

KEVIN M. CASSIDY Staff Attorney

Pacific Environmental Advocacy Center - East P.O. Box 445 Norwell, MA 02061 phone (781) 659-1696 email cassidy@lclark.edu website www.peaclaw.org

November 16, 2011

VIA CERTIFIED MAIL RETURN RECEIPT REQUESTED

Plant Manager or Acting Plant Manager Remington Arms Company, Inc. 2592 Arkansas Highway 15 North P.O. Box 400 Lonoke, AR 72086

Registered Agent Remington Arms Company, LLC The Corporation Company 124 West Capitol Ave., Ste. 1900 Little Rock, AR 72201

Dear Plant Manager and Registered Agent:

This is written on behalf of the Arkansas Chapter of the Sierra Club and its members.

Remington Arms Company, LLC and Remington Arms Company, Inc. (collectively, "Remington") own and operate the Remington Arms Company, Inc. manufacturing facility in Lonoke, Arkansas. As a result of Remington's operation of its Lonoke facility, Remington releases a variety of pollutants into the Bayou Meto. Based on available information, the Sierra Club believes that Remington has violated and will continue to violate the federal Clean Water Act, 33 U.S.C. § 1251, et seq., and Remington's National Pollutant Discharge Elimination System ("NPDES") Permit No. AR0001163 in operating the Lonoke facility.

Dischargers of industrial wastewater must comply with NPDES permits issued under Section 402 of the Clean Water Act, 33 U.S.C. § 1342. In Arkansas, the Arkansas Department of Environmental Quality ("DEQ") administers the NPDES program. A NPDES wastewater discharge permit contains limits on the amount of allowable pollutants and contains pollutant-monitoring requirements. The discharge of any pollutant in violation of a NPDES permit is

prohibited under Section 301(a) of the Clean Water Act, 33 U.S.C. § 1311(a), and the Arkansas Water and Air Pollution Control Act (Act 472 of 1949, as amended Ark. Code Ann. 8-4-101, et seq.).

During the five years previous to the date of this letter, Remington has discharged various pollutants from the Lonoke facility into the Bayou Meto in concentrations and amounts that exceed the discharge limits contained in its NPDES permit. More specifically, Remington's violations are as follows:

Table 1, attached, lists the dates, from May 1, 2007, through June 30, 2011 (the most recent date for which discharge information is publicly available), on which Remington has exceeded the parameters in its permit. Each exceedance constitutes a violation of Remington's NPDES permit and the Clean Water Act. At a minimum, the lawsuit will involve violations on the days Remington was required to sample as reflected in the Discharge Monitoring Reports ("DMRs"). We also expect the lawsuit to include violations that occurred on days in between those required sampling events.

Additional information, including information in Remington's possession, may reveal additional violations, including monitoring, reporting and recordkeeping violations, of the Clean Water Act at the Lonoke facility. This letter covers all such violations occurring within the five years immediately preceding the service of this notice letter to the full extent contemplated by the standard set forth in *Public Interest Research Group of New Jersey v. Hercules*, 50 F.3d 1239 (3d Cir. 1995). See Comfort Lake Ass'n, Inc. v. Dresel Contracting, Inc., 138 F.3d 351, 355 (8th Cir. 1998) (citing Hercules).

The Sierra Club intends to file suit against Remington in federal court to secure appropriate relief under federal and state law for these violations, and for any similar violations that occur after the date of this notice letter. In so doing, the Sierra Club seeks to improve the water quality of the Bayou Meto surrounding the facility by securing Remington's long-term compliance with its NPDES permit and applicable law. We believe that the number and frequency of Remington's violations over a lengthy period of time indicate systemic and ongoing pollution control problems. If, however, Remington can demonstrate during the notice period that it has taken the necessary steps to eliminate all root causes of any of the relevant violations, we will not pursue claims with regard to those violations. Please be aware, however, that we will take the absence of such a showing as an indication that the relevant violations are ongoing.

During the 60-day notice period, we would be willing to discuss a settlement of the claims in this letter. However, if you wish to pursue such negotiations in the absence of litigation, we suggest that you initiate those discussions within the next 15 days so that they may be completed before the end of the 60-day notice period. We do not intend to delay the filing of a

¹ Remington's NPDES Permit No. AR0001163 was issued on February 29, 2008, became effective on March 1, 2008, and is set to expire on February 28, 2013. Remington's previous NPDES permit expired on June 30, 2007, but was administratively continued until the current permit became effective. Some of the violations relate to Remington's previous permit.

complaint in federal court if discussions are continuing when that period ends. If you are interested is such discussions, please contact me at (781) 659-1696 or cassidy@lclark.edu.

Sincerely,

Kevin M. Cassidy

Pacific Environmental Advocacy Center

Encl.

Cc:

Hank Bates, Esq.

