Compliance Maintenance Annual Report

La Crosse City

Last Updated: 5/6/2024 Reporting For: **2023**

Influent Flow and Loading

1. Monthly Average Flows and BOD Loadings

1.1 Verify the following monthly flows and BOD loadings to your facility.

Influent No. 701	Influent Monthly Average Flow, MGD	x	Influent Monthly Average BOD Concentration mg/L	x	8.34	=	Influent Monthly Average BOD Loading, lbs/day
January	8.6901	x	285	x	8.34	=	20,644
February	9.1276	x	295	x	8.34	=	22,482
March	9.0540	x	321	x	8.34	=	24,212
April	13.1212	x	252	x	8.34	=	27,562
May	13.1932	x	251	x	8.34	=	27,646
June	9.8820	x	291	x	8.34	=	23,958
July	8.9935	x	306	x	8.34	=	22,943
August	9.4599	x	366	x	8.34	=	28,873
September	9.7372	x	463	x	8.34	=	37,559
October	9.9423	x	331	x	8.34	=	27,480
November	9.9664	x	585	x	8.34	=	48,654
December	12.6541	x	499	x	8.34	=	52,696

2. Maximum Monthly Design Flow and Design BOD Loading

2.1 Verify the design flow and loading for your facility.

Design	Design Factor	x	%	=	% of Design
Max Month Design Flow, MGD	20	x	90	=	18
		x	100	=	20
Design BOD, lbs/day	29793	x	90	=	26813.7
		x	100	=	29793

2.2 Verify the number of times the flow and BOD exceeded 90% or 100% of design, points earned, and score:

	Months of Influent	Number of times flow was greater than 90% of	Number of times flow was greater than 100% of	Number of times BOD was greater than 90% of design	Number of times BOD was greater than 100% of design
January	1	0	0	0	0
February	1	0	0	0	0
March	1	0	0	0	0
April	1	0	0	1	0
May	1	0	0	1	0
June	1	0	0	0	0
July	1	0	0	0	0
August	1	0	0	1	0
September	1	0	0	1	2
October	1	0	0	1	0
November	1	0	0	1	2
December	1	0	0	1	2
Points per each		2	1	3	2
Exceedances		0	0	7	3
Points		0	0	21	6
Total Number of Points					**27**

27

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3. Flow Meter

3.1 Was the influent flow meter calibrated in the last year?

● Yes Enter last calibration date (MM/DD/YYYY): 2023-09-19

○ No

If No, please explain:

4. Sewer Use Ordinance

4.1 Did your community have a sewer use ordinance that limited or prohibited the discharge of excessive conventional pollutants ((C)BOD, SS, or pH) or toxic substances to the sewer from industries, commercial users, hauled waste, or residences?

● Yes

○ No

If No, please explain:

4.2 Was it necessary to enforce the ordinance?

● Yes

○ No

If Yes, please explain:

FOG from 3 commercial entities.

TSS from 1 commercial entity.

5. Septage Receiving

5.1 Did you have requests to receive septage at your facility?

Septic Tanks	Holding Tanks	Grease Traps
● Yes	● Yes	● Yes
○ No	○ No	○ No

5.2 Did you receive septage at your facility? If yes, indicate volume in gallons.

Septic Tanks

● Yes 1,301,698 gallons

○ No

Holding Tanks

● Yes 1,450,350 gallons

○ No

Grease Traps

● Yes 1,362,850 gallons

○ No

5.2.1 If yes to any of the above, please explain if plant performance is affected when receiving any of these wastes.

We sampled trucked waste at random on a quarterly basis to maintain baselines for those waste streams. We also require sampling for any new waste stream to be hauled in. The current grease receiving area is not the best and can cause some periodic operational issues; however, this will be resolved in the active facility upgrade process which is scheduled to be completed in 2024.

6. Pretreatment

6.1 Did your facility experience operational problems, permit violations, biosolids quality concerns, or hazardous situations in the sewer system or treatment plant that were attributable to commercial or industrial discharges in the last year?

○ Yes

- ● No

If yes, describe the situation and your community's response.

6.2 Did your facility accept hauled industrial wastes, landfill leachate, etc.?

- ● Yes
- ○ No

If yes, describe the types of wastes received and any procedures or other restrictions that were in place to protect the facility from the discharge of hauled industrial wastes.

Leachate received from La Crosse County Solid Waste via the collection system. We receive a waste profile annually from this facility.

Received Metallics process waste via hauler, waste stream is sampled and analyzed 6 times throughout the year.

Total Points Generated	
Score (100 - Total Points Generated)	
Section Grade	

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Effluent Quality and Plant Performance (BOD/CBOD)

1. Effluent (C)BOD Results

1.1 Verify the following monthly average effluent values, exceedances, and points for BOD or CBOD

Outfall No. 001	Monthly Average Limit (mg/L)	90% of Permit Limit > 10 (mg/L)	Effluent Monthly Average (mg/L)	Months of Discharge with a Limit	Permit Limit Exceedance	90% Permit Limit Exceedance
January	25	22.5	6	1	0	0
February	25	22.5	7	1	0	0
March	25	22.5	6	1	0	0
April	25	22.5	5	1	0	0
May	25	22.5	5	1	0	0
June	25	22.5	6	1	0	0
July	25	22.5	7	1	0	0
August	25	22.5	8	1	0	0
September	25	22.5	11	1	0	0
October	25	22.5	6	1	0	0
November	25	22.5	4	1	0	0
December	25	22.5	5	1	0	0
* Equals limit if limit is <= 10						
Months of discharge/yr				12		
Points per each exceedance with 12 months of discharge					7	3
Exceedances					0	0
Points					0	0
Total number of points						**0**

0

NOTE: For systems that discharge intermittently to state waters, the points per monthly exceedance for this section shall be based upon a multiplication factor of 12 months divided by the number of months of discharge. Example: For a wastewater facility discharging only 6 months of the year, the multiplication factor is 12/6 = 2.0

1.2 If any violations occurred, what action was taken to regain compliance?

2. Flow Meter Calibration

2.1 Was the effluent flow meter calibrated in the last year?

● Yes Enter last calibration date (MM/DD/YYYY)

2023-09-19

○ No

If No, please explain:

3. Treatment Problems

3.1 What problems, if any, were experienced over the last year that threatened treatment?

We are under a major facility upgrade for Phosphorus control as well as other plant processes. The fact of construction causes some necessary and unavoidable alterations and hiccups in normal operations.

