South Carolina Department of Health and Environmental Control
Analytical Services Division Laboratory Report

Station Code: SC31399C
Location Description: 001 PINEY GROVE UT/FRANKLIN PK
Matrix: WATER
County: RICHLAND
Sample Type: CP3

Laboratory Sample Number: AB31536
Program Charge: WPC
Collected By: WATFORD T
Date of Collection: 3/2/2005
Time of Collection: 12:05:00 PM

Laboratory Sample Number: **AB31536**

Analysis	Result	Units
Total Phosphorus in Water	0.66	mg/L
5 Day BOD Facility	29	mg/L
Total Suspended Solids	67	mg/L

Sample Comments

RECEIVED
MAR 17 2005
CENTRAL MIDLANDS
DISTRICT - EQC

South Carolina Department of Health and Environmental Control
Analytical Services Division Laboratory Report

Station Code: SC31399G
Location Description: 001 PINEY GROVE UT/FRANKLIN PK
Matrix: WATER
County: RICHLAND
Sample Type: GR3

Laboratory Sample Number: AB31535
Program Charge: WPC
Collected By: WATFORD T
Date of Collection: 3/2/2005
Time of Collection: 11:35:00 AM

Laboratory Sample Number: **AB31535**

Analysis	Result	Units
Fecal Coliform - MPN	3000	cnt/100mL

Sample Comments

RECEIVED
MAR 17 2005
CENTRAL MIDLANDS
DISTRICT - EQC

RECEIVED
MAY 03 2005
CENTRAL MIDLANDS
DISTRICT - EQC

Rita Foxworth

Accounts/Collection Dept.
R. Foxworth & Services
2270 Sand Hill Rd.
Turbeville, S.C. 29162

Telephone 843-659-3939 Mb. 803-473-0572

May 02, 2005

S.C. D.H.E.C.
P.O. Box 156
Building #5
State Park,S.C.
29147

Att: Tracy Wilkes

Re: NPDES # SC000031399
Franklin Park S/D WWT/F

In response to your letter of violations dated 02/28/05.

Deficiencies:

Item#1 Chlorinator and Dechlorinate.

Tablets are dropped into chlorinator chamber, Not placed in the tubes. This due to fast dissolving when broken to fit in tube. The tube was place in final chamber as a added protection of treatment, by the operator.
Sodium Bisulfate Powder is used in the placed of the tablets. The Company can not afford the tablets.

High Flow:

The first of the year rainfall were heavier than usually. We have no way to control the amount of water leaving the treatment plant. The CEO have been asked to look into the matter of infiltration/ or manhole protection from stormwater ran off.

Operators Log:

Unable to leave log due to vandalism. In the past I have had record removed or torn up .

High P.H.

Fresh water entering plant has impact on P.H.. No treatment is added at this site for P.H. Have no control.

Grounds:

Have talked to CEO about this matter.

I have enclosed copies of my records as you requested.

Sincerely,

Rita W. Foxworth
(operator)

D H E C

PROMOTE PROTECT PROSPER

South Carolina Department of Health and Environmental Control

WASTEWATER TREATMENT PLANT FACILITY EVALUATION INSPECTION REPORT

Exhibit #12 6/05 LL

C. Midlands EQC District
Bldg. # 5, PO Box 156
State Park, SC 29147
803.896.0620
803.896.0617 - Fax

NPDES #: SC0031399

Outfall: 001

Last Inspection Date: 04/26/04

Effective Permit Dates: 11/1/04-9/30/09

Piney Grove Utilities/Franklin Park S/D

Mr. Reece Williams
49 Archdale Street
Charleston, SC 29401

Name and Grade of Operator on Site:
Rita Foxworth: B-4883

Richland County

Field Observations	Rating
Permit	Sat
Records and Reports	Unsat
Operator's Log	Unsat
Self-Monitoring (Daily)	Sat
Operator of Record	Sat
Flow Measurement	Sat
Bar Screen	N/a
Grinder	N/a
Grit Removal	N/a
Primary Sedimentation	N/a
Trickling Filter	N/a
Aeration	Unsat
Secondary Sedimentation	N/a
Digester	N/a
Ponds	Sat
Post Chlorination (tablet)	Sat
Dechlorination (tablet)	Sat
Sludge Disposal	N/a
Final Filters	N/a
Spray/Tile Field	N/a
Housekeeping	Unsat

Field Parameters	Effluent Results
pH (SU)	6.99
DO (mg/l)	3.60
Temp. (deg. C)	11.5
TRC (mg/l)	.59
Cl2 in C.C.	1.34

Remarks / Comments / Recommendations:

Weather : Clear Effluent: Green/ Cloudy

1. No Records or Reports on site at the time of this inspection. Operator submitted a photo copy of the Operators log sheet during the inspection, but the operator will not leave log sheet onsite due to problems with theft. The Operators log doesn't indicate the name of the facility and/ or permit number.
2. The facility is under a Consent Order to have aeration, but no aerator or electricity is on site.
3. The tablet chlorinator box doesn't allow the water to flow freely through the box and there appears to be a hole or crack in the floor of the box. However, the Operator is utilizing a tube of chlorine tablets in the contact basin.
4. The trees have over grown the dike of the lagoon and on the fence making it extremely difficult to get to the effluent basin. The free board of the lagoon is also heavily covered in vegetation. There is no access around the entire lagoon. The fence is in need of repair in several locations and the vegetation needs to be removed from the fence.

EXHIBIT #DTW 42

The Department is requesting a written corrective action plan on the above deficiencies and a copy of the September and October, 2004 operator's log sheet within 10 days from receipt of this inspection. The District's fax number is 803-896-0617.

The Department has not received responses to previous operational and maintenance inspections. A copy of this inspection is being submitted to the Owner and Operator of Record for a response.

Unsatisfactory Overall Rating	11/17/04 Date: (mm/dd/yy)	1000-1050 Entry/Exit Times
Rita Foxworth Operator w/Inspector	BWM Brad Martin DHEC Field Inspector	_____ Reviewed By

Inspection was made to determine the operating condition of the facility, and is not to be interpreted that adequate treatment is being provided.

9771

Exhibit 14
LLR 6/05

D H E C
PROMOTE PROTECT PROSPER
South Carolina Department of Health and Environmental Control

WASTEWATER TREATMENT PLANT FACILITY EVALUATION INSPECTION REPORT

C. Midlands EQC District
Bldg. # 5, PO Box 156
State Park, SC 29147
803.896.0620
803.896.0617 - Fax

CERTIFIED MAIL: 7002 0860 0004 8322 6653

NPDES# SC0031399 **Outfall: 001** **Last Inspection Date: 03/25/04**

Type of Inspection: 1st Follow-up O&M

Effective Permit Dates: 4/1/00-09/30/04

Facility Name: Piney Grove Utilities/Franklin Park S/D WWTP
Mr. Reece Williams
49 Archdale Street
Charleston, SC 29401

Operator of Record: Rita Foxworth
B-4883

County: Richland

Facility Observations	Rating	Field Parameters	Effluent Results
Permit	SAT	pH (SU)	No Discharge
Records & Reports	UNSAT	DO (mg/l)	
Operator's Log	UNSAT	Temp. (dep.C)	
Self-Monitoring	UNSAT	**TRC (mg/l)**	
Operator of Record (Req.)	UNSAT	CL2 in C.C.	
Flow Measurement ( )	SAT		
Bar Screen (Manual) ( )			
Grinder ( )			
Grit Removal ( )			
Primary Sedimentation ( )			
Trickling Filter ( )			
Aeration ( )( )	UNSAT	Consent order requires aeration. No aerator or power on site.	
Secondary Sedimentation ( )			
Digester ( )( )			
Ponds (1)	SAT		
Post Chlorination (Tablet)	UNSAT	Approved location not being utilized Chlorine tablets placed in an unapproved location down stream from the approved chlorination location. This can affect disinfection/contact time needed to meet NPDES parameters.	
Dechlorination (Tablet)	UNSAT	No tablets in the tubes.	
Sludge Handling ( )			
Final Filters ( )			
Spray/Tile Field			
Housekeeping	UNSAT	Vegetation/Bushes/Trees on free board around entire lagoon, fence line and fence down in several locations.	
Sludge Disposal ( )			
Other: Daily Inspections	UNSAT	No log on site. Daily inspections by appropriate grade operator could not be confirmed.	

*Note if observations are satisfactory or unsatisfactory.

EXHIBIT #DTW 43

A.O. 00-071-W (C.O. 99-117-WP, C.A. 00-167-W) As of 3/05/04 the Department has filed in Circuit Court and is being handled by Legal.

Weather: Fair
Effluent Appearance: No Discharge

Remarks / Comments / Recommendations:

Please respond within 5 days upon receipt of this inspection of the corrective actions taken to correct the deficiencies noted above. You still have not responded to the first O&M inspection.

Please fax a copy of the January, February and March, 2004 Operations Log. 803-896-0617.

Unsatifactory Overall Rating	**04/26/2004** Date: (mm/dd/yy)	**11:20** Military Time
None Operator w/ Evaluator	**Brad Martin** DHEC Field Evaluator	Reviewed By

Inspection was made to determine the operating condition of the facility, and is not to be interpreted that adequate treatment is being provided.

Schedule FUI

(Refer)

DHEC

PROMOTE PROTECT PROSPER

South Carolina Department of Health and Environmental Control

on file

WASTEWATER TREATMENT PLANT FACILITY EVALUATION INSPECTION REPORT

CERTIFIED MAIL: 7099-3400-0003-6617-9594

C. Midlands EQC District
Bldg. # 5, PO Box 156
State Park, SC 29147
803.896.0620
803.896.0617 - Fax

NPDES# SC0031399 **Outfall: 001** **Last Inspection Date: 08/25/03**

Type of Inspection: Initial O&M

Facility Name: Piney Grove Utilities/Franklin Park S/D WWTP
Mr. Reece Williams
2 Fifth Avenue
Charleston, SC 29403

Effective Permit Dates: 4/1/00-09/30/04

Operator of Record: Rita Foxworth
B-4883

County: Richland

Facility Observations	Rating	Field Parameters	Effluent Results
Permit	SAT	pH (SU)	6.69
Records & Reports		DO (mg/l)	4.75
Operator's Log	UNSAT	Temp. (dep.C)	14.7
Self-Monitoring	UNSAT	**TRC (mg/l)**	**0.95**
Operator of Record (Req.)	UNKNOWN	CL2 in C.C.	1.80
Flow Measurement ( )	SAT		
Bar Screen (Manual) ( )			
Grinder ( )			
Grit Removal ( )			
Primary Sedimentation ( )			
Trickling Filter ( )			
Aeration ( ) ( )	UNSAT	Consent order requires aeration. No aerator or power on site.	
Secondary Sedimentation ( )			
Digester ( ) ( )			
Ponds (1)	SAT		
Post Chlorination (Tablet)	UNSAT	Approved location not being utilized Chlorine tablets placed in an unapproved location down stream from the approved chlorination location. This can affect disinfection/contact time needed to meet NPDES parameters.	
Dechlorination (Tablet)	UNSAT	Exceeded NPDES Permit Limit- Could be due to chlorinating in the incorrect location and/or not making daily inspections and taking corrective actions needed to meet NPDES parameters.	
Sludge Handling ( )			
Final Filters ( )			
Spray/Tile Field			
Housekeeping	UNSAT	Vegetation/Bushes/Trees on free board around entire lagoon, fence line and fence down in several locations.	
Sludge Disposal ( )			
Other: Daily Inspections	UNSAT	No log on site. Daily inspections by appropriate grade operator could not be confirmed.	

*Note if observations are satisfactory or unsatisfactory.

EXHIBIT #DTW 44

A.O. 00-071-W (C.O. 99-117-WP, C.A. 00-167-W) As of 3/05/04 the Department has filed in Circuit Court and is being handled by Legal.

Weather: Fair
Effluent Appearance: Light Green/Turbid

Remarks / Comments / Recommendations:

Please respond within 5 days upon receipt of this inspection of the corrective actions taken to correct the deficiencies noted above.

Please fax a copy of the January, February and March, 2004 Operations Log. 803-896-0617.

Unsatifactory Overall Rating	**03/25/04** Date: (mm/dd/yy)	**11:20** Military Time
None Operator w/ Evaluator	**T. Wilkes & J. Arrants** DHEC Field Evaluator	_____ Reviewed By

Inspection was made to determine the operating condition of the facility, and is not to be interpreted that adequate treatment is being provided

Tackled | Bow 9-10-03 DTW

DHEC
PROMOTE PROTECT PROSPER
South Carolina Department of Health and Environmental Control

Wastewater Treatment Facility Operation & Maintenance Evaluation Report

Exhibit 12 LR 6/05

Central Midlands EQC
P.O. Box 156
State Park, SC 29147
(803) 896-0620
(803) 896-0615 Fax

Entered Tracked 9-10-03 DT

NPDES NO.: SC0031399 **Pipe:** 001 **Last Insp. Date:** 09/10/02

Facility: Piney Grove Utilities / Franklin Park Subdivision WWTP

County: Richland
Owner: Mr. Reece Williams
2 Fifth Avenue
Charleston, SC 29403

Phone # : 803-606-9224

Operator Grade: B-Biological
Grade Required: C

Facility Observation Checked	Rating	Field Tests:	Effluent
Flow Measurement (60 Degree V-Notch)	**SAT**	**pH (Su)**	No discharge
Bar Screen	N/A	D.O. (Mg/l)	
Grinder	N/A	Temp (deg. C)	
Grit Removal	N/A	TRC (mg/l)	
Primary Sedimentation	N/A	CL2 In C.C.	
Trickling Filter	N/A		
Aeration-(Type:)	**UNSAT**		
Secondary Sedimentation	N/A		
Digester	N/A		
Ponds (1)	**UNSAT**		
Post Chlorination (tablets)	**UNSAT**		
Dechlorination (tablets)	**UNSAT**		
Sludge Disposal	N/A		
Final Filters	N/A		
Field	N/A		
Housekeeping	**UNSAT**		

Remarks/Comments/Recommendations:
Inspection Type: O&M Inspection
Operator of Record: Rita Foxworth "B" Biological #4483
Weather: Clear
Effluent: No discharge
Daily Inspections/ Self Monitoring: No documents could be located.
Facility Security: There is a lock and emergency sign on the gate.

Comments: This facility is currently under a Consent Order (#00-167-W). A schedule of compliance became part of this order on December 1, 2000. A new schedule of compliance took place of the original one on April 25, 2001. This schedule was also amended on May 7, 2002 and called for construction to be completed on September 1, 2002. As of today's date, construction (running power and/or installing an aerator) has not begun. District records do not indicate that an extension of the Schedule of Compliance was requested; therefore, as of this date, the Permittee appears to be in violation of Consent Order #00167-W.

During the inspection there was no discharge into the lagoon or out of the lagoon. After the inspection took place the drinking water section informed the wastewater section that there was a well system failure at the facility, and this could explain the lack of flow to the lagoon. Upon inspection of the contact chamber it was found that there were no tablets in the Dechlorination. or Chlorination chambers. Vegetation on and around the free board and dike of the lagoon must be removed. Root systems from trees and bushes will compromise the dike's integrity. Tree limbs are hanging over the roadway and through the fence leading to the discharge point, and there is a tree down along one side of the lagoon. which

has knocked the fence down in that area. Also, there are holes in the roadway that must be filled in. Walking to the discharge point with monitoring equipment through tall grass and with the condition of the roadway would be much more dangerous. The roadway leading completely around the lagoon must be cleared off and holes filled in. There were no visible signs posted around the perimeter of the fence during the inspection.

Daily inspections and self-monitoring could not be confirmed due to Operator documents were not at the facility. The container where the documents used to be kept is empty. All buckets at the discharge area where checked but, no documents where located. Mr. Williams and Ms. Foxworth have both been made aware of this in the last couple of months. Ms. Foxworth was asked to have the operator records at the facility at all times as stated in the Permit.

The Department is requesting that Mr. Williams notify the Central Midlands District in writing within 5 days of receiving this letter of what actions have taken place to correct the deficiencies noted.

Unsatisfactory **Overall Rating**	08/25/03 **Date: (mm/dd/yy)**	1215 **Military Time**
None **Operator w/Inspector**	BWM JM Brad Martin & Jay Mundy **DHEC Field Inspector**	**Reviewed By** DWilkes

Inspection was made to determine the operating condition of the plant and, is not to be interpreted that adequate treatment is being provided.

* * * COMMUNICATION RESULT REPORT (MAY.12 2003 11:03AM) * * *

TTI ENV LAB CERTIFICATIO

FILE MODE	OPTION	ADDRESS (GROUP)	RESULT	PAGE
788 MEMORY TX		98983795	OK	P. 8/8

REASON FOR ERROR
E-1) HANG UP OR LINE FAIL
E-2) BUSY
E-3) NO ANSWER
E-4) NO FACSIMILE CONNECTION

Fax: L. Proctor 898-3795 05/12/03 (Mon 3 pages) Calin Branch → Myers Creek → Congaree

South Carolina Department of Health and Environmental Control
FIELD QUALITY CONTROL WORKSHEET

COLLECTOR: B. Martin		Franklin Park							
		SC0031399							
WEATHER CODES: Clear 00, Fair 01, Cloudy 02, Rain 22 TIDE STAGE CODES: Ebb 2000, Flood 4000	SAMPLE I.D.	001 GR	001 GR	001 CP	001 CP	001 GR	001 CP		
Time Collected	In			0950			0940		
(military)	Out		0945			0940	0940		
Date (yr/mo/day)			03516	03515	03516	03519	03518		
Weather	00041		02			01			
Temp., Air (°C)	00020		21.5			23.0			
% from R.B.	00002								
Depth (meters)	82048								
Tape Down/Staff Gage (ft.)			0.07			.11			
Tide Stage	00067								
Field pH (su)	00400		7.32			8.08			
Field D.O. (mg/1)	00300		4.60			7.20			
Temp., Water (°C)	00010		23.0			21.5			
Chlorine, Tot. Res. (mg/1)	50060		>2.0			0.94			
~~Salinity (ppt)~~ CL 2 C.C	00480		>2.0			1.14			
Conductivity (µmhos/cm)	00402								
Flow, Stream (cfs)	00061								
Flow, Facility (mgd)	50050		.0012			.0037	.0038		
QUALITY ASSURANCE									
pH Meter Serial No.	WWTTT	WWTTT			WWTTT				
pH Buffer Temp. (°C)	20.8	21.3			21.0				

EXHIBIT #DTW 46

Calin Branch → Myers Creek → Congaree

South Carolina Department of Health and Environmental Control

FIELD QUALITY CONTROL WORKSHEET

COLLECTOR: B. Martin		Franklin Park							
		SC0031399							
WEATHER CODES: Clear 00, Fair 01, Cloudy 02, Rain 22 TIDE STAGE CODES: Ebb 2000, Flood 4000	SAMPLE I.D.	001 GR	001 GR	001 CP	001 CP	001 GR	001 CP		
Time Collected	In			09150			09140		
(military)	Out		09145			09140	09140		
Date (yr/mo/day)			031516	031515	031516	031519	031518		
Weather	00041		02			01			
Temp., Air (°C)	00020		21.5			23.0			
% from R.B.	00002								
Depth (meters)	82048								
Tape Down/Staff Gage (ft.)			0.07			.11			
Tide Stage	00067								
Field pH (su)	00400		7.32			8.08			
Field D.O. (mg/1)	00300		4.60			7.20			
Temp., Water (°C)	00010		23.0			21.5			
Chlorine, Tot. Res. (mg/1)	50060		>2.0			0.94			
~~Salinity (ppt)~~ Cl acc	00480		>2.0			1.14			
Conductivity (µmhos/cm)	00402								
Flow, Stream (cfs)	00061								
Flow, Facility (mgd)	50050		.0012			.0037	.0038		
QUALITY ASSURANCE									
pH Meter Serial No.		WWTT	WWTT		WWTT				
pH Buffer Temp. (°C)		20.8	21.3		21.9				
pH 7.0 Buffer (su)		7.01	7.01		7.01				
Meter Adjusted to (su)		7.00	7.00		7.00				
pH 4.0 Buffer (su)		4.01/99.0	4.01/100.0		4.01/98.2				
pH 10.0 Buffer (su)		10.00	9.93		10.05				
D.O. Meter Serial No.		A2073	A2073		A2073				
Winkler D.O. (mg/1)		8.90	8.48		8.72				
Air Cal. Temp. (°C)		21.0	23.5		22.0				
Meter D.O. (mg/1)		9.15	8.70		8.70				
Meter Adjusted to (mg/1)		8.90	8.50		8.70				
Conductivity Meter Serial No.									
Std. [µmhos/cm] °C									
Std. [µmhos/cm] °C									
Chlorine Meter Serial No.									
Standard [Blank]									
Standard [0.50 mg/1]									
Standard [1.00 mg/1]									
Sample pH Adjusted to (su)									
Flow Recorder Serial No.		C7428					✓		
Sampler Serial No.		45.080					✓		
Comp. Frequency (Min. or Gals.)		20					~~1~~ 70		
Ind. Sample Volume (ml)		125					✓		
Number of Ind. Samples		50					43		
Comp. Temp. (°C)							4.0		
Samples Split with							none		

Batch mail: Polaroid pictures (8). DW

South Carolina Department of Health and Environmental Control
FIELD QUALITY CONTROL WORKSHEET

Facility: Franklin Park NPDES No.: SC0031399 County: Richi

Date In: 5-7-03 Time In: ~~0950~~ 0940 Date Out: 5-8-03 Time Out: 0940

Flow Meter Serial Number: C 7428 Module No: N/A Max. Head: 1'0"

Primary Flow Device: 60° V-notch

Scaling Constant (GPS): 1.08 x 10 Chart Speed: 1/2"/hr.

Head at Set-Up: .04 Flow Rate at Set-Up (GPS): .0035

Full Scale Flow Rate (GPS): 2.000 Estimated Daily Flow (MGD): ~~.001~~ .0035 .002 - .015

Total Flow Day One (MGD): .0031 Total Flow Day Two (MGD):

In-House Flow Equipment Checked:

COMMENTS

Cell # 606-9224

CR: Fecal; TRC .6 max; DO 2.0 min.; pH 6.0-8.5

CP: BOD5; TSS

Rita F. said ~~these~~ were her initials BWM

(1) Records on site; no samples/run on ~~[illegible]~~ 5-3-03 & 5-4-03 but there was a set of initials; not the same initials as on 5-1-03 & 5-2-03; no TRC or CL2cc samples on 5-1 & 5-2

(2) Vegetation needs cutting on pond bank & cleared off of fence.

Padlock in links 8

(3) Sampler & flow meter has been put in but ~~[illegible]~~ the flow meter is not on & the sampler is running

(4) Rita wrote in log book that flow would be inaccurate due too flow being less than 1/2" over weir, she said that is < .0001 mgd. & her flow meter was broke 5/7/03

(5) Rita F. set her sampler back up without a flowmeter on 5-7-03 to pull off on 5-8-03; time ~~[illegible]~~ composite

Samples released to T. Cunningham 5/5/03 @ 1330

" " " R. Brewer 5/6/03 @ 1305

" " " T. Cunningham 5/7/03 @ 1335

" " " J. Price 5/8/03 @ 1150

Page No. 65

DHEC 1943 (1/86)

From: Tracey Wilkes
To: Boland, Larry; Foy, J. Robin; Hunter-Shaw, Anastasia
Date: 4/21/03 10:56AM
Subject: Compliance Sampling - Franklin Park

For your information, Brad made two attempts today (8am and 11am) to contact Rita Foxworth on her cell phone to have her meet him out at Franklin Park so we could sample. No return call was made by her. Her home phone has been disconnected.