PERSONS GIVING NOTICE AND REPRESENTING ATTORNEYS

Addresses and telephone numbers of the Sierra Club

Sierra Club 85 Second Street, 2d Floor San Francisco, CA 94105-3441 415-977-5500 Sierra Club/Arkansas Chapter 1308 West 2nd St. Little Rock, AR 72201 479-575-2709 (Robert LeFlar, Legal Chair)

Addresses and telephone numbers of Representing Attorneys

Kevin M. Cassidy Pacific Environmental Advocacy Center P.O. Box 445 Norwell, MA 02061 Tel: 781-659-1696

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11311 Arcade Drive
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copies:

Via certified mail/return receipt requested

Lisa Jackson, Administrator United States Environmental Protection Agency Ariel Rios Building 1200 Pennsylvania Ave., NW Mail Code: 1101A Washington, D.C. 20460

Dr. Alfredo Armendariz EPA Regional Administrator South Central (Region 6) 1445 Ross Ave., Suite 1200 Dallas, TX 75202

Teresa Marks, Director Arkansas Department of Environmental Quality 5301 Northshore Drive North Little Rock, AR 72118-5317

TABLE 1 - REMINGTON DISCHARGE VIOLATIONS								
	Outfall 004							
DATE	Parameter	Type of Limit	Units	Permit Limit	Reported Discharge			
9/30/08	Copper	Conc monthly avg	μg/l	99.5	220			
1/31/09	Copper	Conc monthly avg	μg/l	99.5	220			
2/28/09	Copper	Conc monthly avg	μg/l	99.5	220			
3/31/09	Copper	Conc monthly avg	μg/l	99.5	140			
10/31/09	Copper	Conc monthly avg	μg/l	99.5	310			
11/30/09	Copper	Conc monthly avg	μg/l	99.5	150			
12/31/09	Copper	Conc monthly avg	μg/l	99.5	910			
1/31/10	Copper	Conc monthly avg	μg/l	99.5	220			
2/28/10	Copper	Conc monthly avg	μg/l	99.5	200			
3/31/10	Copper	Conc monthly avg	μg/l	99.5	120			
5/31/10	Copper	Conc monthly avg	μg/l	99.5	185			
6/30/10	Copper	Conc monthly avg	μg/l	99.5	140			
11/30/10	Copper	Conc monthly avg	<u>μg/</u> l	99.5	111			
12/31/10	Copper	Conc monthly avg	μg/l	99.5	160			
1/31/11	Copper	Conc monthly avg	μg/l	99.5	170			
2/28/11	Copper	Conc monthly avg	μg/l	99.5	670			
3/31/11	Copper	Conc monthly avg	μg/l	99.5	360			
4/30/11	Copper	Conc monthly avg	μg/l	99.5	640			
5/31/11	Copper	Conc monthly avg	μg/l	99.5	310			
6/30/11	Copper	Conc monthly avg	μg/l	99.5	160			
1/22/08	Copper	Conc daily max	μg/l	167.01	200			
1/31/08	Copper	Conc daily max	μg/l	167.01	1800			
9/30/08	Copper	Conc daily max	μg/l	199.7	220			
1/31/09	Copper	Conc daily max	μg/l	199.7	220			
2/28/09	Copper	Conc daily max	<u>μg/l</u>	199.7	220			
10/31/09	Copper	Conc daily max	μg/l	199.7	310			
12/31/09	Copper	Conc daily max	μg/l	199.7	910			
1/31/10	Copper	Conc daily max	μg/l	199.7	220			
2/28/10	Copper	Conc daily max	μg/l	199.7	200			
5/31/10	Copper	Conc daily max	<u>μg/l</u>	199.7	220			
2/28/11	Copper	Conc daily max	<u>μg/</u> Ι	199.7	670			
3/31/11	Copper	Conc daily max	<u>μg/l</u>	199.7	360			
4/30/11	Copper	Conc daily max	<u>μ</u> g/l	199.7	640			
5/31/11	Copper	Conc daily max	μg/l	199.7	310			

