



# City of Flagstaff

## Water Services Division



### Introduction

The City of Flagstaff is the largest city and regional center of northern Arizona and is the seat of Coconino County. It has a population of about 72,000 and a hearty tourist season with its proximity to the Grand Canyon, Oak Creek Canyon, Meteor Crater, Arizona Snowbowl, and historic Route 66. The average annual rainfall is 23.14 inches, average annual snowfall is 77 inches, average high temperature is 60.8° F, and average low is 26.8° F.

Although Flagstaff became an incorporated town in 1894, the modern history really dates to 1876 when settlers passing through honored the nation's centennial by raising an American flag up a pine tree. Their "flag staff" became a landmark for those who followed, and eventually became the town's namesake. The western expansion of the railroad in the 1880s attracted merchants and saloonkeepers to set up shop for the railroad workers and lumbermen. Within a couple of years, Flagstaff was a thriving town of railroad, lumber and ranching industries. Early families such as the Riordans (lumber) and Babbitts (ranching) have descendants who still live and work in Flagstaff today. Since then, the Normal School would become Northern Arizona University. It is one of the state's three public universities with an enrollment of 30,000 students. Lowell Observatory was established in 1894 and was designated a National Historic Landmark in 1965. On October 24<sup>th</sup>, 2001, the City of Flagstaff became the World's First "International Dark Sky City", awarded by the International Dark Sky Association. Perhaps the most important development for Flagstaff is its growth as a strong tourism-based center and a center for athletes to do high altitude training. Hundreds of thousands of people now visit Flagstaff every year. They come to hike and camp in the pristine wilderness of the largest ponderosa pine forest in the world, visit our National Monuments and museums, the Grand Canyon and other local attractions.

The United States Environmental Protection Agency (EPA) approved the Industrial Waste Pretreatment Program for Flagstaff in 1993. The most recent local limits study for the City of Flagstaff was completed in 2015. This program currently oversees 1 CIU, 6 SIUs, and 2 NSCIUs. Industrial Pretreatment program also manages the FOG/small business program and the cross-connection program for the City of Flagstaff.

The City owns and operates the Wildcat Hill and Rio de Flag Water Reclamation Plants (WRP). The Wildcat Hill WRP is a rated 6 MGD and the Rio de Flag WRP is a 4 MGD plant. The treated effluent from these plants is reused in a city-wide reclaim distribution system and discharged to the Rio de Flag river for wetlands and recharge to the aquifer.

The Water Services mission is to professionally and cost-effectively provide water, wastewater, and stormwater services that meet the present and future environmental, health, and safety needs of the community.

### ***Water – Wastewater - Reclaimed Water - Stormwater***

**Administration Offices**  
2323 N Walgreens St. Suite 1  
Flagstaff, Arizona 86004

**City Hall**  
211 W. Aspen Ave.  
Flagstaff, Arizona 86001

## NPDES Annual Report 2019

### Pretreatment Program

#### Program Changes:

Administrative changes:

City of Flagstaff's Water Services Admin Department (including Industrial Pretreatment) moved into a new office. A new workspace/garage is currently under construction for Industrial Pretreatment personnel.

#### Training/Seminars:

Supervisor and inspectors attend various safety and technical trainings throughout the year. These include: IAPMO backflow repair and recertification courses, FOG workshops, AZ water conference and meetings, ABPA conferences, and City Risk Management safety training.

#### Year summary:

In February of 2019, Industrial Pretreatment hired a consultant to do an evaluation of the Pretreatment program to identify any deficiencies or areas for improvement. The final report was released in May 2019. A few highlights from the report include lots of code changes, new management systems for enforcement and laboratory data, standardizing SIU slug plans, and changes to annual inspection/report to more closely align with EPA's checklist.

In March of 2019, the City began talks with NAU to consolidate sampling sites from 5 to 2. A meeting was held with NAU Environmental Hygiene and Facility Maintenance personnel. GIS maps of the sewer lines were evaluated, and promising sites were found. After inspecting manholes and doing dye tests, it is not possible to consolidate any of the 5 sites. The sampling sites will remain in their current locations.

In July 2019, a pilot program for the SAMs P3 database for grease interceptors was initiated. IPP used it for a couple of months but found it did not meet the needs of the section. At the end of 2019, IPP was finding a new program to fit its FOG management system needs.

Business surveys sent out to 8 businesses in town for evaluation of waste streams. Six of the businesses returned the surveys. None of those qualified as a new categorical or significant industrial user.

Working with public relations aides, a new residential FOG brochure was printed and in the process of finalizing commercial FOG brochures and posters.

Started the Local limits study with a consultant in November. IPP had the initial data evaluation done in December.

The new ERP is fully implemented with 6 NOVs issued along with numerous warning letters throughout 2019.

City of Flagstaff has 58% compliance with dental amalgam rule. The forms were mailed in July and inspectors visited dental offices in December.

**POTW PRETREATMENT ANNUAL REPORT**  
**CITY OF FLAGSTAFF, ARIZONA**

NPDES Permit Holder: City of Flagstaff, Arizona

Period Covered by this Report: 01/01/2019 through 12/31/2019

Name of Wastewater Treatment Plant: Wildcat Hill & Rio de Flag WRP

AZPDES Permit Number: Wildcat Hill WRP - AZ0020427  
Rio de Flag WRP - AZ0023639

Person to Contact Concerning City of Flagstaff Information Contained in the Report:

Jolene Hayes  
Industrial Pretreatment Supervisor  
2323 N Walgreens  
Suite 1  
Flagstaff, Arizona 86004  
928-213-2117

As required by 40 C.F.R. Section 122.22(b)(2):

*I certify under penalty of law that all CITY OF FLAGSTAFF attachments contained in this document 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.*



Brad Hill  
Water Services Director  
City of Flagstaff

26 FEB 2020

Date

## CITY OF FLAGSTAFF

### SUMMARY OF PRETREATMENT PROGRAM EXPENDITURES

January 1, 2019 – December 31, 2019 – Total Pretreatment Expenditures \$ **332,995**

### PRETREATMENT PROGRAM PERSONNEL

<u>Title</u>	<u>FTEs 2019</u>	<u>FTEs 2018</u>
<b>Regulatory Compliance Manager</b>	<b>1.0</b>	<b>1.0</b>
<b>Pretreatment Supervisor</b>	<b>1.0</b>	<b>1.0</b>
<b>Pretreatment Inspectors</b>	<b>2.0</b>	<b>2.0</b>

### PRETREATMENT PROGRAM EXPENDITURES

<b>Laboratory Services</b>	<b>\$ 15,215</b>
<b>Operating Supplies and Expenses</b>	<b>\$ 17,329</b>
<b>Pretreatment Fees</b>	<b>\$3,000</b>
<b>Training/workshops</b>	<b>\$5,200</b>

### PRETREATMENT EQUIPMENT INVENTORY

<u>Equipment Name</u>	<u>Purchased 2019</u>	<u>Total 2019</u>
<b>pH Meter</b>	<b>0</b>	<b>2</b>
<b>Gas Detectors</b>	<b>0</b>	<b>3</b>
<b>Portable Auto-Sampler</b>	<b>0</b>	<b>3</b>
<b>Vehicles</b>	<b>0</b>	<b>2</b>
<b>Computers/Tablets</b>	<b>1</b>	<b>6</b>
<b>Flow Meters</b>	<b>0</b>	<b>3</b>