She told Brad Martin a couple of months ago when we tried to sample, that the only key to the gate is hers because she is providing the lock on the gate.

Please advise what we are to do about sampling this facility and obtaining a key to the gate. Also, in the past we couldn't get in touch with Reece either. What do we do if there is ever an emergency and we can't speak to anyone immediately?

Thanks for your help in this matter.

DHEC
PROMOTE PROTECT PROSPER

EQC District Laboratory Report Form for Stream and Facility Data
Analytical Services Division

Charge Code: WPC
Sheet No.: Day 2

STREAM: Primary ( ) Secondary ( ) Special ( ) COUNTY: Rich.

Facility: Franklin Park Type: Lagoon Samples Split: EPA (1) Owner (2) None (3)

NPDES No: SC00 31399 Receiving Stream: Colin Creek Basin: Congaree

DATE: From 23 5 5 (Yr Mo Day) To 03 5 6 (Yr Mo Day) Collector: B. Martin Weather Code: Fair 01, Clear 00, Cloudy 02, Rain 22

Sample (Sta. No.)		001	~~001~~						
Lab No.	AA	77534							
Time Collected (Military)	In								
	Out	0945							
SAMPLE TYPE		GR	~~GP~~						
Weather	00041	02							
Temp., Air (°C)	00020	21.5							
% From RB	00002								
Depth (m)	82048								
Tape Down/Staff Gage (ft)		0.07							
Field pH (su)	00400	7.32							
Field D. O. (mg/L)	00300	4.60							
Temp., Water (°C)	00010	23.0							
Chlorine, Tot. Res. (mg/L)	50060	>2.0							
~~Salinity (ppt)~~ Cl2 SC	00480	>2.0							
Conductivity (umhos/cm)	00402								
Flow, Stream (cfs)	00061								
Flow, Facility (MGD)	50050	.0012							
Lab pH (su)	00403								
Phth Alk (mg/L)(pH 8.3)	00415								
Tot. Alk (mg/L)(pH 4.5)	00410								
Color (c.u.)	00080								
Turbidity (NTU)	00076								
BOD_5 (mg/L)	00310	X BNM	X						
Residue Sus. (mg/L)	00530	X BNM	X						
Residue Total (mg/L)	00500								
Residue Diss. (mg/L)	70300								
Fecal Coli/100mL (MFC)	31616								
Fecal Coli/100mL (MPN)	31615	X							
Fecal Coli/100mL (A-1)	31621								
Total Coli/100mL (MPN)	31505								
Phenols (ug/L)	32730								
Oil & Grease (mg/L)	00556								
Cyanide (mg/L)	00720								
Sulfides (mg/L)	00745								
Enterococci		X							

COD
Metals
Nutrients
Organics
TOC
(✓) If Req.

RECEIVED
MAY 30 2003
CENTRAL MIDLANDS DISTRICT - EQC

Comments:
Samples Released To: R. Brewer By: B. Martin Date: 5/6/03 Time: 1305
Samples Received By: [illegible] Date Received: SC00
Data Released By: TC Kurrimack Verified By: Release Date: 5-20-03

Match AA 72914 72181

DHEC 0186 (11/1996) White - Central Office Canary - Lab: Pink - District Office

South Carolina Department of Health and Environmental Control
Analytical Services Division Laboratory Report

Station Code: SC31399G
Location Description: 001 PINEY GROVE UT/FRANKLIN PK
Matrix: WATER
County: RICHLAND
Sample Type: GR3

Laboratory Sample Number: AA72534
Program Charge: WPC
Collected By: MARTIN B
Date of Collection: 5/6/2003
Time of Collection: 9:45:00 AM

Laboratory Sample Number: **AA72534**

Analysis	Result	Units
A-1 Fecal Coliform	<20	cnt/100mL

Sample Comments

DHEC
PROMOTE PROTECT PROSPER

EQC District Laboratory Report Form for Stream and Facility Data
Analytical Services Division

Charge Code: WPC
Sheet No.: Day 2

STREAM: Primary ( ) Secondary ( ) Special ( ) COUNTY: Rich.

Facility: Franklin Park Type: Lagoon Samples Split: EPA (1) Owner (2) None (3)

NPDES No: SC00 31399 Receiving Stream: Colin Branch Basin: Congaree

DATE: From 03 5 7 (Yr Mo Day) To 03 5 8 (Yr Mo Day) Collector: B. Martin Weather Code: Fair 01, Clear 00, Cloudy 02, Rain 22

Sample (Sta. No.)		001								
Lab No.		AA 72914								
Time Collected (Military)	In	0191410								
	Out	0191410								
SAMPLE TYPE		CP								
Weather	00041									
Temp., Air (°C)	00020									
% From RB	00002									
Depth (m)	82048									
Tape Down/Staff Gage (ft)										
Field pH (su)	00400									
Field D. O. (mg/L)	00300									
Temp., Water (°C)	00010									
Chlorine, Tot. Res. (mg/L)	50060									
Salinity (ppt)	00480									
Conductivity (umhos/cm)	00402									
Flow, Stream (cfs)	00061									
Flow, Facility (MGD)	50050	.0031								
Lab pH (su)	00403									
Phth Alk (mg/L)(pH 8.3)	00415									
Tot. Alk (mg/L)(pH 4.5)	00410									
Color (c.u.)	00080									
Turbidity (NTU)	00076									
BOD_5 (mg/L)	00310									
Residue Sus. (mg/L)	00530									
Residue Total (mg/L)	00500									
Residue Diss. (mg/L)	70300									
Fecal Coli/100mL (MFC)	31616									
Fecal Coli/100mL (MPN)	31615									
Fecal Coli/100mL (A-1)	31621									
Total Coli/100mL (MPN)	31505									
Phenols (ug/L)	32730									
Oil & Grease (mg/L)	00556									
Cyanide (mg/L)	00720									
Sulfides (mg/L)	00745									
COD	(✓) If Req.									
Metals										
Nutrients										
Organics										
TOC										

RECEIVED
MAY 30 2003
CENTRAL MIDLANDS DISTRICT - EQC

Comments:
Samples Released To: J. Price By: B. Martin Date: 5/7/03 Time: 1150
Samples Received By: [signature] Date Received: 5/8/03
Data Released By: [signature] Verified By: Release Date: 5-20-03

Lab Disk District Office Match AA 72681 72534

South Carolina Department of Health and Environmental Control
Analytical Services Division Laboratory Report

Station Code: SC31399C
Location Description: 001 PINEY GROVE UT/FRANKLIN PK
Matrix: WATER
County: RICHLAND
Sample Type: CP3

Laboratory Sample Number: AA72914
Program Charge: WPC
Collected By: MARTIN B
Date of Collection: 5/8/2003
Time of Collection: 9:40:00 AM

Laboratory Sample Number: **AA72914**

Analysis	Result	Units
5 Day BOD Facility	27	mg/l
Total Suspended Solids	30	mg/L

Sample Comments

DHEC
PROMOTE PROTECT PROSPER

EQC District Laboratory Report Form for Stream and Facility Data
Analytical Services Division

Charge Code: WPC
Sheet No.: Day 2

STREAM: Primary ( ) Secondary ( ) Special ( ) COUNTY: Rich

Facility: Franklin Type: Lagoon Samples Split: EPA (1) Owner (2) None (3)

NPDES No: SC00 31399 Receiving Stream: Colin Branch Basin: Congaree

DATE: From 03 5 10 (Yr Mo Day) To 03 5 7 (Yr Mo Day) Collector: B. Martin Weather Code: Fair 01, Clear 00, Cloudy 02, Rain 22

Sample (Sta. No.)		001	~~00~~ BWM						
Lab No.		AA 72681							
Time Collected (Military)	In		~~0950~~						
	Out	0940							
SAMPLE TYPE		CR	~~CP~~						
Weather	00041	01							
Temp., Air (°C)	00020	23.0							
% From RB	00002								
Depth (m)	82048								
Tape Down/Staff Gage (ft)		.11							
Field pH (su)	00400	8.08							
Field D. O. (mg/L)	00300	7.20							
Temp., Water (°C)	00010	21.5							
Chlorine, Tot. Res. (mg/L)	50060	0.94							
~~Salinity (ppt)~~ Cl2 CC	00480	1.14							
Conductivity (umhos/cm)	00402								
Flow, Stream (cfs)	00061								
Flow, Facility (MGD)	50050	.0037							
Lab pH (su)	00403								
Phth Alk (mg/L)(pH 8.3)	00415								
Tot. Alk (mg/L)(pH 4.5)	00410								
Color (c.u.)	00080								
Turbidity (NTU)	00076								
BOD_5 (mg/L)	00310		X BWM						
Residue Sus. (mg/L)	00530								
Residue Total (mg/L)	00500								
Residue Diss. (mg/L)	70300								
Fecal Coli/100mL (MFC)	31616								
Fecal Coli/100mL (MPN)	31615	X							
Fecal Coli/100mL (A-1)	31621								
Total Coli/100mL (MPN)	31505								
Phenols (ug/L)	32730								
Oil & Grease (mg/L)	00556								
Cyanide (mg/L)	00720								
Sulfides (mg/L)	00745								
COD	(✓) If Req.								
Metals									
Nutrients									
Organics									
TOC									

RECEIVED
MAY 30 2003
CENTRAL MIDLANDS DISTRICT - EQC

Comments:
Samples Released To: T. Cunningham By: B. Martin Date: 5/7/03 Time: 1335
Samples Received By: [signature] Date Received: 5/7/03
Data Released By: [signature] Verified By: Release Date: 5-20-03

Match AA 72914 72534

Copy: LCF - Green - Lab Pink - District Office

South Carolina Department of Health and Environmental Control
Analytical Services Division Laboratory Report

Station Code: SC31399G
Location Description: 001 PINEY GROVE UT/FRANKLIN PK
Matrix: WATER
County: RICHLAND
Sample Type: GR3

Laboratory Sample Number: AA72681
Program Charge: WPC
Collected By: MARTIN B
Date of Collection: 5/7/2003
Time of Collection: 9:40:00 AM

Laboratory Sample Number: **AA72681**

Analysis	Result	Units
A-1 Fecal Coliform	<20	cnt/100mL

Sample Comments

H E C
PROMOTE PROTECT PROSPER
South Carolina Department of Health and Environmental Control

Wastewater Treatment Facility Operation & Maintenance Evaluation Report

Central Midlands EQC
P.O. Box 156
State Park, SC 29147
(803) 896-0620
(803) 896-0615 Fax

NPDES NO.: SC0031399 **Pipe:** 001 **Last Insp. Date:** 09/05/00

Facility: Piney Grove Utilities / Franklin Park Subdivision WWTP

County: Richland
Owner: Mr. Reece Williams
2 Fifth Avenue
Charleston, SC 29403

Phone # : 803-606-9224

Operator Grade: B-Biological
Grade Required: C

Facility Observation Checked	Rating	Field Tests:	Effluent
Flow Measurement (60 Degree V-Notch)	**SAT**	**pH (Su)**	No discharge
Bar Screen	N/A	D.O. (Mg/l)	
Grinder	N/A	Temp (deg. C)	
Grit Removal	N/A	TRC (mg/l)	
Primary Sedimentation	N/A	CL2 In C.C.	
Trickling Filter	N/A		
Aeration-(Type:)	**UNSAT**		
Secondary Sedimentation	N/A		
Digester	N/A		
Ponds (1)	**UNSAT**		
Post Chlorination (tablets)	**SAT**		
Dechlorination (tablets)	**SAT**		
Sludge Disposal	N/A		
Final Filters	N/A		
Field	N/A		
Housekeeping	**UNSAT**		

Remarks/Comments/Recommendations:
Inspection Type: O&M Inspection
Operator of Record: Rita Foxworth "B" Biological #4483
Weather: Clear
Effluent: No discharge, level of lagoon is very low but not dry.
Daily Inspections/ Self Monitoring: No documents could be located.
Facility Security: The entrance gate to the facility was missing the lock and emergency sign.

Comments: This facility is currently under a Consent Order (#00-167-W). A schedule of compliance became part of this order on December 1, 2000. A new schedule of compliance took place of the original one on April 25, 2001. This schedule was also amended on May 7, 2002 and called for construction to be completed on September 1, 2002. As of today's date, construction (running power and/or installing an aerator) has not begun. District records do not indicate that an extension of the Schedule of Compliance was requested; therefore, as of this date, the Permittee appears to be in violation of Consent Order #00167-W.

The Permittee was contacted by phone on 9/10/02 in reference to the consent order requirements. The Permittee, Mr. Reece William indicated that the hold up on the upgrade was due to them waiting on the power company to run power to the facility. He also stated that, without power and having a low water level in the lagoon, there was no need for the aerator; it would not be able to run. He was advised that he should have requested an extension based on that information prior to September 1, 2002.

EXHIBIT #DTW 47

The following information was also discussed with the Permittee.

During the inspection, it was noticed that there was no influent discharging to the lagoon. An attempt to check the sewer lines was made, however, the manhole covers in the road could not be lifted up. It was recommended to Mr. Williams that he check the collection system lines for blockages and/or breaks to insure that the waste is not going somewhere other than the lagoon. However, he did state that the majority of the subdivision was on septic tanks but, that he would have the lines checked.

Vegetation on and around the free board and dike of the lagoon must be removed. Root systems from trees and bushes will comprise the dike's integrity. Tree limbs are hanging over the roadway and through the fence leading to the discharge point, which is scratching our vehicles. Also, there are holes in the roadway that must be filled in. Walking to the discharge point with monitoring equipment through tall grass and with the condition of the roadway would be much more dangerous. The roadway leading completely around the lagoon must be cleared off and holes filled in. Mr. Williams stated that he would have someone take care of the vegetation. He also requested that no one drive into the facility because it is a dangerous situation anyway. He was asked to make his request in writing to the State, he stated that he already did, however, the District is not aware of this request.

Daily inspections and self-monitoring could not be confirmed due to Operator documents were not at the facility. The container where the documents use to be kept is no longer there. All buckets at the discharge area where check but, no documents where located. Mr. Williams was asked to have the operator keep the records at the facility at all times as stated in the Permit. Mr. William indicated that there were problems with keeping the records on site.

The entrance gate to the facility did not have a lock on it and the emergency sign was missing too. These items must be replaced immediately upon receiving this inspection.

The Department is requesting that Mr. Williams notify the Central Midlands District in writing by October 10, 2002 of what actions have taken place to correct the deficiencies noted.

Unsatisfactory **Overall Rating**	09/10/02 **Date: (mm/dd/yy)**	0950 **Military Time**
None **Operator w/Inspector**	Tracey Wilkes **DHEC Field Inspector**	LCB **Reviewed By**

Inspection was made to determine the operating condition of the plant and, is not to be interpreted that adequate treatment is being provided.

D H E C
PROMOTE PROTECT PROSPER
2600 Bull Street
Columbia, SC 29201-1708

LLR Exhibit 6

RECEIVED
MAR 14 2002
CENTRAL MIDLANDS
DISTRICT - EQC

COMMISSIONER:
C. Earl Hunter

BOARD:
Bradford W. Wyche
Chairman

Mark B. Kent
Vice Chairman

Howard L. Brilliant, MD
Secretary

Carl L. Brazell

Louisiana W. Wright

L. Michael Blackmon

Larry R. Chewning, Jr., DMD

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

Tracy

March 13, 2002

Mr. Reece Williams, President
Piney Grove Utilities, Inc.
2 Fifth Ave.
Charleston, SC 29403

Re: **Piney Grove Utilities/Franklin Park Subdivision**
NPDES Permit # SC0031399
Richland County

Dear Mr. Williams:

Attached are the results of the **Compliance Evaluation Inspection** of your wastewater treatment facility performed by DHEC on February 26, 2002. A review of this report indicates that deficiencies of the NPDES permit requirements were noted in the area of **Records and Reports**, **Flow Measurement**, and **Self-Monitoring**, which resulted in an overall **non-compliance** rating.

Please note that failure to comply with the NPDES permit conditions places you in violation of Sections 48-1-90 and 48-1-110 of the Code of Laws of South Carolina. Therefore, it is requested that you respond in writing to this office within fifteen (15) days of receipt of this letter concerning corrective action. Failure to respond or an inadequate response will provide a basis for enforcement action.

If you have any questions regarding this inspection, please contact me at (803) 898-4224.

Sincerely,

M. Anthony James, Manager
Pollution Source Compliance Section
Bureau of Water

5/17/02
Email, T. Taylor re: reference to response not being rec'd.
DTW

Attachment
cc: District Director
U.S. EPA
Enforcement

EXHIBIT #DTW 48

D H E C

PROMOTE PROTECT PROSPER

RECEIVED
MAR 1 4 2002
CENTRAL MIDLANDS
DISTRICT - EQC

South Carolina Department of Health and Environmental Control

NPDES Compliance Inspection Report

NPDES Permit No.: **SC0031399**

Inspection Type:	**CEI**	Date of Inspection:	**02/26/02**
Entry Time:	**0950**	Exit Time:	**1340**
Permit Effective Date:	**04/01/00**	Permit Expiration Date:	**09/30/04**

Name and Location of Facility, (include county):
PINEY GROVE UTILITIES, INC. / FRANKLIN PARK WASTEWATER FACILITY
OFF CABIN CREEK ROAD

RICHLAND COUNTY

Name, Title, Telephone No. of On-Site Representative(s):
MS. RITA FOXWORTH, OPERATOR OF RECORD
GARFIELD ENVIRONMENTAL SERVICES, INC.
(803) 478-7369 FAX # 478-7369 OR MOBILE 473-0572

MR. REECE WILLIAMS, PRESIDENT (803) 606-9224
PINEY GROVE UTILITIES, INC.

Name and Address of Responsible Official/Title/Telephone No. :
MR. REECE WILLIAMS, PRESIDENT
PINEY GROVE UTILITIES, INC.
2 FIFTH AVE.
CHARLESTON, SC 29403
(803) 606-9224

cc: **RITA FOXWORTH**
GARFIELD ENV. SERVICES, INC.
P.O. BOX 1316
SUMMERTON, SC 29148

*Areas Evaluated During Inspection

*Permit	*Flow Measurement	*Operation and Maintenance
*Records/Reports	*Self-Monitoring	*Sludge Handling/Disposal
*Facility Site Review	*Compliance Schedules	Pretreatment
Effluent/Receiving Waters	Laboratory	Storm Water
*Collection System	Other:	

Name of Inspector: **TRACEY WILKES** District/Section: **CM**

Name of District/Section Reviewer: **LARRY BOLAND** Date: **03/01/02**

Signature of PSC Reviewer: Date: 3/13/02

COMPLIANCE EVALUATION INSPECTION

RECEIVED
MAR 14 2002
CENTRAL MIDLANDS
DISTRICT - EQC

PINEY GROVE UTILITIES
FRANKLIN PARK SUBDIVISION
WASTEWATER TREATMENT FACILITY
NPDES NO. SC0031399

On February 26, 2002, personnel from the South Carolina Department of Health and Environmental Control (SCDHEC) conducted a Compliance Evaluation Inspection (CEI) of the Franklin Park Subdivision Wastewater Treatment Facility. The facility is owned by Piney Grove Utilities and operated by Garfield Environmental Services. SCDHEC Evaluator, Mrs. Tracey Wilkes, met with the facility representatives, Ms. Rita Foxworth, Garfield Environmental Services-Operator of Record, and Mr. Reece Williams, Owner, to explain the objectives and procedures of the inspection. Findings noted during the inspection were discussed with the representative in a closing conference. The results of the inspection are as follows:

PERMIT

The facility is authorized to discharge under NPDES Permit No. SC0031399. The permit became effective on April 1, 2000 and it expires on September 30, 2004. Permit information regarding the number and location of the receiving waters are correct. All discharges at the facility are permitted.

Rating: Satisfactory

RECORDS AND REPORTS

The Operator's records keeping and report preparation procedures were consistent with the permit requirements except for reporting effluent flow on the Discharge Monitoring Report (DMR). The flow reported on the June 2001 DMR would be incorrect because the flow reported was from one instantaneous flow measurement during the setup of a composite sampling event for the month of June 2001. Therefore, the flow used for the pounds per day calculation would also be incorrect for BOD and TSS. According to the NPDES permit, an "instantaneous" flow is required but shall either be the average of eight instantaneous flow readings or the continuous flow measurement used in obtaining the composite sample as required in Part I.E.8.j of the permit. Please see this section of the permit for more details on how to obtain a reportable flow and representative sample. A copy of the complete permit has been mailed to the operator of record at her request. All other parameters reported on the June 2001 DMR appear to be correct. The December 2001 and the January 2002 monthly DMR's were initially reviewed; however, it was noted on the DMR that there was no flow for those months. All other records reviewed appear to be satisfactory. The operator's log is being maintained at the facility near the discharge point. It was recommended that if any process control analyses are being performed on the facility prior to the permitted outfall then those results must be documented separately from the required discharge monitoring sampling results. The owner indicated that maps and schematics are being maintained on the system's collection system. The operator maintains an Operations and Maintenance Manual for the ISCO sampler as well as sampler setup documentation.

This facility is not required at this time to have a Best Management Plan (BMP), Storm Water Pollution Prevention Plan (SWP3) or Spill Prevention Counter Measures Plan (SPCC).

Rating: Unsatisfactory

This section is being rated unsatisfactory due to an inaccurate flow being used to calculate and report pounds per day for BOD and TSS parameters on the DMR.

FACILITY SITE REVIEW

The facility's design flow is 0.04 MGD. Wastewater flows by gravity to the oxidation pond; to the contact chamber and through a chlorine tablet Sanuril for disinfection; through a 60 degree V-Notch weir, and then is dechlorinated by wastewater flowing through the tablet Sanuril prior to discharging to the outfall. Typically, the effluent flow-measuring device (V-Notch weir) is positioned after the final treatment just prior to the discharge point; however, this is not the case at this facility. Should the plant go through any upgrades, this situation should be addressed. The oxidation pond is green in color possibly due to algae and there was no discharge during this inspection. The facility's grounds keeping activities around the discharge point are still being maintained satisfactory; however, the surrounding areas of the pond and the fence line needs improvements. The owner has indicated that in the near future the bushes and trees growing on the dike of the pond and on the freeboard of the pond will be cut back and maintained. This type of maintenance should also be included on the fence line. It was recommended that the pot-holes in the roadway around the pond be filled-in so that necessary equipment can be transported in and out of the facility with ease.

Rating: Satisfactory

FLOW MEASUREMENT

Flow is measured at the effluent using a 60-degree V-notch weir. The facility's flow is not being measured as required by the permit for reporting or sampling of composite samples. All composite samples must be collected proportional to the flow at the time a composite sample is being collected. This requirement was discussed in the records keeping section of the report.

Rating: Unsatisfactory

This section is being rated unsatisfactory due to improperly flow measurements of the final effluent for NPDES reporting.