TABLE 1 - REMINGTON DISCHARGE VIOLATIONS					
		Outfall 004			
DATE	Parameter	Type of Limit	Units	Permit Limit	Reported Discharge
9/30/08	Copper	quantity - monthly avg	lbs/day	0.37	0.72
1/31/09	Copper	quantity - monthly avg	lbs/day	0.37	0.98
2/28/09	Copper	quantity - monthly avg	lbs/day	0.37	0.85
3/31/09	Copper	quantity - monthly avg	lbs/day	0.37	0.46
10/31/09	Copper	quantity - monthly avg	lbs/day	0.37	1.68
11/30/09	Copper	quantity - monthly avg	lbs/day	0.37	0.65
12/31/09	Copper	quantity - monthly avg	lbs/day	0.37	4.4
1/31/10	Copper	quantity - monthly avg	lbs/day	0.37	0.91
2/28/10	Copper	quantity - monthly avg	lbs/day	0.37	0.53
3/31/10	Copper	quantity - monthly avg	lbs/day	0.37	0.52
5/31/10	Copper	quantity - monthly avg	lbs/day	0.37	1.15
6/30/10	Copper	quantity - monthly avg	lbs/day	0.37	0.6
10/31/10	Copper	quantity - monthly avg	lbs/day	0.37	0.45
11/30/10	Copper	quantity - monthly avg	lbs/day	0.37	0.49
12/31/10	Copper	quantity - monthly avg	lbs/day	0.37	0.39
2/28/11	Copper	quantity - monthly avg	lbs/day	0.37	3.24
3/31/11	Copper	quantity - monthly avg	lbs/day	0.37	1.42
4/30/11	Copper	quantity - monthly avg	lbs/day	0.37	1.7
5/31/11	Copper	quantity - monthly avg	lbs/day	0.37	1.67
6/30/11	Copper	quantity - monthly avg	lbs/day	0.37	0.74
1/22/08	Copper	quantity - daily max	lbs/day	0.83	0.894
1/31/08	Copper	quantity - daily max	lbs/day	0.83	1.092
1/31/09	Copper	quantity - daily max	lbs/day	0.75	0.98
2/28/09	Copper	quantity - daily max	lbs/day	0.75	0.85
10/31/09	Copper	quantity - daily max	lbs/day	0.75	1.68
12/31/09	Copper	quantity - daily max	lbs/day	0.75	4.4
1/31/10	Copper	quantity - daily max	lbs/day	0.75	0.91
5/31/10	Copper	quantity - daily max	lbs/day	0.75	1.64
2/28/11	Copper	quantity - daily max	lbs/day	0.75	3.24
3/31/11	Copper	quantity - daily max	lbs/day	0.75	1.42
4/30/11	Copper	quantity - daily max	lbs/day	0.75	1.42
5/31/11	Copper	quantity - daily max	lbs/day	0.75	
6/30/11	Copper	quantity - daily max	lbs/day	0.75	1.67 0.79
		quartery daily filed	inoj udy	0.75	0.79
9/30/08	Lead	Conc monthly avg	μg/l	56.8	150

TABLE 1 - REMINGTON DISCHARGE VIOLATIONS					
100		Outfall 004			
		T	11:	Permit	Reported
DATE	Parameter	Type of Limit	Units	Limit	Discharge
1/31/09	Lead	Conc monthly avg	μg/l	56.8	100
2/28/09	Lead	Conc monthly avg	μg/l	56.8	60
3/31/09	Lead	Conc monthly avg	μg/l	56.8	90
4/30/09	Lead	Conc monthly avg	μg/l	56.8	120
5/31/09	Lead	Conc monthly avg	μg/l	56.8	83
6/30/09	Lead	Conc monthly avg	μg/l	56.8	100
7/31/09	Lead	Conc monthly avg	μg/l	56.8	98
10/31/09	Lead	Conc monthly avg	μg/l	56.8	120
11/30/09	Lead	Conc monthly avg	μg/l_	56.8	130
12/31/09	Lead	Conc monthly avg	μg/l	56.8	290
1/31/10	Lead	Conc monthly avg	μg/l	56.8	220
2/28/10	Lead	Conc monthly avg	μg/l	56.8	190
3/31/10	Lead	Conc monthly avg	μg/l	56.8	150
5/31/10	Lead	Conc monthly avg	μg/l	56.8	137.5
6/30/10	Lead	Conc monthly avg	μg/l	56.8	120
7/31/10	Lead	Conc monthly avg	μg/l	56.8	91
8/31/10	Lead	Conc monthly avg	μg/l	56.8	180
9/30/10	Lead	Conc monthly avg	μg/l	56.8	140
10/31/10	Lead	Conc monthly avg	μg/l	56.8	110
11/30/10	Lead	Conc monthly avg	μg/l	56.8	130
12/31/10	Lead	Conc monthly avg	μg/l	56.8	80
1/31/11	Lead	Conc monthly avg	μg/l	56.8	160
2/28/11	Lead	Conc monthly avg	μg/l	56.8	200
3/31/11	Lead	Conc monthly avg	μg/l	56.8	260
4/30/11	Lead	Conc monthly avg	μg/l	56.8	230
5/31/11	Lead	Conc monthly avg	μg/l	56.8	220
6/30/11	Lead	Conc monthly avg	μg/l	56.8	265
11/2/07	Lead	Conc daily max	μg/l	91.35	110
1/31/08	Lead	Conc daily max	μg/l	91.35	97
9/30/08	Lead	Conc daily max	μg/l	80	150
1/31/09	Lead	Conc daily max	μg/l	80	100
3/31/09	Lead	Conc daily max	μg/l	80	90
4/30/09	Lead	Conc daily max	μg/l	80	120
5/31/09	Lead	Conc daily max	μg/l	80	83
6/30/09	Lead	Conc daily max	μg/l	80	100
7/31/09	Lead	Conc daily max	μg/l	80	98