COMPANY NAME AND ADDRESS		WRP	SIC CODE	Regulation
1	W.L. Gore & Associates Gore Woody Mountain Facilities P.O. Box 300 Flagstaff, AZ 86004	Rio de Flag/ Wildcat Hill	3842	City Code/ EPA 463
2	Nestle Purina Co. 4700 Nestle Purina Avenue Flagstaff, AZ 86004	Wildcat Hill	2047	City Code
3	Wis-Pak Bottling Company 4900 Railhead Ave. Flagstaff, AZ 86004	Wildcat Hill	2086	City Code
4	Flagstaff Medical Center 1200 N. Beaver St. P.O. Box 1268 Flagstaff, AZ 86002	Rio de Flag/ Wildcat Hill	8062	City Code
5	Northern Arizona University P.O. Box 4067 Flagstaff, AZ 86011	Rio de Flag/ Wildcat Hill	8221	City Code
6	Joy Cone Company 2843 West Shamrell Blvd Flagstaff, AZ 86001	Rio de Flag	2052	City Code
7	Mission Linen Industries 2450 E. Huntington Dr Flagstaff, AZ 86001	Wildcat Hill	7213/7218	City Code
<b>Non-Significant Categorical Industrial User</b>				
1	W.L. Gore & Associates Gore Medical West Facilities 1500 N Fourth St. Flagstaff, AZ 86004	Wildcat Hill	3842	City Code/ EPA 463
2	SenesTech Inc. 3140 N. Caden Court #1 Flagstaff, AZ 86004	Wildcat Hill	2879	City Code/ EPA 403

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**ADDITIONS**

The following Significant Industrial Users were added in 2019:

None

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**DELETIONS**

The following Significant Industrial Users have ceased operations in 2019:

None

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**RECLASSIFICATIONS**

The following Significant Industrial Users have been reclassified in 2019:

None

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**NAME CHANGES**

The following Significant Industrial Users changed their names in 2019:

None

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# Legend

## SIU

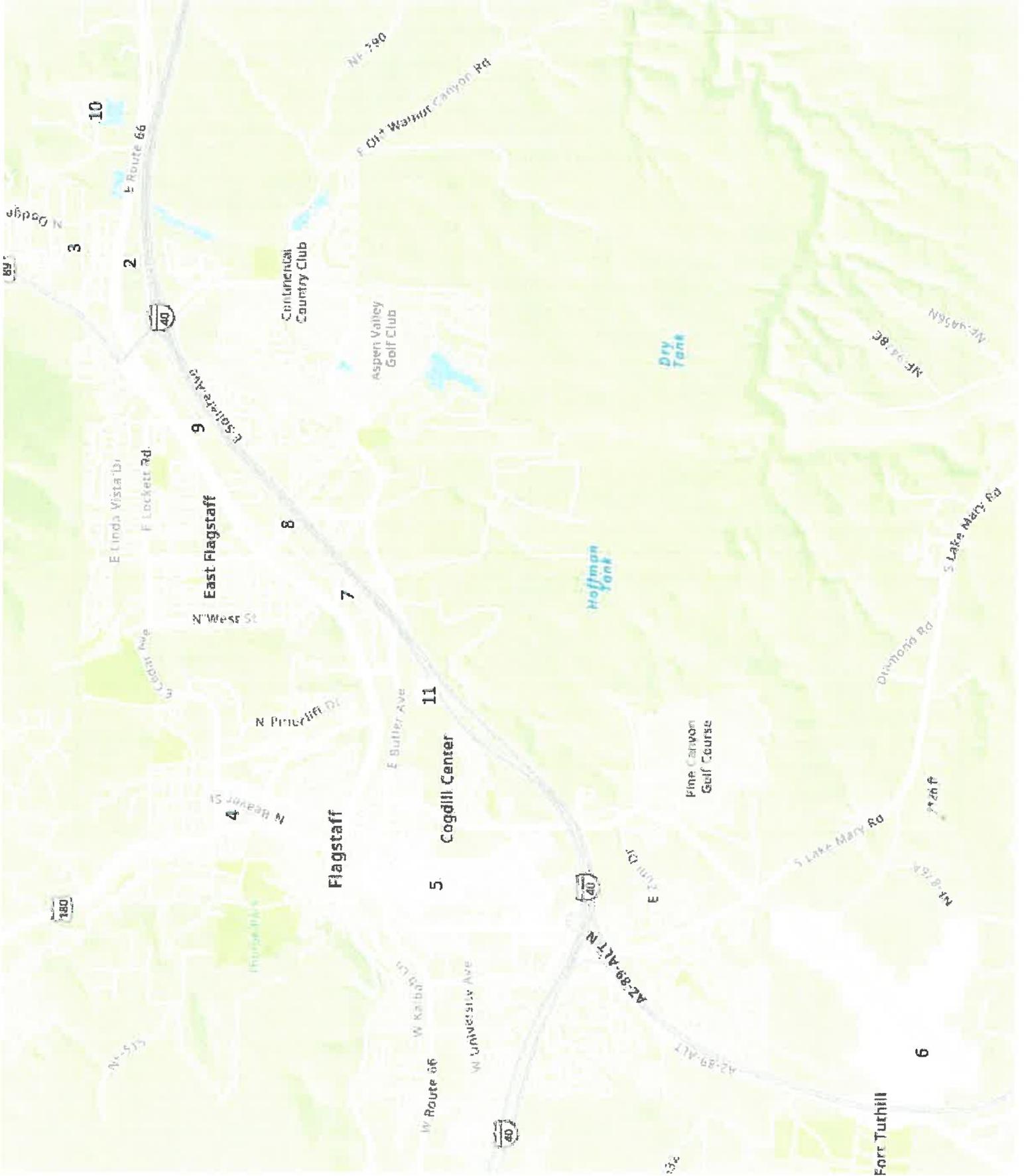
- 1. W.L. Gore & Assoc (Woody Mtn)
- 2. Nestle Purina
- 3. Wis-Pak Bottling
- 4. Flagstaff Medical Center
- 5. Northern Arizona University
- 6. Joy Cone
- 7. Mission Linen

## NSCIU

- 8. W.L. Gore & Assoc St)
- 9. SenesTech

## Treatment Plants

- 10. Wildcat Hill WRP
- 11. Rio de Flag WRP



**City of Flagstaff**  
**PRETREATMENT PERFORMANCE SUMMARY**  
**Rio de Flag Water Reclamation Facility**

I. General Information							
Control Authority Name: City of Flagstaff			NPDES No: AZ0023639				
Address: 600 S Babbitt Dr.		City: Flagstaff		State: Arizona		ZIP: 86001	
Contact Person: Jolene Hayes				Contact Telephone Number: (928) 213-2117			
Reporting Period: January 1 – December 31, 2019			Categorical IUs: 1		Significant Non-Categorical IUs: 3		
II. Significant Industrial User Compliance							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	No. of SIUs in Full Compliance	0	0	0	0	0	0
2.	No. of SIUs in Inconsistent Compliance	1	100	3	100	4	100
3.	No. of SIUs in Significant Noncompliance	0	0	0	0	0	0
4.	No. of Parameter Violations	2		7		9	
5.	No. of Reporting Violations	0		0		0	
6.	No. of Permit Condition Violations	0		2		2	
III. Compliance Monitoring Program							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	No. of Control Documents Issued	1		3		4	
2.	No. of Nonsampling Inspections Conducted	1		3		4	
3.	No. of Facilities Inspected (Nonsampling)	1		3		4	
4.	No. of Sampling Visits Conducted	2		8		10	
5.	No. of Facilities Sampled	1		3		4	
IV. Enforcement Actions							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	Notices of Violations Issued to SIUs	0		1		0	
2.	Temporary Increase in IU Self Monitoring	0		0		0	
3.	Administrative Orders Issued to SIUs	0		0		0	
4.	Compliance Schedules Issued	0		0		0	
5.	Settlement Agreements	0		0		0	
6.	Warning Letters	1		4		2	
7.	Amount of Penalties Collected (Total Dollars / IUs Assessed)	\$ 0 / 0		\$ 1,883.04/1,883.04		\$ 0 / 0	