4. Other Monitoring and Limits

4.1 At any time in the past year was there an exceedance of a permit limit for any other pollutants such as chlorides, pH, residual chlorine, fecal coliform, or metals?

- [x] Yes
- [ ] No

If Yes, please explain:

Monthly E. Coli Geomean exceeded:
August 2023 disinfection treatment has been a challenge. Around a week into this month, we experienced major nocardia growth. At first, we did not suspect this. We were under the assumption it was a result of reduced treatment capacity in aeration and final clarifiers due to ongoing plant upgrades. It wasn't until we did gram staining that we discovered what we were dealing with.
Through this upset, we were trying every trick and tool in the operator's toolbox to no avail. Finally, we reached out to local septic hauler and had them vector off foam in our aeration basins 9/11-12/23. Treatment appears to be turning around. Foam is greatly reduced in aeration and eff. TSS and BOD has been declining. Hopefully this filamentous upset is behind us.

Sept 2023 E. Coll monthly Geomean exceedance.
This deficiency is a continuation from last month. We thought we were turning a comer with vectoring off nocardia foam, but it was short lived. We struggled with disinfection treatment up until the 25th then we saw an improvement. We wonder if weather helped out. It has been dry and hot (Eff. temps above 23'C) and finally on the 23rd we received .88" and continued to receive small amounts of precipitation. Another hindrance is we were still only running on 1/2 of aeration and 1/2 final clarifier capacity. Going forward, next year, we should be in a much better position for disinfection treatment due to major completion to our plant upgrade.

4.2 At any time in the past year was there a failure of an effluent acute or chronic whole effluent toxicity (WET) test?

- [ ] Yes
- [x] No

If Yes, please explain:

4.3 If the biomonitoring (WET) test did not pass, were steps taken to identify and/or reduce source(s) of toxicity?

- [ ] Yes
- [ ] No
- [x] N/A

Please explain unless not applicable:

Total Points Generated	0
Score (100 - Total Points Generated)	100
Section Grade	**A**

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Effluent Quality and Plant Performance (Total Suspended Solids)

1. Effluent Total Suspended Solids Results

1.1 Verify the following monthly average effluent values, exceedances, and points for TSS:

Outfall No. 001	Monthly Average Limit (mg/L)	90% of Permit Limit >10 (mg/L)	Effluent Monthly Average (mg/L)	Months of Discharge with a Limit	Permit Limit Exceedance	90% Permit Limit Exceedance
January	30	27	12	1	0	0
February	30	27	10	1	0	0
March	30	27	9	1	0	0
April	30	27	9	1	0	0
May	30	27	6	1	0	0
June	30	27	8	1	0	0
July	30	27	15	1	0	0
August	30	27	15	1	0	0
September	30	27	16	1	0	0
October	30	27	12	1	0	0
November	30	27	10	1	0	0
December	30	27	13	1	0	0
* Equals limit if limit is <= 10						
Months of Discharge/yr				12		
Points per each exceedance with 12 months of discharge:					**7**	**3**
Exceedances					0	0
Points					0	0
Total Number of Points						**0**

0

NOTE: For systems that discharge intermittently to state waters, the points per monthly exceedance for this section shall be based upon a multiplication factor of 12 months divided by the number of months of discharge.

Example: For a wastewater facility discharging only 6 months of the year, the multiplication factor is 12/6 = 2.0

1.2 If any violations occurred, what action was taken to regain compliance?

Total Points Generated	0
Score (100 - Total Points Generated)	100
Section Grade	**A**

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Effluent Quality and Plant Performance (Ammonia - NH3)

1. Effluent Ammonia Results

1.1 Verify the following monthly and weekly average effluent values, exceedances and points for ammonia

Outfall No. 001	Monthly Average NH3 Limit (mg/L)	Weekly Average NH3 Limit (mg/L)	Effluent Monthly Average NH3 (mg/L)	Monthly Permit Limit Exceedance	Effluent Weekly Average for Week 1	Effluent Weekly Average for Week 2	Effluent Weekly Average for Week 3	Effluent Weekly Average for Week 4	Weekly Permit Limit Exceedance
January	108	108	4.408	0	6.953	2.865	5.756	2.398	0
February	108	108	12.438	0	9.25	8.514		15.994	0
March	108	108	13.146	0		19.047	13.882		0
April	108	108	5.156	0	1.564	3.365	7.283	8.412	0
May	108	108	1.438	0	4.579	.174	1.86	.052	0
June	108	108	4.858	0	8.17	1.54	3.25	6.47	0
July	108	108	2.385	0	2.521	5.549	1.357	.111	0
August	108	108	11.564	0	1.51		12.193	21.36	0
September	108	108	20.565	0	23.87	22.449	27.585	8.354	0
October	108	108	17.588	0	23	13.63	15.48	18.24	0
November	108	108	3.056	0	14.06	.05	.585	0	0
December	108	108	.423	0	1.38	.09	.08	.14	0

Points per each exceedance of Monthly average:	10
Exceedances, Monthly:	0
Points:	0
Points per each exceedance of weekly average (when there is no monthly average):	2.5
Exceedances, Weekly:	0
Points:	0
Total Number of Points	**0**

0

NOTE: Limit exceedances are considered for monthly OR weekly averages but not both. When a monthly average limit exists it will be used to determine exceedances and generate points. This will be true even if a weekly limit also exists. When a weekly average limit exists and a monthly limit does not exist, the weekly limit will be used to determine exceedances and generate points.

1.2 If any violations occurred, what action was taken to regain compliance?

Total Points Generated	0
Score (100 - Total Points Generated)	100
Section Grade	**A**

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Effluent Quality and Plant Performance (Phosphorus)

1. Effluent Phosphorus Results

1.1 Verify the following monthly average effluent values, exceedances, and points for Phosphorus

Outfall No. 001	Monthly Average phosphorus Limit (mg/L)	Effluent Monthly Average phosphorus (mg/L)	Months of Discharge with a Limit	Permit Limit Exceedance
January	1	0.580	1	0
February	1	1.080	1	1
March	1	0.391	1	0
April	1	0.390	1	0
May	1	0.336	1	0
June	1	0.494	1	0
July	1	1.212	1	1
August	1	0.723	1	0
September	1	0.980	1	0
October	1	0.709	1	0
November	1	0.787	1	0
December	1	0.787	1	0
Months of Discharge/yr			12	
Points per each exceedance with 12 months of discharge:				**10**
Exceedances				2
Total Number of Points				**20**

NOTE: For systems that discharge intermittently to waters of the state, the points per monthly exceedance for this section shall be based upon a multiplication factor of 12 months divided by the number of months of discharge.