TABLE 1 - REMINGTON DISCHARGE VIOLATIONS					
	-	Outfall 004			
DATE	D	T	11.7	Permit	Reported
DATE	Parameter	Type of Limit	Units	Limit	Discharge
10/31/09	Lead	Conc daily max	μg/l	80	120
11/30/09	Lead	Conc daily max	μg/l	80	130
12/31/09	Lead	Conc daily max	μg/l	80	290
1/31/10	Lead	Conc daily max	μg/l	80	220
2/28/10	Lead	Conc daily max	μg/l	80	190
3/31/10	Lead	Conc daily max	μg/l	80	150
5/31/10	Lead	Conc daily max	μg/l	80	190
6/30/10	Lead	Conc daily max	μg/l	80	120
7/31/10	Lead	Conc daily max	μg/l	80	110
8/31/10	Lead	Conc daily max	μg/l	80	180
9/30/10	Lead	Conc daily max	μg/l	80	140
10/31/10	Lead	Conc daily max	μg/l	80	110
11/30/10	Lead	Conc daily max	μg/l	80	130
1/31/11	Lead	Conc daily max	μg/l	80	160
2/28/11	Lead	Conc daily max	μg/l	80	200
3/31/11	Lead	Conc daily max	μg/l	80	260
4/30/11	Lead	Conc daily max	μg/l	80	230
5/31/11	Lead	Conc daily max	μg/l	80	220
6/30/11	Lead	Conc daily max	μg/l	80	350
9/30/08	Lead	quantity - monthly avg	lbs/day	0.21	0.49
1/31/09	Lead	quantity - monthly avg	lbs/day	0.21	0.45
2/28/09	Lead	quantity - monthly avg	lbs/day	0.21	0.23
3/31/09	Lead	quantity - monthly avg	lbs/day	0.21	0.29
5/31/09	Lead	quantity - monthly avg	lbs/day	0.21	0.26
6/30/09	Lead	quantity - monthly avg	lbs/day	0.21	0.357
7/31/09	Lead	quantity - monthly avg	lbs/day	0.21	0.35
10/31/09	Lead	quantity - monthly avg	lbs/day	0.21	0.65
11/30/09	Lead	quantity - monthly avg	lbs/day	0.21	0.57
12/31/09	Lead	quantity - monthly avg	lbs/day	0.21	1.4
1/31/10	Lead	quantity - monthly avg	lbs/day	0.21	0.91
2/28/10	Lead	quantity - monthly avg	lbs/day	0.21	0.5
3/31/10	Lead	quantity - monthly avg	lbs/day	0.21	0.65
5/31/10	Lead	quantity - monthly avg	lbs/day	0.21	0.74
6/30/10	Lead	quantity - monthly avg	lbs/day	0.21	0.52
7/31/10	Lead	quantity - monthly avg	lbs/day	0.21	0.38
8/31/10	Lead	quantity - monthly avg	lbs/day	0.21	0.79

TABLE 1 - REMINGTON DISCHARGE VIOLATIONS					
		Outfall 004		entermonistration (A self-definite a 17 miles on a particle (no. 1 miles page 4) of	
DATE	Parameter	Type of Limit	Units	Permit	Reported
		Type of Elline	Offics	Limit	Discharge
9/30/10	Lead	quantity - monthly avg	lbs/day	0.21	0.57
10/31/10	Lead	quantity - monthly avg	lbs/day	0.21	0.53
11/30/10	Lead	quantity - monthly avg	lbs/day	0.21	0.57
1/31/11	Lead	quantity - monthly avg	lbs/day	0.21	0.25
2/28/11	Lead	quantity - monthly avg	lbs/day	0.21	0.97
3/31/11	Lead	quantity - monthly avg	lbs/day	0.21	1.03
4/30/11	Lead	quantity - monthly avg	lbs/day	0.21	0.61
5/31/11	Lead	quantity - monthly avg	lbs/day	0.21	1.18
6/30/11	Lead	quantity - monthly avg	lbs/day	0.21	1.23
9/30/08	Lead	quantity - daily max	lbs/day	0.29	0.49
1/31/09	Lead	quantity - daily max	lbs/day	0.29	0.45
6/30/09	Lead	quantity - daily max	lbs/day	0.29	0.357
7/31/09	Lead	quantity - daily max	lbs/day	0.29	0.35
10/31/09	Lead	quantity - daily max	lbs/day	0.29	0.65
11/30/09	Lead	quantity - daily max	lbs/day	0.29	0.57
12/31/09	Lead	quantity - daily max	lbs/day	0.29	1.4
1/31/10	Lead	quantity - daily max	lbs/day	0.29	0.91
2/28/10	Lead	quantity - daily max	lbs/day	0.29	0.5
3/31/10	Lead	quantity - daily max	lbs/day	0.29	0.65
5/31/10	Lead	quantity - daily max	lbs/day	0.29	0.85
6/30/10	Lead	quantity - daily max	lbs/day	0.29	0.52
7/31/10	Lead	quantity - daily max	lbs/day	0.29	0.38
8/31/10	Lead	quantity - daily max	lbs/day	0.29	0.79
9/30/10	Lead	quantity - daily max	lbs/day	0.29	0.57
10/31/10	Lead	quantity - daily max	lbs/day	0.29	0.53
11/30/10	Lead	quantity - daily max	lbs/day	0.29	0.62
2/28/11	Lead	quantity - daily max	lbs/day	0.29	0.97
3/31/11	Lead	quantity - daily max	lbs/day	0.29	1.03
4/30/11	Lead	quantity - daily max	lbs/day	0.29	0.61
5/31/11	Lead	quantity - daily max	lbs/day	0.29	1.18
6/30/11	Lead	quantity - daily max	lbs/day	0.29	1.64
5/1/07	BOD	Conc monthly avg	mg/l	20	29
6/1/07	BOD	Conc monthly avg	mg/l	20	28
7/31/08	BOD	Conc monthly avg	mg/l	20	42.7
8/31/08	BOD	Conc monthly avg	mg/l	20	23.3