**City of Flagstaff**  
**PRETREATMENT PERFORMANCE SUMMARY**  
**Wildcat Hill Water Reclamation Facility**

I. General Information							
Control Authority Name: City of Flagstaff			NPDES No: AZ0020427				
Address: 2800 N El Paso Flagstaff Rd		City: Flagstaff		State: Arizona		ZIP: 86004	
Contact Person: Jolene Hayes				Contact Telephone Number: (928) 213-2117			
Reporting Period: January 1 – December 31, 2019			Categorical IUs: 1		Significant Non-Categorical IUs: 5		
II. Significant Industrial User Compliance							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	No. of SIUs in Full Compliance	0	0	1	20	1	17
2.	No. of SIUs in Inconsistent Compliance	1	100	3	60	4	66
3.	No. of SIUs in Significant Noncompliance	0	0	1	20	1	17
4.	No. of Parameter Violations	2		14		16	
5.	No. of Reporting Violations	0		3		3	
6.	No. of Permit Condition Violations	0		3		3	
III. Compliance Monitoring Program							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	No. of Control Documents Issued	1		5		6	
2.	No. of Nonsampling Inspections Conducted	1		5		6	
3.	No. of Facilities Inspected (Nonsampling)	1		5		6	
4.	No. of Sampling Visits Conducted	2		11		13	
5.	No. of Facilities Sampled	1		5		6	
IV. Enforcement Actions							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	Notices of Violations Issued to SIUs	0		2		2	
2.	Temporary Increase in IU Self Monitoring	0		0		0	
3.	Administrative Orders Issued to SIUs	0		0		0	
4.	Compliance Schedules Issued	0		0		0	
5.	Settlement Agreements	0		0		0	
6.	Warning Letters	1		7		8	
7.	Amount of Penalties Collected (Total Dollars / IUs Assessed)	\$ 0 / 0		\$ 370.99/370.99		\$ 0 / 0	

## Summary of Priority Pollutant Results

Rio de Flag Water Reclamation Plant  
Wildcat Hill Water Reclamation Plant

Part V Section B.4.a. of the Rio de Flag WRP NPDES Permit and the Wildcat Hill WRP AZPDES Permit require the following to be included within this annual report:

*A summary of analytical results from representative, flow proportioned, 24-hour composite sampling of the POTW's influent and effluent for those pollutants identified under CWA section 307(a) which are known or suspected to be discharged by nondomestic users. This will consist of an annual full priority pollutant scan, with quarterly samples analyzed only for those pollutants detected in the full scan. Influent or effluent monitoring data shall be provided for nonpriority pollutants which the Cities believe may be causing or contributing to Interferences or Pass Through. All sampling and analysis required under this paragraph must be performed using the test methods specified under 40 CFR 136. Sampling and analysis for asbestos is not required. Sludge sampling and analyses are covered elsewhere in this permit.*

As required, a summary of analytical results for influent, effluent, and biosolids samples collected from the Rio de Flag and Wildcat Hill Water Reclamation Plants are presented in the following pages.

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## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>1,1,1-Trichloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,1,2,2-Tetrachloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,1,2-Trichloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,1 Dichloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,1-Dichloroethylene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,2,4-Trichlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,2-Dichlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,2-Dichloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,2-Dichloropropane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,2-Diphenylhydrazine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,2-Trans-dichloroethylene (Trans-1,2-Dichloroethene)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,3-Dichlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>1,3-Dichloropropylene (trans-1,3-Dichloropropene)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>1,4 Dichlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>2,3,7,8-TCDD (Dioxin)</b>					
Influent	2	2	All Non-Detects		pg/L
Effluent	1	1	All Non-Detects		pg/L
<b>2,4,6-Trichlorophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>2,4-Dichlorophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>2,4-Dimethylphenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>2,4-Dinitrophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>2,4-Dinitrotoluene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>2,6-Dinitrotoluene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>2-Chloroethyl vinyl ethers</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>2-Chloronaphthalene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>2-Chlorophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>2-Nitrophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>3,3-Dichlorobenzidine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>4,4-DDD</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>4,4-DDE</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>4,4-DDT</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>4,6-Dinitro-o-cresol (2-Methyl-4,6-dinitrophenol)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>4-Bromophenyl phenyl ether</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>4-Chlorophenyl phenyl ether</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>4-Nitrophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Acenaphthene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Acenaphthylene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Acrolein</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Acrylonitrile</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Aldrin</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Alpha-BHC</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Anthracene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Antimony</b>					
Influent	1	1	All Non-Detects		µg/L
Effluent	1	0	0.32	0.32	µg/L
<b>Arsenic</b>					
Influent	4	0	3.38	4.6	µg/L
Effluent	1	0	2.2	2.2	µg/L
<b>Benzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Benzidine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Benzo(a) anthracene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Benzo(a) pyrene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Benzo(b) fluoranthene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Benzo(ghi) perylene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Benzo (k) fluoranthene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Beryllium</b>					
Influent	4	4	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Beta-BHC</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Bis(2-chloroethoxy) methane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Bis(2-chloroethyl) ether</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Bis(2-chloroisopropyl) ether</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Bis(2-ethylhexyl)phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Bromodichloromethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Bromoform</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Bromomethane (Methyl bromide)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Butyl benzyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Cadmium</b>					
Influent	1	0	0.12	0.12	µg/L
Effluent	1	0	0.04	0.04	µg/L
<b>Carbon tetrachloride</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Chlordane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Chlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Chloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Chloroform</b>					
Influent	3	0	4.6	6.5	µg/L
Effluent	1	0	0.6	0.6	µg/L
<b>Chloromethane (Methyl chloride)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Chromium</b>					
Influent	1	0	2.3	2.3	µg/L
Effluent	1	0	0.63	0.63	µg/L
<b>Chrysene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Copper</b>					
Influent	4	0	65	85	µg/L
Effluent	4	0	10.6	14	µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Cyanide, Total (discrete)</b>					
Influent	4	4	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Delta-BHC</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Dibenzo(a,h) anthracene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Dichlorobromomethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Dieldrin</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Diethyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Dimethyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Di-n-butyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Di-n-octyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Endodulfan I</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Endosulfan II</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Endosulfan sulfate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Endrin</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Endrin aldehyde</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Ethylbenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Fluoranthene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Fluorene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Gamma-BHC</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Heptachlor</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Heptachlor epoxide</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Heptachlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Hexachlorobutadiene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Hexachlorocyclopentadiene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Hexachloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Indeno (1,2,3-cd) pyrene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Isophorone</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Lead</b>					
Influent	4	0	1.2	1.4	µg/L
Effluent	1	0	0.4	0.4	µg/L
<b>Mercury</b>					
Influent	4	3	0.17	0.39	µg/L
Effluent	1	0	0.0014	0.0014	µg/L
<b>Methylene chloride (Dichloromethane)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Naphthalene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Nickel</b>					
Influent	4	0	2.75	3.4	µg/L
Effluent	1	0	1.3	1.3	µg/L
<b>Nitrobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>N-nitrosodimethylamine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>N-nitrosodi-n-propylamine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>N-nitrosodiphenylamine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Parachlorometa cresol (4-Chloro-3-methylphenol)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>PCB-1016 (Arochlor 1016)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>PCB-1221 (Arochlor 1221)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>PCB-1232 (Arochlor 1232)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>PCB-1242 (Arochlor 1242)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>PCB-1248 (Arochlor 1248)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>PCB-1254 (Arochlor 1254)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>PCB-1260 (Arochlor 1260)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Pentachlorophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Phenanthrene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L

## Rio de Flag WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Phenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Pyrene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Selenium</b>					
Influent	4	0	1.23	1.5	µg/L
Effluent	4	0	0.46	0.54	µg/L
<b>Silver</b>					
Influent	4	0	0.27	0.37	µg/L
Effluent	1	0	0.015	0.015	µg/L
<b>Tetrachloroethylene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Thallium</b>					
Influent	4	4	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Toluene</b>					
Influent	3	0	3.1	5	µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Toxaphene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Trichloroethylene (Trichloroethene)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Vinyl Chloride</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
<b>Zinc</b>					
Influent	4	0	118	180	µg/L
Effluent	1	0	71	71	µg/L

<sup>1</sup> Average calculations include non-detect values. Non-detect values were multiplied by 0.5. Due to varying laboratory reporting levels, the average can exceed the maximum in some cases. No averages were calculated when all results were non-detects.