Example: For a wastewater facility discharging only 6 months of the year, the multiplication factor is 12/6 = 2.0

1.2 If any violations occurred, what action was taken to regain compliance?

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Total Phos. Monthly Exceedance: 1.21 mg/I Lacrosse VVWILI exceeded monthly phos. limit of 1 mg/I. The cause we feel was a combination of events from emergency equipment maintenance, ongoing plant upgrade and possible slug loading. Starting on the 10th we began the process of cleaning our gravity thickeners due to south thickener influent pipe plugging. Normal forward flow along with south thickener wastewater was diverted and pumped to north thickener during cleaning process. Cleaning of north thickener commenced on the 13th. Same process was followed and both thickeners were back online midday Friday 14th. Going into the weekend plant treatment was returning to normal but by Sunday morning effluent began to deteriorate. We suspect that we received a slug of raw wastewater that fouled up our treatment. Monday morning the aeration basin had an unfamiliar smell and foam. The final clarifiers were loaded with scum as well. During normal operational conditions, of all aeration basins and final clarifiers online (currently we are running 1/2 aeration and 1/2 final clarifiers due to plant upgrading), we believe the task of thickener cleaning and slug loading would not have been nearly as detrimental. 2-27-23: INF Composite Sampler malfunctioned. No sample was collected. 2-18-23: Eff Composite sampler malfunctioned. No sample was collected. Monthly Phos. Ave. Exceedance: 1.08mg/I. Limit: 1mg/i We had monthly average total Phos limit exceedance. Reason for exceedance was due to failure of new process aeration system. Parts of new submerged fine bubble diffuser piping broke apart. We quickly isolated and shutdown failed aeration train to negate anymore damage. This quick action drove all forward flow into existing old aeration train. We adjusted secondary parameters as fast as we could to accept all flow thru one aeration train but still experienced a spike in composite effluent phos. sample of 13.28mg/I. 24hrs later 3.47mg/I, and within 48hrs we were back down to .66mg/I. These 2 high readings skewed our monthly phos. average to just over the 1mg/I limit.	**20**

Total Points Generated	20
Score (100 - Total Points Generated)	80
Section Grade	**C**

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Biosolids Quality and Management

1. Biosolids Use/Disposal

1.1 How did you use or dispose of your biosolids? (Check all that apply)

- ☒ Land applied under your permit
- ☐ Publicly Distributed Exceptional Quality Biosolids
- ☒ Hauled to another permitted facility
- ☐ Landfilled
- ☐ Incinerated
- ☐ Other

NOTE: If you did not remove biosolids from your system, please describe your system type such as lagoons, reed beds, recirculating sand filters, etc.

1.1.1 If you checked Other, please describe:

2. Land Application Site

2.1 Last Year's Approved and Active Land Application Sites

2.1.1 How many acres did you have?

6208.4 acres

2.1.2 How many acres did you use?

1111.1 acres

2.2 If you did not have enough acres for your land application needs, what action was taken?

2.3 Did you overapply nitrogen on any of your approved land application sites you used last year? **0**

- ○ Yes (30 points)
- ● No

2.4 Have all the sites you used last year for land application been soil tested in the previous 4 years?

- ● Yes
- ○ No (10 points)
- ○ N/A

3. Biosolids Metals

Number of biosolids outfalls in your WPDES permit:

3.1 For each outfall tested, verify the biosolids metal quality values for your facility during the last calendar year.

Outfall No. 002 - CLASS B CAKE SLUDGE

Parameter	80% of Limit	H.Q. Limit	Ceiling Limit	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	80% Value	High Quality	Ceiling
Arsenic		41	75	0			<2.08	0		0		0		0			0	0
Cadmium		39	85	0			.686	0		0		0		0			0	0
Copper		1500	4300	0			633	0		0		0		0			0	0
Lead		300	840	0			12.3	0		0		0		0			0	0
Mercury		17	57	0			<.469	0		0		0		0			0	0
Molybdenum	60		75	0			8.25	0		0		0		0		0		0
Nickel	336		420	0			23	0		0		0		0		0		0
Selenium	80		100	0			<2.83	0		0		0		0		0		0
Zinc		2800	7500	0			565	0		0		0		0			0	0

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Outfall No. 003 - CLASS B LIQUID SLUDGE

Parameter	80% of Limit	H.Q. Limit	Ceiling Limit	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	80% Value	High Quality	Ceiling
Arsenic		41	75	.805		<1.65		<2.84		1.7		<1.7		<3.04			0	0
Cadmium		39	85	.784		.683		.758		.864		.758		.772			0	0
Copper		1500	4300	827		743		653		644		798		806			0	0
Lead		300	840	15.1		13.3		14.6		13.8		18.1		14.8			0	0
Mercury		17	57	<.086		<1.81		<1.56		<1.86		<1.86		<1.67			0	0
Molybdenum	60		75	22.6		14.5		11		13.5		24		23.7		0		0
Nickel	336		420	26.7		24		22.9		23.8		24		18.3		0		0
Selenium	80		100	1.2		<2.25		<3.87		<2.32		<2.31		<4.15		0		0
Zinc		2800	7500	1060		818		705		736		22.8		675			0	0

Outfall No. 010 - CLASS B LIQUID SLUDGE

Parameter	80% of Limit	H.Q. Limit	Ceiling Limit	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	80% Value	High Quality	Ceiling
Arsenic		41	75	0		0		0		0		0		0			0	0
Cadmium		39	85	0		0		0		0		0		0			0	0
Copper		1500	4300	0		0		0		0		0		0			0	0
Lead		300	840	0		0		0		0		0		0			0	0
Mercury		17	57	0		0		0		0		0		0			0	0
Molybdenum	60		75	0		0		0		0		0		0		0		0
Nickel	336		420	0		0		0		0		0		0		0		0
Selenium	80		100	0		0		0		0		0		0		0		0
Zinc		2800	7500	0		0		0		0		0		0			0	0

0

3.1.1 Number of times any of the metals exceeded the high quality limits OR 80% of the limit for molybdenum, nickel, or selenium = 0

Exceedence Points

- ● 0 (0 Points)
- ○ 1-2 (10 Points)
- ○ > 2 (15 Points)

3.1.2 If you exceeded the high quality limits, did you cumulatively track the metals loading at each land application site? (check applicable box)

- ○ Yes
- ○ No (10 points)
- ● N/A - Did not exceed limits or no HQ limit applies (0 points)
- ○ N/A - Did not land apply biosolids until limit was met (0 points)

3.1.3 Number of times any of the metals exceeded the ceiling limits = 0

Exceedence Points

- ● 0 (0 Points)
- ○ 1 (10 Points)
- ○ > 1 (15 Points)

3.1.4 Were biosolids land applied which exceeded the ceiling limit?

- ○ Yes (20 Points)
- ● No (0 Points)

3.1.5 If any metal limit (high quality or ceiling) was exceeded at any time, what action was taken? Has the source of the metals been identified?