SELF-MONITORING PROGRAM

The facility's self-monitoring program consists of sampling when the facility is discharging. The operator of record is utilizing an ISCO 1580 sampler for composite sampling events. The sampler is iced down during sampling. Effluent composite samples are being collected at least once a month if the facility is discharging for BOD and TSS; however, not proportional to effluent flows. The operator has informed this office that a flow meter (ISCO 1700) will be used in the future when sampling for flow proportional composite samples. Effluent grab samples are being collected at least once a month for fecal coliform and TRC if the facility is discharging. Monday through Friday the facility is inspected. If the facility is discharging any day during the week (Monday through Friday) then pH and DO samples are collected and analyzed. Please be reminded that the permit does require that daily (7days a week) facility inspections by an appropriate grade operator (C-Biological) is required as well as sampling daily parameters when the facility is discharging.

A contract laboratory (Columbia Analytical Services, Lab ID #40001) is analyzing effluent BOD and TSS composite samples for the operator of record. Chain of custody information and the Certificate of Analyses appear to be satisfactory and contain required information.

Rating: Unsatisfactory

This section is being rated unsatisfactory due to composite samples were not being collected proportional to the effluent flow as required by the permit.

COMPLIANCE SCHEDULE

The Permittee was issued a Consent Agreement (#00-167-W) effective on August 28, 2000 with a compliance schedule. This schedule has been given extensions, which includes the most recent extension dated November 19, 2001. The schedule was changed and the following schedule became part of the original order:

1. By December 15, 2001 submit to the Department plans and specifications and an administratively complete application for a permit to construct for the addition of curtain walls and aerators to the lagoon.
2. By December 31, 2001, remove the sludge from the lagoon in a manner approved by the Department.

On January 10, 2001, the Enforcement Section of SCDHEC submitted a Notice of Violation based on plans and specifications and an application for a construction permit not being submitted on or before December 15, 2001 and the removal of sludge from the lagoon had not taken place. As of this date, the situation is the same. The owner did indicate that plans are being addressed and will possibly be available the first week of March 2002 and he thought the sludge removal

requirement was to be part of the plans and specifications and not a separate issue.

Rating: Unsatisfactory

This section is being rated unsatisfactory due to the Permittee not meeting the Consent Agreement Schedule of Compliance dates.

OPERATION AND MAINTENANCE

This facility doesn't have any mechanical equipment on site. The chlorination and dechlorination Sanurils table dispensers are checked and stocked during weekday inspections. The chlorination and dechlorination equipment appears to be maintained properly. An emergency telephone number sign is posted at the front gate. The grounds maintenance was addressed in the Facility Site Review section of this report. The Department is requesting an up to date listing of all state certified operators operating this facility.

Rating: Satisfactory

SLUDGE HANDLING & DISPOSAL

The facility doesn't have any sludge handling and/or disposal. Typically, oxidation ponds don't require sludge removal. However, the permittee must apply to the Water Facilities Permitting Division of SCDHEC for a sludge disposal permit when and if it becomes necessary to dispose of sludge from this facility.

D H E C
PROMOTE PROTECT PROSPER
2600 Bull Street
Columbia, SC 29201-1708

LLR
Exhibit 3

CERTIFIED MAIL--RETURN RECEIPT REQUESTED

May 8, 2001

RECEIVED
MAY 08 2001
CENTRAL MIDLANDS
DISTRICT - EQC
Tracey DW

Mr. Reece Williams, President
Piney Grove Utilities
717 Kings Street
Columbia, SC 29201

Re: **PGU/Franklin Park WWTF**
NPDES Permit # SC0033199
Richland County

Dear Mr. Williams:

Attached are the results of the **Compliance Evaluation Inspection** of your wastewater treatment facility performed by DHEC on April 18, 2001.

A review of this report indicates that deficiencies of the NPDES permit requirements were noted in the areas of **Records and Reports, Flow Measurement, Self-Monitoring Program, and Compliance Schedules** which resulted in an overall **non-compliance** rating being assigned.

Please note, failure to comply with the NPDES permit conditions places you in violation of Sections 48-1-90 and 48-1-110 of the Code of Laws of South Carolina. Therefore, it is requested that you respond in writing to this office within fifteen (15) days of receipt of this letter concerning corrective action. Failure to respond or inadequate response will provide a basis for enforcement action.

If you have any questions regarding this inspection, please contact me at (803) 898-4241.

Sincerely,

Joseph Rivers

Joseph Rivers
riversjr@columb32.dhec.state.sc.us
Facilities Compliance Manager
Pollution Source Compliance Section
Bureau of Water

Attachment
cc: District Director
U.S. EPA
Enforcement

EXHIBIT #DTW 49

United States Environmental Protection Agency, Washington, D C., 20460

EPA Water Compliance Inspection Report

Form Approved
OMB No.2040-0057
Approval Expires 8-31-98

Section A: National Data System Coding (ie. PCS)

Transaction Code	NPDES	YR/MO/DAY	Inspection Type	Inspector	Facility Type
N	SC0033199	01/04/18	C	S	1

Inspection Work Days	Facility Self-Monitoring Evaluation Rating	B1	QA	Reserved

Section B: Facility Data

Name and Location of Facility Inspected
PINEY GROVE UTILITIES / FRANKLIN PARK SUBDIVISION
OFF CABIN CREEK ROAD
RICHLAND COUNTY

Entry Time/Date: 1300 - 04/18/01
Exit Time/Date: 1420 - 04/18/01
Permit Effective Date: 04/01/00
ermit Expiration Date: 09/30/04

Name(s) of On-Site Representative(s), Title(s), Phone & Fax Numbers
MR. RITE FOXWORTH, OPERATOR OF RECORD

Name, Address of Responsible Official/Title/Phone & Fax Number
MR. REECE WILLIAMS, PRESIDENT
PINEY GROVE UTILITIES
717 KINGS STREET
COLUMBIA, SC 29201
(803) 799-9700

Person(s) Contacted: R.FOXWORTH & R. WILLIAMS

Other Facility Data

Section C: Areas Evaluated During Inspection (Check only those areas evaluated)

_X Permit
_X Records/Reports
_X Facility Site Review
_ Effluent/Receiving Waters
_X Flow Measurement
_X Self-Monitoring Program
_X Compliance Schedules
__ Laboratory
_X Operations & Maintenance
_ Pretreatment
_X Sludge Handling/Disposal
_ Storm Water
_ CSO/SSO
_ Pollution Prevention
_ Multimedia
__ Other:

Section D: Summary of Findings/Comments (Attach additional sheets of narrative and checklists as necessary)

SEE ATTACHED:

DEFICIENCIES: RECORD/REPORTS, FLOW MEASUREMENT, SELF-MONITORING, COMPLIANCE SCHEDULE

Name(s) and Signature(s) of Inspector(s)	Agency/Office/Phone & Fax Numbers	Date
D. TRACEY WILKES	SCDHEC, CENTRAL MIDLANDS, 896-0620	
Signature of District Reviewer LARRY E. BOLAND	Agency/Office SCDHEC, CENTRAL MIDLANDS	Date
Signature of PSC QA Reviewer Joseph Rhett	Agency/Office/Phone & Fax Numbers SCDHEC/BOW/803.898.4241/FAX 803.898.4215	Date 5/7/2001

EPA Form 3560-3 (Rev 9-94) Previous editions are obsolete

COMPLIANCE EVALUATION INSPECTION

PINEY GROVE UTILITIES
FRANKLIN PARK SUBDIVISION WWTP

NPDES NO. SC0031399

On April 18, 2001 personnel from the South Carolina Department of Health and Environmental Control (SCDHEC) conducted a Compliance Evaluation Inspection (CEI) of the Franklin Park Subdivision Wastewater Treatment Plant, South Carolina owned by Piney Grove Utilities and operated by Garfield Environmental Services. This is the first Federal CEI performed on the facility. The South Carolina Department of Health and Environmental Control (SCDHEC) evaluator, Mrs. Tracey Wilkes, met with the facility representative, Ms. Rita Foxworth, Garfield Environmental Services-Operator of Record to explain the objectives and procedures of the inspection. Garfield Environmental Services obtained the operations of this facility in January, 2001. All findings made during the inspection were discussed with the representative in a closing conference. The results of the inspection are as follows:

PERMIT

The facility is authorized to discharge under NPDES Permit No. SC0031399. The permit became effective on April 1, 2000 and it expires on September 30, 2004. Permit information regarding the number and location of the receiving waters are correct. All discharges at the facility are permitted.

Rating: Satisfactory

RECORDS AND REPORTS

Operational and laboratory records were present during this inspection from the past three years. Prior to January, 2001, the facility was contracted by E.A. Services, Inc.

Current operational records and Discharge Monitoring Reports (DMR) from January through April, 2001 were reviewed during this inspection. The Operator's log sheet is being maintained at the facility in a weather proof container and appears to contain Monday - Friday inspections and sampling documentation. Field analytical results reported on the February, 2001 DMR were compared to the facility's log sheet. It appears that pH results were reported correctly on the DMR; however, there were several days where pH results were above the NPDES daily limit. Each day that the limits are exceeded is considered an exception and must be reported on the DMR. Reasons for the violation can be written or typed in the comments section of the DMR or can be included in a cover letter attached to the DMR. The DMR's indicate that the pH frequency of measurements were 01/01 (meaning 7 days a week) and the number of exceptions was "0", meaning no parameter violations. According to data reviewed this information is being reported incorrectly. The facility is being sampled Monday through Friday, respectively; therefore, the frequency of measurements are to be reported as 05/07. Also, when the seven (7) day a week sampling is not met for pH and DO, those days missed are considered to be exceptions because it is unknown if the facility is meeting the daily pH and DO NPDES limits. *It is being requested that incorrect DMR's be revised and resubmitted to the DMR section of SCDHEC. Please note "REVISED" OR "CORRECTED" on the top or bottom of the complete set of DMR forms. Also, it is being recommended that the facility be monitored daily (7 day a week) for pH and DO as required by the permit.* DMR's indicate that Ms. Rita Foxworth is signing as the authorized agent for Mr. Reece Williams, President of Piney Grove Utilities. Departmental files do not indicate that authorization was given to a specific person to sign the DMR's. A letter dated January 29, 2001 received by the Department from Piney Grove Utilities states Garfield Environmental or its agents can sign DMR's. *It is being requested that the responsible official / permittee submit a letter listing the person(s) authorization to sign DMR's.*

Rating: Unsatisfactory

This section is being rated unsatisfactory due to the incorrect information being reported on February, 2001 DMR for the number of exception on the effluent pH and DO. This section must include the number of times a daily pH and DO sample wasn't analyzed as required by the permit and the number of pH measurements that violated the permitted values.

FACILITY SITE REVIEW

The facility's design flow is 0.04 mgd and is averaging 0.016 mgd. Wastewater flows by gravity to the oxidation pond; to the contact chamber and through a chlorine tablet Sanuril for disinfection; through a 60 degree V-Notch weir, and then is dechlorinated by wastewater flowing through the tablet Sanuril prior to discharging to the outfall. The pond was green during this inspection and during rain events flow is heavier. The facility's grounds keeping has been increased considerably. The front gate has been repaired, the walkway to the discharge side of the pond has been repaired, vegetation near this walkway and around the effluent contact chamber has been cut and looks great. Empty containers and debris have been removed and the access road is being maintained better inside the fenced in property. The maintenance person has scheduled additional grounds keeping such as cutting and removing the trees located on the dike and the freeboard of the pond, treating and cutting vegetation from the fence line and repair areas of the fence where there are large holes in the fence and barbwire broken. The effluent was light green which appears to be due to algae.

Rating: Satisfactory

FLOW MEASUREMENT

Flow is measured at the effluent using a 60 degree V-notch weir. The weir is properly installed and maintained.

During this evaluation it was determined that the monthly flow reported is a one time flow measurement taken during the time a composite sample is being collected. However, composite sampling is done by placing a siphon tube at the outfall (gravity flow) to a sampling container. This method would not be considered flow proportional. As stated in the NPDES permit, Flow measurements are required at least once per month either by the average of eight instantaneous flow readings or by a continuous flow used in obtaining composite samples proportional to flow as required in Part I.E.8.j of the NPDES permit. Improper composite sampling and flow measurements can lead to improper reporting of pounds per day values.

Rating: Unsatisfactory

This section is being rated unsatisfactory due to improper flow measurement and composite sampling methods.

SELF-MONITORING PROGRAM

The facility's self-monitoring program is not in compliance with permit requirements according to documentation reviewed. When the facility is discharging, pH and DO samples must be collected and analyzed at least once per day. Analytical and chain of custody records indicate the Effluent composite samples are being collected by the Operator of Record and are being analyzed for BOD, TSS, and Fecal coliform by a state certified contract laboratory at least once a month. Effluent grab samples for pH and DO are collected and analyzed by the permittee during the week when the facility is discharging.

Rating: Unsatisfactory

This section is being rated unsatisfactory due the self monitoring not being performed as required by the permit. Composite sampling was addressed in the flow measurement section of this report.

COMPLIANCE SCHEDULE

The Permittee was issued a Consent Agreement (#00-167-W) effective on August 28, 2000 with a compliance schedule. A letter dated December 1, 2000 from the Department to the permittee indicates that the schedule of compliance includes beginning construction by December 15, 2000 and complete construction by January 15, 2001. It is the District's understanding that this facility will be installing an aerator. As of this date, no construction has taken place. It was noted during this inspection however, that the permittee is working on obtaining electricity at this facility for the aeration equipment.

Rating: Unsatisfactory

This section is being rated unsatisfactory due to the Permittee not meeting the Consent Agreement Schedule of Compliance dates.

OPERATION AND MAINTENANCE

This facility doesn't have any mechanical equipment on site. The chlorination and dechlorination Sanurils are checked and stocked during week day inspections. Grounds keeping has been increased as stated above. The chlorination and dechlorination equipment appears to be maintained. Several Sanuril tubes have been replaced with new ones. An emergency telephone number sign must be posted in a conspicuous place. The Department recommends on the entrance gate. Signs identifying the wastewater lagoon, "No Trespassing" are also required to be placed around the facility's fence. The facility doesn't have an O&M (operations & maintenance) Manual. *It is being recommended that a manual be developed especially when construction has been completed.*

Rating: Satisfactory

SLUDGE HANDLING & DISPOSAL

The facility is a lagoon and does not generate sludge. However, the permittee must apply to the Domestic Wastewater Division of SCDHEC for a sludge disposal permit when and if it becomes necessary to dispose of sludge from this facility.

LLR
Exhibit 5

RECEIVED

JUN 6 2001

COMPLIANCE MONITORING
DIVISION

Garfields Environmental Services

Susan Hobbs/ R. Foxworth
Owner/Operator
post Office 1316
Summerton,SC 29148

Telephone (803)478 7369 - 473 0572

June 04, 2001

South Carolina DHEC
Facilities Compliance Manager
Pollution Source Compliance Section
2600 Bull Street
Columbia, SC
29201

Re: PGU/Franklin Park WWTF
NPDES Permit # SC0033199

Att: Mr. Joseph Rivers

In response to your Compliance Evaluation Inspection on April 18, 2001.

Deficencies/ and Correction:

Records And Reports

(A) All incorrect DMR's were corrected and mail to the DMR section following the inspection.

(B) Attacted you will a copy of the letter that was mailed. Given authorization to sign DMR'S.

Not true see Lee. Show purchase recent

FLOW MEASUREMENT/ SELF-MONITORING

A PROwatt Inverter has been purchase for the operation of the 24hr. composite sample.

COMPLIANCE SCHEDULE:
The owners is working on obtaining electricity for the aeration equipment.

If you should have any questions. Please call me at (803) 478-7369 or 473-0572.

Sincerely,

R.W. Foxworth(OIC)
Garfield Env. Services

cc Pollution Source Compliance Section
Mr. Reese Williams
File

D H E C

PROMOTE PROTECT PROSPER

South Carolina Department of Health and Environmental Control

Wastewater Treatment Facility Operation & Maintenance Evaluation Report

Central Midlands EQC
P. O. Box 156
State Park, SC 29147
(803) 896-0620
(803) 896-0617 Fax

NPDES NO. SC0031402 **Pipe:** 001 **Last Insp. Date:** 03/29/99
Facility: LLOYDWOOD S/D WWTF
County: LEXINGTON
Owner: PINEY GROVE UTILITIES, INC.
MR. W.E. SELLERS, PRESIDENT **Phone #:** 803-796-9232
Address: 717 KING STREET
COLUMBIA, SC 29201
Operator Grade:
Grade Required: C

Facility Observation Checked	Rating	Field Tests:	Effluent
Flow Measurement (90 Degree V-Notch)	SAT	**pH (Su)**	n/a
Fine Screen	n/a	**D.O. (Mg/l)**	n/a
Grinder	n/a	**Temp (deg. C)**	n/a
Grit Removal	n/a	**TRC (mg/l)**	<0.10
Primary Sedimentation	n/a	**CL2 In C.C.**	1.2
Trickling Filter	n/a		
Aeration-(Type:CONT)(2)	SAT		
Secondary Sedimentation	n/a		
Digester	n/a		
Ponds(2)(Aerated & Polishing)	SAT		
Post Chlorination(150 lb Cl2 gas)	SAT		
Dechlorination	n/a		
Sludge Disposal	n/a		
Final Filters	n/a		
Spray \ Tile Field	n/a		
Housekeeping	**SAT*See Comments***		
Other-On-site Pump Station	SAT		
Other-Compliance Schedule	**SAT*See Comments***		

Remarks/Comments/Recommendations:
1st Follow-up O&M.
The Operator of Record is Mr. Kevin Lesher, "B" Biological #11349
Operator's list is up to date.
The effluent has green tint.

Corrected Deficiencies:
TRC was within limits during this follow up inspection.
The housekeeping in referenced to the rags and debris appeared to be cleaned up.
The Consent Order 94-002-W was executed and not fulfilled. Permittee has appealed the Circuit Court Judge's ruling.

Deficiencies not corrected:
The posting of a weather durable sign with a 24 hour emergency number and contact person.
The facility is required to inspected and sampled for certain effluent parameters seven days a week. The facility is being inspected and sampled Monday through Friday each week.
Tree limbs hanging in path of driveway and hanging on the fence line must be cut back or treated. The grass needs to be cut back.
The water meter appears to be leaking. This must be repaired.

Please notify the Department by June 30, 2000 of what corrective actions are going to be taken or have been taken to fix the above deficiencies.

SATISFACTORY
Overall Rating

NONE
Operator w/Inspector

05/01/00
Date: (mm/dd/yy)

DHEC Field Inspector

1225
Military Time

LEB
Reviewed By

Inspection was made to determine the operating condition of the plant and, is not to be interpreted that adequate treatment is being provided.

EXHIBIT #DTW 50

June 3, 2005

Re: Piney Grove Utilities Log

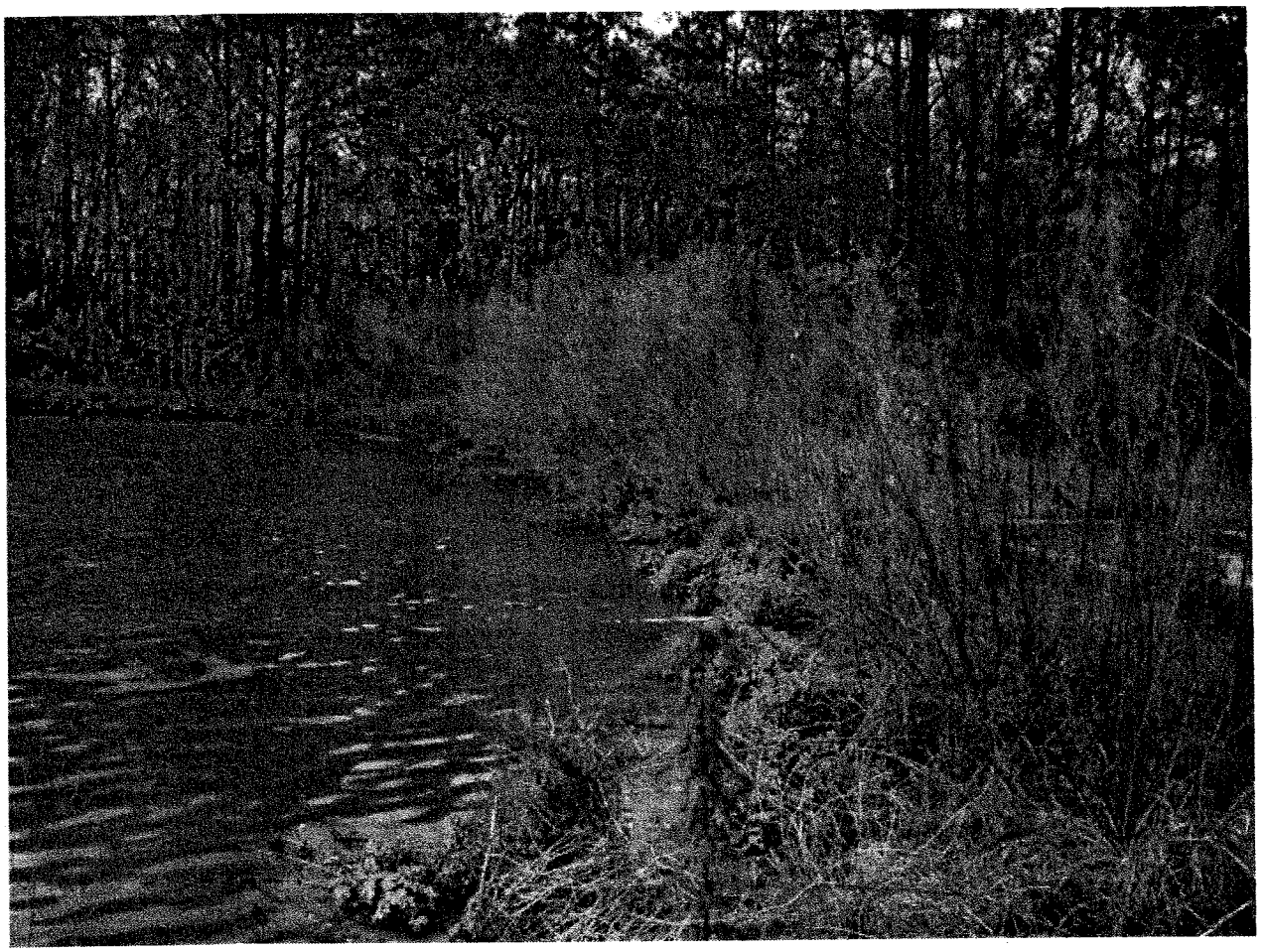
1. On 5-25-2005 Willie Morgan, Dawn Hipp, Michelle Culbreath, and I went to Lloydwood, Franklin Park, and Albene Park. There were several problems found that need immediate attention.