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>1,1,1-Trichloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,1,2,2-Tetrachloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,1,2-Trichloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,1 Dichloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,1-Dichloroethylene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,2,4-Trichlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,2-Dichlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,2-Dichloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,2-Dichloropropane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>1,2-Diphenylhydrazine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	0				mg/kg Dry wt
<b>1,2-Dichloroethylene (trans-1,2-Dichloroethene)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,3-Dichlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,3-Dichloropropylene (trans-1,3-Dichloropropene)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>1,4 Dichlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>2,3,7,8-TCDD (Dioxin)</b>					
Influent	2	2	All Non-Detects		pg/L
Effluent	1	1	All Non-Detects		pg/L
Biosolids	1	0	32	32	pg/L
<b>2,4,6-Trichlorophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>2,4-Dichlorophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>2,4-Dimethylphenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>2,4-Dinitrophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>2,4-Dinitrotoluene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>2,6-Dinitrotoluene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>2-Chloroethyl vinyl ethers</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>2-Chloronaphthalene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>2-Chlorophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>2-Nitrophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>3,3-Dichlorobenzidine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>4,4-DDD</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>4,4-DDE</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>4,4-DDT</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>4,6-Dinitro-o-cresol (2-Methyl-4,6-dinitrophenol)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>4-Bromophenyl phenyl ether</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>4-Chlorophenyl phenyl ether</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>4-Nitrophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Acenaphthene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Acenaphthylene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Acrolein</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Acrylonitrile</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Aldrin</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Alpha-BHC</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Anthracene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Antimony</b>					
Influent	1	1	All Non-Detects		µg/L
Effluent	4	0	0.48	0.54	µg/L
Biosolids	0				mg/kg Dry wt
<b>Arsenic</b>					
Influent	4	0	3.1	3.9	µg/L
Effluent	4	0	2.2	2.7	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Benzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	1	0.94	0.88	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Benzidine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	0	1.6	1.6	mg/kg Dry wt
<b>Benzo(a) anthracene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Benzo(a) pyrene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Benzo(b) fluoranthene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Benzo(ghi) perylene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Benzo (k) fluoranthene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Beryllium</b>					
Influent	4	4	All Non-Detects		µg/L
Effluent	4	3	0.94	0.24	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Beta-BHC</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Bis(2-chloroethoxy) methane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Bis(2-chloroethyl) ether</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Bis(2-chloroisopropyl) ether</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Bis(2-ethylhexyl)phthalate</b>					
Influent	3	2	43	53	µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	0	1.6	1.6	mg/kg Dry wt
<b>Bromodichloromethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	0	8.3	9.5	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Bromoform</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Bromomethane (Methyl Bromide)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Butyl benzyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Cadmium</b>					
Influent	1	0	0.22	0.22	µg/L
Effluent	4	1	0.042	0.052	µg/L
Biosolids	1	0	0.38	0.38	mg/kg Dry wt
<b>Carbon tetrachloride</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Chlordane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Chlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Chloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Chloroform</b>					
Influent	3	0	5.3	7.5	µg/L
Effluent	2	0	45.5	47	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Chloromethane (Methyl chloride)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Chromium</b>					
Influent	1	0	3.9	3.9	µg/L
Effluent	4	1	0.56	0.92	µg/L
Biosolids	1	0	0.73	0.73	mg/kg Dry wt
<b>Chrysene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Copper</b>					
Influent	4	0	93	120	µg/L
Effluent	4	0	5.6	7.2	µg/L
Biosolids	1	0	13	13	mg/kg Dry wt
<b>Cyanide, Total (discrete)</b>					
Influent	4	4	All Non-Detects		µg/L
Effluent	4	3	2.25	4	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Delta-BHC</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	0				µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Dibenzo(a,h) anthracene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Dibromochloromethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	0	0.81	1	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Dieldrin</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Diethyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	0	67	67	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Dimethyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Di-n-butyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Di-n-octyl phthalate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Endosulfan I</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Endosulfan II</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Endosulfan sulfate</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Endrin</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Endrin aldehyde</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Ethylbenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Fluoranthene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Fluorene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Gamma-BHC</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Heptachlor</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Heptachlor epoxide</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Heptachlorobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Hexachlorobutadiene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Hexachlorocyclopentadiene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	0	0.15	0.2	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Hexachloroethane</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Indeno (1,2,3-cd) pyrene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Isophorone</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Lead</b>					
Influent	4	0	2.2	2.5	µg/L
Effluent	4	0	0.3	0.42	µg/L
Biosolids	1	0	0.54	0.54	mg/kg Dry wt
<b>Mercury</b>					
Influent	4	4	All Non-Detects		µg/L
Effluent	4	2	0.0007	0.001	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Methylene chloride (Dichloromethane)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Naphthalene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Nickel</b>					
Influent	4	0	4.3	4.9	µg/L
Effluent	4	0	1.5	2	µg/L
Biosolids	1	0	0.5	0.5	mg/kg Dry wt
<b>Nitrobenzene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>N-nitrosodimethylamine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>N-nitrosodi-n-propylamine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>N-nitrosodiphenylamine</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Parachlorometa cresol (4-Chloro-3-methylphenol)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>PCB-1016 (Arochlor 1016)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	0				µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>PCB-1221 (Arochlor 1221)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	0				µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>PCB-1232 (Arochlor 1232)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	0				µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>PCB-1242 (Arochlor 1242)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	0				µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>PCB-1248 (Arochlor 1248)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	0				µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>PCB-1254 (Arochlor 1254)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	0				µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>PCB-1260 (Arochlor 1260)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	0				µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Pentachlorophenol</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Phenanthrene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Phenol</b>					
Influent	3	2	50.5	55	µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Pyrene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Selenium</b>					
Influent	4	0	1.35	1.5	µg/L
Effluent	4	0	0.41	0.58	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt

## Wildcat Hill WRP Priority Pollutants

	Number of Samples	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>Silver</b>					
Influent	4	0	0.36	0.42	µg/L
Effluent	4	0	0.023	0.047	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Tetrachloroethylene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Thallium</b>					
Influent	4	4	All Non-Detects		µg/L
Effluent	4	4	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Toluene</b>					
Influent	3	0	1.4	1.8	µg/L
Effluent	2	0	0.56	0.77	µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Toxaphene</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	1	1	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Trichloroethylene (Trichloroethene)</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Vinyl Chloride</b>					
Influent	3	3	All Non-Detects		µg/L
Effluent	2	2	All Non-Detects		µg/L
Biosolids	1	1	All Non-Detects		mg/kg Dry wt
<b>Zinc</b>					
Influent	4	0	178	200	µg/L
Effluent	4	0	61	74	µg/L
Biosolids	1	0	17	17	mg/kg Dry wt

<sup>1</sup> Average calculations include non-detect values. Non-detect values were multiplied by 0.5. Due to varying laboratory reporting levels, the average can exceed the maximum in some cases. No averages were calculated when all results were non-detects.

## Upset, Interference, and Pass Through

Rio de Flag Water Reclamation Plant  
Wildcat Hill Water Reclamation Plant

The following is a discussion of Upset, Interference, or Pass-Through incidents, if any, which City of Flagstaff know or suspect, were caused by nondomestic users of the POTW system during the year ending December 31, 2018. If any incidents occurred, the reasons why, the corrective actions taken, and the nondomestic user(s) or industry sector(s) responsible are provided.

Additionally, a review of the applicable pollutant limits to determine whether any additional limitations, or changes to existing requirements may be necessary to prevent Interference, Pass Through or noncompliance with sludge disposal requirements is provided.

This information is required under Part V Section B.4.b of the AZPDES Permit.

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Analytical results of effluent samples obtained during 2018 at the Rio de Flag and Wildcat Hill Water Reclamation Plants (WRP) were compared against the federal definitions of Upset, Interference, and Pass Through.

