

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
COLORADO RIVER BASIN REGION

CEASE AND DESIST ORDER R7-2023-0043
FOR

TWO-NINE HOSPITALITY, INC. DBA HOLIDAY INN EXPRESS
HOLIDAY INN EXPRESS
WASTEWATER TREATMENT AND DISPOSAL SYSTEMS
CITY OF TWENTYNINE PALMS, SAN BERNARDINO COUNTY

The California Regional Water Quality Control Board, Colorado River Basin Region, (Regional Water Board) finds that:

1. Two-Nine Hospitality, Inc. dba Holiday Inn Express (Discharger) owns and operates a wastewater treatment and disposal system used to treat domestic wastewater generated at the Holiday Inn Express & Suites Twentynine Palms-Joshua Tree (Hotel). The Hotel and the wastewater treatment and disposal system are located at 72535 Twentynine Palms Highway in the City of Twentynine Palms.
2. The Discharger is regulated by Waste Discharge Requirements (WDRs) Order No. R7-2009-0010, adopted by the Regional Water Board on January 22, 2009¹. The Discharger is also regulated by Revised Monitoring and Reporting Program (Revised MRP) Order No. R7-2009-0010-01, issued by the Executive Officer on December 8, 2022.
3. The WDRs contain effluent limitations, prohibitions, specifications, and provisions necessary to protect the beneficial uses of the underlying groundwater and to prevent nuisance conditions from the discharge of waste.

DESCRIPTION OF FACILITY

4. Domestic wastewater from the Hotel flows to a wastewater treatment facility (WWTF) which consists of an activated sludge package treatment plant that includes a lift pump, metering, instrumentation, screening, equalization/anoxic tank, secondary clarifier, and aerobic sludge digester. Effluent from the WWTF is disposed of via seven seepage pits

¹ The WDRs identify Nathsons Construction Inc. as the owner/operator of a proposed La Quinta Inn & Suites Hotel. On February 2, 2015, a Form 200 Report of Waste Discharge was submitted to change the name of the facility to Holiday Inn Express and change the owner/operator to Bislam Hospitality, Inc. On July 11, 2019, a Form 200 was submitted to change the owner/operator to Two-Nine Hospitality Inc dba Holiday Inn Express. Board Order No. R7-2023-0025 formally changes the name of the Discharger.

located in the western parking lot, just south of the package plant. Solids and sludge are removed by a licensed septage hauler.

5. Effluent from the laundry facility flows to a two-chamber septic tank, followed by discharge to six seepage pits in the southern (back) parking lot. The septic tank is pumped as needed. According to the WDRs, laundry effluent is separated from the effluent flowing to the main WWTF to avoid potential upsets caused by the bleach used to wash sheets and towels.
6. The Discharger submitted the construction documents required by the WDRs and received authorization to begin discharging waste on September 8, 2010.

RELEVANT PROVISIONS OF WDRS ORDER NO. R7-2009-0010

7. Discharge Prohibition A.6 of WDRs Order No. R7-2009-0010 states “WWTFs and seepage pits shall be maintained to prohibit sewage or treated effluent from surfacing or overflowing.”
8. Discharge Specification B.1 of WDRs Order No. R7-2009-0010 states “The 30-day monthly average daily discharge from the main WWTF shall not exceed 8,460 gpd.”
9. Discharge Specification B.2 of WDRs Order No. R7-2009-0010 states “The 30-day monthly average daily discharge from the septic tank serving the laundry facilities shall not exceed 1,500 gpd.”
10. Discharge Specification B.3 of WDRs Order No. R7-2009-0010 states “Effluent from both wastewater treatment systems shall not have a pH below 6.0 or above 9.0.”
11. Discharge Specification B.9 of WDRs Order No. R7-2009-0010 states “Effluent from the main WWTF shall not exceeded the following effluent limits:

| Constituent | Units | Monthly Average | Weekly Average | Daily Maximum |
|-------------------------------|--------------|------------------------|-----------------------|----------------------|
| BOD ₅ ¹ | mg/L | 30 | 45 | 65 |
| Total Suspended Solids | mg/L | 30 | 45 | 65 |
| Nitrogen (as Total Nitrogen) | mg/L | 10 | 15 | 20 |
| Total Dissolved Solids (TDS) | mg/L | 470 | -- | -- |