	TABLE 1 - REM	MINGTON DISCHARGE	VIOLATIO	ONS	
	- <u></u>	Outfall 004			
DATE	Parameter	Type of Limit	Units	Permit Limit	Reported Discharge
9/30/08	BOD	Conc monthly avg	mg/l	20	27.7
5/31/09	BOD	Conc monthly avg	mg/l	20	68
6/30/09	BOD	Conc monthly avg	mg/l	20	60.7
7/31/09	BOD	Conc monthly avg	mg/l	20	20.3
8/31/09	BOD	Conc monthly avg	mg/l	20	37.7
9/30/09	BOD	Conc monthly avg	mg/l	20	35
4/30/10	BOD	Conc monthly avg	mg/l	35	45.7
5/31/10	BOD	Conc monthly avg	mg/l	20	36
6/30/10	BOD	Conc monthly avg	mg/l	20	48.3
7/31/10	BOD	Conc monthly avg	mg/l	20	32
8/31/10	BOD	Conc monthly avg	mg/l	20	35
9/30/10	BOD	Conc monthly avg	mg/l	20	31
6/30/11	BOD	Conc monthly avg	mg/l	20	32.3
				· · · · · · · · · · · · · · · · · · ·	
5/1/07	BOD	Conc daily max	mg/l	30	39
6/1/07	BOD	Conc daily max	mg/l	30	46
8/9/07	BOD	Conc daily max	mg/l	30	35
9/27/07	BOD	Conc daily max	mg/l	60	88
7/31/08	BOD	Conc daily max	mg/l	30	75
9/30/08	BOD	Conc daily max	mg/l	30	34
5/31/09	BOD	Conc daily max	mg/l	30	73
6/30/09	BOD	Conc daily max	mg/l	30	100
8/31/09	BOD	Conc daily max	mg/l	30	45
9/30/09	BOD	Conc daily max	mg/l	30	39
5/31/10	BOD	Conc daily max	mg/l	30	45
6/30/10	BOD	Conc daily max	mg/l	30	50
7/31/10	BOD	Conc daily max	mg/l	30	35
8/31/10	BOD	Conc daily max	mg/l	30	41
9/30/10	BOD	Conc daily max	mg/l	30	35
6/30/11	BOD	Conc daily max	mg/l	30	38
5/1/07	BOD	quantity - monthly avg	lbs/day	100.1	104
6/1/07	BOD	quantity - monthly avg	lbs/day	100.1	115.6
7/31/08	BOD	quantity - monthly avg	lbs/day	75.1	159.3
8/31/08	BOD	quantity - monthly avg	lbs/day	75.1	96.3
9/30/08	BOD	quantity - monthly avg	lbs/day	75.1	103
5/31/09	BOD	quantity - monthly avg	lbs/day	75.1	290