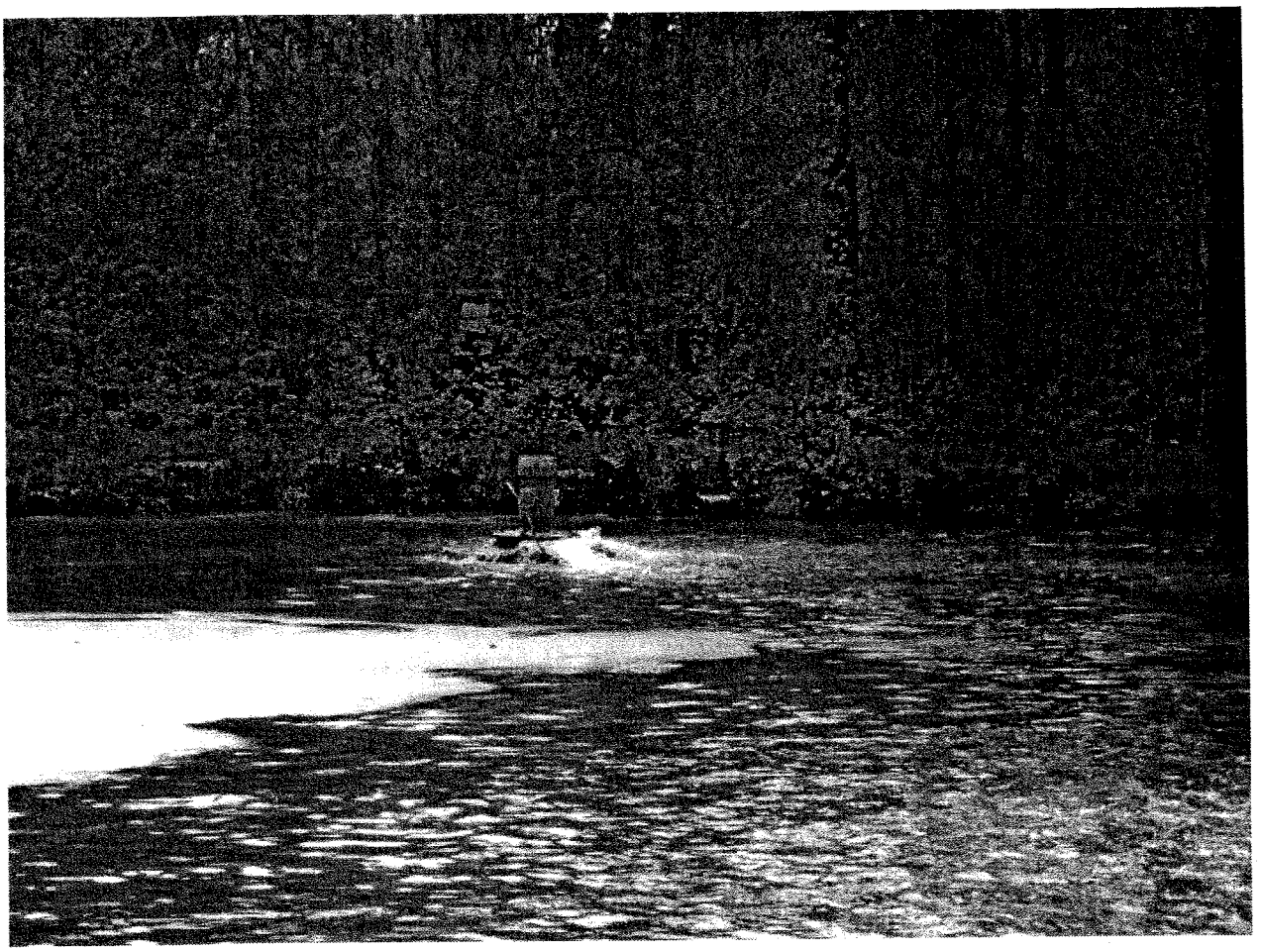
    a. One of the problems was a sinkhole in the yard of 315 Lloydwood Dr. The sinkhole has been happening for approx. 1½ years. The homeowner said that Mr. Williams had been out about 1 year ago and couldn't find anything wrong with his system. The homeowner has had numerous tons of white sand hauled in to try to fill the hole, but the sand just keeps caving in. I opened the manhole about 40 yards away and saw white sand in the sewer line trough that comes from the direction of 315 Lloydwood Dr. The manhole is in the yard at 319 Lloydwood Dr. I contacted Mr. Williams on 5-26/05 @ 0830 and informed him of what we had found and told him that it needed to be repaired. I rechecked the problem on 5-27-05 @ 1200 and nothing had been done. I left Mr. Williams a voicemail on 5/27/05 @ 1415 asking him to call me back. Mr. Williams called me back on 5/27/05 @ 1430 and he informed me that the engineer was supposed to be going out to take a look and to come up with a "Plan of Attack." Mr. Williams stated that he would call me back on 5/31/05 and let me know what they were going to do. I have heard nothing up to now, 6/3/05 @ 1045. I have checked and rechecked the sinkhole all this week and nothing has been done up till my last inspection 6/2/05 along with Larry Boland @ 1225.
    b. Another problem that was found during the 5-25-2005 ride along was in the Franklin Park subdivision. Upon entering Cabin Creek Blvd. It was noted that the rode was caving in on the centerline. It was also noted that there were 2 manholes running down the centerline of the road. We also noticed a dugout area right around where the road is caving in. We spoke with a homeowner and he informed us that a water line going to the other side of the road had been leaking for several months and it took a while to get someone to come and fix the problem. He said that Mr. Williams had someone finally come out and dig up the line, cut it, and cap it off. The repairmen left the hole uncovered and left. It had been noted during a 3-2-05 mCSI that the flow at the wastewater lagoon was over .100mgd while we were there. This tells us that there was water getting into the sewer line somewhere, and somehow. I pulled the manhole that's in the road in front of house number 227 Cabin Creek Blvd. and there appeared to be sand, gravel, and clay in the trough in the manhole that could've been carried down from where the road is caving in. I believe the sewer line has a hole in it around where the road is caving in and somehow the dirt is getting into the sewer line.
    c. Another continued problem that Mr. Lee Proctor has been working on is 310 Cooksmount. This home has sewage coming up from their cleanout, but there plumber says that when he runs a snake down the line it goes out to under the road before it hits a stopping point. This has been a problem area for several years, but the man has now had the problem without it getting fixed for around 3-4 months that I'm aware of. We can't find the manhole in the area, so we can't figure out the responsibility and I've asked Mr. Williams on several occasions to locate the manholes so they can figure it out.

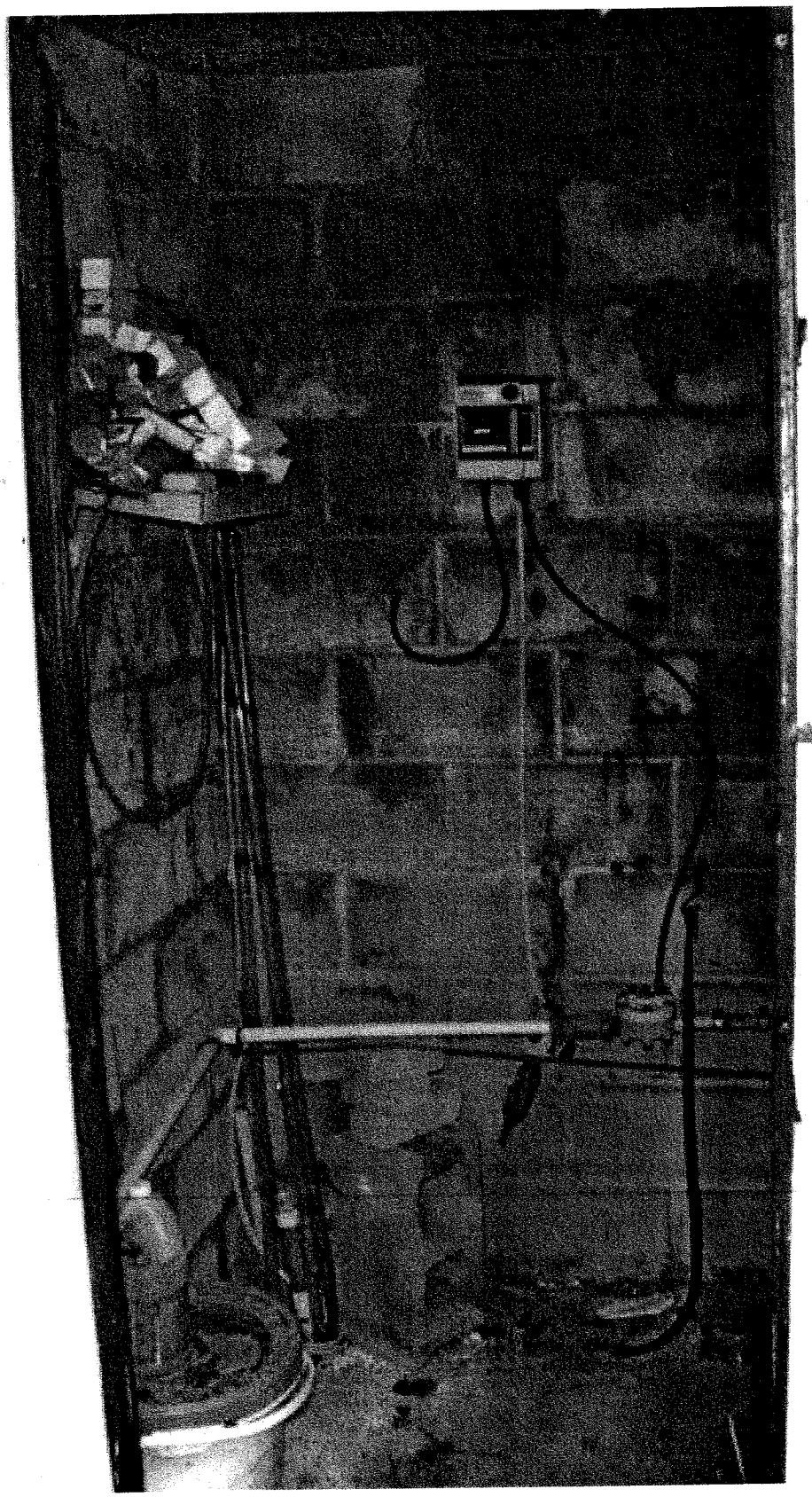
EXHIBIT #DTW 51

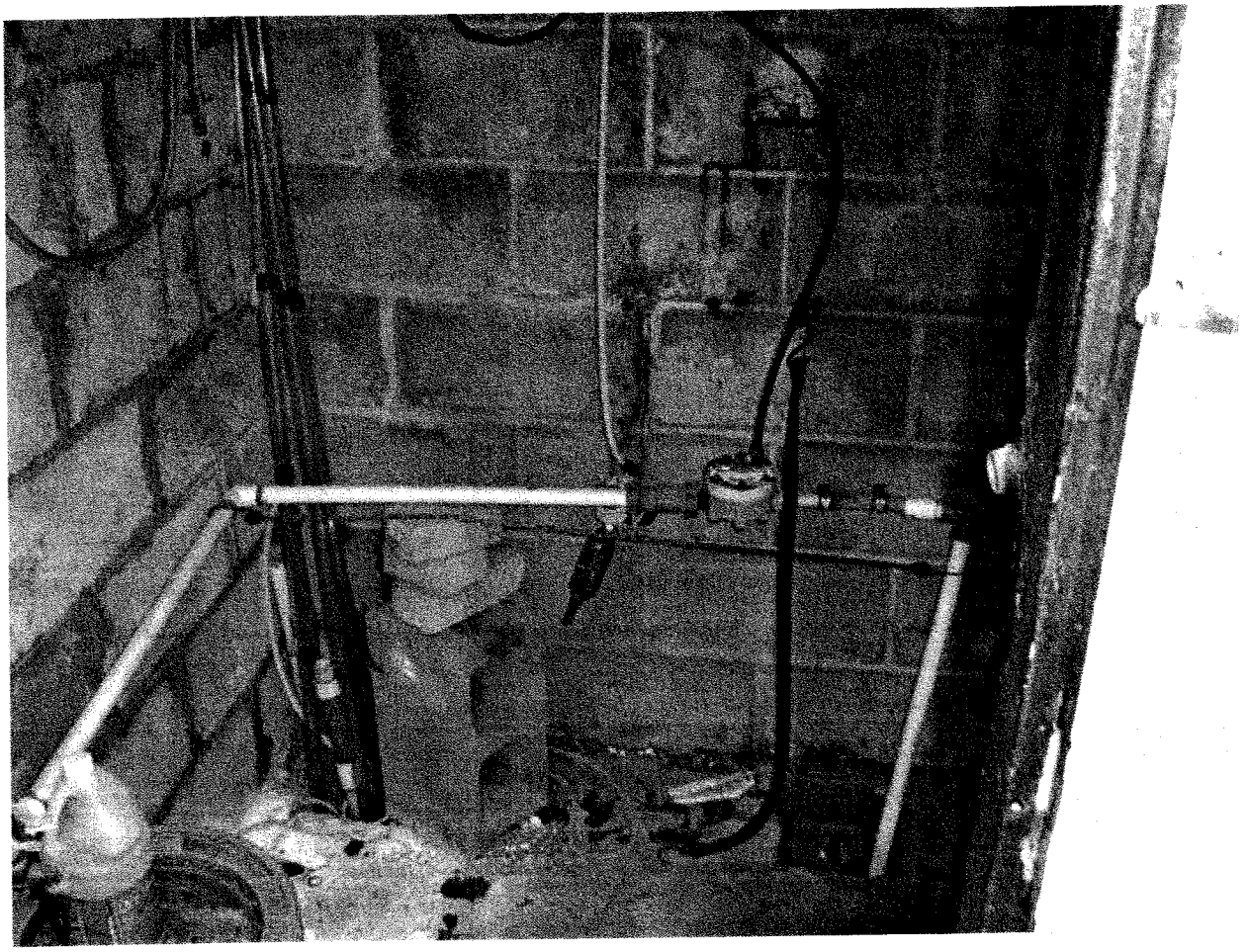
2. I called Mr. Louis Lang and informed him of these three problems 6/2/05 @ 1515 and he informed me that he would get them to the Mr. Williams.
3. On 6-7-2005 I (Brad Martin) made a visit to the Lloydwood and Franklin Park subdivisions to check on the above issues. I found that the sinkholes in Lloydwood and Franklin Parks were as before with nothing fixed. I also checked the 310 Cooksmount Rd. problem and sewage was still coming up in this individuals yard. I also happened to check a manhole at 304 Carterhill Dr. and found that it was almost full, and this manhole is approx. 4-6 feet deep. I went on down the line and checked the manhole at 314 Carterhill Dr. and it was flowing, but very slowly. I call the 803-606-9224 & the 843-200-4876 numbers on 6-7-2005 @ 1318 and left voicemail messages about this problem and left word for a return phone call on both numbers.
4. I (Brad Martin) visited 421 and 417 Old Plantation Dr. in the Lloydwood S/D 6-8-2005 @ 0850 and found the manhole in front of 421 to be full and almost overflowing. The manhole at 417 was full of some type of unexplainable debris. These visits were made based on a complaint on 6-7-2005 about the manhole in front of 421 overflowing. Keith Collinsworth went out on the evening of 6-7-2005 and didn't see them overflowing, but he could see a small amount of solids around the manhole at 421 that would indicate some form of release. Mrs. Ann Clark called Mr. Williams phone numbers @ 0948 and they called back and stated that they were sending someone right out.
5. I (Brad Martin) visited 421 & 417 Old Plantation Dr. 6-9-2005 @ 1030 and found the lines to still be in the same condition. When I arrived I found that a property owner in the area had called Midlands Utilities and asked them if they could come out there and help them to stop the problems so that their sewage would flow right. Midlands Utilities was trying to jet rod the line, but they were having trouble finding out where the lines ran. I had to leave and try and perform my other duties, so as I was leaving Keith Parnell called his employee and informed him that Mr. Williams had called him and told him that someone was on his way with a set of plans to help. They also informed me that they would be in contact with our office to let us know what they were doing. I arrived back at the office at 1345, and found that Mr. Claude McMillan was waiting and he had a set of plans for us. Mr. McMillan told me that the problems had been taken care of, and they were still waiting on the guy that is supposed to look at the 310 Cooksmount problem and the sinkhole at 315 Lloydwood Dr. Mr. McMillan informed me that the problems in Franklin Park are all because of water problems, not sewer problems, and they were going to snake it when the above mentioned guy has time. Mr. McMillan wanted me to let everyone know that the leaking valve in the tank house in Albene Park has been fixed and that they have a new chemical pump in there as well.
6. I (Brad Martin) visited Lloydwood on 6/13/2005 to make sure the repairs had been finished at 417 & 421 Old Plantation Dr. The manholes were not full anymore, but the trough that the wastewater runs through wasn't flowing. I also went by 310 Cooksmount and the sinkhole on Lloydwood Dr. and nothing has been done to repair these problems.