4. Pathogen Control (per outfall):

4.1 Verify the following information. If any information is incorrect, use the Report Issue button under the Options header in the left-side menu.

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Outfall Number:	**002**
Biosolids Class:	B
Bacteria Type and Limit:	Fecal Coliform
Sample Dates:	03/01/2023 - 04/30/2023
Density:	40,100
Sample Concentration Amount:	CFU/G TS
Requirement Met:	Yes
Land Applied:	Yes
Process:	Anaerobic Digestion
Process Description:	Sludge is mixed and heated to 95 degrees in the anaerobic digestion process

Outfall Number:	**003**
Biosolids Class:	B
Bacteria Type and Limit:	Fecal Coliform
Sample Dates:	01/01/2023 - 02/28/2023
Density:	29,500
Sample Concentration Amount:	CFU/G TS
Requirement Met:	Yes
Land Applied:	No
Process:	Anaerobic Digestion
Process Description:	Sludge is mixed and heated to 95 degrees in the anaerobic digestion process

Outfall Number:	**003**
Biosolids Class:	B
Bacteria Type and Limit:	Fecal Coliform
Sample Dates:	03/01/2023 - 04/30/2023
Density:	79,900
Sample Concentration Amount:	CFU/G TS
Requirement Met:	Yes
Land Applied:	Yes
Process:	Anaerobic Digestion
Process Description:	Sludge is mixed and heated to 95 degrees in the anaerobic digestion process

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Outfall Number:	**003**
Biosolids Class:	B
Bacteria Type and Limit:	Fecal Coliform
Sample Dates:	05/01/2023 - 06/30/2023
Density:	33,300
Sample Concentration Amount:	CFU/G TS
Requirement Met:	Yes
Land Applied:	Yes
Process:	Anaerobic Digestion
Process Description:	Sludge is mixed and heated to 95 degrees in the anaerobic digestion process

Outfall Number:	**003**
Biosolids Class:	B
Bacteria Type and Limit:	Fecal Coliform
Sample Dates:	07/01/2023 - 08/31/2023
Density:	2,299
Sample Concentration Amount:	CFU/G TS
Requirement Met:	Yes
Land Applied:	No
Process:	Anaerobic Digestion
Process Description:	Sludge is mixed and heated to 95 degrees in the anaerobic digestion process

Outfall Number:	**003**
Biosolids Class:	B
Bacteria Type and Limit:	Fecal Coliform
Sample Dates:	09/01/2023 - 10/31/2023
Density:	2,300
Sample Concentration Amount:	CFU/G TS
Requirement Met:	Yes
Land Applied:	Yes
Process:	Anaerobic Digestion
Process Description:	Sludge is mixed and heated to 95 degrees in the anaerobic digestion process

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Outfall Number:	**003**
Biosolids Class:	B
Bacteria Type and Limit:	Fecal Coliform
Sample Dates:	11/01/2023 - 12/31/2023
Density:	104,000
Sample Concentration Amount:	CFU/G TS
Requirement Met:	Yes
Land Applied:	No
Process:	Anaerobic Digestion
Process Description:	Sludge is mixed and heated to 95 degrees in the anaerobic digestion process

Outfall Number:	**010**
Biosolids Class:	B
Bacteria Type and Limit:	Fecal Coliform
Sample Dates:	01/01/2023 - 12/31/2023
Density:	79,900
Sample Concentration Amount:	CFU/G TS
Requirement Met:	Yes
Land Applied:	No
Process:	Anaerobic Digestion
Process Description:	Sludge is heated to 95 degrees at all time and well mixed to meet vector attraction.

0

4.2 If exceeded Class B limit or did not meet the process criteria at the time of land application.

4.2.1 Was the limit exceeded or the process criteria not met at the time of land application?

○ Yes (40 Points)

● No

If yes, what action was taken?

5. Vector Attraction Reduction (per outfall):

5.1 Verify the following information. If any of the information is incorrect, use the Report Issue button under the Options header in the left-side menu.

Outfall Number:	**002**
Method Date:	04/26/2023
Option Used To Satisfy Requirement:	Volatile Solids Reduction
Requirement Met:	Yes
Land Applied:	Yes
Limit (if applicable):	>=38
Results (if applicable):	41.8

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Outfall Number:	**003**
Method Date:	01/29/2023
Option Used To Satisfy Requirement:	Volatile Solids Reduction
Requirement Met:	Yes
Land Applied:	No
Limit (if applicable):	>=38
Results (if applicable):	65.4

Outfall Number:	**003**
Method Date:	03/08/2023
Option Used To Satisfy Requirement:	Volatile Solids Reduction
Requirement Met:	Yes
Land Applied:	Yes
Limit (if applicable):	>=38
Results (if applicable):	57.9

Outfall Number:	**003**
Method Date:	07/24/2023
Option Used To Satisfy Requirement:	Volatile Solids Reduction
Requirement Met:	Yes
Land Applied:	Yes
Limit (if applicable):	>=38
Results (if applicable):	59.6

Outfall Number:	**003**
Method Date:	07/07/2023
Option Used To Satisfy Requirement:	Volatile Solids Reduction
Requirement Met:	Yes
Land Applied:	No
Limit (if applicable):	>=38
Results (if applicable):	58.3

Outfall Number:	**003**
Method Date:	09/08/2023
Option Used To Satisfy Requirement:	Volatile Solids Reduction
Requirement Met:	Yes
Land Applied:	Yes
Limit (if applicable):	>=38
Results (if applicable):	61.4

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Outfall Number:	**003**
Method Date:	11/10/2023
Option Used To Satisfy Requirement:	Volatile Solids Reduction
Requirement Met:	Yes
Land Applied:	No
Limit (if applicable):	>=38
Results (if applicable):	60.6

Outfall Number:	**010**
Method Date:	03/08/2023
Option Used To Satisfy Requirement:	Volatile Solids Reduction
Requirement Met:	Yes
Land Applied:	No
Limit (if applicable):	>=38
Results (if applicable):	40.4

0

5.2 Was the limit exceeded or the process criteria not met at the time of land application?

- ○ Yes (40 Points)
- ● No

If yes, what action was taken?