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DATE	V-1 42 - Alana		Outfall 004	The state of the s		
6/30/09 BOD quantity - monthly avg lbs/day 75.1 212. 7/31/09 BOD quantity - monthly avg lbs/day 75.1 80 8/31/09 BOD quantity - monthly avg lbs/day 75.1 13 9/30/09 BOD quantity - monthly avg lbs/day 75.1 13 10/31/09 BOD quantity - monthly avg lbs/day 75.1 13 4/30/10 BOD quantity - monthly avg lbs/day 75.1 20 6/30/10 BOD quantity - monthly avg lbs/day 75.1 20 6/30/10 BOD quantity - monthly avg lbs/day 75.1 21 7/31/10 BOD quantity - monthly avg lbs/day 75.1 13 8/31/10 BOD quantity - monthly avg lbs/day 75.1 15 9/30/10 BOD quantity - monthly avg lbs/day 75.1 13 10/31/10 BOD quantity - monthly avg lbs/day 75.1	DATE	Parameter	Type of Limit	Units		Reported Discharge
7/31/09 BOD quantity - monthly avg lbs/day 75.1 80 8/31/09 BOD quantity - monthly avg lbs/day 75.1 13 9/30/09 BOD quantity - monthly avg lbs/day 75.1 13 10/31/09 BOD quantity - monthly avg lbs/day 75.1 12 4/30/10 BOD quantity - monthly avg lbs/day 75.1 12 4/30/10 BOD quantity - monthly avg lbs/day 75.1 20 6/30/10 BOD quantity - monthly avg lbs/day 75.1 21 7/31/10 BOD quantity - monthly avg lbs/day 75.1 13 8/31/10 BOD quantity - monthly avg lbs/day 75.1 13 10/31/10 BOD quantity - monthly avg lbs/day 75.1 13 10/31/10 BOD quantity - monthly avg lbs/day 13.4 191 6/30/11 BOD quantity - monthly avg lbs/day 15.1	6/30/09	BOD	quantity - monthly avg	lbs/dav		212.96
8/31/09 BOD quantity - monthly avg lbs/day 75.1 13 9/30/09 BOD quantity - monthly avg lbs/day 75.1 13 10/31/09 BOD quantity - monthly avg lbs/day 75.1 12 4/30/10 BOD quantity - monthly avg lbs/day 75.1 12 6/30/10 BOD quantity - monthly avg lbs/day 75.1 20 6/30/10 BOD quantity - monthly avg lbs/day 75.1 21 7/31/10 BOD quantity - monthly avg lbs/day 75.1 21 8/31/10 BOD quantity - monthly avg lbs/day 75.1 15 9/30/10 BOD quantity - monthly avg lbs/day 75.1 13 10/31/10 BOD quantity - monthly avg lbs/day 75.1 13 10/31/10 BOD quantity - monthly avg lbs/day 13.4 191 6/30/11 BOD quantity - monthly avg lbs/day 15.1	7/31/09	BOD		 		80
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10/31/09 BOD quantity - monthly avg lbs/day 75.1 12 4/30/10 BOD quantity - monthly avg lbs/day 131.4 17 5/31/10 BOD quantity - monthly avg lbs/day 75.1 20 6/30/10 BOD quantity - monthly avg lbs/day 75.1 21 7/31/10 BOD quantity - monthly avg lbs/day 75.1 13 8/31/10 BOD quantity - monthly avg lbs/day 75.1 15 9/30/10 BOD quantity - monthly avg lbs/day 75.1 15 10/31/10 BOD quantity - monthly avg lbs/day 75.1 77 2/28/11 BOD quantity - monthly avg lbs/day 75.1 146 5/1/07 BOD quantity - daily max lbs/day 150.1 15 6/1/07 BOD quantity - daily max lbs/day 150.1 18 7/31/08 BOD quantity - daily max lbs/day 112.6 <td< td=""><td>9/30/09</td><td>BOD</td><td></td><td></td><td></td><td>136</td></td<>	9/30/09	BOD				136
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9/30/10 BOD quantity - monthly avg lbs/day 75.1 13 10/31/10 BOD quantity - monthly avg lbs/day 75.1 77. 2/28/11 BOD quantity - monthly avg lbs/day 131.4 191 6/30/11 BOD quantity - monthly avg lbs/day 150.1 146 5/1/07 BOD quantity - daily max lbs/day 150.1 15 6/1/07 BOD quantity - daily max lbs/day 150.1 18 7/31/08 BOD quantity - daily max lbs/day 150.1 18 7/31/08 BOD quantity - daily max lbs/day 112.6 29 9/30/08 BOD quantity - daily max lbs/day 112.6 13 5/31/09 BOD quantity - daily max lbs/day 112.6 34 8/31/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 17	7/31/10	BOD	quantity - monthly avg	lbs/day	75.1	139
10/31/10 BOD quantity - monthly avg lbs/day 75.1 77. 2/28/11 BOD quantity - monthly avg lbs/day 131.4 191 6/30/11 BOD quantity - monthly avg lbs/day 75.1 146 5/1/07 BOD quantity - daily max lbs/day 150.1 15 6/1/07 BOD quantity - daily max lbs/day 150.1 18 7/31/08 BOD quantity - daily max lbs/day 112.6 29 9/30/08 BOD quantity - daily max lbs/day 112.6 13 5/31/09 BOD quantity - daily max lbs/day 112.6 34 6/30/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 112.6 29<	8/31/10	BOD	quantity - monthly avg	lbs/day	75.1	157
2/28/11 BOD quantity - monthly avg lbs/day 131.4 191 6/30/11 BOD quantity - monthly avg lbs/day 75.1 146 5/1/07 BOD quantity - daily max lbs/day 150.1 15 6/1/07 BOD quantity - daily max lbs/day 150.1 18 7/31/08 BOD quantity - daily max lbs/day 112.6 29 9/30/08 BOD quantity - daily max lbs/day 112.6 13 5/31/09 BOD quantity - daily max lbs/day 112.6 34 6/30/09 BOD quantity - daily max lbs/day 112.6 34 8/31/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 112.6 29 <td>9/30/10</td> <td>BOD</td> <td>quantity - monthly avg</td> <td>lbs/day</td> <td>75.1</td> <td>139</td>	9/30/10	BOD	quantity - monthly avg	lbs/day	75.1	139
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5/1/07 BOD quantity - daily max lbs/day 150.1 15 6/1/07 BOD quantity - daily max lbs/day 150.1 18 7/31/08 BOD quantity - daily max lbs/day 112.6 29 9/30/08 BOD quantity - daily max lbs/day 112.6 13 5/31/09 BOD quantity - daily max lbs/day 112.6 34 6/30/09 BOD quantity - daily max lbs/day 112.6 34 8/31/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 112.6 29 5/31/10 BOD quantity - daily max lbs/day 112.6 21 7/31/10 BOD quantity - daily max lbs/day 112.6 18	2/28/11	BOD	quantity - monthly avg	lbs/day	131.4	191.3