¹5-day biochemical oxygen demand at 20°C

HISTORY OF VIOLATIONS

12. On April 29, 2015, the Discharger was issued a Notice of Noncompliance for violations of the pH and biochemical oxygen demand (BOD) effluent limits.
13. On June 16, 2015, the Discharger was issued a Notice of Noncompliance for violations of the pH, BOD, and total suspended solids (TSS) effluent limits.
14. On August 1, 2018, the City of Twentynine Palms Code Enforcement Officer contacted the Regional Water Board to report that wastewater was surfacing from the Discharger's laundry facility seepage pits. Regional Water Board staff inspected the facility the same day and documented the discharge. On August 7, 2018, the Discharger was issued a Notice of Noncompliance, requiring the Discharger to immediately cease the discharge of wastewater from the laundry seepage pits.
15. On October 5, 2018, the Discharger was issued a Notice of Violation for violations of the BOD, TSS, total dissolved solids (TDS), and total nitrogen effluent limits.
16. On July 10, 2019, the City of Twentynine Palms Code Enforcement Officer contacted the Regional Water Board to report surfacing of wastewater from the laundry facility seepage pits. The surfacing was confirmed by Regional Water Board staff during an inspection on July 10, 2019.
17. On May 20, 2022, the Discharger was issued a Notice of Violation for (a) failure to properly maintain and operate the WWTF at all times, and (b) violations of the BOD, TSS, total nitrogen, TDS, and pH effluent limits.
18. On March 28, 2023, Regional Water Board staff notified the Discharger that its February 2023 monitoring report did not comply with the Revised MRP. In particular, two constituents were not monitored, the laundry flow was not measured, and the monitoring frequency for those constituents which exceeded effluent limits had not been increased from monthly to two samples per month.
19. Attachment A to this Cease and Desist Order lists the Discharger's effluent limit violations from January 2021 through August 2023.
20. The Self-Monitoring reports do not report the volume discharged from the laundry septic tank, and therefore it is unknown whether the Discharger complies with Discharge Specification B.2, the laundry effluent flow limit. With respect to the volume discharged from the WWTF, the Discharger does not measure the effluent flow and instead reports the percentage of hotel capacity. It is not possible to verify these numbers, and therefore not possible to determine whether the Discharger complies with Discharge Specification B.1, the WWTF flow limit.

RECENT ACTIONS BY THE DISCHARGER

21. Laundry effluent was originally discharged to two seepage pits. However, the seepage pits overflowed frequently and in late 2019, the Discharger installed an additional four seepage pits.
22. In response to the May 20, 2022 Notice of Violation, the Discharger began almost-weekly monitoring of the WWTF effluent, and continued this extra monitoring through December 2022. The Discharger also hired a California Registered Engineer who submitted two reports.
 - a. The July 2022 Engineering Report states that the Discharger has replaced the missing/inoperable components (i.e., internal recycle pump, blower #2, and dissolved air flotation pump and piping) of the WWTF. At that time, the operator was in the process of seeding the WWTF and removing solids. The engineer would then evaluate the WWTF's ability to treat the waste to meet the effluent limitations.
 - b. The August 2022 Engineering Report states that when all the WWTF's equipment is operating properly, the effluent still exceeds the total nitrogen and TSS effluent limits. To address this, the Report states that an anoxic tank mixer, a dissolved oxygen probe, a throttle air valve, and a Dissolved Air Flotation isolation valve need to be installed. In addition, the plant operator needs to fine-tune the operation of the sludge pump. The Report states that all tasks will be completed by October 7, 2022.
23. The Discharger has not installed any of the components recommended by its California Registered Engineer. In addition, the March 2023 Self-Monitoring Report states that the Chief Plant Operator is seeking approval to purchase a dissolved oxygen probe and new biochip media to enhance treatment.
24. In summary, the WWTF's effluent continues to exceed the effluent limits, as shown in Attachment A.

