IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF WEST VIRGINIA
WHEELING DIVISION

OHIO VALLEY ENVIRONMENTAL COALITION, and THE SIERRA CLUB,

Plaintiffs,

v. **Civil Action No. _____**

EAGLE NATRIUM LLC,

Defendant.

COMPLAINT

1. This is a citizen suit under Section 505 of the Clean Water Act (CWA), 33 U.S.C. § 1365. Plaintiffs seek a declaratory judgment, injunctive relief, civil penalties, and the award of costs, including attorneys' and expert witness' fees, for Defendant's violations of the conditions and limitations in its National Pollution Discharge Elimination System (NPDES) Permit No. WV0004359 under the CWA at its Natrium, West Virginia plant.

Jurisdiction and Venue

2. This Court has subject matter jurisdiction under Section 505(a) of the CWA, 33 U.S.C. § 1365(a).

3. On June 4, 2019, Plaintiffs gave notice of the violations and their intent to file suit to the Administrator of the U.S. Environmental Protection Agency (EPA), to the Regional Administrator of EPA's Region 3 Office, to the West Virginia Department of Environmental Protection (WVDEP), and to Defendant, as required by Section 505(b)(1)(A) of the CWA, 33 U.S.C. § 1365(b)(1)(A).

4. More than 60 days have passed since notice was served and neither the State of West Virginia nor EPA has commenced or is diligently prosecuting a civil or criminal action to

redress the violations alleged in this Complaint, which have occurred from April 2014 to the present.

5. In 2009, WVDEP filed a civil action against Eagle's predecessor, PPG Industries, Inc., in West Virginia Circuit Court in Marshall County for violations of NPDES Permit No. WV0004359. The court entered a consent order in that action in 2010, but by its terms that order only resolved claims for violations that occurred up to October 31, 2009. Consent Order, ¶ III.E. The court amended that consent order in 2013, but by its terms that order only resolved claims for violations that occurred through May 6, 2013. First Amendment to Consent Order, ¶¶ K, 22.

6. Neither the State of West Virginia nor EPA commenced an administrative civil penalty action under Section 309(g)(6) of the Act, 33 U.S.C. § 1319(g)(6), or a comparable state law, to redress the violations prior to the issuance of the June 4, 2019 notice letter.

7. WVDEP issued an administrative consent order against Eagle on October 15, 2015 that purported to impose interim limits on mercury in discharges from Outlet 009, but those limits did not modify Eagle's NPDES Permit No. WV0004359 and are not binding on Plaintiffs because WVDEP did not follow the required procedures for modifying an NPDES permit.

8. Venue is appropriate in this District pursuant to Section 505(c)(1) of the CWA, 33 U.S.C. § 1365(c)(1), because the source of the violations is located within this District in Marshall County, West Virginia.

Parties

9. Defendant Eagle Natrium LLC (Eagle) is a Delaware corporation with its principal place of business in Natrium, West Virginia.

10. Plaintiff Ohio Valley Environmental Coalition is a nonprofit organization incorporated in Ohio. Its principal place of business is in Huntington, West Virginia. It has

approximately 400 members. Its mission is to organize and maintain a diverse grassroots organization dedicated to the improvement and preservation of the environment through education, grassroots organizing, coalition building, leadership development, and media outreach. The Coalition has focused on water quality issues and is a leading source of information about water pollution in West Virginia.

11. Plaintiff Sierra Club is a nonprofit corporation incorporated in California, with more than 768,000 members and supporters nationwide including approximately 2,600 members who reside in West Virginia and belong to its West Virginia Chapter. The Sierra Club is dedicated to exploring, enjoying, and protecting wild places of the Earth; to practicing and promoting the responsible use of Earth's resources and ecosystems; to educating and enlisting humanity to protect and restore the quality of the natural and human environment; and to using all lawful means to carry out these objectives. The Sierra Club's concerns encompass the exploration, enjoyment and protection of surface water in West Virginia.

12. Plaintiffs have members, including Jim Harrigan, who use, enjoy, and benefit from the water quality in the Ohio River downstream from those streams. They would like to recreate in areas downstream from the portion of the river into which Eagle's Natrium plant discharges pollutants harmful to aquatic life, including BHC and mercury. Excessive amounts of these pollutants degrade the water quality of the Ohio River, make the water aesthetically unpleasant and environmentally undesirable and impair its suitability for aquatic life. Because of this pollution, Plaintiffs' members refrain from and/or restrict their usage of these water bodies and associated natural resources. As a result, the environmental, health, aesthetic, and recreational interests of these members are adversely affected by Eagle's excessive discharges of these pollutants from its Natrium plant in violation of its NPDES permit. If Eagle's unlawful

discharges ceased, the harm to the interests of Plaintiffs' members could be redressed. Injunctions and/or civil penalties would redress Plaintiffs' members' injuries by preventing and/or deterring future violations of the limits in Eagle's permit.