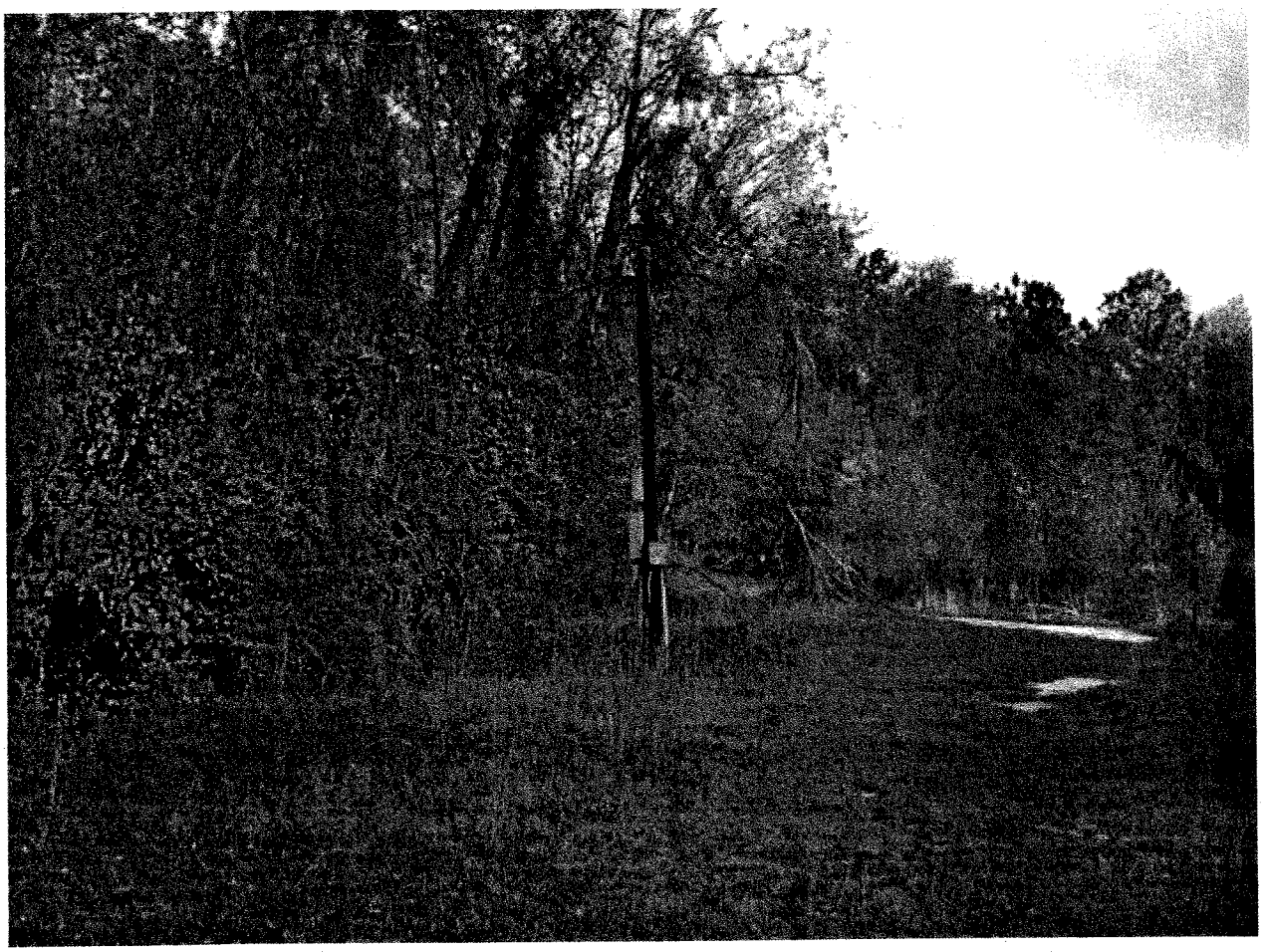
EXHIBIT #DTW 52

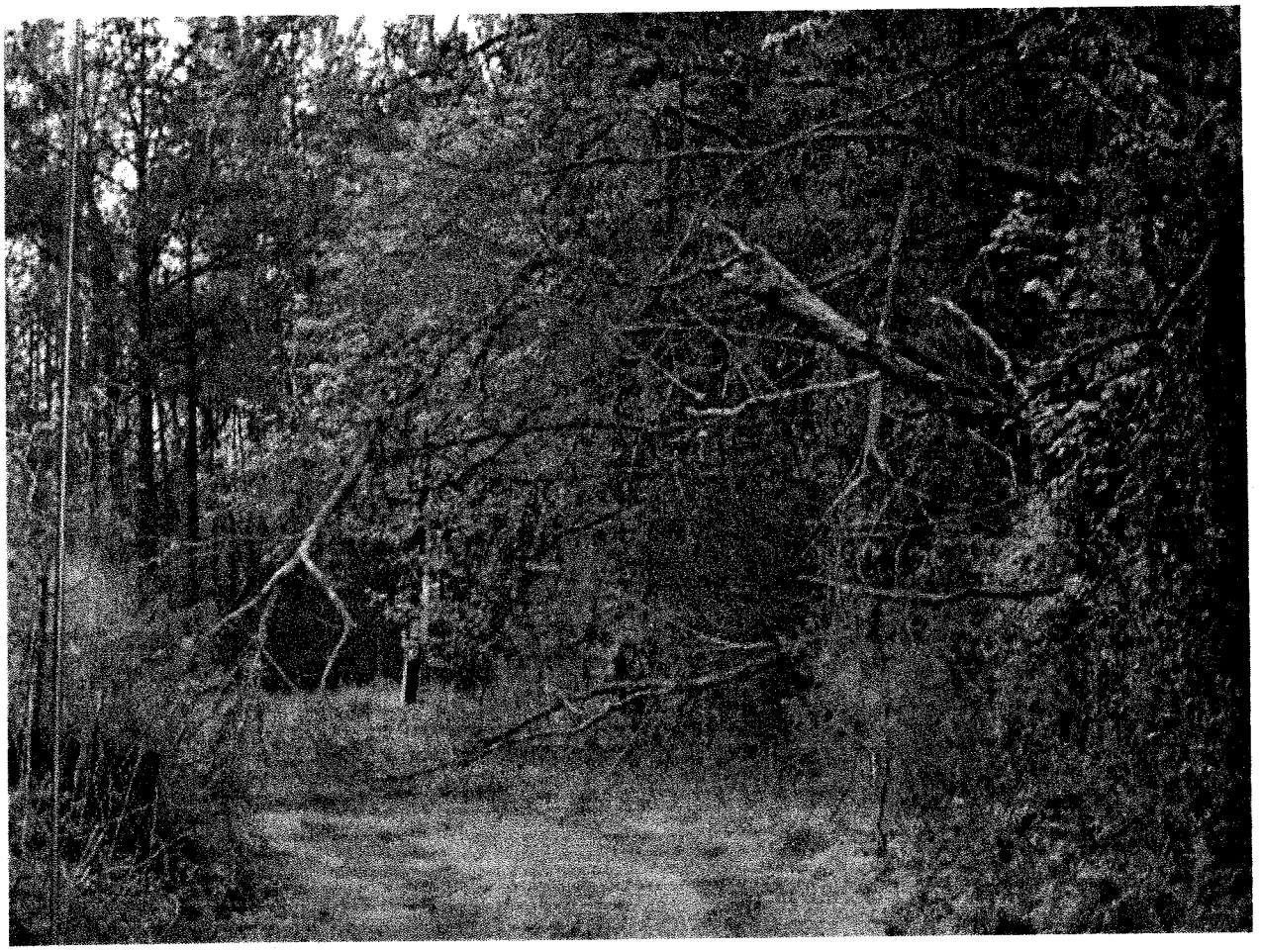


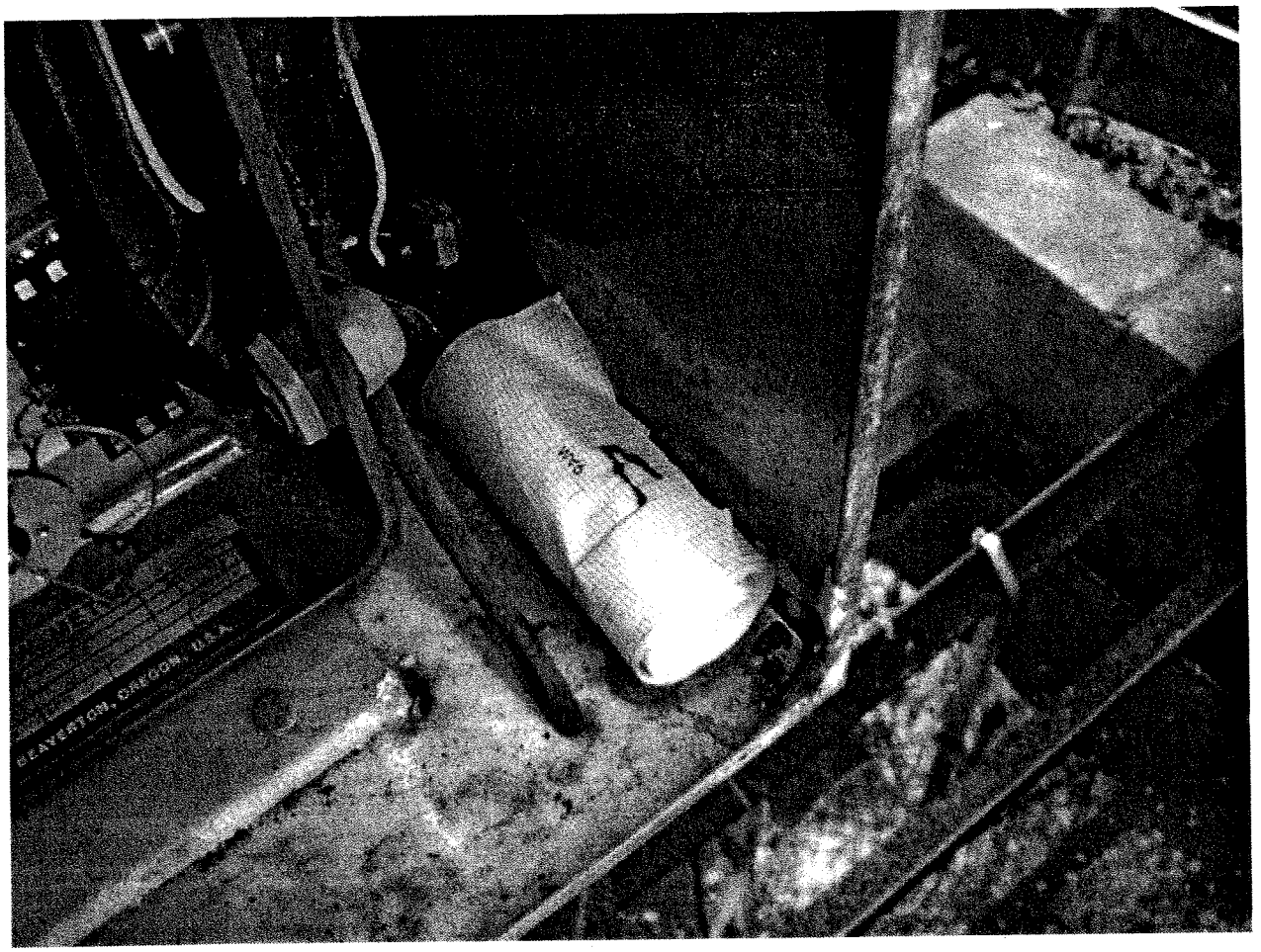


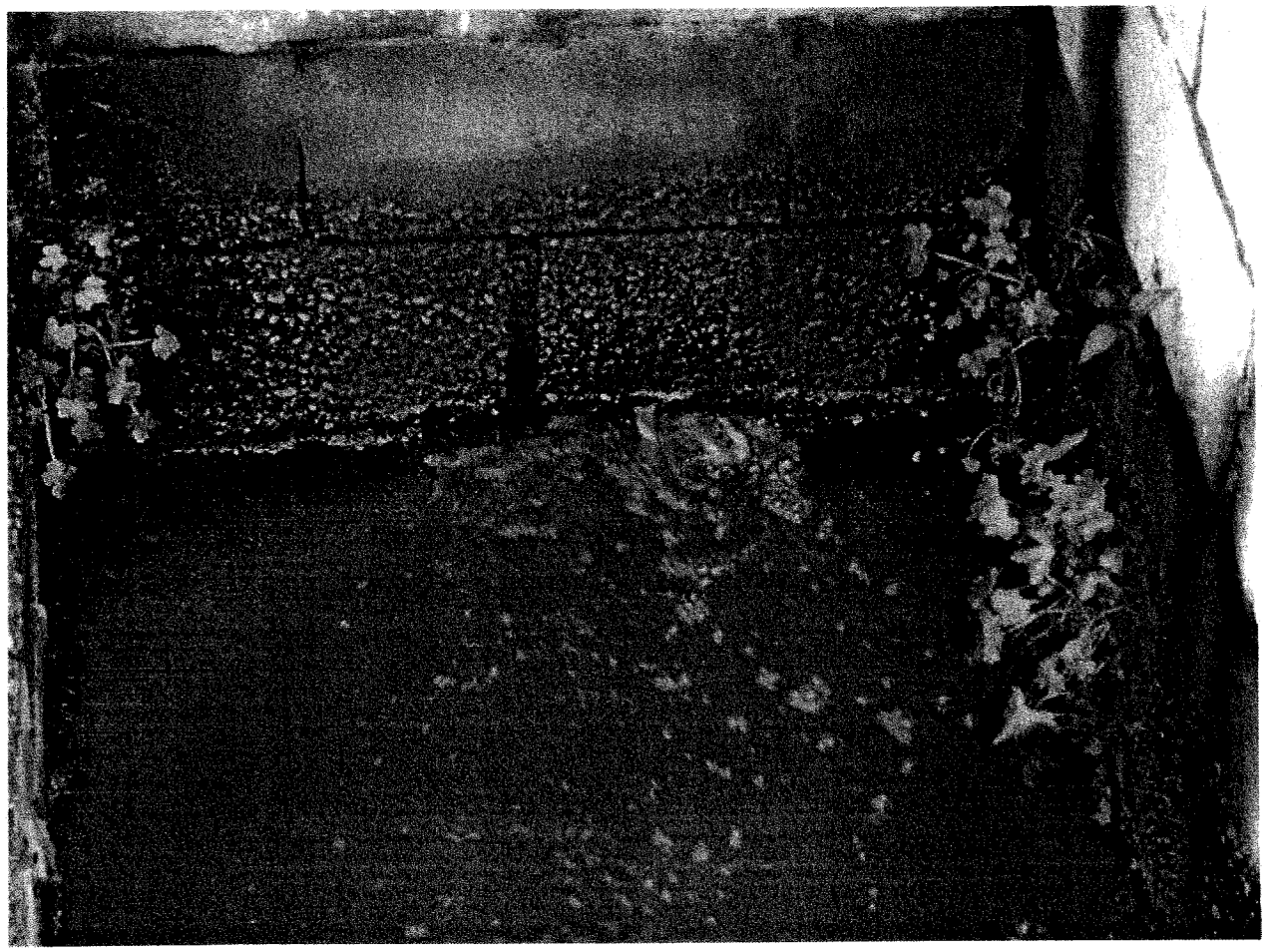


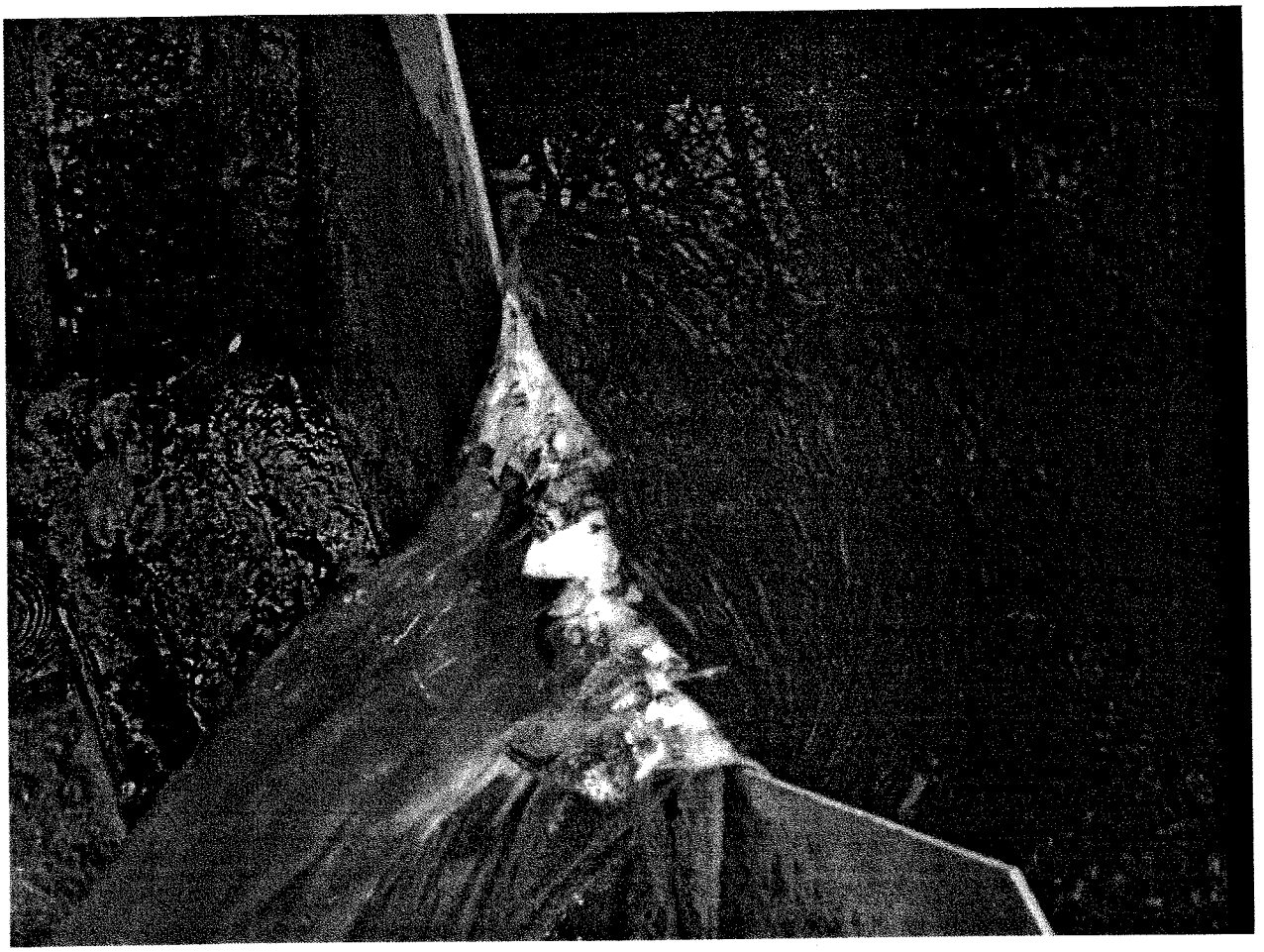


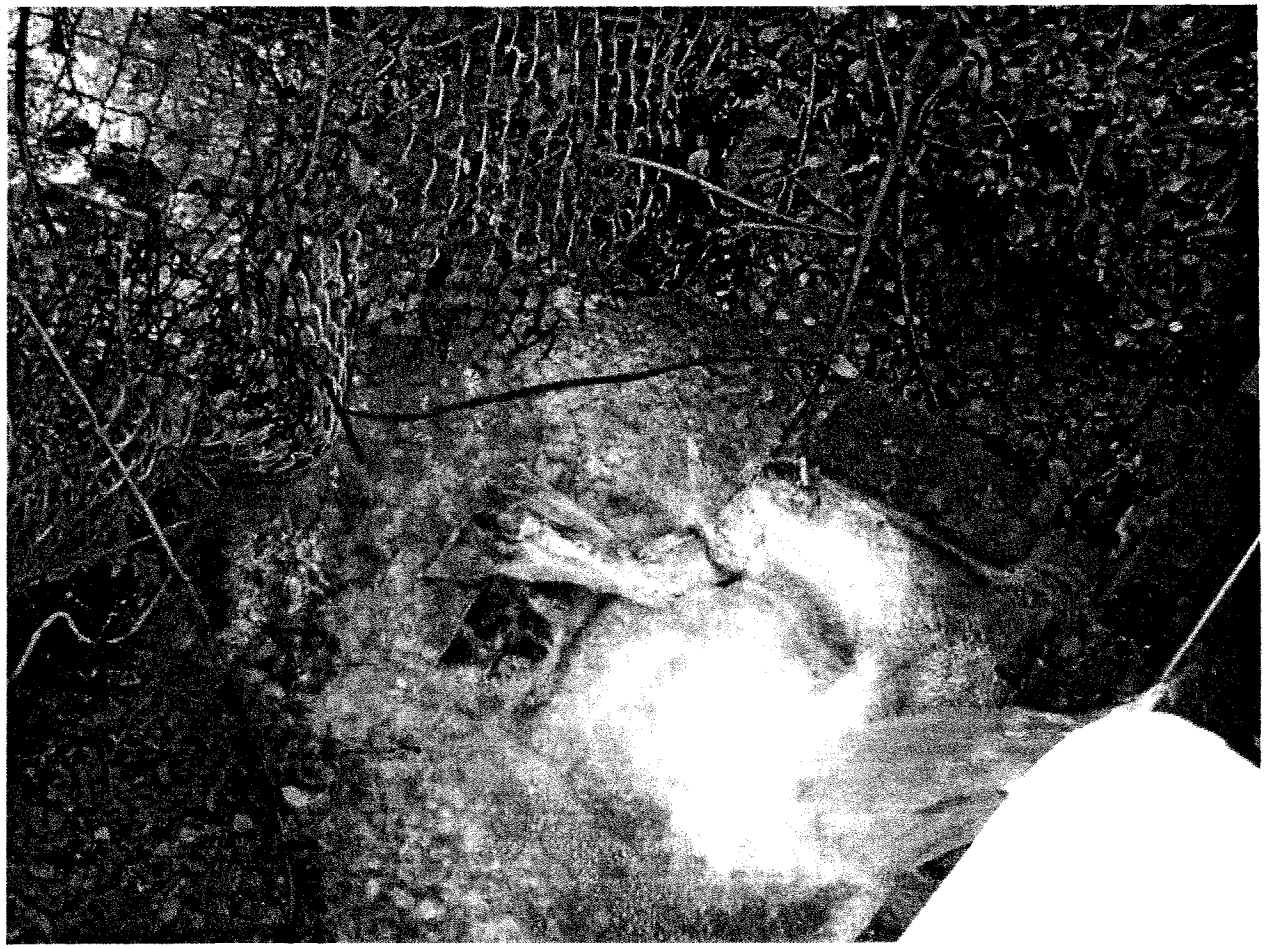


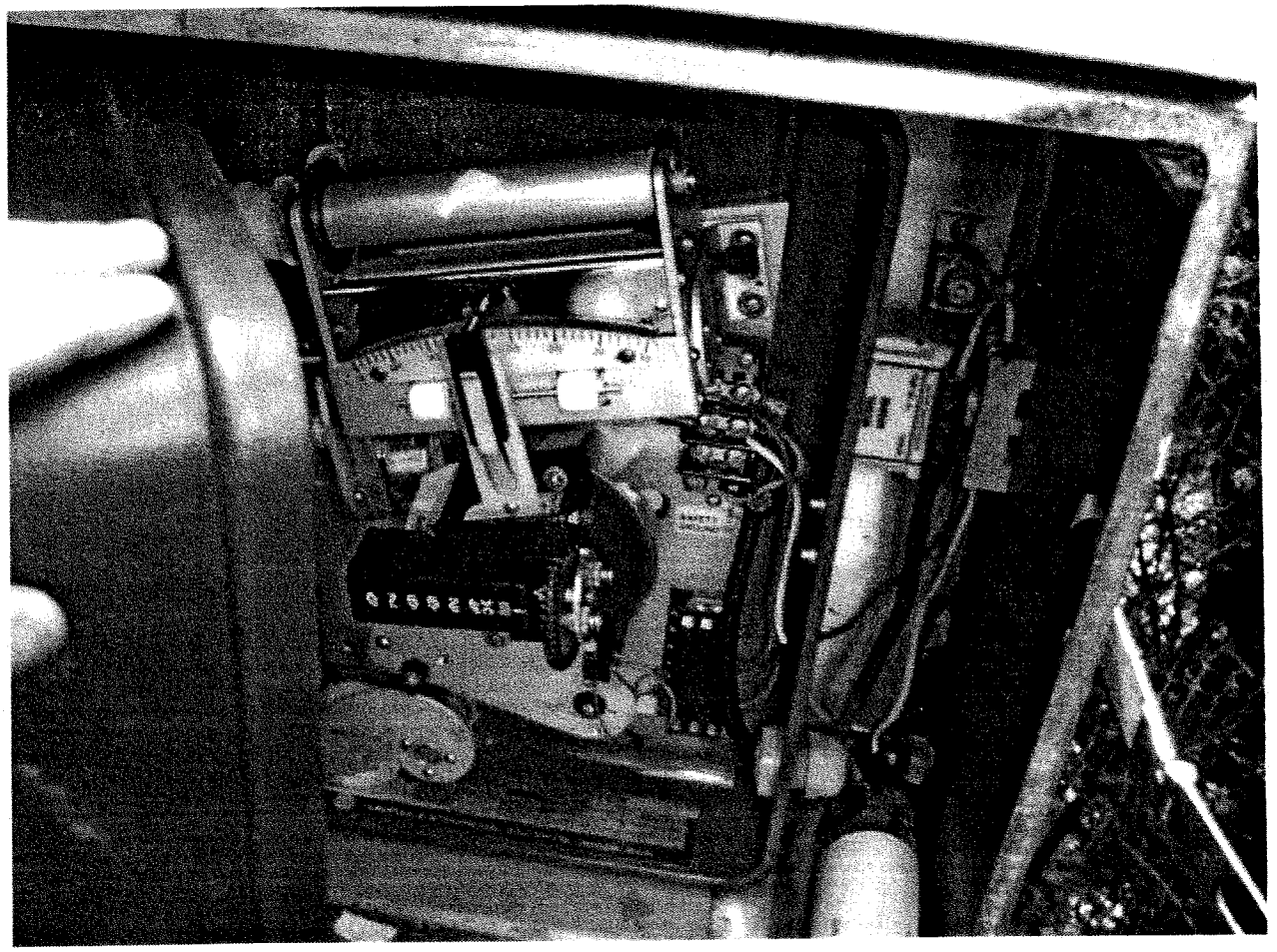



BEAVERTON, OREGON, U.S.A.