REGULATORY CONSIDERATIONS

25. According to the WDRs, discharge from the WWTF is to groundwater within the Dale hydrologic unit of the Lucerne Valley Planning Area.
25. The beneficial uses of the groundwater are defined in the [Water Quality Control Plan for the Colorado River Basin Region](#). The beneficial uses of the Dale hydrologic unit are municipal and domestic water supply, agricultural supply, and industrial supply. The

failure to comply fully with the effluent limits in Order No. R7-2009-0010 threatens these beneficial uses.

27. Water Code section 13301 states, in part: “When a regional board finds that a discharge of waste is taking place, or threatening to take place, in violation of requirements or discharge prohibitions prescribed by the regional board or the state board, the board may issue an order to cease and desist and direct that those persons not complying with the requirements or discharge prohibitions (a) comply forthwith, (b) comply in accordance with a time schedule set by the board, or (c) in the event of a threatened violation, take appropriate remedial or preventive action.”
28. The Regional Water Board finds that a discharge of waste is taking place in violation of WDRs Order No. R7-2009-0010, as described in the Findings of this Order. This Order requires the Discharger to take appropriate remedial action and to comply in accordance with the time schedule set forth below.
29. Water Code section 13267, subdivision (b) states, in part: “In conducting an investigation specified in subdivision (a), the regional board may require that any person who has discharged, discharges, or is suspected of having discharged or discharging, or who proposes to discharge waste within its region [...] that could affect the quality of waters within its region shall furnish, under penalty of perjury, technical or monitoring program reports which the regional board requires. The burden, including costs, of these reports shall bear a reasonable relationship to the need for the report and the benefits to be obtained from the reports. In requiring those reports, the regional board shall provide the person with a written explanation with regard to the need for the reports, and shall identify the evidence that supports requiring that person to provide the reports.”
30. The Discharger owns and operates the Holiday Inn Express wastewater treatment and disposal system which is subject to WDRs Order No. R7-2009-0010 and this Cease and Desist Order. The technical and monitoring reports required by this Order are necessary to determine compliance with the requirements in WDRs Order No. R7-2009-0010 and with this Order to ensure prevention of degradation to groundwater. The cost to produce the reports required by this Order is estimated to be \$1,350 based on statewide rates for a project engineer. Therefore, the burden of production of these reports is reasonable.
31. Issuance of this Order is exempt from the provisions of the California Environmental Quality Act (Pub. Resources Code § 21000 et seq.), in accordance with California Code of Regulations, title 14, section 15321(a)(2).
32. After due notice to the Discharger, and all other affected persons, the Regional Water Board conducted a public hearing at which evidence was received to consider this Cease and Desist Order under Water Code section 13301 to establish a time schedule to achieve compliance with waste discharge requirements.

IT IS HEREBY ORDERED that, pursuant to sections 13301 and 13267 of the Water Code, the Discharger shall implement the following measures in order to achieve compliance with its WDRs:

1. By **January 1, 2024**, submit a technical report, prepared by a California Registered Engineer or Certified Engineering Geologist, documenting that (a) the improvements recommended in the August 2022 Engineer's Report and the March 2023 Self-Monitoring Report (as described in Findings 22.b and 23), have been implemented, (b) that a flow meter has been installed and calibrated to measure the discharge from the laundry septic tank, and (c) that a flow meter has been installed and calibrated to measure the discharge from the WWTF.
2. By **May 1, 2024**, submit a technical report, prepared by a California Registered Engineer or Certified Engineering Geologist, containing an evaluation of the past six months of monitoring data and a discussion of whether the discharge from both the upgraded WWTF and the laundry septic tank will consistently meet the WDR's effluent and flow limits. If not, the report shall include a proposal for additional facility modifications that will be implemented no later than **July 1, 2024**.
3. By **August 1, 2024**, submit a technical report, prepared by a California Registered Engineer or Certified Engineering Geologist, containing an evaluation of all seepage pits to determine whether they are appropriate to consistently dispose of the WWTF effluent and laundry effluent in compliance with Prohibition A.6 of the WDRs. If not, include a proposal for seepage pit improvements that will be implemented no later than **September 15, 2024**.
4. By **October 1, 2024**, submit a technical report, prepared by a California Registered Engineer or Certified Engineering Geologist, documenting that any seepage pit improvements have been completed, that any additional facility modifications have been completed, and certification that the discharge from the WWTF and laundry septic tank can fully comply with the WDR's flow and effluent limits.
5. No later than **October 1, 2024**, the Discharger shall comply with all aspects of its WDRs.
6. The Regional Water Board has transitioned to a paperless office. Therefore, all technical reports required by this Order must be converted to a searchable pdf file and submitted via email to RB7-wdrs_paperless@waterboards.ca.gov.
7. In accordance with California Business and Professions Code sections 6735, 7835, and 7835.1, engineering and geologic evaluations and judgments shall be performed by or under the direction of registered professionals competent and proficient in the fields pertinent to the required activities. All technical reports specified herein that contain

workplans for investigations and studies, that describe the conduct of investigations and studies, or that contain technical conclusions and recommendations concerning engineering and geology shall be prepared by or under the direction of appropriately qualified professional(s), even if not explicitly stated. Each technical report submitted by the Discharger shall bear the professional's signature and stamp.

8. Any person signing a document submitted under this Order shall make the following certification:

"I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document and all attachments and that, based on my knowledge and on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment."

The Executive Officer or her delegee may extend the deadlines contained in this Order if the Discharger demonstrates that circumstances beyond the Discharger's control have created delays, provided that the Discharger continues to undertake all appropriate measures to meet the deadlines. The Discharger shall make any deadline extension request in writing at least 30 days prior to the deadline. The Discharger must obtain written approval from the Executive Officer or her delegee for any departure from the time schedule shown above. Failure to obtain written approval for any departures may result in further enforcement action.

If, in the opinion of the Executive Officer or her delegee, the Discharger fails to comply with the provisions of this Order, the Executive Officer or her delegee may refer this matter to the Attorney General for judicial enforcement, may issue a complaint for administrative civil liability, or may take other enforcement actions. Failure to comply with this Order or the WDRs may result in the assessment of Administrative Civil Liability of up to \$5,000 per violation, per day, depending on the violation, pursuant to the Water Code, including sections 13268 and 13350. The Regional Water Board reserves its right to take any enforcement actions authorized by law.

Any person aggrieved by this action of the Regional Water Board may petition the State Water Resources Control Board (State Water Board) to review the action in accordance with Water Code section 13320 and California Code of Regulations, title 23, sections 2050 and following. The State Water Board must receive the petition by 5:00 p.m., 30 days after the date that this Order becomes final, except that if the thirtieth day following the date that this Order becomes final falls on a Saturday, Sunday, or state holiday, the petition must be received by the State Water Board by 5:00 p.m. on the next business day. Copies of [the law and regulations applicable to filing petitions](#) may be found on the Internet at:

(http://www.waterboards.ca.gov/public_notices/petitions/water_quality) or will be provided upon request.

I, PAULA RASMUSSEN, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an Order issued by the California Regional Water Quality Control Board, Colorado River Basin, on October 10, 2023.