Facts

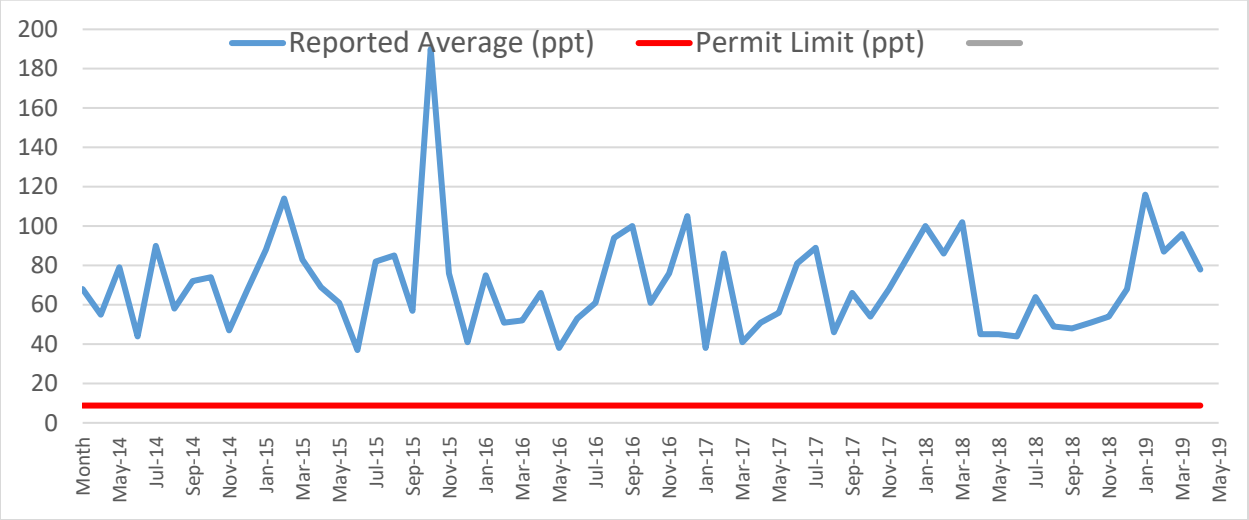
13. Eagle owns and operates a chlor-alkali plant in Natrium, West Virginia (the Natrium Plant) that produces chlorine, caustic, brine, calcium hypochlorite, and hydrochloric acid. One of the Natrium Plant's production lines uses mercury cells to produce caustic. In December 2017, the production rate from the mercury cells was 11,056,288 pounds per month. The Natrium Plant is the only remaining chlor-alkali plant in the United States that uses mercury cells; the other chlor-alkali plants have all converted to production methods that do not use mercury.

14. The Administrator of EPA authorized WVDEP, pursuant to Section 402(a)(2) of the Act, 33 U.S.C. § 1342(a)(2), to issue NPDES permits on May 10, 1982. 47 Fed. Reg. 22363. The applicable West Virginia law for issuing NPDES permits is the Water Pollution Control Act (WPCA), W.V. Code § 22-11-1, et seq.