6. Biosolids Storage

6.1 How many days of actual, current biosolids storage capacity did your wastewater treatment facility have either on-site or off-site?

- ● >= 180 days (0 Points)
- ○ 150 - 179 days (10 Points)
- ○ 120 - 149 days (20 Points)
- ○ 90 - 119 days (30 Points)
- ○ < 90 days (40 Points)
- ○ N/A (0 Points)

0

6.2 If you checked N/A above, explain why.

7. Issues

7.1 Describe any outstanding biosolids issues with treatment, use or overall management:

Total Points Generated	0
Score (100 - Total Points Generated)	100
Section Grade	**A**

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Staffing and Preventative Maintenance (All Treatment Plants)

1. Plant Staffing

1.1 Was your wastewater treatment plant adequately staffed last year?

- ● Yes
- ○ No

If No, please explain:

Could use more help/staff for:

1.2 Did your wastewater staff have adequate time to properly operate and maintain the plant and fulfill all wastewater management tasks including recordkeeping?

- ● Yes
- ○ No

If No, please explain:

2. Preventative Maintenance

2.1 Did your plant have a documented AND implemented plan for preventative maintenance on major equipment items?

- ● Yes (Continue with question 2) ☐☐
- ○ No (40 points)☐☐

If No, please explain, then go to question 3:

2.2 Did this preventative maintenance program depict frequency of intervals, types of lubrication, and other tasks necessary for each piece of equipment?

- ● Yes
- ○ No (10 points)

2.3 Were these preventative maintenance tasks, as well as major equipment repairs, recorded and filed so future maintenance problems can be assessed properly?

- ● Yes
  - ○ Paper file system
  - ○ Computer system
  - ● Both paper and computer system
- ○ No (10 points)

0

3. O&M Manual

3.1 Does your plant have a detailed O&M and Manufacturer Equipment Manuals that can be used as a reference when needed?

- ● Yes
- ○ No

4. Overall Maintenance /Repairs

4.1 Rate the overall maintenance of your wastewater plant.

- ○ Excellent
- ○ Very good
- ● Good
- ○ Fair
- ○ Poor

Describe your rating:

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The La Crosse WWTP is an older facility and we continue to upgrade to ensure reliability. We are in the last year of a major upgrade which started in March of 2021 which will touch most of the WWTP over several years. Included will be Biosolids management by installing a biosolids heat dryer and storage silo, low level Phosphorus compliance through the addition of disc filters, and dewatering equipment to gain capacity within our digestion process which will give us the ability to handle more solids. We will also add gas collection and a methane engine for energy production with the goal of being energy neutral.

Total Points Generated	0
Score (100 - Total Points Generated)	100
Section Grade	**A**

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Operator Certification and Education

1. Operator-In-Charge

1.1 Did you have a designated operator-in-charge during the report year?

- ● Yes (0 points)
- ○ No (20 points)

Name: JARED R GREENO

Certification No: 31667

0

2. Certification Requirements

2.1 In accordance with Chapter NR 114.56 and 114.57, Wisconsin Administrative Code, what level and subclass(es) were required for the operator-in-charge (OIC) to operate the wastewater treatment plant and what level and subclass(es) were held by the operator-in-charge?

Sub Class	SubClass Description	WWTP	OIC		
		Advanced	OIT	Basic	Advanced
A1	Suspended Growth Processes	X			X
A2	Attached Growth Processes				
A3	Recirculating Media Filters				
A4	Ponds, Lagoons and Natural				
A5	Anaerobic Treatment Of Liquid				
B	Solids Separation	X			X
C	Biological Solids/Sludges	X			X
P	Total Phosphorus	X			X
N	Total Nitrogen				
D	Disinfection	X			X
L	Laboratory	X			X
U	Unique Treatment Systems				
SS	Sanitary Sewage Collection	X	NA	X	NA

2.2 Was the operator-in-charge certified at the appropriate level and subclass(es) to operate this plant? (Note: Certification in subclass SS is required 5 years after permit reissuance.)

- ● Yes (0 points)
- ○ No (20 points)

2.3 For wastewater treatment facilities with a registered or certified laboratory, is at least one operator that works in the laboratory certified at the basic level in the laboratory (L) subclass?

- ● Yes
- ○ No
- ○ N/A – Wastewater treatment facility does not have a registered or certified laboratory

2.4 For wastewater treatment facilities that own and operate a sanitary sewage collection system, has at least one operator been designated the OIC for sanitary sewage collection system and certified at the basic level in the sanitary sewage collection system (SS) subclass?

- ● Yes
- ○ No
- ○ N/A – Owner of the Wastewater treatment facility does not own and operate a sanitary sewage collection system

0

3. Succession Planning

3.1 In the event of the loss of your designated operator-in-charge, did you have a contingency plan to ensure the continued proper operation and maintenance of the plant that includes one or more of the following options (check all that apply)?

- ☒ One or more additional certified operators on staff

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☐ An arrangement with another certified operator ☐ An arrangement with another community with a certified operator ☐ An operator on staff who has an operator-in-training certificate for your plant and is expected to be certified within one year ☐ A consultant to serve as your certified operator ☐ None of the above (20 points) If "None of the above" is selected, please explain:	**0**
4. Continuing Education Credits 4.1 If you had a designated operator-in-charge, was the operator-in-charge earning Continuing Education Credits at the following rates? OIT and Basic Certification: ○ Averaging 6 or more CECs per year. ○ Averaging less than 6 CECs per year. Advanced Certification: ● Averaging 8 or more CECs per year. ○ Averaging less than 8 CECs per year.	

Total Points Generated	0
Score (100 - Total Points Generated)	100
Section Grade	**A**

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Financial Management

1. Provider of Financial Information

Name: Jared Greeno

Telephone: 608-789-7322 (XXX) XXX-XXXX

E-Mail Address (optional): greenoja@cityoflacrosse.org

2. Treatment Works Operating Revenues

2.1 Are User Charges or other revenues sufficient to cover O&M expenses for your wastewater treatment plant AND/OR collection system ?