The definition for **Upset** is found at 40 CFR 122.41(n):

*"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.*

The definition for **Interference** is found at 40 CFR 403.3(i):

*The term "interference" means a Discharge which, alone or in conjunction with a discharge or discharges from other sources, both:*

- 1) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and*
- 2) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to Subtitle D or the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.*

The definition for **Pass-Through** is found at 40 CFR 403.3(n):

*The term "Pass-Through" means a Discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).*

### **Rio de Flag WRP**

Based upon these definitions, there were no violations due to incidents of upset, interference, or pass-through that were attributable to nondomestic users of the POTW at the Rio de Flag Water Reclamation Plant (WRP) during 2019.

### **Wildcat Hill WRP**

Based upon these definitions, there were no violations due to incidents of upset, interference, or pass-through that were attributable to nondomestic users of the POTW at the Wildcat Hill Water Reclamation Plant (WRP) during 2019.

## Publication of Significant Industrial Users in Significant Noncompliance (SNC)

In accordance with the Federal Clean Water Act and the public participation requirements of 40 CFR 25 pertaining to the enforcement of National Pretreatment Standards as defined by 40 CFR 403.8(f)(2)(viii), the City of Flagstaff, Arizona must annually publish in the newspaper a list of Industrial Users in Significant Noncompliance with pretreatment requirements.

A list of Industrial Users in SNC for the year ending December 31, 2019 appeared in the Arizona Daily Sun on Sunday, February 9<sup>th</sup>, 2020.

### LEGAL NO. 731

#### Permitted Industrial Users in Significant Noncompliance with Applicable Pretreatment Requirements in 2019

The City of Flagstaff is responsible for implementing and operating an industrial wastewater control (pretreatment) program that is designed to protect the wastewater treatment plants (POTW), the safety of personnel operating the wastewater collection system, and the environment from adverse impact that could occur when toxic wastes are discharged into a wastewater collection system. The City of Flagstaff issues wastewater discharge permits to Industrial Users (Users), and the Users are responsible for ensuring compliance with local ordinances and federal regulations.

In accordance with the Federal Clean Water Act, and the public participation requirements of 40 CFR Part 25 in the enforcement of the National Pretreatment Standards as defined by 40 CFR 403.8(f)(2)(viii), the City of Flagstaff is hereby publishing the following list of Users in Significant Noncompliance (SNC) with applicable pretreatment requirements. **This notice covers the period from January 1, 2019 through December 31, 2019.**

SNC criteria can be found in City of Flagstaff Code 7-02-001-0018.

Industrial User	Nature of Violation/Type of Pollutant	Has User Returned to Compliant Status as of 12/31/2019?
Nestle Purina Petcare Company 4700 E Nestle Purina Ave. Flagstaff, Az 86004	Daily Max Chronic for 1 <sup>st</sup> & 2 <sup>nd</sup> qtr / TRC for 1 <sup>st</sup> , 2 <sup>nd</sup> , & 3 <sup>rd</sup> qtr – Toluene Daily Max Chronic for 1 <sup>st</sup> qtr / TRC for 1 <sup>st</sup> qtr & 2 <sup>nd</sup> qtr – Bromide Late reporting – 24-hour notification	Yes

**PUB: FEB, 9, 16, 2020 731**

City of Flagstaff  
Significant Industrial User Compliance Status Report

Name: W.L. Gore & Associates – Woody Mountain Campus		Report Period: 1-1-19 to 12-31-19	
Service Address 4000 W. Kiltic Lane, Flagstaff, AZ 86005		Mailing Address: SAME	
Categorical User: YES	40 CFR – 463: (SIC) 3842/ (NAICS) 339113		BMR Submitted: Yes
TTO Certificate Date Submitted: N/A		Permit Effective: 8/23/16	Permit Expires: 8/22/21
Sampling Location Verified: 8/19/19	RCRA Notice: None		
Slug Load Control Plan Evaluation Date: 8/19/19			

**Gore- Woody Mountain**

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Number of Inspections	0	0	1	0
Number of City Sampling Days	1	0	1	0
Number of IU Sampling Days	0	2	0	1
Number of Parameter Violations	0	1	1	0
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	0	0	0	0
Compliance Status	C	I	I	C
Evaluated as of:	April 2019	July 2019	October 2019	January 2020

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance  
If company is in I or S, then the following table applies:

**Gore – Woody Mountain**

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
2 <sup>nd</sup>	Local Limit	5/21/2019 6/25/2019	Composite	City	IU	Copper	0.2 ppm/0.15 ppm 0.15 ppm	2
3 <sup>rd</sup>	Local Limit	8/13/19	Grab	City	City	Bromide	0.1 ppm/0.05 ppm	1
4 <sup>th</sup>	Local Limit	10/17/19	Grab	City	IU	Bromide	0.23 ppm/0.05 ppm	1

**Gore – Woody Mountain**

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	B

**Enforcement Status Codes**

- |                                          |                                      |                                              |
|------------------------------------------|--------------------------------------|----------------------------------------------|
| A – No enforcement action                | F – Civil litigation                 | K – Compliance Schedule                      |
| B – Warning letter                       | G – Settlement agreement             | L – Disconnection from sewer                 |
| C – Notice of Violation (NOV)            | H – Assessment of monetary penalties | M – Published in newspaper as SNC            |
| D – Administrative Order (AO)            | I – Restriction of flow              | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation                |                                              |

**ENFORCEMENT SUMMARY AND COMMENTS**

Company Name: W.L. Gore & Associates - Woody Mtn. Campus

Process Flow: 47,000 gpd

General Information and type of wastewater treatment

Gore Woody Mountain Campus conducts Plastics, Molding, and Forming and is a categorical discharger as listed in US Environmental Protection Agency (EPA) Effluent Guidelines and Pretreatment Standards Title 40 Code of Federal Regulations (CFR) Part 463. The Gore Woody Mountain Campus is sampled once a year by the City of Flagstaff Industrial Pretreatment Program, and twice a year by Gore staff. The Gore Woody Mountain Campus SIC is 3842: Orthopedic, Prosthetic, and Surgical Appliances and Supplies. The Gore Woody Mountain Campus NAICS code is 339113: Surgical Appliance and Supplies Manufacturing. All the wastewater from the Gore Woody Mountain Campus facilities can be sampled from one manhole near the intersection of Kiltie Lane and Woody Mountain Road. This manhole services all Gore Woody Mountain Campus facilities, exclusively, with no other dischargers utilizing the sewer line.

First Quarter

On 2/5/19, the City of Flagstaff sampled the IU with no violations.

Second Quarter

On 5/21/19, the IU sampled with an exceedance of copper (0.2mg/l.). The IU resampled on 6/25/19 and received a result of 0.15 mg/l.. They also sampled each facility to narrow down the cause of the copper issue. They have narrowed it down to 3 possibilities. No warning letter was issued because of the good faith of the operator and steps already in motion to remedy the issue.

Third Quarter

On 8/13/19, the City of Flagstaff sampled the IU with an elevated bromide but low copper. Gore was notified to resample for bromide within 30 days, which coincided with their planned 4<sup>th</sup> qtr. sampling event.  
 On 8/19/19, the City completed the annual inspection of the IU. No major deficiencies were found.  
 The City met with Gore associates on 8/30/19 to discuss the copper exceedance and the steps moving forward. After the results from the 8/13 sampling, the copper was well below local limit and considered closed.

Fourth Quarter

On 10/17/19, the IU sampled with elevated bromide. The City issued a warning letter. Gore did an internal investigation with no conclusive results. Any further enforcement action is on hold pending results of the new local limit study.