Original Signed by
PAULA RASMUSSEN, Executive Officer

Attachment A: Summary of Effluent Limit Violations

Attachment A to CDO R7-2023-0043

Holiday Inn Express, San Bernardino County

Monitoring results are collated from the Discharger’s self-monitoring reports from January 2021 through August 2023. Constituents listed are those required to be monitored per the Monitoring and Reporting Program. Effluent limits are in () and are from the WDRs. Results in bold and yellow highlighting exceed the WDR effluent limits. WWTF flow has been reported in percentage of occupancy. Laundry flow has not been measured (NR=not recorded). NA= not analyzed. The Discharger voluntarily sampled the Main WWTP weekly from June to December 2022.

| Month, Year | Effluent Limits and Results | | | | | | | | | | |
|----------------|---|---|--|--------------|----------------------|------------------------|-----------------|------------------------|-------------------------------|---------------|-------------------------------|
| | Main WWTF | | | | | | Laundry | | | | Influent |
| | BOD, mg/L (30 monthly/ 45 weekly/ 65 max daily) | TSS, mg/L (30 monthly/ 45 weekly / 65 max daily) | Total N, mg/L (10 monthly/ 15 weekly/ 20 daily) | pH- (6-9) | TDS, mg/L (470) | Flow (8,460 gpd) | pH (6- 9) | Flow (1,500 gpd) | TDS, mg/L (no limit) | MBAS, mg/L | TDS, mg/l (no limit) |
| Aug 2023 | 110/24 | 17/22 | 47/17 | 6.8 | 350 | 3,915* | 7.2 | 9,100* | 440 | 1.1 | 200 |
| July 2023 | 53/10 | 43/27 | 67/21 | 7.4 | 310/360 | 2,742* | 8.5 | 3,913* | 420 | 1.6 | 160 |
| Jun 2023 | 16/9 | 42/26 | 26/22 | 6.8 | 380/ 510 | 3,532* | 9.6 | 1,448* | 690 | 3.0 | 190 |
| May 2023 | 7/8/2 | 61/38/55 | 25/15/26 | 6.6 | 390/ 520 /390 | 3,443* | 8.9 | 1,336* | 490 | 0.39 | 31 |
| Apr 2023 | 2.5/5.8 | 27/9/ 45 | /7/18 | 7.0 | 340/330/380 | 3,552* | 8.0 | 1,336* | 360 | 0.56 | 300 |
| Mar 2023 | 41/21/11 | 85/110/27 | 10/ 26/23 | 7.4/6.7 | 290/420/440 | NR | 7.5 | 3,250 | 380 | 0.56 | 320 |
| Feb 2023 | <5 | 40 | 43 | NA | 410 | 69% | NA | NR | 340 | 1.3 | 290 |
| Jan 2023 | 52 | 19 | 31 | NA | 290 | 46% | NA | NR | 360 | 3.5 | 200 |

| Month, Year | Effluent Limits and Results | | | | | | | | | | |
|----------------|---|---|--|--------------|--------------------|------------------------|-----------------|------------------------|-------------------------------|---------------|-------------------------------|
| | Main WWTF | | | | | | Laundry | | | | Influent |
| | BOD, mg/L (30 monthly/ 45 weekly/ 65 max daily) | TSS, mg/L (30 monthly/ 45 weekly / 65 max daily) | Total N, mg/L (10 monthly/ 15 weekly/ 20 daily) | pH- (6-9) | TDS, mg/L (470) | Flow (8,460 gpd) | pH (6- 9) | Flow (1,500 gpd) | TDS, mg/L (no limit) | MBAS, mg/L | TDS, mg/l (no limit) |
| Dec 2022 | 27 | 16 | 22 | 7.1 | 410 | 48% | 7.1 | NR | 550 | 0.26 | 410 |
| 12/14/22 | 1.5 | 8.8 | 13 | 7.2 | 380 | - | - | - | - | - | - |
| 12/7/22 | 0.52 | 12 | 19 | NA | 520 | - | - | - | - | - | - |
| 11/30/22 | 12 | 22 | 20 | NA | 390 | - | - | - | - | - | - |
| Nov 2022 | 11 | 32 | 24 | 6.9 | 430 | 43% | 9.53 | NR | 670 | 1.3 | 420 |
| 11/9/22 | 35 | 1.8 | 6.3 | 7.3 | 430 | - | - | - | - | - | - |
| 11/2/22 | 29 | 86 | 39 | 7.09 | 440 | - | - | - | - | - | - |
| 10/26/22 | 11 | 270 | 39 | 6.69 | 470 | - | - | - | - | - | - |
| Oct 2022 | 2.6 | 4.7 | 21 | 7.2 | 400 | 42% | 8.46 | NR | 580 | 1.1 | 410 |
| 10/12/22 | 1.4 | 5.3 | 20 | 7.28 | 410 | - | - | - | - | - | - |
| 10/5/22 | 19 | 10 | 12 | 7.67 | 440 | - | - | - | - | - | - |
| 9/28/22 | 0.61 | 85 | 22 | 7.8 | 420 | - | - | - | - | - | - |
| Sep 2022 | NR | 12 | 18 | 7.9 | NR | 42% | 7.45 | NR | 540 | 0.62 | |
| 9/14/22 | 1.3 | 9 | 21 | 7.9 | 440 | - | - | - | - | - | - |