- ● Yes (0 points) ☐☐
- ○ No (40 points)

If No, please explain:

2.2 When was the User Charge System or other revenue source(s) last reviewed and/or revised?

Year: 2023

- ● 0-2 years ago (0 points) ☐☐
- ○ 3 or more years ago (20 points)☐☐
- ○ N/A (private facility)

2.3 Did you have a special account (e.g., CWFP required segregated Replacement Fund, etc.) or financial resources available for repairing or replacing equipment for your wastewater treatment plant and/or collection system?

- ● Yes (0 points)
- ○ No (40 points)

0

REPLACEMENT FUNDS [PUBLIC MUNICIPAL FACILITIES SHALL COMPLETE QUESTION 3]

3. Equipment Replacement Funds

3.1 When was the Equipment Replacement Fund last reviewed and/or revised?

Year: 2023

- ● 1-2 years ago (0 points)☐☐
- ○ 3 or more years ago (20 points)☐☐
- ○ N/A

If N/A, please explain:

3.2 Equipment Replacement Fund Activity

3.2.1 Ending Balance Reported on Last Year's CMAR		$ 1,841,954.58
3.2.2 Adjustments - if necessary (e.g. earned interest, audit correction, withdrawal of excess funds, increase making up previous shortfall, etc.)		$ 0.00
3.2.3 Adjusted January 1st Beginning Balance		$ 1,841,954.58
3.2.4 Additions to Fund (e.g. portion of User Fee, earned interest, etc.)	+	$ 0.00

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3.2.5 Subtractions from Fund (e.g., equipment replacement, major repairs - use description box 3.2.6.1 below*) - $ 0.00

3.2.6 Ending Balance as of December 31st for CMAR Reporting Year $ 1,841,954.58

All Sources: This ending balance should include all Equipment Replacement Funds whether held in a bank account(s), certificate(s) of deposit, etc.

3.2.6.1 Indicate adjustments, equipment purchases, and/or major repairs from 3.2.5 above.

3.3 What amount should be in your Replacement Fund? $ 1,666,125.72

0

Please note: If you had a CWFP loan, this amount was originally based on the Financial Assistance Agreement (FAA) and should be regularly updated as needed. Further calculation instructions and an example can be found by clicking the SectionInstructions link under Info header in the left-side menu.

3.3.1 Is the December 31 Ending Balance in your Replacement Fund above, (#3.2.6) equal to, or greater than the amount that should be in it (#3.3)?

- ● Yes
- ○ No

If No, please explain.

4. Future Planning

4.1 During the next ten years, will you be involved in formal planning for upgrading, rehabilitating, or new construction of your treatment facility or collection system?

- ● Yes - If Yes, please provide major project information, if not already listed below.☐☐
- ○ No

Project #	Project Description	Estimated Cost	Approximate Construction Year
1	Repair/rehab sanitary sewer collection system	$365,000	2023
2	Sanitary lift station rehabilitation	$1,370,000	2025
3	Treatment plant facility upgrades for low level phosphorus removal, biosolids management, methane production/energy capture. 3 year project.	$62,000,000	2021
4	Repair/rehab sanitary sewer collection system	$1,370,000	2024
5	Sanitary lift station rehabilitation	$100,000	2024
6	Sanitary forcemain rehabilitation	$800,000	2024
7	Sanitary lift station electrical and control upgrades	$733,500	2024
8	Repair/rehab sanitary sewer collection system	$365,000	2023
9	Treatment plant facility upgrades for low level phosphorus removal, biosolids management, methane production/energy capture. 3 year project.	$62,000,000	2021
10	Repair/rehab sanitary sewer collection system	$1,370,000	2025
11	Sanitary lift station rehabilitation	$100,000	2024
12	Sanitary lift station electrical and control upgrades	$733,500	2026
13	Sanitary lift station electrical and control upgrades	$733,500	2026
14	Sanitary lift station electrical and control upgrades	$733,500	2027
15	Sanitary lift station electrical and control upgrades	$733,500	2027

5. Financial Management General Comments

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ENERGY EFFICIENCY AND USE

6. Collection System

6.1 Energy Usage

6.1.1 Enter the monthly energy usage from the different energy sources:

COLLECTION SYSTEM PUMPAGE: Total Power Consumed

Number of Municipally Owned Pump/Lift Stations: 26

	Electricity Consumed (kWh)	Natural Gas Consumed (therms)
January	66,863	1,156
February	62,207	983
March	61,792	778
April	84,528	474
May	77,599	206
June	52,779	41
July	50,861	32
August	50,961	28
September	48,689	25
October	48,961	90
November	53,591	372
December	41,077	763
Total	**699,908**	**4,948**
Average	**58,326**	**412**

6.1.2 Comments:

6.2 Energy Related Processes and Equipment

6.2.1 Indicate equipment and practices utilized at your pump/lift stations (Check all that apply):

- ☐ Comminution or Screening
- ☒ Extended Shaft Pumps
- ☒ Flow Metering and Recording
- ☒ Pneumatic Pumping
- ☒ SCADA System
- ☒ Self-Priming Pumps
- ☒ Submersible Pumps
- ☒ Variable Speed Drives
- ☐ Other:

6.2.2 Comments:

6.3 Has an Energy Study been performed for your pump/lift stations?

- ● No
- ○ Yes

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Year:

By Whom:

Describe and Comment:

6.4 Future Energy Related Equipment

6.4.1 What energy efficient equipment or practices do you have planned for the future for your pump/lift stations?

7. Treatment Facility

7.1 Energy Usage

7.1.1 Enter the monthly energy usage from the different energy sources:

TREATMENT PLANT: Total Power Consumed/Month

	Electricity Consumed (kWh)	Total Influent Flow (MG)	Electricity Consumed/ Flow (kWh/MG)	Total Influent BOD (1000 lbs)	Electricity Consumed/ Total Influent BOD (kWh/1000lbs)	Natural Gas Consumed (therms)
January	431,560	269.39	1,602	639.96	674	949
February	514,080	255.57	2,012	629.50	817	2,965
March	394,240	280.67	1,405	750.57	525	1,871
April	435,200	393.64	1,106	826.86	526	498
May	516,520	408.99	1,263	857.03	603	22
June	431,200	296.46	1,454	718.74	600	0
July	473,920	278.80	1,700	711.23	666	0
August	583,040	293.26	1,988	895.06	651	66
September	324,800	292.12	1,112	1,126.77	288	298
October	330,400	308.21	1,072	851.88	388	5,289
November	420,000	298.99	1,405	1,459.62	288	8,429
December	462,000	392.28	1,178	1,633.58	283	11,885
Total	**5,316,960**	**3,768.38**		**11,100.80**		**32,272**
Average	**443,080**	**314.03**	**1,441**	**925.07**	**526**	**3,227**