To be published for this year in newspaper for Significant Non-Compliance?        Yes        **X** No

Penalties this reporting Year:      Assessed    **\$ 0.00**      Collected      **\$ 0.00**

City of Flagstaff  
Significant Industrial User Compliance Status Report

Name: Nestle-Purina Petcare Company		Report Period: 1-1-19 to 12-31-19	
Service Address: 4700 E. Nestle Purina Drive, Flagstaff, AZ 86004		Mailing Address: SAME	
Categorical User: NO	40 CFR 403		BMR Submitted: YES
TTO Certificate Date Submitted: N/A		Permit Effective: 1/22/2018	Permit Expires: 1/1/2023
Sampling Location Verified: 12/5/2019		RCRA Notice: None	
Slug Load Control Plan Evaluation Date: 12/5/2019			

**Nestle-Purina**

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Number of Inspections	0	0	0	1
Number of City Sampling Days	2	0	1	0
Number of IU Sampling Days	6	7	0	8
Number of Parameter Violations	3	2	0	2
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	1	0	0
Number of Permit Cond. Violations	0	0	0	0
Compliance Status	S	S	C	I
Evaluated as of:	April 2019	July 2019	October 2019	January 2020

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance  
If company is in I or S, then the following table applies:

**Nestle-Purina**

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
1 <sup>st</sup>	Local limits	1/23/2019 1/31/2019	Grab	City	City IU	Bromide	1.2 ppm/ 0.05 ppm < 0.5 ppm	2
1 <sup>st</sup>	Local limits	1/23/2019 3/21/2019	Grab	City	City	Toluene	0.19 ppm/0.14 ppm 1 ppm	2
1 <sup>st</sup>	Local limits	1/23/2019 3/21/2019	Grab	City	City	Chloroform	0.28 ppm/0.08 ppm 0.00061 ppm	2
2 <sup>nd</sup>	Local limits	5/9/2019 7/9/2019	Grab	City	IU	Toluene	0.43 ppm/0.14 ppm 0.044 ppm	2
2 <sup>nd</sup>	Local limits	5/9/2019	Grab	City	IU	Bromide	0.39 ppm/0.05 ppm	1
3 <sup>rd</sup>	Local limits	8/15/2019 10/17/2019 11/20/2019	Grab	City	City IU	Bromide	0.43 ppm/0.05 ppm 1.29 ppm < 0.5 ppm	3
4 <sup>th</sup>	Local limits	12/17/19	Composite	City	IU	Copper	0.31 ppm/0.15 ppm	1
4 <sup>th</sup>	Local limits	12/17/19	Composite	City	IU	Zinc	1.45 ppm/1.4 ppm	1

**Nestle-Purina**

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Enforcement Status:	B	C	Meeting	M (for the year)

**Enforcement Status Codes**

A – No enforcement action	F – Civil litigation	K – Compliance Schedule
B – Warning letter	G – Settlement agreement	L – Disconnection from sewer
C – Notice of Violation (NOV)	H – Assessment of monetary penalties	M – Published in newspaper as SNC

D – Administrative Order (AO)  
 E – Administrative fines/civil penalties

I – Restriction of flow  
 J – Permit Revocation

N – Automatic increase in IU self-monitoring

**ENFORCEMENT SUMMARY AND COMMENTS**

Company Name: Nestle Purina Petcare Company

Process Flow: 10,000 gpd

General Information and type of wastewater treatment

Nestlé-Purina Pet Care Company is a dry pet food manufacturer. Purina receives whole and ground grain products, meal by-products, fish, chicken, turkey, beef, and lamb slurries. Purina mixes the ingredients, cook, extrude, and dry the product for packaging. The products are then warehoused for distribution. This facility produces pet food under the SIC 2047 and NAICS 311111. Pretreatment equipment include a bar screen on the slurry room’s discharge pipe and a screw press before final discharge from the plant’s processing rooms.

First Quarter

On 1/23/19, the City of Flagstaff sampled the IU and results came back with elevated levels of Bromide, Toluene, and Chloroform (alert). The IU had a resample of Bromide from the exceedance last quarter on 1/31/19. The City resampled on 3/21/19 for Chloroform and Toluene. Chloroform results were under the local limit, but Toluene was higher. A warning letter was sent to Nestle on 4/15/19 for toluene violations with a 30-day response to investigate causes.

Second Quarter

On 5/9/19, the IU sampled with exceedances for Toluene and Bromide. The City was not notified of these exceedances. A NOV was sent out on 8/14/19 concerning the consecutive exceedances and failure to notify violations.

Third Quarter

On 8/15/19, the City of Flagstaff sampled the IU with an exceedance for Bromide. A meeting was conducted with IU to explain the NOV and how they were now in significant non-compliance and would be published in the paper. A notification procedure was agreed upon and a plan of action for Bromide.

Fourth Quarter

On 12/5/19, the City of Flagstaff completed an annual inspection of the IU. On 12/17/19, the IU sampled with exceedances for Copper and Zinc. Resamples are planned week of 2/2/20.

To be published for this year in newspaper for Significant Non-Compliance?   X   Yes        No  
 Penalties this reporting Year: Assessed \$ 0.00 Collected \$ 0.00

City of Flagstaff  
Significant Industrial User Compliance Status Report

Name: Flagstaff Medical Center		Report Period: 1-1-19 to 12-31-19	
Service Address: 1200 North Beaver Street Flagstaff, Arizona 86001		Mailing Address: SAME	
Categorical User: NO	40 CFR 403		BMR Submitted: YES
TTO Certificate Date Submitted: N/A		Permit Effective: 1/2/19	Permit Expires: 1/2/24
Sampling Location Verified: 8/1/19		RCRA Notice: None	
Slug Load Control Plan Evaluation Date: 8/1/19			

FMC

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Number of Inspections	0	0	1	0
Number of City Sampling Days	2	0	0	0
Number of IU Sampling Days	0	1	1	1
Number of Parameter Violations	1	1	1	0
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	0	1	0	0
Compliance Status	C	I	I	C
Evaluated as of:	April 2019	July 2019	October 2019	January 2020

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance  
If company is in I or S, then the following table applies:

FMC

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
1 <sup>st</sup>	Local limits	1/31/19 3/21/19	Composite	City	City	Selenium	0.039 ppm/0.015 ppm 0.0014ppm	2
2 <sup>nd</sup>	Local limits	6/14/19	Composite	City	IU	Copper	0.22 ppm/0.15 ppm	1
3 <sup>rd</sup>	Local limits	9/12/19	Composite	City	IU	Copper	0.37 ppm/0.15 ppm	1

FMC

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	C	B	A

Enforcement Status Codes

- |                                          |                                      |                                              |
|------------------------------------------|--------------------------------------|----------------------------------------------|
| A – No enforcement action                | F – Civil litigation                 | K – Compliance Schedule                      |
| B – Warning letter                       | G – Settlement agreement             | L – Disconnection from sewer                 |
| C – Notice of Violation (NOV)            | H – Assessment of monetary penalties | M – Published in newspaper as SNC            |
| D – Administrative Order (AO)            | I – Restriction of flow              | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation                |                                              |

**ENFORCEMENT SUMMARY AND COMMENTS**

Company Name: Flagstaff Medical Center

Process Flow: 77,000 gpd

General Information and type of wastewater treatment

Flagstaff Medical Center ("FMC") is a local full-care hospital with less than 1,000 beds. FMC has a control manhole with a Parshall flume, an acid neutralization tank for laboratory waste, a grease interceptor for the commissary, a lint interceptor for laundry facilities, ultrasonic flow measuring and continuous pH monitoring. FMC's conventional pollutant loading is primarily of a domestic nature, from the patients who are hospitalized.

First Quarter

On 1/31/19, the City of Flagstaff sampled the IU with elevated levels of Selenium. The City resampled on 3/21/19 and found the levels were lower than the local limit. No warning letter was issued.

Second Quarter

On 6/14/19, the IU sampled, and results were incomplete. A NOV was sent for a second missed sample parameters as part of the permit requirements. A report with the missing results was submitted on 8/5/19. The NOV was closed on 8/26/19. Upon review, the copper had exceeded the local limit and the IU was instructed to resample for that constituent.