6/1/07 BOD quantity - daily max lbs/day 150.1 18 7/31/08 BOD quantity - daily max lbs/day 112.6 29 9/30/08 BOD quantity - daily max lbs/day 112.6 13 5/31/09 BOD quantity - daily max lbs/day 112.6 34 6/30/09 BOD quantity - daily max lbs/day 112.6 15 8/31/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 112.6 29 5/31/10 BOD quantity - daily max lbs/day 112.6 21 7/31/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15	6/30/11	BOD		lbs/day	75.1	146.1
6/1/07 BOD quantity - daily max lbs/day 150.1 18 7/31/08 BOD quantity - daily max lbs/day 112.6 29 9/30/08 BOD quantity - daily max lbs/day 112.6 13 5/31/09 BOD quantity - daily max lbs/day 112.6 34 6/30/09 BOD quantity - daily max lbs/day 112.6 15 8/31/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 112.6 29 5/31/10 BOD quantity - daily max lbs/day 112.6 21 7/31/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15					140	
7/31/08 BOD quantity - daily max lbs/day 112.6 29 9/30/08 BOD quantity - daily max lbs/day 112.6 13 5/31/09 BOD quantity - daily max lbs/day 112.6 34 6/30/09 BOD quantity - daily max lbs/day 112.6 34 8/31/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 112.6 29 5/31/10 BOD quantity - daily max lbs/day 112.6 21 7/31/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15 9/30/10 BOD quantity - daily max lbs/day 112.6 15	5/1/07	BOD	quantity - daily max	lbs/day	150.1	153
9/30/08 BOD quantity - daily max lbs/day 112.6 13 5/31/09 BOD quantity - daily max lbs/day 112.6 34 6/30/09 BOD quantity - daily max lbs/day 112.6 34 8/31/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 112.6 29 5/31/10 BOD quantity - daily max lbs/day 112.6 21 7/31/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15 9/30/10 BOD quantity - daily max lbs/day 112.6 15	6/1/07	BOD	quantity - daily max	lbs/day	150.1	182
5/31/09 BOD quantity - daily max lbs/day 112.6 34 6/30/09 BOD quantity - daily max lbs/day 112.6 34 8/31/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 197 20 5/31/10 BOD quantity - daily max lbs/day 112.6 29 6/30/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15 9/30/10 BOD quantity - daily max lbs/day 112.6 15	7/31/08	BOD	quantity - daily max	lbs/day	112.6	290
6/30/09 BOD quantity - daily max lbs/day 112.6 34. 8/31/09 BOD quantity - daily max lbs/day 112.6 15. 9/30/09 BOD quantity - daily max lbs/day 112.6 15. 10/31/09 BOD quantity - daily max lbs/day 112.6 17. 4/30/10 BOD quantity - daily max lbs/day 112.6 29. 5/31/10 BOD quantity - daily max lbs/day 112.6 21. 7/31/10 BOD quantity - daily max lbs/day 112.6 18. 8/31/10 BOD quantity - daily max lbs/day 112.6 15. 9/30/10 BOD quantity - daily max lbs/day 112.6 15.	9/30/08	BOD	quantity - daily max	lbs/day	112.6	137
8/31/09 BOD quantity - daily max lbs/day 112.6 15 9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 197 20 5/31/10 BOD quantity - daily max lbs/day 112.6 29 6/30/10 BOD quantity - daily max lbs/day 112.6 21 7/31/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15 9/30/10 BOD quantity - daily max lbs/day 112.6 16	5/31/09	BOD	quantity - daily max	lbs/day	112.6	349
9/30/09 BOD quantity - daily max lbs/day 112.6 15 10/31/09 BOD quantity - daily max lbs/day 112.6 17 4/30/10 BOD quantity - daily max lbs/day 197 20 5/31/10 BOD quantity - daily max lbs/day 112.6 29 6/30/10 BOD quantity - daily max lbs/day 112.6 21 7/31/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15 9/30/10 BOD quantity - daily max lbs/day 112.6 16	6/30/09	BOD	quantity - daily max	lbs/day	112.6	344
10/31/09 BOD quantity - daily max lbs/day 112.6 17/31/10 4/30/10 BOD quantity - daily max lbs/day 197 20/31/10 5/31/10 BOD quantity - daily max lbs/day 112.6 29/31/20 6/30/10 BOD quantity - daily max lbs/day 112.6 21/31/30 7/31/10 BOD quantity - daily max lbs/day 112.6 18/31/30 8/31/10 BOD quantity - daily max lbs/day 112.6 15/30/30 9/30/10 BOD quantity - daily max lbs/day 112.6 16/30/30	8/31/09	BOD	quantity - daily max	lbs/day	112.6	152
4/30/10 BOD quantity - daily max lbs/day 197 200 5/31/10 BOD quantity - daily max lbs/day 112.6 290 6/30/10 BOD quantity - daily max lbs/day 112.6 210 7/31/10 BOD quantity - daily max lbs/day 112.6 180 8/31/10 BOD quantity - daily max lbs/day 112.6 150 9/30/10 BOD quantity - daily max lbs/day 112.6 160	9/30/09	BOD	quantity - daily max	lbs/day	112.6	152
5/31/10 BOD quantity - daily max lbs/day 112.6 290 6/30/10 BOD quantity - daily max lbs/day 112.6 21 7/31/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15 9/30/10 BOD quantity - daily max lbs/day 112.6 16	10/31/09	BOD	quantity - daily max	lbs/day	112.6	176
6/30/10 BOD quantity - daily max lbs/day 112.6 21 7/31/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15 9/30/10 BOD quantity - daily max lbs/day 112.6 16		BOD	quantity - daily max	lbs/day	197	206
7/31/10 BOD quantity - daily max lbs/day 112.6 18 8/31/10 BOD quantity - daily max lbs/day 112.6 15 9/30/10 BOD quantity - daily max lbs/day 112.6 16	5/31/10	BOD	quantity - daily max	lbs/day	112.6	290
8/31/10 BOD quantity - daily max lbs/day 112.6 15 9/30/10 BOD quantity - daily max lbs/day 112.6 16	6/30/10	BOD	quantity - daily max	lbs/day	112.6	215
9/30/10 BOD quantity - daily max lbs/day 112.6 16	7/31/10	, BOD	quantity - daily max	lbs/day	112.6	180
	8/31/10	BOD	quantity - daily max	lbs/day	112.6	157
2/29/11 POD guardia della 11/11 100 000	9/30/10	BOD	quantity - daily max	lbs/day	112.6	169
	2/28/11	BOD	quantity - daily max	lbs/day	197	301
6/30/11 BOD quantity - daily max lbs/day 112.6 16	6/30/11	BOD	quantity - daily max	lbs/day	112.6	164
4/30/09 fecal coliform bacteria Conc monthly avg col./100 ml 1000 437	4/30/09	fecal coliform bacteria	Conc monthly avg	col./100 ml	1000	4376
7/04/00				 		1752
				†		1973
						1172