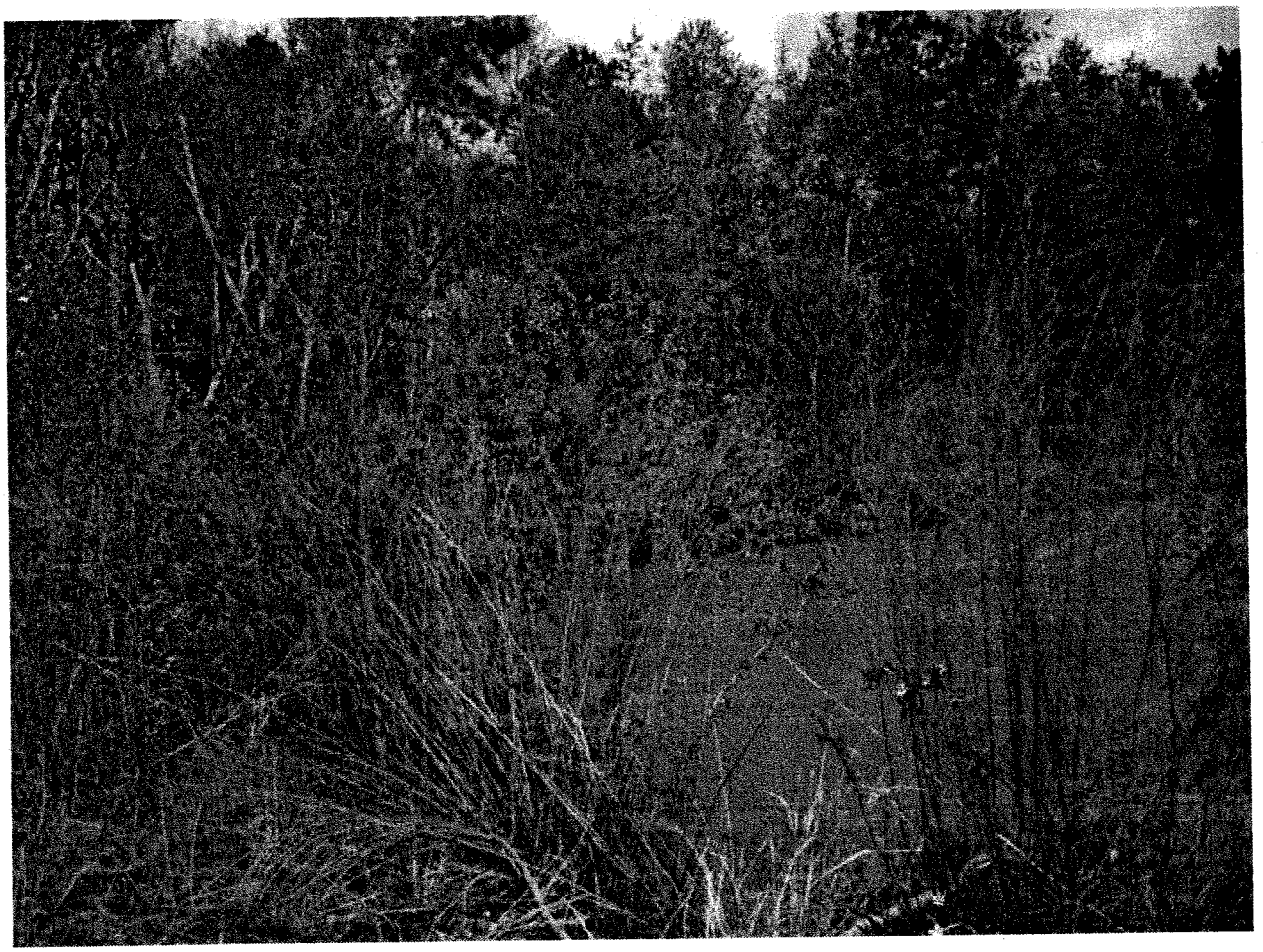


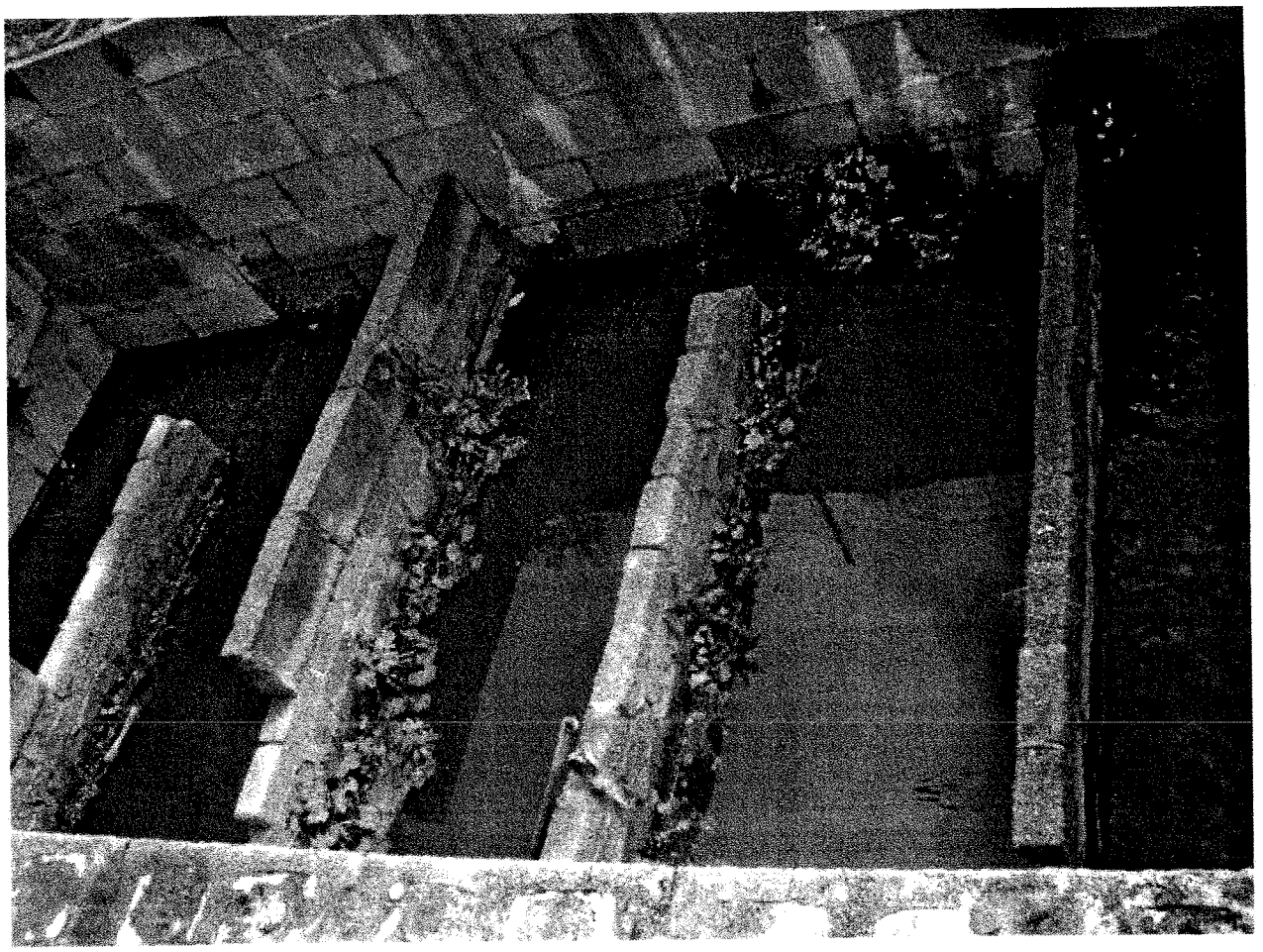


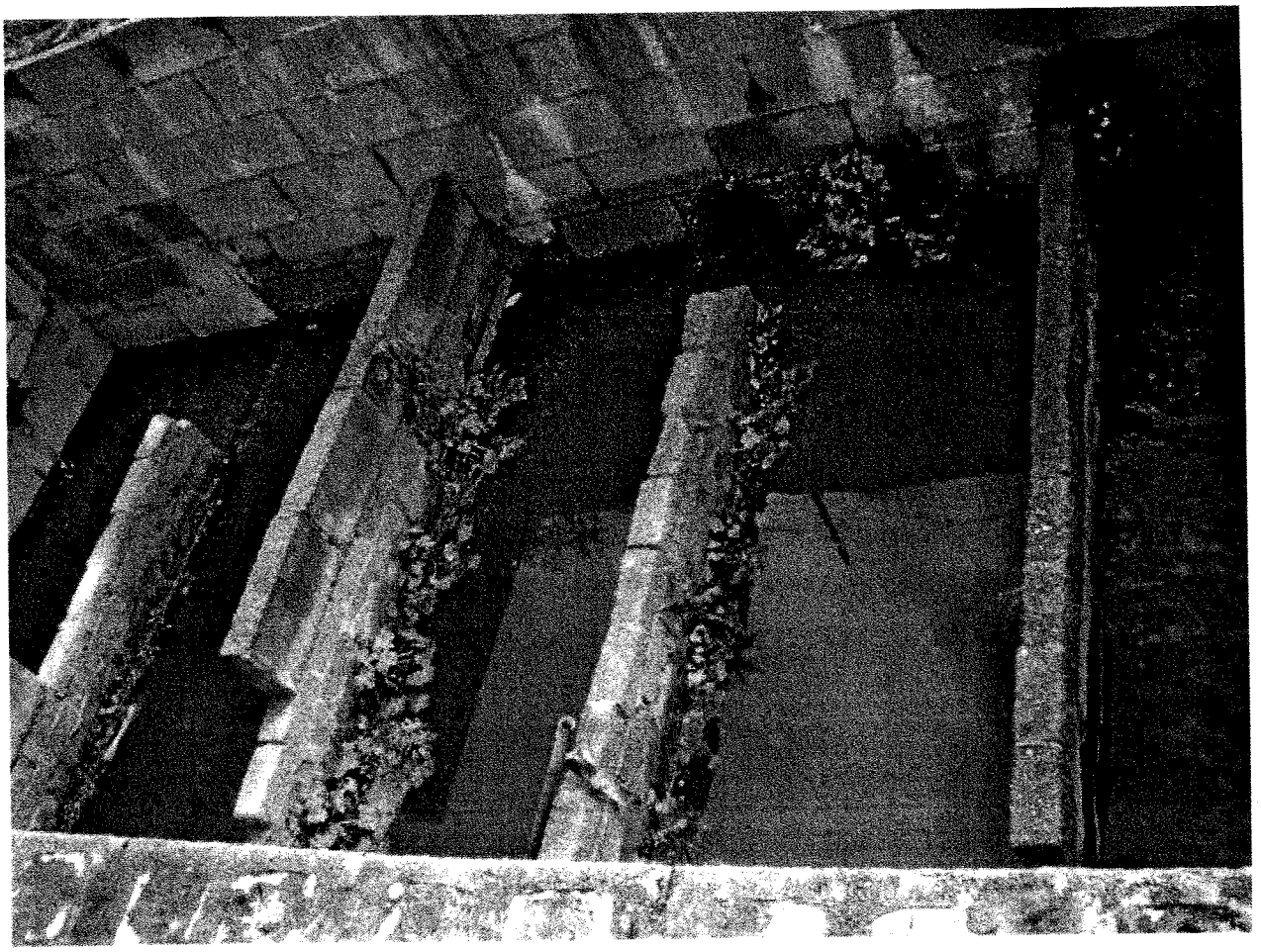


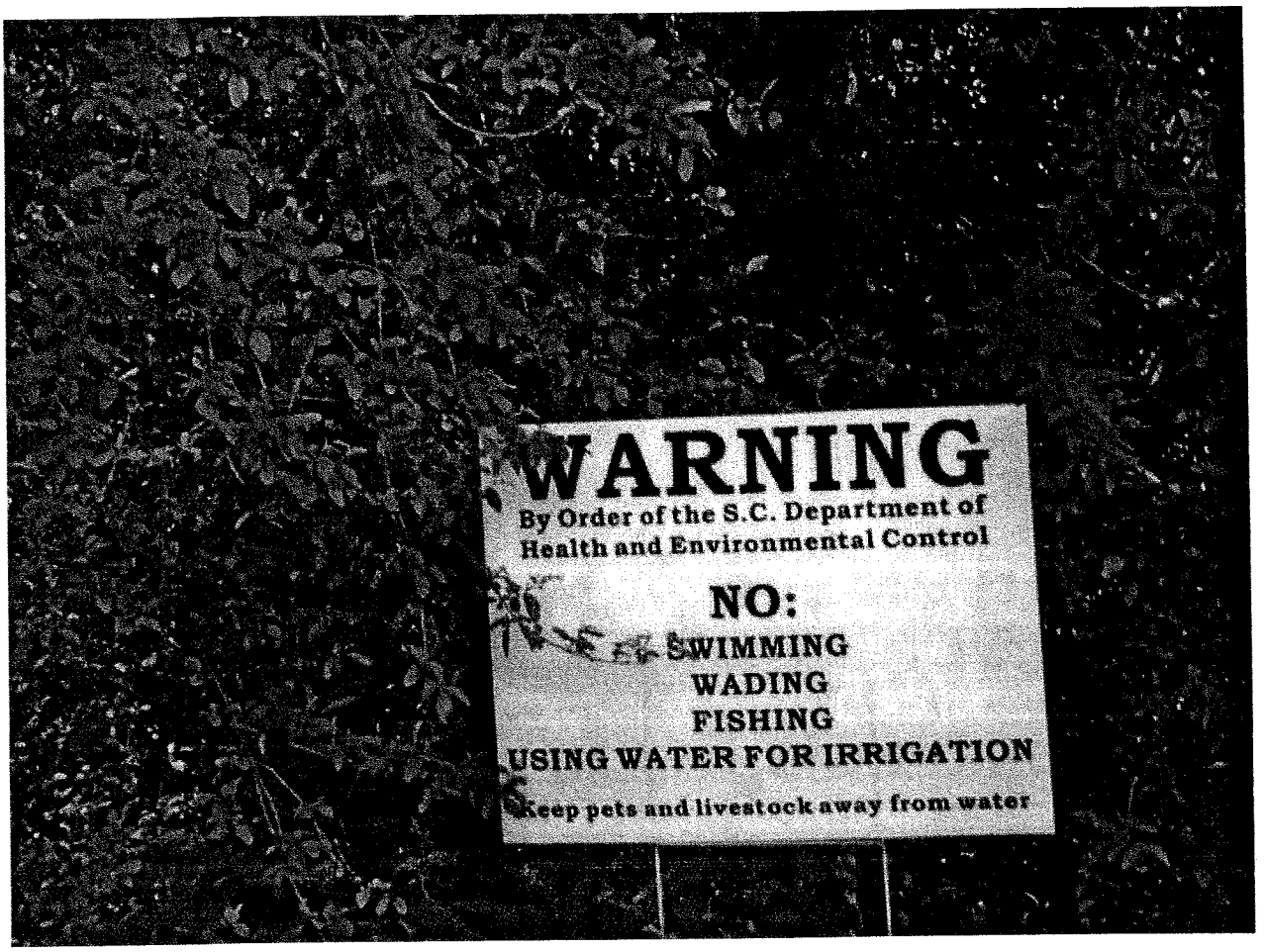


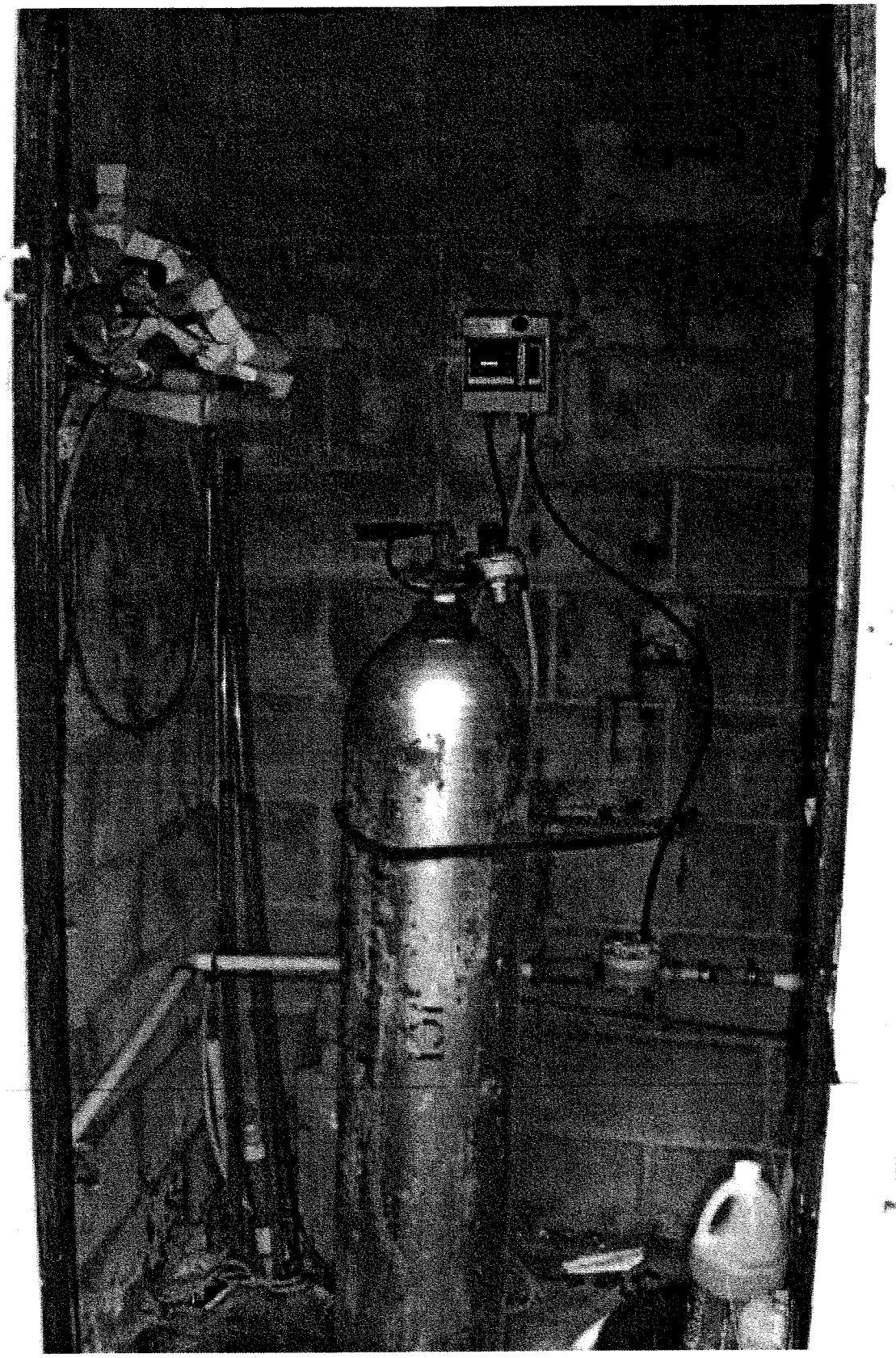
Ben Mustian - 040805 Lloydwood SD-Final effluent with no disinfection discharging over weir to ditch, to creek, between Page 1.








WARNING
By Order of the S.C. Department of
Health and Environmental Control
NO:
SWIMMING
WADING
FISHING
USING WATER FOR IRRIGATION
Keep pets and livestock away from water