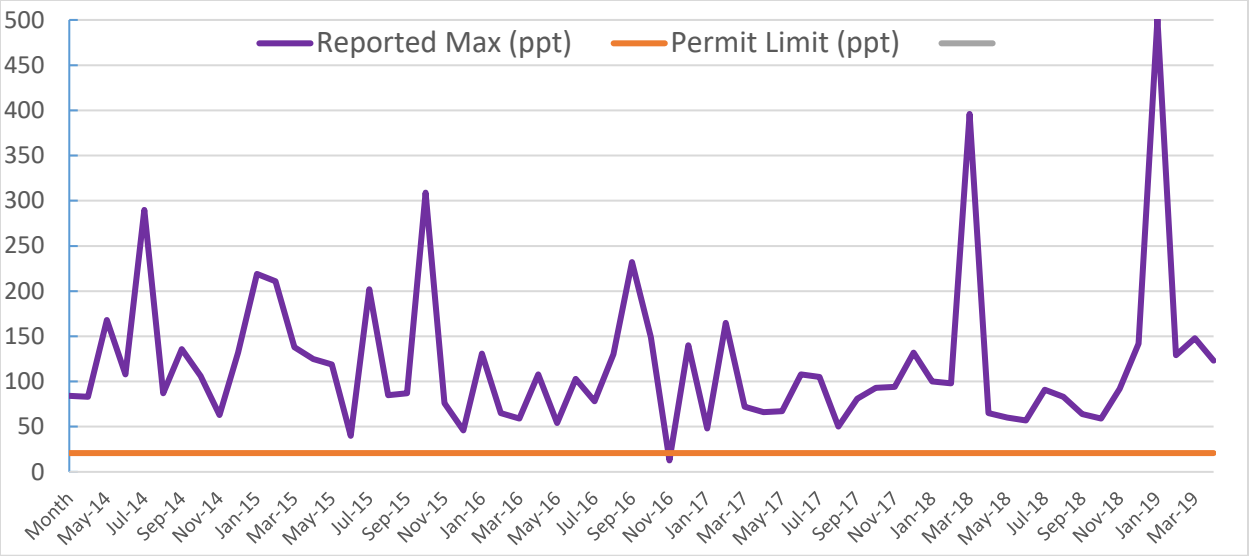
15. Pursuant to this delegation and the WPCA, WVDEP issued NPDES permit number WV0004359 to Eagle's predecessor, PPG Industries, Inc., on January 11, 2010, to be effective from February 10, 2010 through January 10, 2014. Eagle purchased the Natrium plant from PPG Industries, Inc. in January 2013. The 2010 permit authorized Eagle to discharge limited quantities of pollutants from multiple outlets at its Natrium Plant to the Ohio River. Eagle submitted an application to WVDEP to renew the 2010 permit on July 11, 2013. As a result, WVDEP has administratively extended the 2010 permit and it is still in effect.

16. Effective October 16, 2013, the 2010 NPDES permit imposed water-quality based limits for discharges of mercury at Outlet 009, which is the outfall that discharges process water from the mercury cell production line. The monthly average limit is 0.0088 micrograms per liter (µg/l) and the daily maximum limit is 0.0208 micrograms per liter. These limits are equivalent to 8.8 and 20.8 parts per trillion (ppt), respectively.

17. Eagle has discharged mercury from Outlet 009 that in amounts that exceeded its monthly average permit limit for mercury of 8.8 ppt in every month since April 2014, as shown by the chart below:



18. Eagle has discharged mercury from Outlet 009 in amounts that exceeded its daily maximum permit limit for mercury of 20.8 ppt in all but one month since April 2014, as shown by the chart below:



19. Since April 2014, Eagle has also reported exceeding its permit limits for other parameters, including alpha-BHC and beta-BHC, as listed in Appendix A.

20. BHC (also known as benzene hexachloride or hexachlorocyclohexane) and mercury are bioaccumulative chemicals of concern which can produce adverse and long-lasting environmental harm. 60 Fed. Reg. 15393 (Mar. 23, 1995).

21. Based on river mercury levels, a multi-state, multi-agency workgroup has issued a fish consumption advisory of one meal per month for two types of sport fish (freshwater drum and sauger) that are caught recreationally in the Ohio River from Montgomery Locks and Dam to Belleville Locks and Dam. See http://216.68.102.178/comm/fishconsumption/default.asp. That river segment includes outlets from the Natrium Plant.

Claim

22. Section 301(a) of the Act, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants from a point source into navigable waters of the United States, unless the discharge complies with various enumerated sections of the Act. Among other things, Section 301(a) prohibits such discharges not authorized by, or in violation of the terms of, an NPDES permit

issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342.

23. Section 308 of the Act, 33 U.S.C. § 1318, requires NPDES permittees to establish and maintain records; install, use and maintain monitoring equipment; sample effluents; and report on a regular basis to the permit-issuing agency regarding the facility's discharge of pollutants. The reports include Discharge Monitoring Reports (DMRs).

24. Section 505(a) of the Act, 33 U.S.C. § 1365, authorizes citizens to bring suit for violation of any "effluent standard or limitation" under the Act. Section 505(f)(6) of the Act, 33 U.S.C. § 1365(f)(6), defines "effluent standard or limitation" to include "a permit or condition thereof," including the effluent limitations and monitoring requirements of an NPDES permit.

25. Since at least April 2014, Eagle's Natrium Plant has discharged pollutants from its operations or other sources through a point source or sources into the Ohio River pursuant to NPDES permit No. WV0004359.

26. The Ohio River is a navigable water of the United States.

27. Eagle's NPDES permit No. WV0004359 imposes certain limits on pollutants in discharges from its Natrium Plant. In its DMRs submitted since at least April 2014, Eagle has reported the presence, quantity, and concentration of certain pollutants in its wastewater.