TABLE 1 - REMINGTON DISCHARGE VIOLATIONS								
	Outfall 004							
DATE	Parameter	Type of Limit	Units	Permit Limit	Reported Discharge			
6/30/10	fecal coliform bacteria	Conc monthly avg	col./100 ml	1000	4743			
7/31/10	fecal coliform bacteria	Conc monthly avg	col./100 ml	1000	4987			
8/31/10	fecal coliform bacteria	Conc monthly avg	col./100 ml	1000	4132			
9/30/10	fecal coliform bacteria	Conc monthly avg	col./100 ml	1000	4481			
10/31/10	fecal coliform bacteria	Conc monthly avg	col./100 ml	1000	1223			
4/30/11	fecal coliform bacteria	Conc monthly avg	col./100 ml	1000	1239			
6/30/11	fecal coliform bacteria	Conc monthly avg	col./100 ml	1000	17267			
4/30/09	fecal coliform bacteria	Conc daily max	col./100 ml	2000	6800			
6/30/10	fecal coliform bacteria	Conc daily max	col./100 ml	2000	4743			
7/31/10	fecal coliform bacteria	Conc daily max	col./100 ml	2000	4987			
8/31/10	fecal coliform bacteria	Conc daily max	col./100 ml	2000	4132			
9/30/10	fecal coliform bacteria	Conc daily max	col./100 ml	2000	4481			
6/30/11	fecal coliform bacteria	Conc daily max	col./100 ml	2000	17267			