7.1.2 Comments:

7.2 Energy Related Processes and Equipment

7.2.1 Indicate equipment and practices utilized at your treatment facility (Check all that apply):

- ☐ Aerobic Digestion
- ☒ Anaerobic Digestion
- ☒ Biological Phosphorus Removal
- ☐ Coarse Bubble Diffusers
- ☒ Dissolved O2 Monitoring and Aeration Control
- ☒ Effluent Pumping

☒ Fine Bubble Diffusers
☒ Influent Pumping
☒ Mechanical Sludge Processing
☒ Nitrification
☒ SCADA System
☒ UV Disinfection
☒ Variable Speed Drives
☐ Other:

7.2.2 Comments:

7.3 Future Energy Related Equipment

7.3.1 What energy efficient equipment or practices do you have planned for the future for your treatment facility?

Enhanced methane gas production to use as sustainable energy replacement. Energy efficiency upgrades to the BNR system.

8. Biogas Generation

8.1 Do you generate/produce biogas at your facility?
○ No
● Yes

If Yes, how is the biogas used (Check all that apply):
☒ Flared Off
☐ Building Heat
☒ Process Heat
☐ Generate Electricity
☐ Other:

9. Energy Efficiency Study

9.1 Has an Energy Study been performed for your treatment facility?
● No
○ Yes
☐ Entire facility
Year:
By Whom:
Describe and Comment:
☐ Part of the facility

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Year:

By Whom:

Describe and Comment:

Total Points Generated	0
Score (100 - Total Points Generated)	100
Section Grade	**A**

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Sanitary Sewer Collection Systems

1. Capacity, Management, Operation, and Maintenance (CMOM) Program

1.1 Do you have a CMOM program that is being implemented?

- ● Yes
- ○ No

If No, explain:

1.2 Do you have a CMOM program that contains all the applicable components and items according to Wisc. Adm Code NR 210.23 (4)?

- ● Yes
- ○ No (30 points)
- ○ N/A

If No or N/A, explain:

1.3 Does your CMOM program contain the following components and items? (check the components and items that apply)

☒ Goals [NR 210.23 (4)(a)]

Describe the major goals you had for your collection system last year:

Goal to clean 33% of the collection system annually.

Did you accomplish them?

- ● Yes
- ○ No

If No, explain:

☒ Organization [NR 210.23 (4) (b)]☐☐

Does this chapter of your CMOM include:

- ☒ Organizational structure and positions (eg. organizational chart and position descriptions)
- ☒ Internal and external lines of communication responsibilities
- ☒ Person(s) responsible for reporting overflow events to the department and the public

☒ Legal Authority [NR 210.23 (4) (c)]

What is the legally binding document that regulates the use of your sewer system?

Sewer Use Ordinance

If you have a Sewer Use Ordinance or other similar document, when was it last reviewed and revised? (MM/DD/YYYY) 2017-07-07

Does your sewer use ordinance or other legally binding document address the following:

- ☒ Private property inflow and infiltration
- ☒ New sewer and building sewer design, construction, installation, testing and inspection
- ☒ Rehabilitated sewer and lift station installation, testing and inspection
- ☒ Sewage flows satellite system and large private users are monitored and controlled, as necessary
- ☒ Fat, oil and grease control
- ☒ Enforcement procedures for sewer use non-compliance

☒ Operation and Maintenance [NR 210.23 (4) (d)]

Does your operation and maintenance program and equipment include the following:

- ☒ Equipment and replacement part inventories
- ☒ Up-to-date sewer system map
- ☒ A management system (computer database and/or file system) for collection system information for O&M activities, investigation and rehabilitation

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☒ A description of routine operation and maintenance activities (see question 2 below)
☒ Capacity assessment program
☒ Basement back assessment and correction
☒ Regular O&M training

☒ Design and Performance Provisions [NR 210.23 (4) (e)]☐☐

What standards and procedures are established for the design, construction, and inspection of the sewer collection system, including building sewers and interceptor sewers on private property?

☒ State Plumbing Code, DNR NR 110 Standards and/or local Municipal Code Requirements
☒ Construction, Inspection, and Testing
☐ Others:

☒ Overflow Emergency Response Plan [NR 210.23 (4) (f)]☐☐

Does your emergency response capability include:

☒ Responsible personnel communication procedures
☒ Response order, timing and clean-up
☒ Public notification protocols
☒ Training
☒ Emergency operation protocols and implementation procedures

☒ Annual Self-Auditing of your CMOM Program [NR 210.23 (5)]☐☐

☐ Special Studies Last Year (check only those that apply):

☐ Infiltration/Inflow (I/I) Analysis
☐ Sewer System Evaluation Survey (SSES)
☐ Sewer Evaluation and Capacity Managment Plan (SECAP)
☐ Lift Station Evaluation Report
☐ Others:

0

2. Operation and Maintenance

2.1 Did your sanitary sewer collection system maintenance program include the following maintenance activities? Complete all that apply and indicate the amount maintained.