28. The quantities and concentrations reported in Eagle's DMRs as set forth in Appendix A are not within the limits of Eagle's NPDES permit No. WV0004359 and are violations of that permit.

29. Eagle's violations of its NPDES permit No. WV0004359 are continuing or intermittent. Eagle has violated its permit limits for BHC and mercury repeatedly in 2019.

30. Eagle is subject to an injunction ordering Eagle to cease its permit violations.

31. Eagle is subject to assessment of civil penalties for its permit violations pursuant

to Sections 309(d) and 505 of the Act, 33 U.S.C. §§ 1319(d) and 1365.

32. For the purpose of assessing the maximum penalty for which Eagle may be liable, each instance of Eagle's violation of its NPDES permit constitutes a separate violation of Section 301(a) pursuant to Section 309(d), 33 U.S.C. § 1319(d), for each day on which it has occurred or will occur after the filing of this complaint.

33. Eagle's violations of its NPDES permit No. WV0004359 and the CWA have been numerous and repeated. Over the period of time covered by Appendix A, Eagle has violated the terms and conditions of its permit over 200 times. Because of this extensive history of violations of the terms and conditions of its NPDES permit, Plaintiffs believe and allege that, without the imposition of appropriate civil penalties and issuance of an injunction, Eagle will continue to violate its NPDES permit No. WV0004359.

Relief Requested

Wherefore, Plaintiffs respectfully request this Court to grant the following relief:

A. Declare Eagle to have violated and to be in violation of the Act, 33 U.S.C. §§ 1311 and 1342;

B. Enjoin Eagle from operating its Natrium Plant in such a manner as will result in the further violation of Eagle's NPDES permit;

C. Order Eagle to comply immediately with the terms and conditions of its NPDES permit;

D. Order Eagle to pay appropriate civil penalties for each day of each violation of its NPDES permit pursuant to Sections 309(d) and 505(a) of the Act, 33 U.S.C. §§ 1319(d) and 1365(a), including those listed in Appendix A and violations committed subsequent to those listed in Appendix A;

E. Order Eagle to conduct monitoring and sampling to determine the environmental effects of its violations, to remedy and repair environmental contamination and/or degradation caused by its violations, and to restore the environment to its prior uncontaminated condition;

F. Award Plaintiffs their costs (including reasonable attorney and expert witness fees) as authorized by Section 505(d) of the Act, 33 U.S.C. § 1365(d); and

G. Grant such other relief as this Court deems appropriate.

Respectfully submitted,

/s/ J. Michael Becher
J. MICHAEL BECHER (W.Va. Bar No. 10588)
DEREK TEANEY (W.Va. Bar No. 10223)
Appalachian Mountain Advocates
P.O. Box 507
Lewisburg, WV 24901
(304) 382-4798

Counsel for Plaintiffs

Appendix A
List of Violations

	Month	Out-let	Parameter	Limit	Units	Type	Report-ed	Units	% Exceed-ance
1	4/30/2014	4	Copper, total recoverable	0.0204	mg/L	MAX	0.049	mg/L	140
2	4/30/2014	4	Copper, total recoverable	0.0088	mg/L	AVG	0.049	mg/L	457
3	4/30/2014	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.084	ug/L	304
4	4/30/2014	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.068	ug/L	673
5	4/30/2014	12	.alpha.-BHC	0.0053	ug/L	MAX	5.15	ug/L	97070
6	4/30/2014	12	.alpha.-BHC	0.0026	ug/L	AVG	5.15	ug/L	197977
7	4/30/2014	12	.beta.-BHC	0.0091	ug/L	AVG	0.81	ug/L	8801
8	4/30/2014	12	.beta.-BHC	0.013	ug/L	MAX	0.81	ug/L	6131
9	4/30/2014	12	.gamma.-BHC	0.033	ug/L	MAX	0.92	ug/L	2688
10	4/30/2014	12	.gamma.-BHC	0.019	ug/L	AVG	0.92	ug/L	4742
11	5/31/2014	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.083	ug/L	299
12	5/31/2014	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.055	ug/L	525
13	5/31/2014	12	.alpha.-BHC	0.0026	ug/L	AVG	0.00717	ug/L	176
14	5/31/2014	12	.alpha.-BHC	0.0053	ug/L	MAX	0.00717	ug/L	35
15	6/30/2014	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.168	ug/L	708
16	6/30/2014	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.079	ug/L	798
17	6/30/2014	11	.beta.-BHC	0.019	ug/L	MAX	0.03	ug/L	58
18	6/30/2014	11	Iron, total recoverable	1.5	mg/L	MAX	1.9	mg/L	27
19	6/30/2014	12	.alpha.-BHC	0.0053	ug/L	MAX	0.0125	ug/L	136
20	6/30/2014	12	.alpha.-BHC	0.0026	ug/L	AVG	0.0125	ug/L	381
21	7/31/2014	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.108	ug/L	419
22	7/31/2014	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.044	ug/L	400
23	7/31/2014	12	.alpha.-BHC	0.0026	ug/L	AVG	0.00278	ug/L	7
24	8/31/2014	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.09	ug/L	923
25	8/31/2014	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.29	ug/L	1294
26	8/31/2014	12	.alpha.-BHC	0.0026	ug/L	AVG	0.00429	ug/L	65
27	9/30/2014	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.087	ug/L	318
28	9/30/2014	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.058	ug/L	559
29	10/31/2014	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.136	ug/L	554
30	10/31/2014	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.072	ug/L	718
31	10/31/2014	9	Tetrachloroethylene	1.05	ug/L	MAX	2.11	ug/L	101
32	10/31/2014	9	Tetrachloroethylene	0.69	ug/L	AVG	2.11	ug/L	206
33	11/30/2014	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.106	ug/L	410
34	11/30/2014	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.074	ug/L	741