Lloydwood

PLANT DAILY MONTHLY LOG

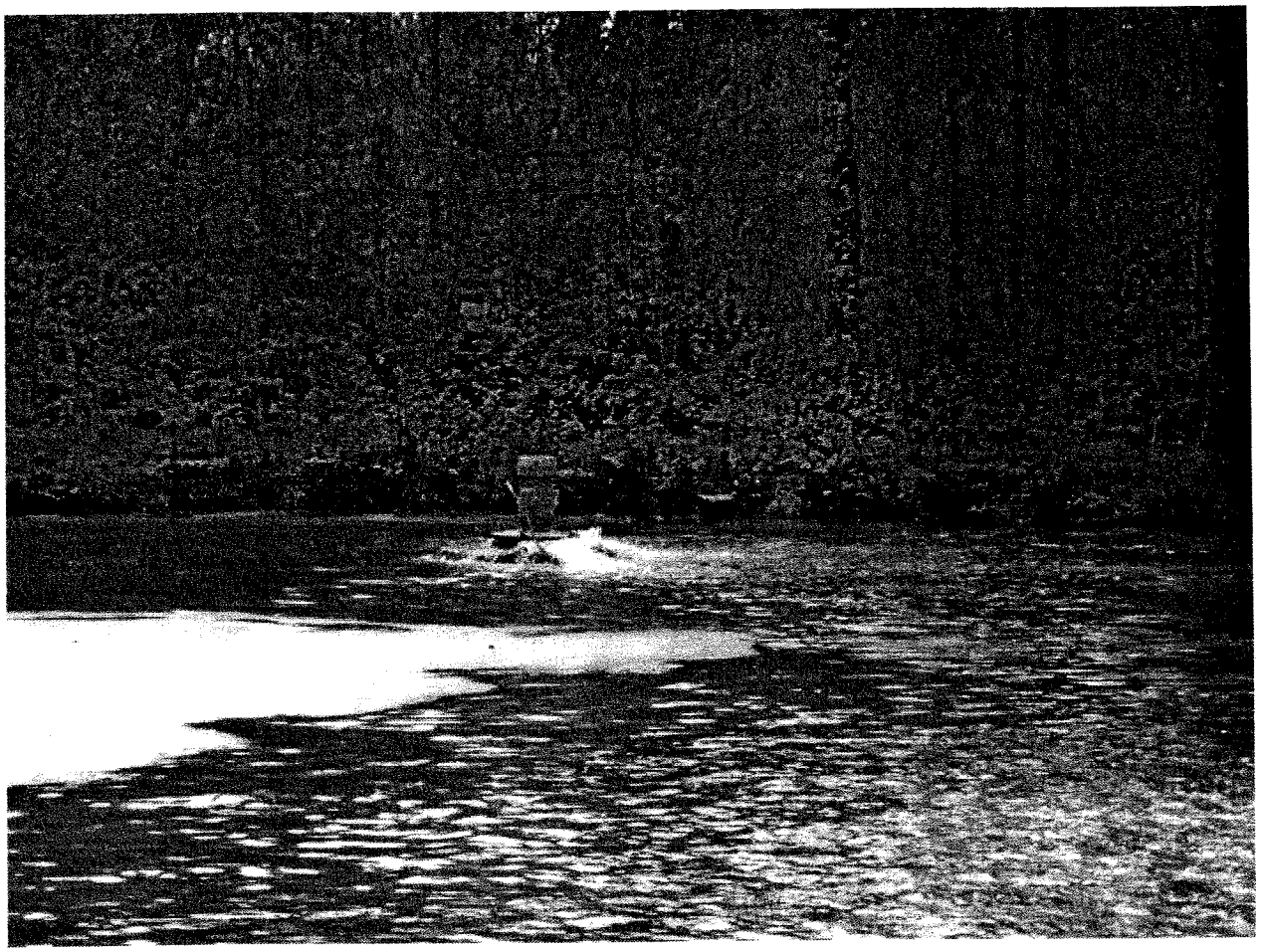
YEAR 2005

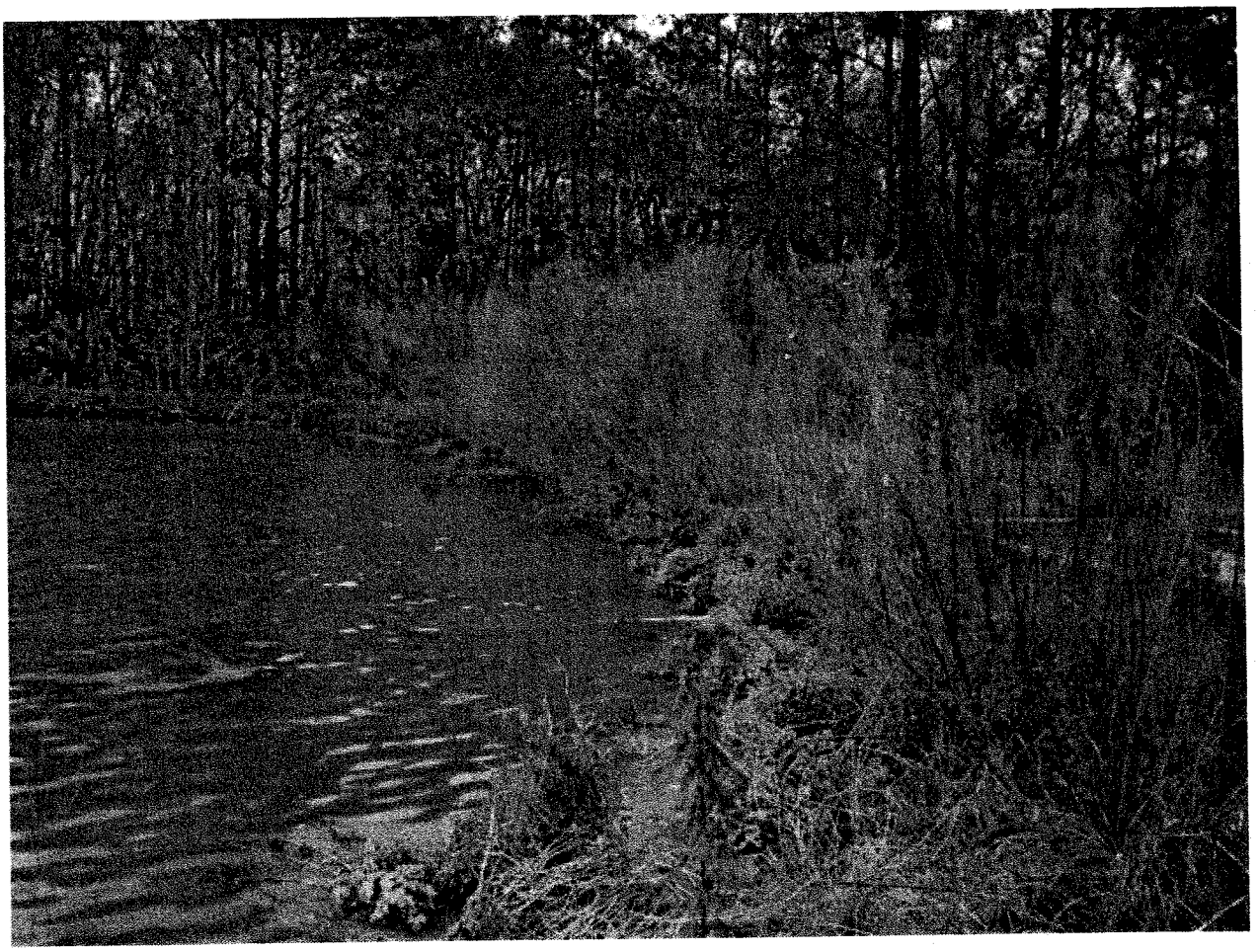
Final Effluent

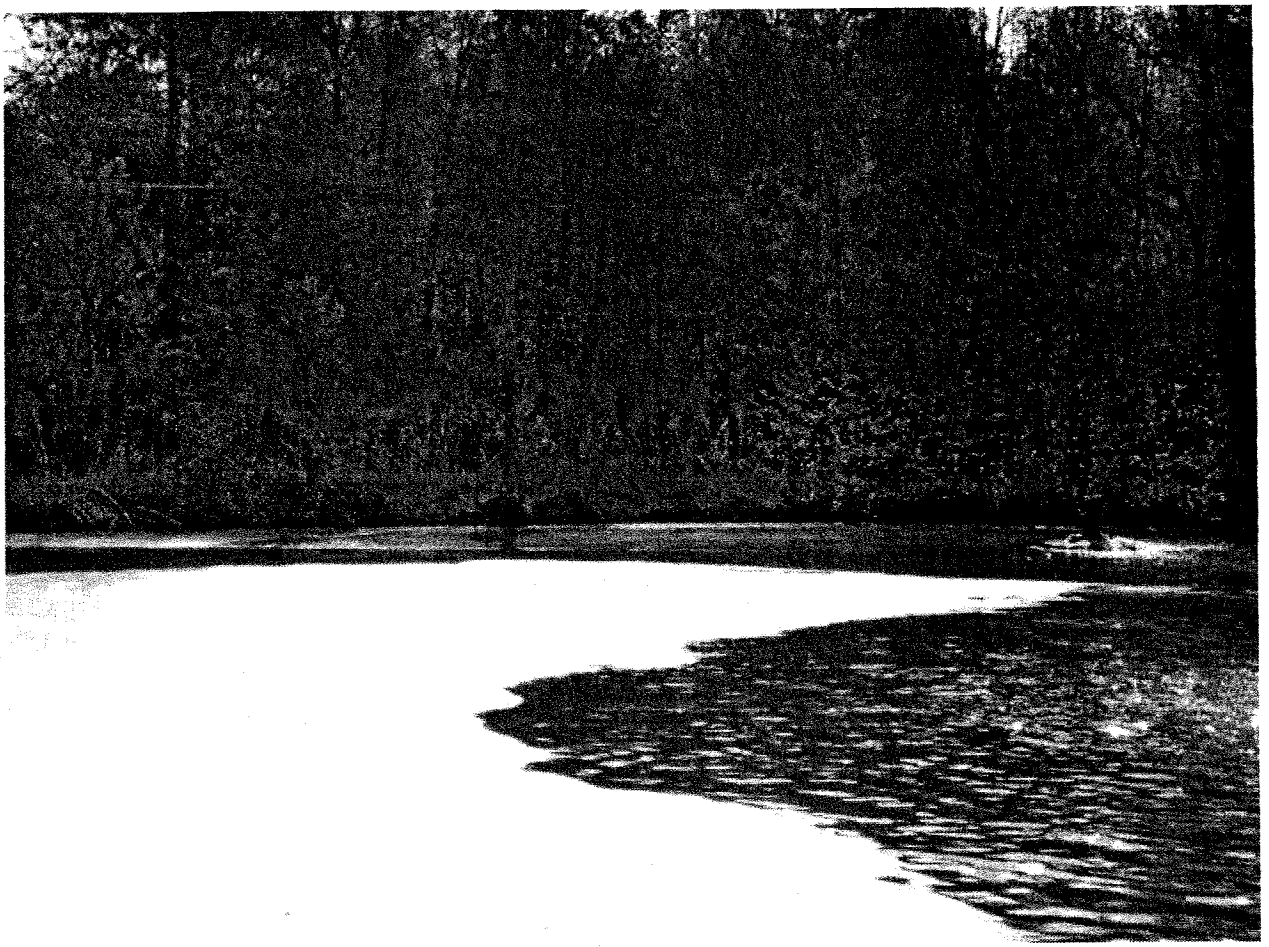
MONTH M

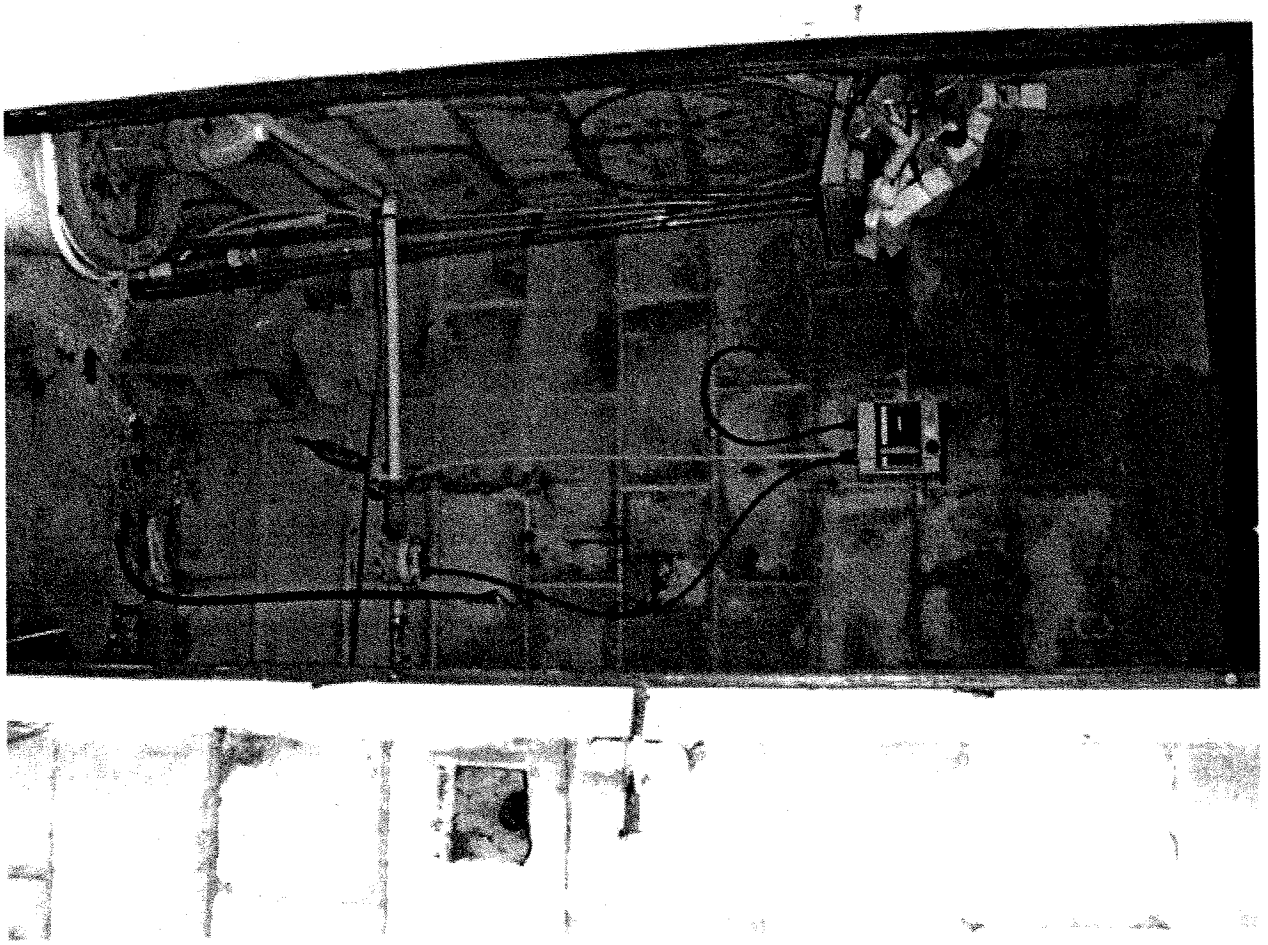
DATE	TIME	P.H.	D.O.	TEMP.	CHLORINE	~~CHL.AFT.DECHL.~~	ADDED CHEMICALS		Reach FLOW	REMAR
5/1	16:15	6.39	2.38	19.1°C	72.20	0.85			6779039	
5/2	11:53	6.28	3.81	16.2°C	72.20	.05/.07	Tabled to Bucket		6779920	
5/3	17:20	6.43	2.91		72.20	0.33/.08			6780850	
5/4	14:45	6.16	2.26	17.2	72.20	0.25/.04			?	
5/5	11:23	6.08	2.41		72.20	.01/.07	Tablet in bucket		6781950	
5/6	11:41	6.1	2.81	15.2°C	72.20	.01/.01	Added tablets		6788650	
5/7	08:40	6.18	3.21	14.2°C	72.20	.05/.07	No tablets (removed)		6783320	
5/8	13:40	5.98	2.84		72.20	.02/.05			6786260	- s

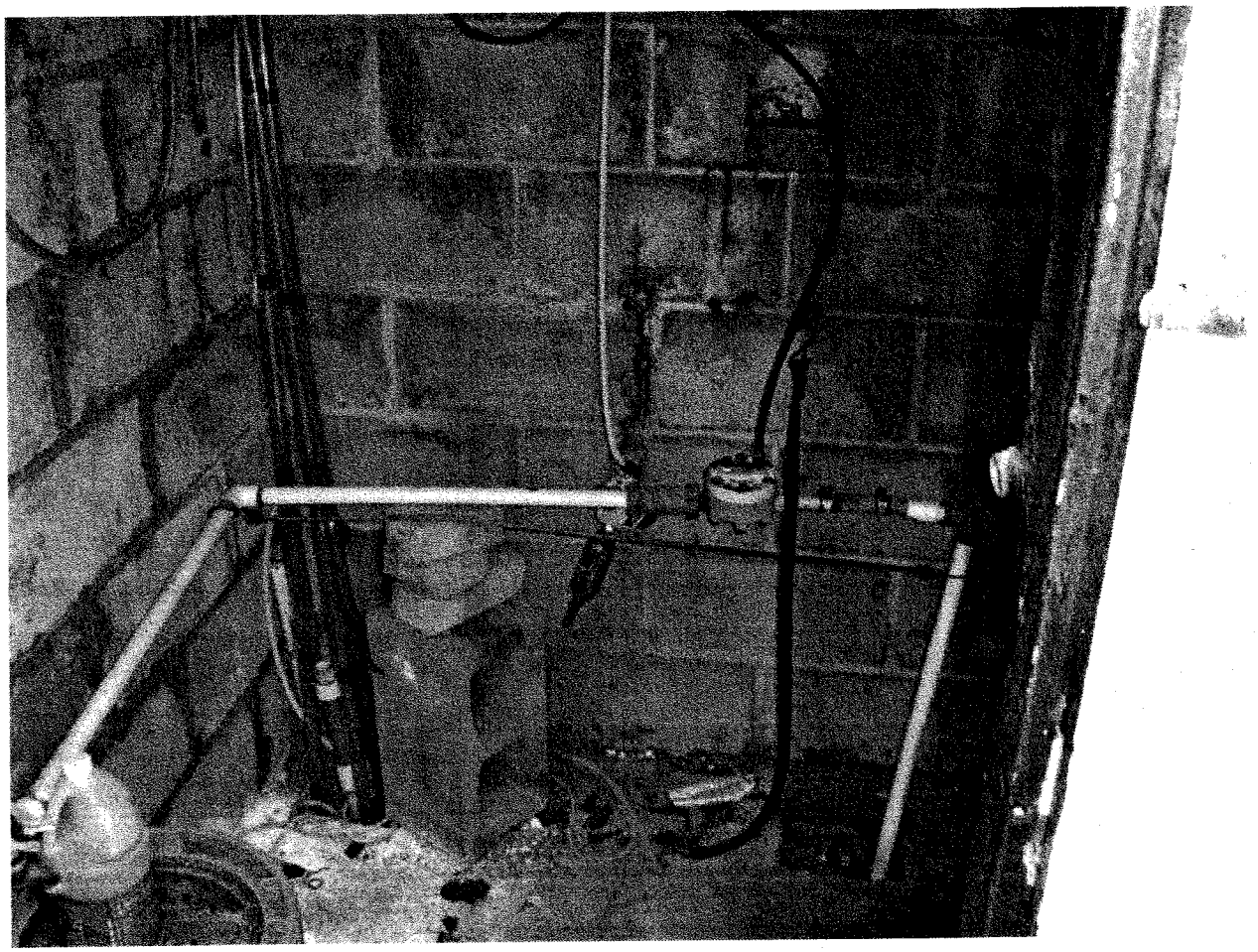
Broken Service

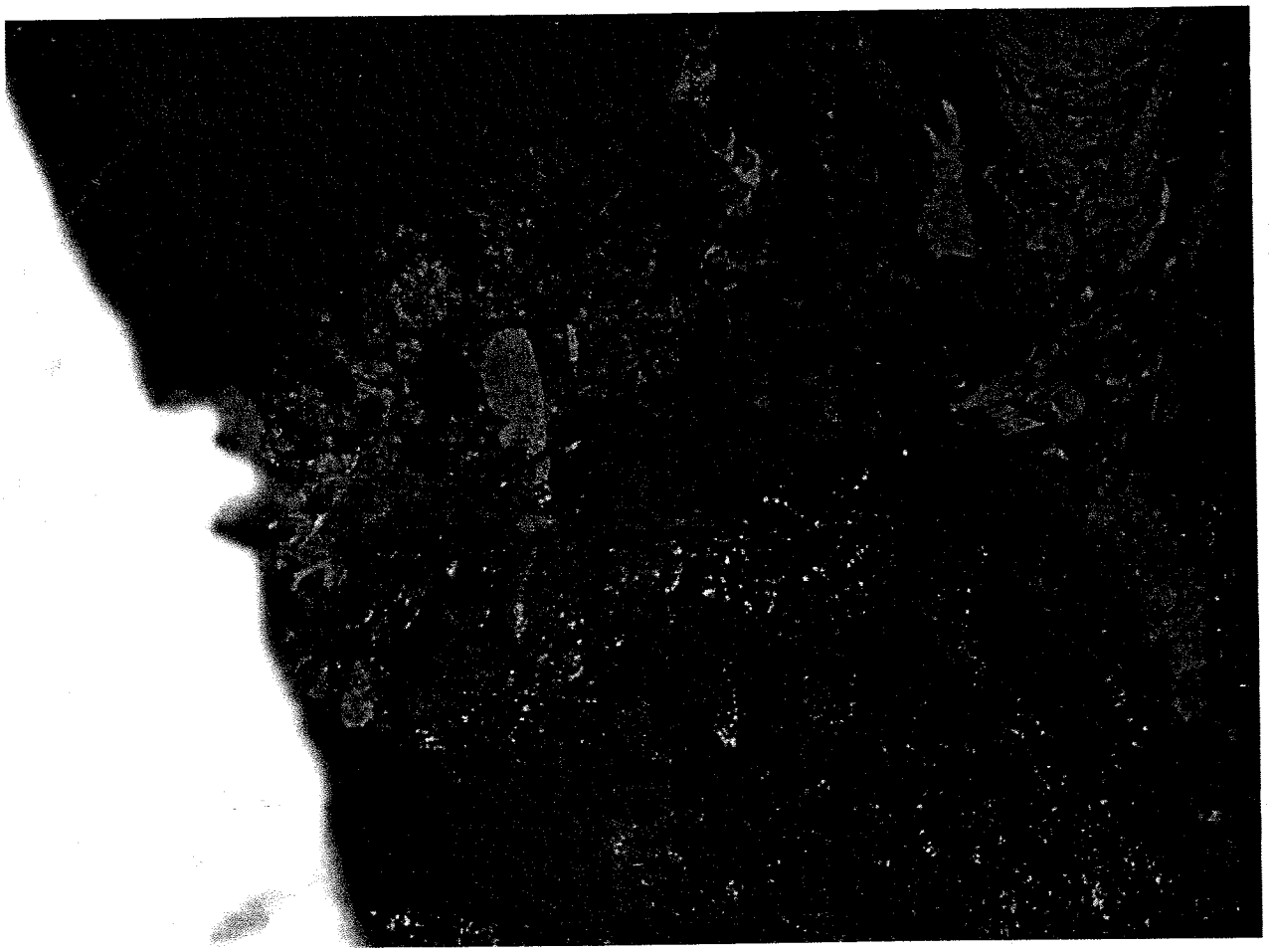


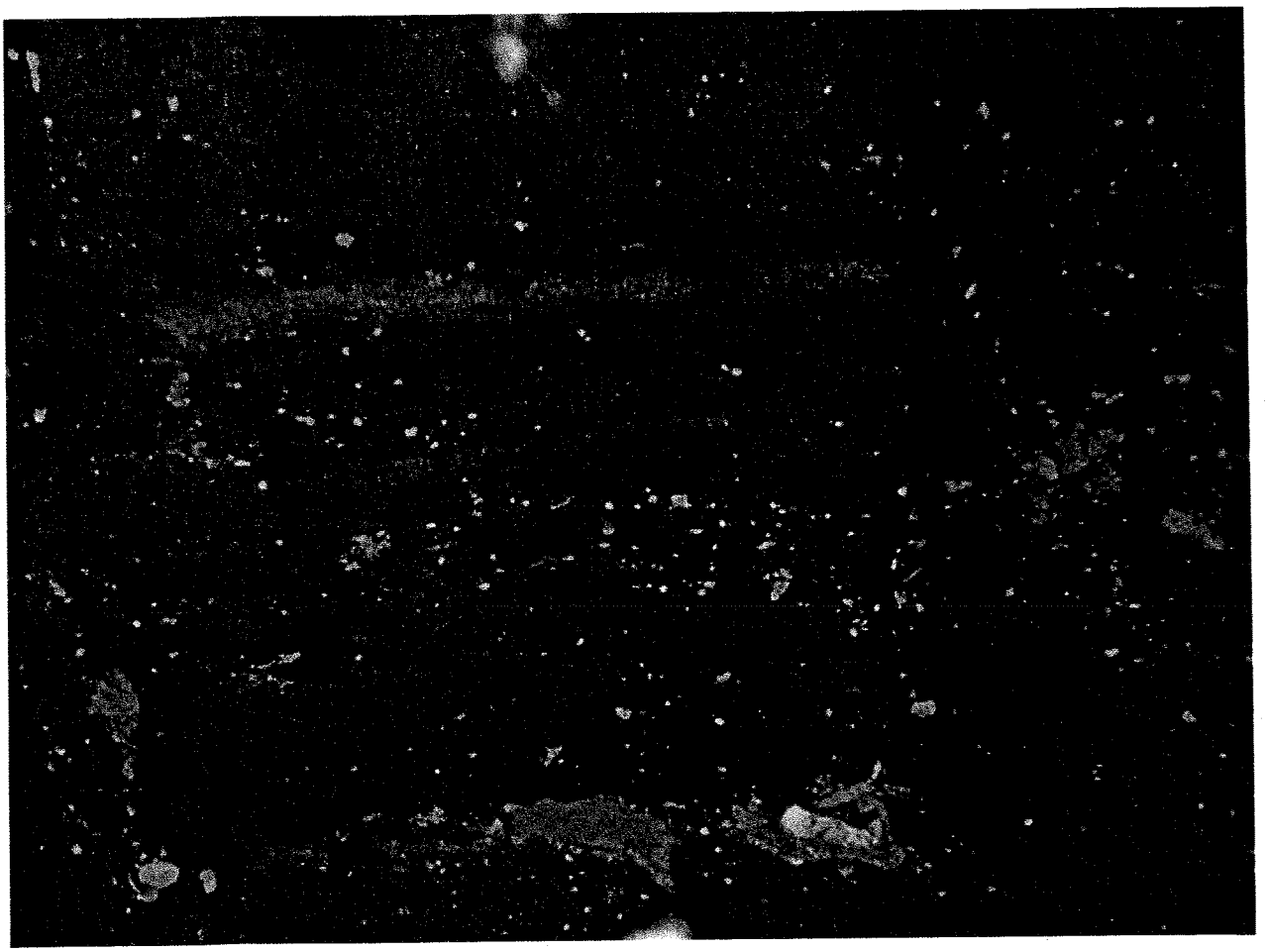












Lloydwood

PLANT DAILY MONTHLY LOG

YEAR 2005

Final Effluent

MONTH M

DATE	TIME	P.H.	D.O.	TEMP.	CHLORINE	~~CHL.AFT.DECHL.~~	ADDED CHEMICALS		Reach FLOW	REMAR
5/1	16.15	6.39	2.35	11.1°C	72.20	0.85			6779030	R
5/2	11.13	6.28	3.81	16.2°C	72.20	05/07	Tablets to Bucket		6779920	
5/3	17.20	6.43	2.91		72.20	0.33/.08			6780850	
5/4	14.45	6.16	2.26	17.2	72.20	0.25/04			?	
5/5	11.13	6.08	2.48		72.20	01/07	Tablets in bucket		6781950	
5/6	11.41	6.1	2.81	15.2°C	72.20	01/01	Added tablets		6788650	
5/7	08.40	6.18	3.21	14.2°	72.20	05/07	No tablets (removed) for		6793310	
		Broken Source								
5/10	13.40	5.98	2.84		72.20	02/05			6786260	

