



**Subject:** Notice of Violation  
**Ref.** INDUSTRIAL WASTEWATER DISCHARGE PERMT NO. B-10- 1285-4

**Date:** May 11, 2018

**To:** Jared Greeno

Description of Violation at the City Brewing Company LLC Pretreatment plant:

- The Specific violation of the monthly limit of TSS (5500 pounds/day average) was violated in February and March of 2018

Response to the Violation at the City Brewing Company LLC Pretreatment plant:

- Call Jared Greeno to discuss the violations and setup a meeting on 5/4/18 to review the violations and have an action plan to discuss at the meeting.
- Hired Mike Davy to review City Brewery's data and to develop an action plan to discuss with the City.
- Sent to the City before the 5/4/18 meeting information of the Brewery's project improvements, the discharge data summarized in an attached spreadsheet, and the Brewery's response to the points listed in your summary of the 1/31/2018 meeting.

Action Plan:

- Attachment

Regards,

A handwritten signature in blue ink, appearing to read "Gerald Clements".

Gerald Clements  
Director of Engineering  
City Brewery Co. LLC  
Tel. (608) 785-4344  
Cell (608) 790-5374  
Fax (608) 785-4299  
Email g\_clements@citybrewery

## ACTION PLAN

### PRETREATMENT TSS/COD NOV

### CITY BREWING/CITY OF LA CROSSE

**MAY 10, 2018**

#### TSS/COD Compliance

1. Clean out sludge from EQ Tank to regain capacity and improve performance. (June-July pending landfill approval)
2. COD meter upgrade to monitor organic slug loads. Consider monitoring reactor pH. (June)
3. Shipping all yeast offsite to reduce loading.
4. Continued emphasis on in-plant control of slug loads.
5. Nutrient addition in 2017 improved COD reduction but may have increased TSS. Retain Stover Group to optimize pretreatment process. (August)
6. Investigate adjusting EQ operation to reduce impacts of slug loads. (September)
7. Inspect solids separation system when reactor roof repaired. (4Q)
8. Request interim increase in monthly average pounds per day allocated mass capacity (May):

	<b>COD</b>	<b>TSS</b>
<i>Existing Limit</i>	<i>8,500</i>	<i>5,500</i>
Dec-17	6,346	3,363
Jan-18	7,567	6,261
Feb-18	6,492	8,818
Mar-18	7,922	7,481
Apr-18	5,477	6,541
<i>Interim Limit</i>	<i>8,500</i>	<i>8,500</i>

#### Notifications

1. Automatic Alarms. Flow alarm based on monitor in LS at bypass level. COD alarm based on COD monitor. Notification to EMS, monitored by engine room. Notification to WWTP operators and Gerald Clements.
2. Add reactor pH alarm. (July)
3. Personnel Alarms. Spills, slugs. Daily discharge report to department heads.
4. Alarm Notification to City by WWTP operators and Gerald Clements.
5. Monthly progress reports to City on the 1<sup>st</sup> of each month, May-November.

#### Phosphorus

1. Increased frequency of monitoring for Total Phosphorus. (Weekly. In progress)
2. Periodic Phosphorus speciation. (Based on TP concentrations)
3. Chemical inventory. (August)
4. Review of nutrients added to reactor.