35	12/31/2014	2	Iron, total recoverable	1.5	mg/L	MAX	6.9	mg/L	360
36	12/31/2014	5	Iron, total recoverable	1.5	mg/L	MAX	2.4	mg/L	60
37	12/31/2014	9	Chlorine, total residual	0.027	mg/L	AVG	0.189	mg/L	600
38	12/31/2014	9	Chlorine, total residual	0.061	mg/L	MAX	0.943	mg/L	1446
39	12/31/2014	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.063	ug/L	203
40	12/31/2014	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.047	ug/L	434
41	12/31/2014	11	.alpha.-BHC	0.0026	ug/L	MAX	0.0383	ug/L	1373
42	12/31/2014	11	.beta.-BHC	0.019	ug/L	MAX	0.339	ug/L	1684
43	12/31/2014	23	Iron, total recoverable	1.5	mg/L	MAX	7	mg/L	367
44	1/31/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.132	ug/L	535
45	1/31/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.068	ug/L	673
46	2/28/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.088	ug/L	900
47	2/28/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.219	ug/L	953
48	3/31/2015	2	Iron, total recoverable	1.5	mg/L	MAX	16	mg/L	967
49	3/31/2015	9	Chlorine, total residual	0.061	mg/L	MAX	0.113	mg/L	85
50	3/31/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.211	ug/L	914
51	3/31/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.114	ug/L	1195
52	3/31/2015	11	.beta.-BHC	0.019	ug/L	MAX	0.127	ug/L	568
53	3/31/2015	22	Iron, total recoverable	1.5	mg/L	MAX	1.6	mg/L	7
54	4/30/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.138	ug/L	563
55	4/30/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.083	ug/L	843
56	5/31/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.125	ug/L	501
57	5/31/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.069	ug/L	684
58	6/30/2015	2	Iron, total recoverable	1.5	mg/L	MAX	41	mg/L	2633
59	6/30/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.061	ug/L	593
60	6/30/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.119	ug/L	472
61	6/30/2015	11	.alpha.-BHC	0.0026	ug/L	MAX	0.00782	ug/L	201
62	6/30/2015	11	.beta.-BHC	0.019	ug/L	MAX	0.151	ug/L	695
63	6/30/2015	11	Iron, total recoverable	1.5	mg/L	MAX	2.7	mg/L	80
64	6/30/2015	12	.alpha.-BHC	0.0026	ug/L	AVG	0.00403	ug/L	55
65	6/30/2015	21	Iron, total recoverable	1.5	mg/L	MAX	2.4	mg/L	60
66	7/31/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.04	ug/L	92
67	7/31/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.037	ug/L	320
68	8/31/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.202	ug/L	871
69	8/31/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.082	ug/L	832