Third Quarter

On 8/1/19, the City of Flagstaff completed an annual inspection of the IU. Resample for copper was completed 9/12/19 with results still above the local limit. A warning letter was sent out to the IU. The City met with the IU on 10/4/19 to discuss the internal findings at the facility and steps moving forward.

Fourth Quarter

On 11/1/19, the IU sampled with the City taking a split sample for copper. No exceedances were found.

To be published for this year in newspaper for Significant Non-Compliance?        Yes   X   No

Penalties this reporting Year:      Assessed    **\$ 0.00**      Collected    **\$ 0.00**

City of Flagstaff  
Significant Industrial User Compliance Status Report

Name: Wis-Pak Bottling Company		Report Period: 1-1-19 to 12-31-19	
Service Address: 4900 E. Railhead Ave, Flagstaff, Arizona 86004		Mailing Address: SAME	
Categorical User: NO	40 CFR 403		BMR Submitted: Yes
TTO Certificate Date Submitted: N/A		Permit Effective: 1/22/18	Permit Expires: 1/21/2023
Sampling Location Verified: 9/11/2019		RCRA Notice: No	
Slug Load Control Plan Evaluation Date: 9/11/2019			

**Wis-Pak**

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Number of Inspections	0	0	1	0
Number of City Sampling Days	1	0	0	0
Number of IU Sampling Days	5	6	6	6
Number of Parameter Violations	0	0	0	0
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	1
Number of Permit Cond. Violations	0	0	0	0
Compliance Status	C	C	C	I
Evaluated as of:	April 2019	July 2019	October 2019	January 2020

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance  
If company is in I or S, then the following table applies:

**Wis-Pak**

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter

**Wis-Pak**

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	B

**Enforcement Status Codes**

- |                                          |                                      |                                              |
|------------------------------------------|--------------------------------------|----------------------------------------------|
| A – No enforcement action                | F – Civil litigation                 | K – Compliance Schedule                      |
| B – Warning letter                       | G – Settlement agreement             | L – Disconnection from sewer                 |
| C – Notice of Violation (NOV)            | H – Assessment of monetary penalties | M – Published in newspaper as SNC            |
| D – Administrative Order (AO)            | I – Restriction of flow              | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation                |                                              |

**ENFORCEMENT SUMMARY AND COMMENTS**

Company Name: Wis-Pak Bottling Company

Process Flow: 30,000 - 80,000 gpd

General Information and type of wastewater treatment

Wis-Pak Bottling Company is a beverage bottling company. Wis-Pak bottles soft drink from high fructose corn sweeteners, food dyes, water, flavorings and carbon dioxide. It packages the product, store in onsite warehouses and distribute it for resale. This facility falls under the SIC 2086 and NAICS 312111 for soft drink manufacturing. Its pretreatment facility includes a DAF system that uses urea to bring down the BOD levels.

First Quarter

On 1/23/19, the City of Flagstaff sampled the IU with no violations.

Second Quarter

On 5/2/19, the IU sampled with no violations.

Third Quarter

On 7/10/19, the IU sampled with no violation. On 9/11/19, the City completed an annual inspection of the IU.

Fourth Quarter

A warning letter was sent to Wis-Pak for missing pH data from November 2019. The probe had stopped communicating with the monitoring service. No notification was sent to the City concerning this issue.

To be published for this year in newspaper for Significant Non-Compliance?  Yes  No  
 Penalties this reporting Year: Assessed \$ 0.00 Collected \$ 0.00

City of Flagstaff  
Significant Industrial User Compliance Status Report

Name: Northern Arizona University		Report Period: 1-1-19 to 12-31-19	
Service Address: PO Box 4067, Flagstaff, Arizona 86011		Mailing Address: SAME	
Categorical User: NO	40 CFR 403		BMR Submitted: Yes
TTO Certificate Date Submitted: N/A		Permit Effective: 9/28/2018	Permit Expires: 9/27/2023
Sampling Location Verified: 6/14/19		RCRA Notice: No	
Slug Load Control Plan Evaluation Date: 6/14/19			

NAU

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Number of Inspections	0	1	0	0
Number of City Sampling Days	4	0	0	0
Number of IU Sampling Days	0	3	0	3
Number of Parameter Violations	1	1	0	1
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	0	0	0	0
Compliance Status	I	C	C	I
Evaluated as of:	April 2019	July 2019	October 2019	January 2020

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance  
If company is in I or S, then the following table applies:

NAU

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
1 <sup>st</sup>	Local limits	2/14/2019	Grab	City	City	Bromide	6.2 ppm/ 0.05 ppm	1 (Wettaw)
2 <sup>nd</sup>	Local limits	6/18/2019 7/23/2019	Composite	City	IU	Copper	0.309 ppm/0.15 ppm 0.0378 ppm	2 (Bio)
4 <sup>th</sup>	Local limits	11/25/19 1/15/20	Composite	City	IU	Copper	0.159 ppm/0.15ppm 0.201 ppm	2 (SIL)
4 <sup>th</sup>	Local limits	11/25/19 1/15/20	Composite	City	IU	Copper	0.36 ppm/0.15 ppm 0.0602	2 (Bio)

NAU

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	B

Enforcement Status Codes

- |                                          |                                      |                                              |
|------------------------------------------|--------------------------------------|----------------------------------------------|
| A – No enforcement action                | F – Civil litigation                 | K – Compliance Schedule                      |
| B – Warning letter                       | G – Settlement agreement             | L – Disconnection from sewer                 |
| C – Notice of Violation (NOV)            | H – Assessment of monetary penalties | M – Published in newspaper as SNC            |
| D – Administrative Order (AO)            | I – Restriction of flow              | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation                |                                              |

**ENFORCEMENT SUMMARY AND COMMENTS**

Company Name: Northern Arizona University

Process Flow: 400,000 gpd

General Information and type of wastewater treatment

Northern Arizona University has thirteen discharge points on campus to the two outfalls which dump into the POTW collection system. Discharge points of concern are monitored through several permitted outfalls. The primary outfalls are: Biology Bldg. Outfall #001, Wetlaw Bldg. Outfall #002, Science Lab Facility (SLF) Outfall #003, Science Health Bldg. (SHB) Outfall #004, and ARD Bldg. Outfall #005.

First Quarter

During 2/7 - 20/19, the City of Flagstaff sampled the IU. The Wetlaw location had elevated levels of Bromide. Due to a miscommunication error, a resample was not taken for the 1<sup>st</sup> quarter. The City began discussions with the IU about changing sample points for a more combined spot on the North campus. On the GIS map, there appeared to be one that could combine 4 locations into one, but during the field verification, it was found to be a fiber optic manhole not sanitary sewer.

Second Quarter

During 6/18-20/19, the IU sampled with an exceedance on copper at the Biology building (may have been due to lab decimal error). Resample from 7/23/19 was below the copper limit. On 6/14/19, the City of Flagstaff completed an annual inspection of the IU with no major deficiencies.

Third Quarter

Fourth Quarter

During 11/25/19 - 12/4/19, the IU sampled. There were elevated levels of copper at SLF and Biology buildings. Resamples were taken 1/15/20. The Biology resample was below the limit but SLF was not. A warning letter was sent for SLF. An internal investigation is currently underway.