| Month, Year | Effluent Limits and Results | | | | | | | | | | |
|----------------|---|---|--|--------------|--------------------|------------------------|-----------------|------------------------|-------------------------------|---------------|-------------------------------|
| | Main WWTF | | | | | | Laundry | | | | Influent |
| | BOD, mg/L (30 monthly/ 45 weekly/ 65 max daily) | TSS, mg/L (30 monthly/ 45 weekly / 65 max daily) | Total N, mg/L (10 monthly/ 15 weekly/ 20 daily) | pH- (6-9) | TDS, mg/L (470) | Flow (8,460 gpd) | pH (6- 9) | Flow (1,500 gpd) | TDS, mg/L (no limit) | MBAS, mg/L | TDS, mg/l (no limit) |
| 9/7/22 | 6.1 | 12 | 22 | 7.39 | 330 | - | - | - | - | - | - |
| 8/31/22 | <5 | 18 | 31 | 7.8 | 480 | - | - | - | - | - | - |
| 8/24/22 | 0.75 | 19 | 17 | 7.5 | 390 | - | - | - | - | - | - |
| Aug 2022 | 1.9 | 33 | 19 | 7.5 | 370 | 44% | 8.0 | NR | 390 | 1.3 | 370 |
| 8/10/2022 | <5 | 140 | 34 | 7.41 | 530 | - | - | - | - | - | - |
| 8/3/2022 | <5 | 36 | 30 | 7.58 | 460 | - | - | - | - | - | - |
| 7/27/2022 | 0.76 | 30 | 26 | 6.9 | 460 | - | - | - | - | - | - |
| July 2022 | 0.45 | 51 | 26 | 7.09 | 420 | 45% | 8.55 | NR | 570 | 1.5 | 400 |
| 7/13/2022 | <5 | 45 | 24 | 7.49 | 440 | - | - | - | - | - | - |
| 7/6/2022 | 18 | 14 | 18 | 7.21 | 400 | - | - | - | - | - | - |
| 6/29/2022 | 1.9 | 10 | 19 | 7.16 | 350 | - | - | - | - | - | - |
| 6/22/2022 | 1 | 1.2 | 19 | 7.04 | 370 | - | - | - | - | - | - |
| Jun 2022 | 5.6 | 15 | 19 | 7.16 | 430 | 74% | 8.26 | NR | 500 | 1.5 | 170 |
| 6/8/2022 | 4.2 | 9 | 12 | 7.17 | 320 | - | - | - | - | - | - |
| May 2022 | 18 | 890 | 75 | 8.0 | 430 | 74% | 7.1 | NR | 460 | 1.8 | 200 |