70	9/30/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.049	ug/L	457
71	9/30/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.085	ug/L	309
72	9/30/2015	11	.alpha.-BHC	0.0026	ug/L	MAX	0.00522	ug/L	101
73	9/30/2015	11	.beta.-BHC	0.019	ug/L	MAX	0.066	ug/L	247
74	10/31/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.087	ug/L	318
75	10/31/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.057	ug/L	548
76	11/30/2015	9	Chloroform	5.7	ug/L	AVG	18.5	ug/L	225
77	11/30/2015	9	Chloroform	8.3	ug/L	MAX	18.5	ug/L	123
78	11/30/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.19	ug/L	2059
79	11/30/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.309	ug/L	1386
80	11/30/2015	12	.alpha.-BHC	0.0053	ug/L	MAX	0.0235	ug/L	343
81	11/30/2015	12	.alpha.-BHC	0.0026	ug/L	AVG	0.0235	ug/L	804
82	11/30/2015	12	.beta.-BHC	0.0091	ug/L	AVG	0.0109	ug/L	20
83	12/31/2015	9	Chloroform	5.7	ug/L	AVG	6.27	ug/L	10
84	12/31/2015	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.076	ug/L	265
85	12/31/2015	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.06	ug/L	582
86	12/31/2015	11	.alpha.-BHC	0.0026	ug/L	MAX	0.00616	ug/L	137
87	12/31/2015	11	.beta.-BHC	0.019	ug/L	MAX	0.11	ug/L	479
88	12/31/2015	14	Iron, total recoverable	1.5	mg/L	MAX	4	mg/L	167
89	1/31/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.041	ug/L	366
90	1/31/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.046	ug/L	121
91	2/29/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.075	ug/L	752
92	2/29/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.131	ug/L	530
93	2/29/2016	12	.alpha.-BHC	0.0053	ug/L	MAX	0.0073	ug/L	38
94	2/29/2016	12	.alpha.-BHC	0.0026	ug/L	AVG	0.0073	ug/L	181
95	2/29/2016	12	.beta.-BHC	0.0091	ug/L	AVG	0.0268	ug/L	195
96	2/29/2016	12	.beta.-BHC	0.013	ug/L	MAX	0.0268	ug/L	106
97	3/31/2016	11	.beta.-BHC	0.019	ug/L	MAX	0.0492	ug/L	159
98	3/31/2016	12	.alpha.-BHC	0.0026	ug/L	AVG	0.00313	ug/L	20
99	3/31/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.051	ug/L	480
100	3/31/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.065	ug/L	213
101	4/30/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.052	ug/L	491
102	4/30/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.059	ug/L	184
103	5/31/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.066	ug/L	650
104	5/31/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.108	ug/L	419
105	5/31/2016	12	.beta.-BHC	0.0091	ug/L	AVG	0.011	ug/L	21
106	6/30/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.038	ug/L	332
107	6/30/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.054	ug/L	160
108	7/31/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.103	ug/L	395
109	7/31/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.053	ug/L	502
110	8/31/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.061	ug/L	593

111	8/31/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.078	ug/L	275
112	9/30/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.094	ug/L	968
113	9/30/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.13	ug/L	525
114	9/30/2016	11	.alpha.-BHC	0.0026	ug/L	MAX	0.00505	ug/L	94
115	9/30/2016	11	.beta.-BHC	0.019	ug/L	MAX	0.0702	ug/L	269
116	9/30/2016	11	Chloroform	5.7	ug/L	MAX	44.7	ug/L	684
117	9/30/2016	11	Iron, total recoverable	1.5	mg/L	MAX	2.5	mg/L	67
118	10/31/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.232	ug/L	1015
119	10/31/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.1	ug/L	1036
120	11/30/2016	9	Copper, total recoverable	0.0456	mg/L	MAX	0.063	mg/L	38
121	11/30/2016	9	Copper, total recoverable	0.0255	mg/L	AVG	0.063	mg/L	147
122	11/30/2016	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.149	ug/L	616
123	11/30/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.061	ug/L	593
124	12/31/2016	9	Chloroform	8.3	ug/L	MAX	8.4	ug/L	1
125	12/31/2016	9	Chloroform	5.7	ug/L	AVG	8.4	ug/L	47
126	12/31/2016	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.0759	ug/L	763
127	12/31/2016	11	.beta.-BHC	0.019	ug/L	MAX	0.0332	ug/L	75
128	1/31/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.14	ug/L	573
129	1/31/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.105	ug/L	1093
130	2/28/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.038	ug/L	332
131	2/28/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.048	ug/L	131
132	3/31/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.086	ug/L	877
133	3/31/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.165	ug/L	693
134	3/31/2017	11	.alpha.-BHC	0.0026	ug/L	MAX	0.00985	ug/L	279
135	3/31/2017	11	.beta.-BHC	0.019	ug/L	MAX	0.0203	ug/L	7
136	3/31/2017	11	Chloride [as Cl]	230	mg/L	MAX	248	mg/L	8
137	4/30/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.041	ug/L	366
138	4/30/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.072	ug/L	246
139	5/31/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.066	ug/L	217
140	5/31/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.051	ug/L	480
141	6/30/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.067	ug/L	222
142	6/30/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.056	ug/L	536
143	6/30/2017	11	.beta.-BHC	0.019	ug/L	MAX	0.0471	ug/L	148
144	6/30/2017	14	Iron, total recoverable	1.5	mg/L	MAX	1.8	mg/L	20
145	7/31/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.081	ug/L	820
146	7/31/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.108	ug/L	419
147	8/31/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.089	ug/L	911
148	8/31/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.105	ug/L	405
149	9/30/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.046	ug/L	423

