 daily max	1.1	3

Gladlo Water and Sewer WWTF				
Date	Parameter	Weekly Avg.	Monthly Avg.	Reported value
12/31/18	BOD	65 daily max	45	48
9/30/18	E. coli	1030 daily max	206	(2420 daily max) (450 monthly)
9/30/17	Chlorine, total residual	129.99 daily max	129.99	(2100 daily max) (240 monthly)
6/30/17	Chlorine, total residual	129.99 daily max	129.99	(2100 daily max) (300 monthly)

Castlereagh Estates Subdivision				
Date	Parameter	Weekly Avg.	Monthly Avg.	Reported value
8/31/18	E. coli	1030 daily max	206	24,200
7/31/18	E. coli	1030 daily max	206	546
6/30/18	E.coli	1030 daily max	206	5,490
4/30/18	E. coli	1030 daily max	206	15,600
10/31/17	E. coli	1030 daily max	206	41,100
9/30/17	E. coli	1030 daily max	206	51,700
9/30/17	BOD	45	30	47
8/31/17	E. coli	1030 daily max	206	81,600
7/31/17	E. coli	1030 daily max	206	141,000
6/30/17	E. coli	1030 daily max	206	6,700
5/31/17	E. coli	1030 daily max	206	240

Roy-L Utilities WWTF				
Date	Parameter	Weekly Avg.	Monthly Avg.	Reported value
9/30/18	E. coli	1030 daily max	206	11,200
12/31/17	E. coli	1030 daily max	206	10

Calvey Brook Estates WWTF				
Date	Parameter	Weekly Avg.	Monthly Avg.	Reported value
6/30/18	Nitrogen as Ammonia	3.7 daily max	1.4	4.3
6/30/18	Total Suspended Solids	15	10	19
3/31/18	Nitrogen as Ammonia	7.5 daily max	2.8	5