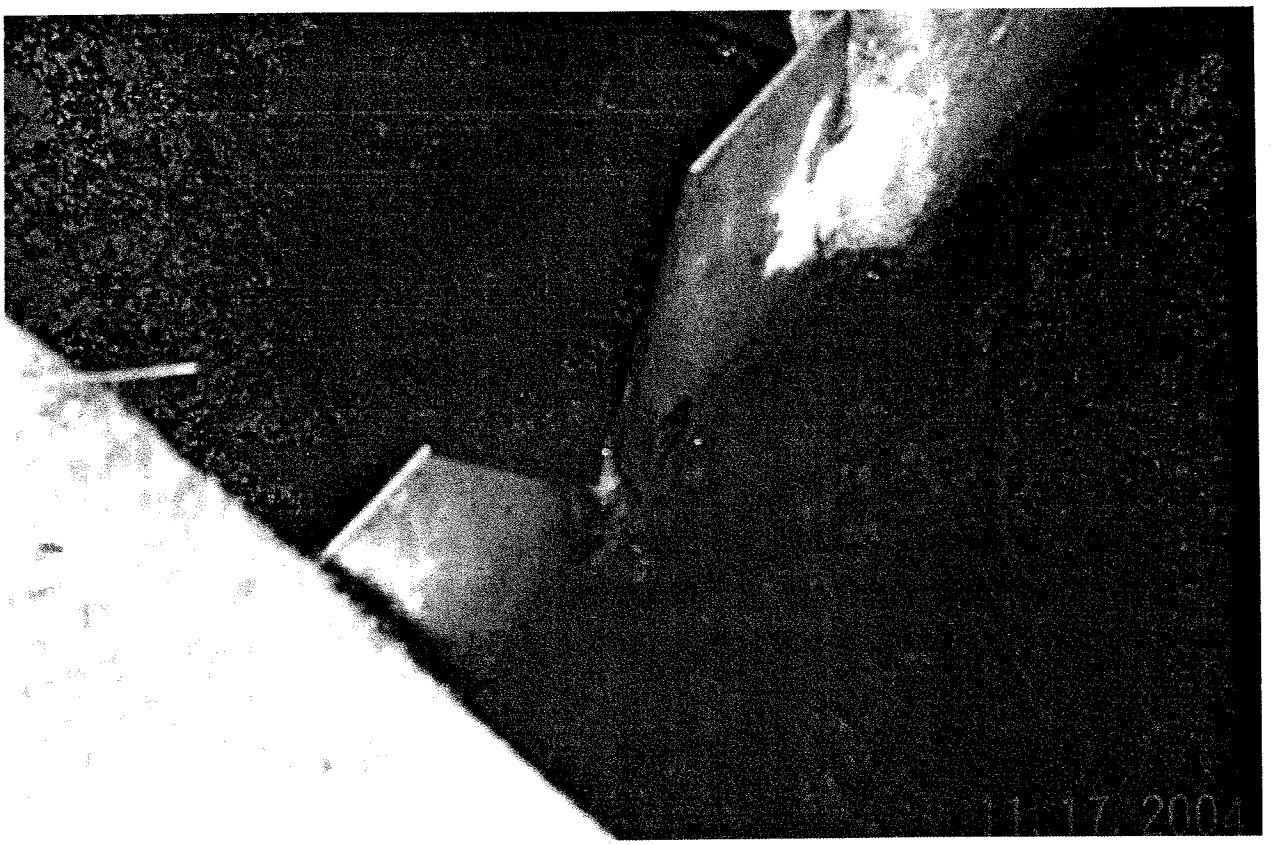
PLANT DAILY MONTHLY LOG
YEAR

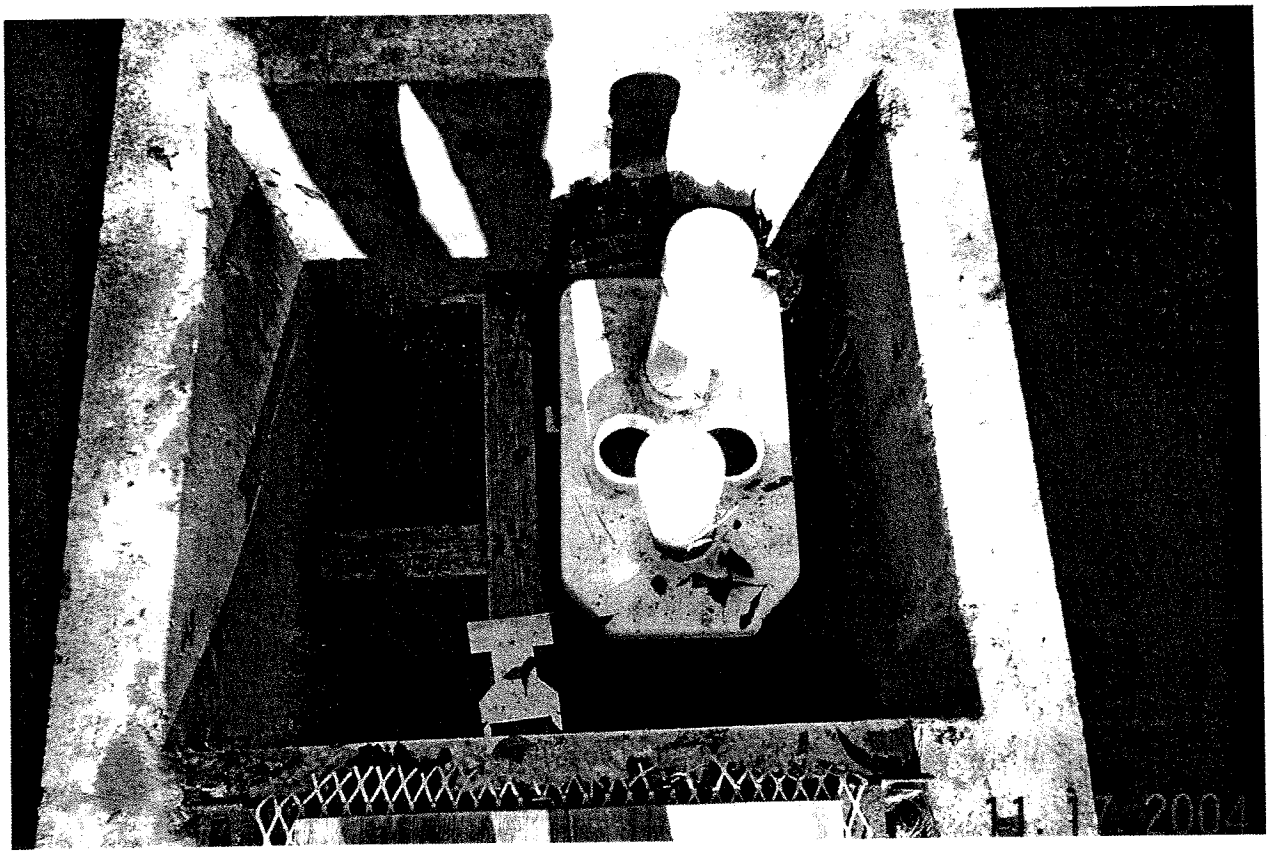
GARFIELDS
ENVIRONMENTAL
SERVICES

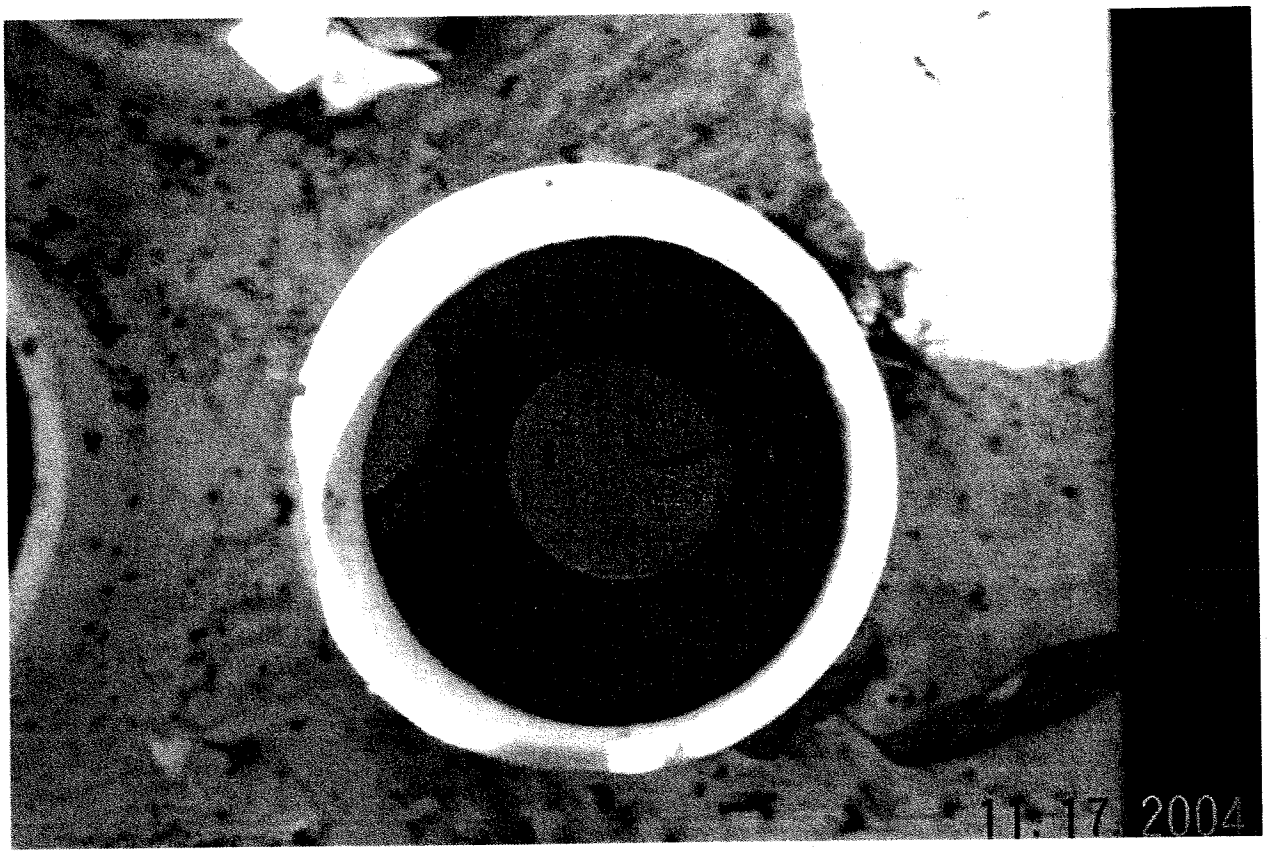
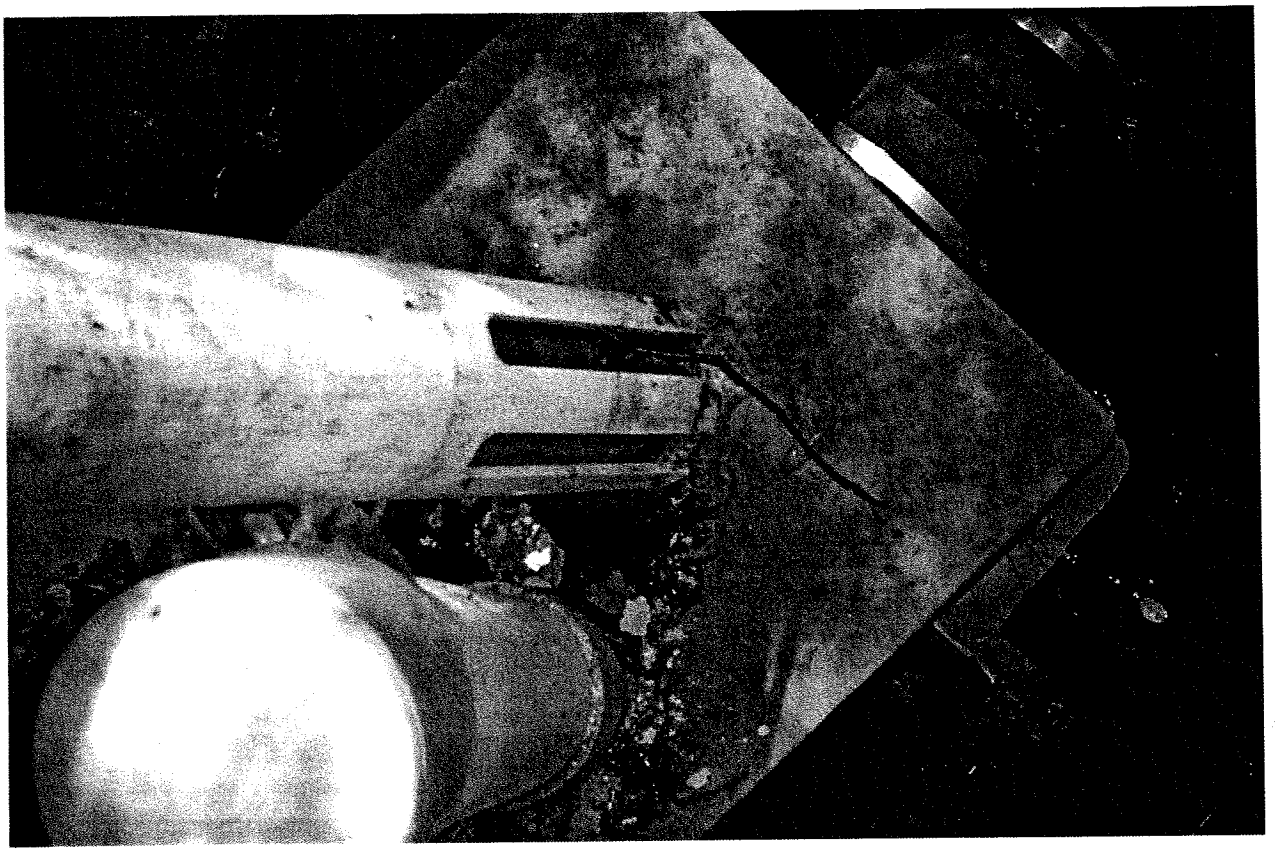
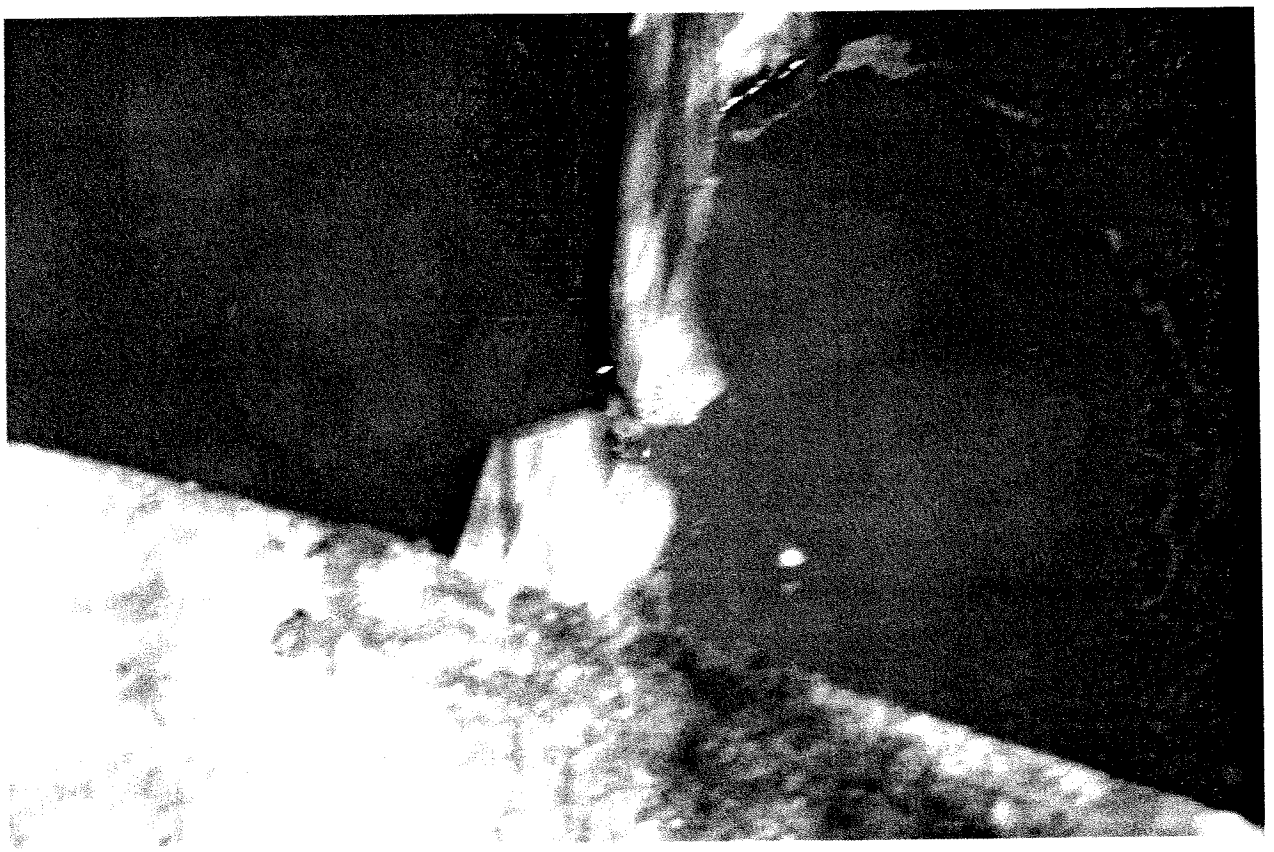
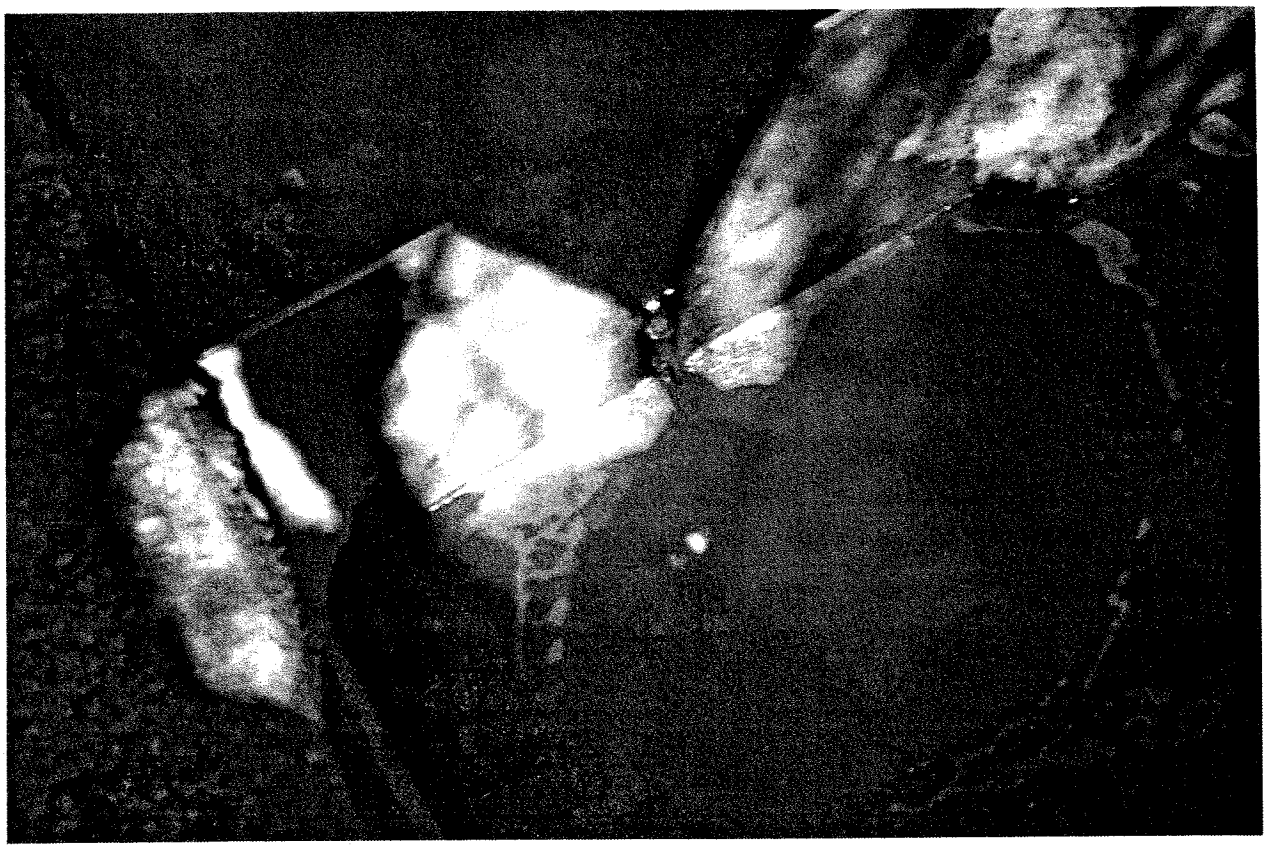
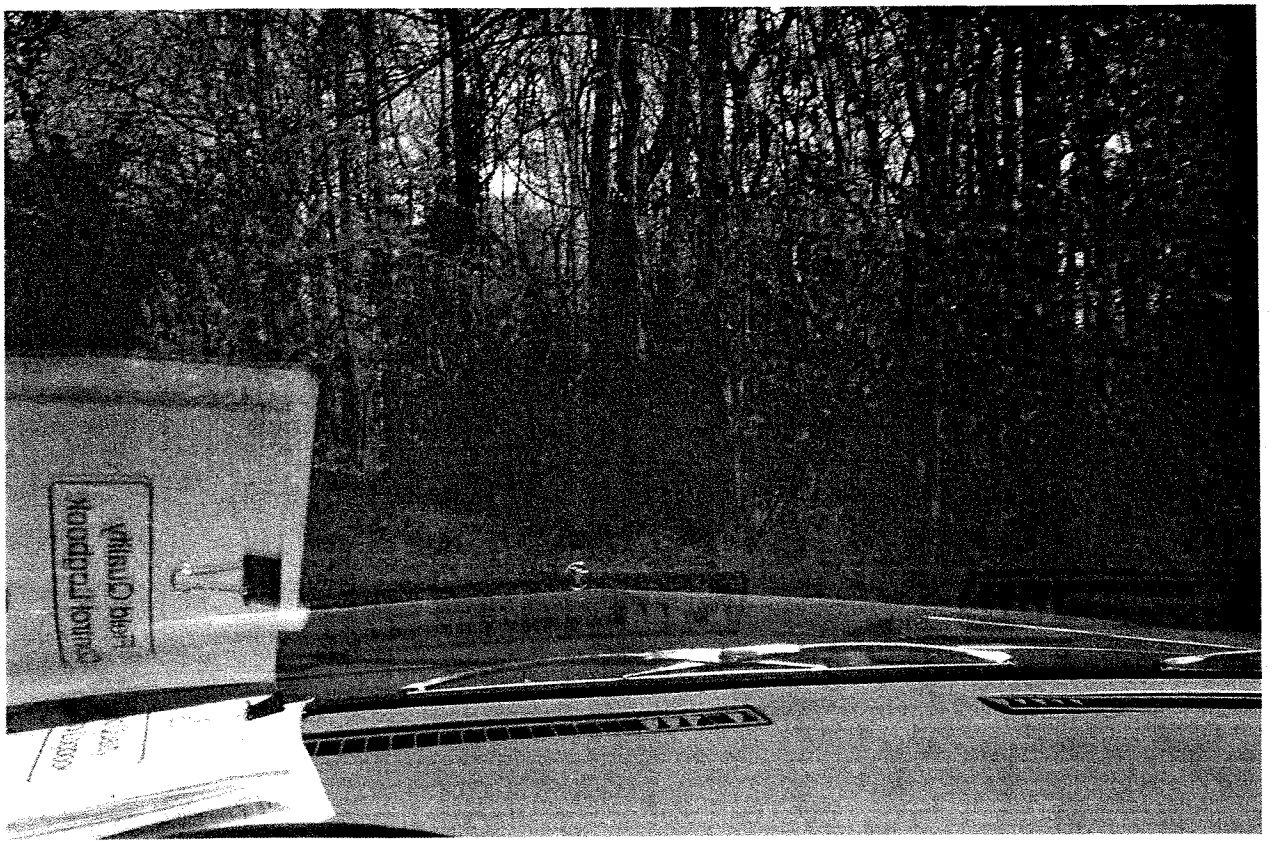
MONTH May

DATE	TIME	P.H.	D.O.	TEMP.	CHLORINE	CHL. AFT. DECHL.	ADDED CHEMICALS	FLOW	REMARKS
1									
2									
3									
4									
5									
6									
7									
8									
9									
10									
11									
12									
13									
14									
15									
16									
17									
18									
19									
20									
21									
22									
23									
24									
25									
26									
27									
28									
29									
30									
31									

OPERATOR IN CHARGE TOTAL CHEMICALS AVERAGE FLOW


11-17-2004




11 17 2004

11 17 2004