150	9/30/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.05	ug/L	140
151	10/31/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.066	ug/L	650
152	10/31/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.081	ug/L	289
153	11/30/2017	9	Chloroform	5.7	ug/L	AVG	16.4	ug/L	188
154	11/30/2017	9	Chloroform	8.3	ug/L	MAX	16.4	ug/L	98
155	11/30/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.093	ug/L	347
156	11/30/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.054	ug/L	514
157	11/30/2017	12	.beta.-BHC	0.013	ug/L	MAX	0.0516	ug/L	297
158	11/30/2017	12	.beta.-BHC	0.0091	ug/L	AVG	0.0516	ug/L	467
159	12/31/2017	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.068	ug/L	673
160	12/31/2017	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.094	ug/L	352
161	12/31/2017	11	.beta.-BHC	0.019	ug/L	MAX	0.0196	ug/L	3
162	12/31/2017	14	Iron, total recoverable	1.5	mg/L	MAX	1.8	mg/L	20
163	1/31/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.084	ug/L	855
164	1/31/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.132	ug/L	535
165	1/31/2018	12	.alpha.-BHC	0.0026	ug/L	AVG	0.0029	ug/L	12
166	1/31/2018	12	.beta.-BHC	0.0091	ug/L	AVG	0.0141	ug/L	55
167	1/31/2018	12	.beta.-BHC	0.013	ug/L	MAX	0.0141	ug/L	8
168	2/28/2018	9	Chloroform	5.7	ug/L	AVG	7.3	ug/L	28
169	2/28/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.1002	ug/L	1039
170	2/28/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.1002	ug/L	382
171	3/31/2018	9	Chloroform	5.7	ug/L	AVG	6.4	ug/L	12
172	3/31/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.086	ug/L	877
173	3/31/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.098	ug/L	371
174	3/31/2018	11	.alpha.-BHC	0.0026	ug/L	MAX	0.0427	ug/L	1542
175	3/31/2018	11	.beta.-BHC	0.019	ug/L	MAX	0.052	ug/L	174
176	3/31/2018	11	Chloride [as Cl]	230	mg/L	MAX	255	mg/L	11
177	3/31/2018	12	.alpha.-BHC	0.0053	ug/L	MAX	0.0857	ug/L	1517
178	3/31/2018	12	.alpha.-BHC	0.0026	ug/L	AVG	0.0857	ug/L	3196
179	3/31/2018	12	.beta.-BHC	0.0091	ug/L	AVG	0.191	ug/L	1999
180	3/31/2018	12	.beta.-BHC	0.013	ug/L	MAX	0.191	ug/L	1369
181	3/31/2018	23	Iron, total recoverable	1.5	mg/L	MAX	1.9	mg/L	27
182	4/30/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.396	ug/L	1804
183	4/30/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.102	ug/L	1059
184	4/30/2018	9	Tetrachloroethylene	1.05	ug/L	MAX	1.31	ug/L	25
185	4/30/2018	9	Tetrachloroethylene	0.69	ug/L	AVG	1.31	ug/L	90
186	4/30/2018	12	.alpha.-BHC	0.0026	ug/L	AVG	0.0463	ug/L	1681
187	4/30/2018	12	.alpha.-BHC	0.0053	ug/L	MAX	0.0463	ug/L	774
188	4/30/2018	12	.beta.-BHC	0.0091	ug/L	AVG	0.0552	ug/L	507
189	4/30/2018	12	.beta.-BHC	0.013	ug/L	MAX	0.0552	ug/L	325
190	5/31/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.065	ug/L	213