To be published for this year in newspaper for Significant Non-Compliance?  Yes  No

Penalties this reporting Year: Assessed \$ 0.00 Collected \$ 0.00

**City of Flagstaff  
Significant Industrial User Compliance Status Report**

<b>Name:</b> Joy Cone Company		<b>Report Period:</b> 1-1-19 to 12-31-19	
<b>Service Address:</b> 2843 West Shamrell Boulevard, Flagstaff, AZ 86001		<b>Mailing Address:</b> SAME	
<b>Categorical User:</b> NO	40 CFR 403.1		<b>BMR Submitted:</b> Yes
<b>TTO Certificate Date Submitted:</b> N/A		<b>Permit Effective:</b> 1/22/2018	<b>Permit Expires:</b> 1/22/2023
<b>Sampling Location Verified:</b> 5/28/2019		<b>RCRA Notice:</b> No	
<b>Slug Load Control Plan Evaluation Date:</b> 5/28/2019			

**Joy Cone**

	<b>1<sup>st</sup> Quarter (Jan 1 – Mar 31)</b>	<b>2<sup>nd</sup> Quarter (Apr 1 – Jun 30)</b>	<b>3<sup>rd</sup> Quarter (Jul 1 – Sep 30)</b>	<b>4<sup>th</sup> Quarter (Oct 1 – Dec 31)</b>
<b>Number of Inspections</b>	0	1	0	0
<b>Number of City Sampling Days</b>	2	0	0	0
<b>Number of IU Sampling Days</b>	5	6	6	6
<b>Number of Parameter Violations</b>	1	0	0	0
<b>Number of Inspection Violations</b>	0	0	0	0
<b>Number of Reporting Violations</b>	0	0	0	0
<b>Number of Permit Cond. Violations</b>	0	0	0	1
<b>Compliance Status</b>	I	C	C	I
<b>Evaluated as of:</b>	April 2019	July 2019	October 2019	January 2020

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance  
If company is in I or S, then the following table applies:

**Joy Cone**

<b>Quarter</b>	<b>Type of Violation</b>	<b>Date of Violation</b>	<b>Sample Composite or Grab</b>	<b>Limit Federal or City</b>	<b>Monitoring City or IU</b>	<b>Parameter</b>	<b>Value/ Limit</b>	<b>Number of Measurements per Quarter</b>
1 <sup>st</sup>	Local Limits	2/14/19 3/19/19 4/4/19	Grab	City	City  IU	Bromide	4.3 ppm/ 0.05 ppm 0.79ppm < 10 ppm	3

	<b>1<sup>st</sup> Quarter (Jan 1 – Mar 31)</b>	<b>2<sup>nd</sup> Quarter (Apr 1 – Jun 30)</b>	<b>3<sup>rd</sup> Quarter (Jul 1 – Sep 30)</b>	<b>4<sup>th</sup> Quarter (Oct 1 – Dec 31)</b>
<b>Enforcement Status:</b>	B	A	A	B

**Enforcement Status Codes**

- |                                          |                                      |                                              |
|------------------------------------------|--------------------------------------|----------------------------------------------|
| A – No enforcement action                | F – Civil litigation                 | K – Compliance Schedule                      |
| B – Warning letter                       | G – Settlement agreement             | L – Disconnection from sewer                 |
| C – Notice of Violation (NOV)            | H – Assessment of monetary penalties | M – Published in newspaper as SNC            |
| D – Administrative Order (AO)            | I – Restriction of flow              | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation                |                                              |

**ENFORCEMENT SUMMARY AND COMMENTS**

Company Name: Joy Cone Company

Process Flow: 2,000 gpd

General Information and type of wastewater treatment

Joy Cone is an ice cream cone manufacturer. They bake, package, and distribute ice cream cones for resale. The product consists mainly of flour, tapioca flour, sugar and water. Joy Cone practices water conservation and will batch waste during production hours. This facility falls under the SIC 2052 and NAICS 311821 – cookie and cracker manufacturing. Joy Cone batch wastes 1-3 times during a production day. This facility uses a vault to collect process wastes before sending to a rotary drum to remove solids and aerate before discharge. Solids are put in a dumpster and sent to the landfill.

First Quarter

On 2/14/19, the City of Flagstaff sampled the IU with elevated levels of Bromide. The City resampled for Bromide on 3/19/19 with a result still above the local limit. A warning letter was sent on 4/1/19 with a 30-day response time for the Bromide exceedance. A report was sent to the City on 4/25/19 with sample results and a probable cause of new cleaning materials that are no longer being used. A reminder about correct method detection limits was sent to the IU.

Second Quarter

On 4/4/19, the IU sampled with no violations. On 5/28/19, the City of Flagstaff completed an annual inspection of the IU. One deficiency was found, the pH and flow meters were not functioning.

Third Quarter

Fourth Quarter

It was found the IU missed their self-monitoring event per their permit. A warning letter was sent out. Samples were taken in January 2020.

To be published for this year in newspaper for Significant Non-Compliance?  Yes  No

Penalties this reporting Year: Assessed \$ 1883.04 (BOD/TSS) Collected \$ 1883.04

City of Flagstaff  
Significant Industrial User Compliance Status Report

Name: Mission Linen		Report Period: 1-1-19 to 12-31-19	
Service Address 2450 E. Huntington, Flagstaff, Arizona 86004		Mailing Address: P.O. Box 2936, Flagstaff, AZ 86004-2936	
Categorical User: NO	40 CFR 403		BMR Submitted: 1/1/13
TTO Certificate Date Submitted: N/A		Permit Effective: 1/22/2018	Permit Expires: 1/21/2023
Sampling Location Verified: 10/22/2019		RCRA Notice: None	
Slug Load Control Plan Evaluation Date: 10/22/2019			

**Mission Linen**

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Number of Inspections	0	0	0	1
Number of City Sampling Days	1	0	0	0
Number of IU Sampling Days	6	5	10	6
Number of Parameter Violations	0	0	1	0
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	1	0
Number of Permit Cond. Violations	0	1	0	1
Compliance Status	C	I	I	I
Evaluated as of:	April 2019	July 2019	October 2019	January 2020

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance  
If company is in I or S, then the following table applies:

**Mission Linen**

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
3 <sup>rd</sup>	Local Limit	7/25/19 9/6/19	Grab	City	IU	HEM	525 ppm/152 ppm 81.4	2
3 <sup>rd</sup>	Local limit	7/25/19 9/9/19	Grab	City	IU	Chloroform (alert level)	0.14 ppm/0.08 ppm 0.0845	2

**Mission Linen**

	1 <sup>st</sup> Quarter (Jan 1 – Mar 31)	2 <sup>nd</sup> Quarter (Apr 1 – Jun 30)	3 <sup>rd</sup> Quarter (Jul 1 – Sep 30)	4 <sup>th</sup> Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	B	B	B

**Enforcement Status Codes**

- |                                          |                                      |                                              |
|------------------------------------------|--------------------------------------|----------------------------------------------|
| A – No enforcement action                | F – Civil litigation                 | K – Compliance Schedule                      |
| B – Warning letter                       | G – Settlement agreement             | L – Disconnection from sewer                 |
| C – Notice of Violation (NOV)            | H – Assessment of monetary penalties | M – Published in newspaper as SNC            |
| D – Administrative Order (AO)            | I – Restriction of flow              | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation                |                                              |

**ENFORCEMENT SUMMARY AND COMMENTS**

Company Name: Mission Linen Supply

Process Flow: 45,000 gpd

General Information and type of wastewater treatment

Mission Linen is a commercial laundry company. Mission Linen is in the business of laundering, drying and ironing items such as linens, tablecloths, napkins, uniforms, shop-towels and mats. Mission Linen stores laundry on site and when ready, distributes these items via a fleet of box-van trucks. Mission Linen produces approximately 27,600 to 30,700 pounds of laundry per day and operates a pretreatment process that consists of air-flotation, flow equalization, lint traps, lint shakers, solids press, pH control and flow monitoring. This facility falls under the SIC 7213/7218 and NAICS 812331/812332 – linen supply/industrial launderers.

First Quarter

On 2/29/19, the City of Flagstaff sampled the IU with no violations.

Second Quarter

It was found the IU missed their self-monitoring event per their permit. A warning letter was sent out.

Third Quarter

On 7/25/19, the IU sampled with an exceedance of HDM (oil & grease) and an alert level of chloroform. A warning letter was sent 8/23/19 because the City was not notified of the exceedances. Resamples showed level below the local limit on both constituents.

Fourth Quarter

It was found the IU missed their self-monitoring event per their permit. A warning letter was sent out. Samples were taken in January 2020.

To be published for this year in newspaper for Significant Non-Compliance?  Yes  No

Penalties this reporting Year: Assessed **\$ 370.99 (BOD)** Collected **\$ 370.99**