Cleaning	41.58	% of system/year
Root removal	3.69	% of system/year
Flow monitoring	0	% of system/year
Smoke testing	0	% of system/year
Sewer line televising	9.41	% of system/year
Manhole inspections	41.58	% of system/year
Lift station O&M	104	# per L.S./year
Manhole rehabilitation	1.70	% of manholes rehabbed
Mainline rehabilitation	.10	% of sewer lines rehabbed
Private sewer inspections	0	% of system/year
Private sewer I/I removal	0	% of private services

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River or water crossings: 0 % of pipe crossings evaluated or maintained

Please include additional comments about your sanitary sewer collection system below:

3. Performance Indicators

3.1 Provide the following collection system and flow information for the past year.

27.67	Total actual amount of precipitation last year in inches
35.3	Annual average precipitation (for your location)
198.9	Miles of sanitary sewer
26	Number of lift stations
0	Number of lift station failures
1	Number of sewer pipe failures
25	Number of basement backup occurrences
37	Number of complaints
11.08	Average daily flow in MGD (if available)
14.45	Peak monthly flow in MGD (if available)
45.0	Peak hourly flow in MGD (if available)

3.2 Performance ratios for the past year:

0.00	Lift station failures (failures/year)
0.01	Sewer pipe failures (pipe failures/sewer mile/yr)
0.01	Sanitary sewer overflows (number/sewer mile/yr)
0.13	Basement backups (number/sewer mile)
0.19	Complaints (number/sewer mile)
1.3	Peaking factor ratio (Peak Monthly:Annual Daily Avg)
4.1	Peaking factor ratio (Peak Hourly:Annual Daily Avg)

4. Overflows

LIST OF SANITARY SEWER (SSO) AND TREATMENT FACILITY (TFO) OVERFLOWS REPORTED **

	Date	Location	Cause	Estimated Volume
0	9/26/2023 11:00:00 AM - 9/26/2023 12:30:00 PM	905 Joseph Houska Drive La Crosse, WI 54601	Broken Sewer, Broken Sewer	105,000

** If there were any SSOs or TFOs that are not listed above, please contact the DNR and stop work on this section until corrected.

What actions were taken, or are underway, to reduce or eliminate SSO or TFO occurences in the future?

A contractor accidentally drove a sheet pile rail through the RAS pipe. The flow was stopped, site was contained, and a pipe repair made. Contactor was warned to be careful and adhere to markings.

5. Infiltration / Inflow (I/I)

5.1 Was infiltration/inflow (I/I) significant in your community last year?

○ Yes

● No

If Yes, please describe:

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5.2 Has infiltration/inflow and resultant high flows affected performance or created problems in your collection system, lift stations, or treatment plant at any time in the past year?

- ○ Yes
- ● No

If Yes, please describe:

5.3 Explain any infiltration/inflow (I/I) changes this year from previous years:

Some I & I has been reduced due to pipe replacements as needed.

5.4 What is being done to address infiltration/inflow in your collection system?

We line and replace sewer mains where ground water is an issue and rehab the manholes. We also conduct flow monitoring when necessary to identify areas to focus our efforts for reducing I&I.

Total Points Generated	0
Score (100 - Total Points Generated)	100
Section Grade	**A**

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Grading Summary

WPDES No: 0029581

SECTIONS	LETTER GRADE	GRADE POINTS	WEIGHTING FACTORS	SECTION POINTS
Influent				
BOD/CBOD	A	4	10	40
TSS	A	4	5	20
Ammonia	A	4	5	20
Phosphorus	C	2	3	6
Biosolids	A	4	5	20
Staffing/PM	A	4	1	4
OpCert	A	4	1	4
Financial	A	4	1	4
Collection	A	4	3	12
TOTALS			**34**	**130**
GRADE POINT AVERAGE (GPA) = 3.82				

Notes:
A = Voluntary Range (Response Optional)
B = Voluntary Range (Response Optional)
C = Recommendation Range (Response Required)
D = Action Range (Response Required)
F = Action Range (Response Required)

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Resolution or Owner's Statement

Name of Governing Body or Owner: City of La Crosse

Date of Resolution or Action Taken: 2024-06-13

Resolution Number:

Date of Submittal:

ACTIONS SET FORTH BY THE GOVERNING BODY OR OWNER RELATING TO SPECIFIC CMAR SECTIONS (Optional for grade A or B. Required for grade C, D, or F):

Influent Flow and Loadings: Grade =

Effluent Quality: BOD: Grade = A

Effluent Quality: TSS: Grade = A

Effluent Quality: Ammonia: Grade = A

Effluent Quality: Phosphorus: Grade = C

Total Phos. Monthly Exceedance: 1.21 mg/I
Lacrosse VVWILI exceeded monthly phos. limit of 1 mg/I. The cause we feel was a combination of events from emergency equipment maintenance, ongoing plant upgrade and possible slug loading. Starting on the 10th we began the process of cleaning our gravity thickeners due to south thickener influent pipe plugging. Normal forward flow along with south thickener wastewater was diverted and pumped to north thickener during cleaning process. Cleaning of north thickener commenced on the 13th. Same process was followed and both thickeners were back online midday Friday 14th. Going into the weekend plant treatment was returning to normal but by Sunday morning effluent began to deteriorate. We suspect that we received a slug of raw wastewater that fouled up our treatment. Monday morning the aeration basin had an unfamiliar smell and foam. The final clarifiers were loaded with scum as well.
During normal operational conditions, of all aeration basins and final clarifiers online (currently we are running 1/2 aeration and 1/2 final clarifiers due to plant upgrading), we believe the task of thickener cleaning and slug loading would not have been nearly as detrimental.

2-27-23: INF Composite Sampler malfunctioned. No sample was collected.
2-18-23: Eff Composite sampler malfunctioned. No sample was collected.
Monthly Phos. Ave. Exceedance: 1.08mg/I. Limit: 1mg/i
We had monthly average total Phos limit exceedance. Reason for exceedance was due to failure of new process aeration system. Parts of new submerged fine bubble diffuser piping broke apart. We quickly isolated and shutdown failed aeration train to negate anymore damage. This quick action drove all forward flow into existing old aeration train. We adjusted secondary parameters as fast as we could to accept all flow thru one aeration train but still experienced a spike in composite effluent phos. sample of 13.28mg/I. 24hrs later 3.47mg/I, and within 48hrs we were back down to .66mg/I. These 2 high readings skewed our monthly phos. average to just over the 1mg/I limit.

Compliance Maintenance Annual Report

La Crosse City

Last Updated: 5/6/2024

Reporting For: **2023**

Biosolids Quality and Management: Grade = A

Staffing: Grade = A

Operator Certification: Grade = A

Financial Management: Grade = A

Collection Systems: Grade = A

(Regardless of grade, response required for Collection Systems if SSOs were reported)

TSO: A contractor accidentally drove a sheet pile rail through the RAS pipe. The flow was stopped, site was contained, and a pipe repair made. Contactor was warned to be careful and adhere to markings.

ACTIONS SET FORTH BY THE GOVERNING BODY OR OWNER RELATING TO THE OVERALL GRADE POINT AVERAGE AND ANY GENERAL COMMENTS

(Optional for G.P.A. greater than or equal to 3.00, required for G.P.A. less than 3.00)

G.P.A. = 3.82