191	5/31/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.045	ug/L	411
192	5/31/2018	9	Tetrachloroethylene	1.05	ug/L	MAX	1.12	ug/L	7
193	5/31/2018	12	.alpha.-BHC	0.0026	ug/L	AVG	0.00514	ug/L	98
194	5/31/2018	12	.beta.-BHC	0.0091	ug/L	AVG	0.011	ug/L	21
195	6/30/2018	4	Copper, total recoverable	0.0204	mg/L	MAX	0.023	mg/L	13
196	6/30/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.045	ug/L	411
197	6/30/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.06	ug/L	188
198	6/30/2018	11	.alpha.-BHC	0.0026	ug/L	MAX	0.0049	ug/L	88
199	6/30/2018	11	.beta.-BHC	0.019	ug/L	MAX	0.0203	ug/L	7
200	6/30/2018	12	.alpha.-BHC	0.0053	ug/L	MAX	0.00809	ug/L	53
201	6/30/2018	12	.alpha.-BHC	0.0026	ug/L	AVG	0.00809	ug/L	211
202	6/30/2018	12	.beta.-BHC	0.013	ug/L	MAX	0.0396	ug/L	205
203	6/30/2018	12	.beta.-BHC	0.0091	ug/L	AVG	0.0396	ug/L	335
204	6/30/2018	14	Iron, total recoverable	1.5	mg/L	MAX	3.3	mg/L	120
205	6/30/2018	23	Iron, total recoverable	1.5	mg/L	MAX	1.7	mg/L	13
206	7/31/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.057	ug/L	174
207	7/31/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.044	ug/L	400
208	7/31/2018	12	.beta.-BHC	0.013	ug/L	MAX	0.0197	ug/L	52
209	7/31/2018	12	.beta.-BHC	0.0091	ug/L	AVG	0.0197	ug/L	116
210	8/31/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.064	ug/L	627
211	8/31/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.091	ug/L	338
212	8/31/2018	12	.alpha.-BHC	0.0026	ug/L	AVG	0.0045	ug/L	73
213	8/31/2018	12	.beta.-BHC	0.0091	ug/L	AVG	0.0251	ug/L	176
214	8/31/2018	12	.beta.-BHC	0.013	ug/L	MAX	0.0251	ug/L	93
215	9/30/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.049	ug/L	457
216	9/30/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.083	ug/L	299
217	9/30/2018	11	.beta.-BHC	0.019	ug/L	MAX	0.021	ug/L	11
218	9/30/2018	14	Iron, total recoverable	1.5	mg/L	MAX	5.2	mg/L	247
219	10/31/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.064	ug/L	208
220	10/31/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.048	ug/L	445
221	10/31/2018	9	Tetrachloroethylene	0.69	ug/L	AVG	1.23	ug/L	78
222	10/31/2018	9	Tetrachloroethylene	1.05	ug/L	MAX	1.23	ug/L	17
223	11/30/2018	9	Chloroform	5.7	ug/L	AVG	8.37	ug/L	47
224	11/30/2018	9	Chloroform	8.3	ug/L	MAX	8.37	ug/L	1
225	11/30/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.059	ug/L	184
226	11/30/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.051	ug/L	480
227	11/30/2018	111	Flow, in conduit or thru treatment plant	0.024	MGD	MAX	0.032	MGD	33
228	12/31/2018	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.092	ug/L	342
229	12/31/2018	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.054	ug/L	514

230	1/31/2019	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.068	ug/L	227
231	1/31/2019	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.142	ug/L	1514
232	1/31/2019	9	Chloride	2645	mg/l	MAX	3007	mg/l	14
233	2/28/2019	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.501	ug/L	2309
234	2/28/2019	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.116	ug/L	1218
235	2/28/2019	12	.alpha.-BHC	0.0053	ug/L	MAX	0.012	ug/L	126
236	2/28/2019	12	.alpha.-BHC	0.0026	ug/L	AVG	0.012	ug/L	362
237	2/28/2019	12	.beta.-BHC	0.013	ug/L	MAX	0.0532	ug/L	309
238	2/28/2019	12	.beta.-BHC	0.0091	ug/L	AVG	0.0532	ug/L	485
239	2/28/2019	111	Flow, in conduit or thru treatment plant	0.024	MGD	MAX	0.0265	MGD	10
240	3/31/2019	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.129	ug/L	520
241	3/31/2019	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.087	ug/L	889
242	3/31/2019	12	.alpha.-BHC	0.0026	ug/L	AVG	0.0040	ug/L	54
243	3/31/2019	12	.beta.-BHC	0.013	ug/L	MAX	0.055	ug/L	323
244	3/31/2019	12	.beta.-BHC	0.0091	ug/L	AVG	0.055	ug/L	504
245	4/30/2019	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.148	ug/L	612
246	4/30/2019	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.096	ug/L	991
247	5/31/2019	9	Mercury, total [as Hg]	0.0208	ug/L	MAX	0.123	ug/L	491
248	5/31/2019	9	Mercury, total [as Hg]	0.0088	ug/L	AVG	0.078	ug/L	786
249	5/31/2019	12	.beta.-BHC	0.0091	ug/L	AVG	0.013	ug/L	43