| Month, Year | Effluent Limits and Results | | | | | | | | | | |
|----------------|---|---|--|--------------|--------------------|------------------------|-----------------|------------------------|-------------------------------|---------------|-------------------------------|
| | Main WWTF | | | | | | Laundry | | | | Influent |
| | BOD, mg/L (30 monthly/ 45 weekly/ 65 max daily) | TSS, mg/L (30 monthly/ 45 weekly / 65 max daily) | Total N, mg/L (10 monthly/ 15 weekly/ 20 daily) | pH- (6-9) | TDS, mg/L (470) | Flow (8,460 gpd) | pH (6- 9) | Flow (1,500 gpd) | TDS, mg/L (no limit) | MBAS, mg/L | TDS, mg/l (no limit) |
| Apr 2022 | <5 | 55 | 60 | 7.52 | 420 | 76% | 8.36 | NR | 480 | 1.0 | 420 |
| Mar2022 | 2.2 | 32 | 40 | 6.13 | 560 | 79% | 6.7 | NR | 590 | 2.2 | 440 |
| Feb 2022 | <5 | 55 | 60 | 7.52 | 420 | 75% | 8.36 | NR | 480 | 1.0 | 420 |
| Jan 2022 | <5 | 61 | 41 | 7.55 | 590 | 56% | 7.4 | NR | 600 | 2.0 | 450 |
| Dec 2021 | 4.6 | 18 | 11 | 7.5 | 460 | 69% | 8.15 | NR | 630 | 3.0 | 440 |
| Nov 2021 | <5 | 35 | 51 | 5.59 | 580 | 71% | 9.3 | NR | 690 | 2.3 | 450 |
| Oct 2021 | 20 | 13 | 46 | 6.98 | 520 | 81% | 9.57 | NR | 710 | 3.0 | 440 |
| Sep 2021 | 35 | 6.3 | 16 | 7.34 | 240 | 63% | 9.89 | NR | 430 | 1.6 | 180 |
| Aug 2021 | 7 | 68 | 42 | 6.91 | 470 | 64% | 9.4 | NR | 540 | 1.0 | 330 |
| July 2021 | <5 | 8.3 | 33 | 7.02 | 410 | 51% | 8.92 | NR | 530 | 3.5 | 210 |
| Jun 2021 | 4.3 | 7.8 | 40 | 7.03 | 450 | 70% | 9.51 | NR | 660 | 3.7 | 420 |
| May 2021 | 3.9 | 6.1 | 48 | 7.48 | 470 | 66% | 7.37 | NR | 870 | 1.8 | 420 |
| Apr 2021 | 58 | 19 | 5.6 | 6.83 | 600 | 72% | 8.59 | NR | 470 | 0.09 | 370 |
| Mar 2021 | 110 | 39 | 4.0 | 6.92 | 530 | 80% | 6.89 | NR | 550 | 0.08 | 420 |
| Feb 2021 | 82 | 27 | 3.4 | 7.62 | 330 | 72% | 6.57 | NR | 300 | 0.17 | 310 |

| Month, Year | Effluent Limits and Results | | | | | | | | | | |
|----------------|---|---|--|--------------|--------------------|------------------------|-----------------|------------------------|-------------------------------|---------------|-------------------------------|
| | Main WWTF | | | | | | Laundry | | | | Influent |
| | BOD, mg/L (30 monthly/ 45 weekly/ 65 max daily) | TSS, mg/L (30 monthly/ 45 weekly / 65 max daily) | Total N, mg/L (10 monthly/ 15 weekly/ 20 daily) | pH- (6-9) | TDS, mg/L (470) | Flow (8,460 gpd) | pH (6- 9) | Flow (1,500 gpd) | TDS, mg/L (no limit) | MBAS, mg/L | TDS, mg/l (no limit) |
| Jan 2021 | 2.2 | 7.6 | 37 | 6.6 | 390 | | 6.6 | NR | 350 | 9.7 | 200 |

*=estimated