Ohio Environmental Protection Agency

Mike DeWine, Governor
Jon Husted, Lt. Governor
Laurie Stevenson, Director

August 1, 2022

Re: Lima WWTP
Inspection
NPDES
Allen County
2PE00000

Mayor and Council
City of Lima
50 Town Square
Lima, Ohio 45804

Subject: Nine Minimum Control Implementation/Combined Sewer Overflow Inspection

Dear Mayor Brown,

On June 9, 2022, Ohio EPA staff Peggy Christie, Ryan Gierhart, and I conducted an inspection of the wastewater collection and treatment system for the City of Lima (City). The purpose of the inspection was to determine compliance with Ohio's environmental laws and regulations as found in Chapter 6111 of the Ohio Revised Code (ORC) and Chapter 3745-33 of the Ohio Administrative Code (OAC) and the terms and conditions of the Lima - WWTP NPDES Permit 2PE000000*ND. This letter focuses on the combined sewer overflows (CSOs), sanitary sewer overflows (SSOs), implementation of the nine minimum controls (NMCs) for reducing CSOs, and the status of the City's Long Term Control Plan (LTCP).

Findings

The City entered into a federal Consent Decree (case 3:14 CV 2551) on January 13, 2015. The Consent Decree (CD) includes a number of conditions to improve operations & maintenance, mitigate known discharges, and implement the approved LTCP, which was incorporated into the CD as Appendix A. . The LTCP proposes to control CSOs to 5 events per typical year and eliminate all SSOs through a series of projects to be completed by 2038. Recently, the City achieved substantial completion of the 13-million gallon Simmons Field equalization basin and began implementation of the Lima WWTP Flow Maximization Plan.

Part II, Item E of the current NPDES permit (2PE00000*ND) lists the NMCs to be implemented in order to minimize pollutant loadings during wet weather events. Discussion regarding the City's efforts for each of the NMCs and recommendations for additional measures to improve upon current efforts is located in Attachment A.

Conclusion

Discussion and observations made during the inspection, as well as a review of information that you have submitted to this office, indicates that the City is in compliance with permit requirements calling for implementation of the NMCs at this time. Please note that continued implementation of the NMCs is critical to achieving compliance with your NPDES permit.

Recommendations

The recommendations below are not orders but are offered by Ohio EPA in an effort to provide compliance assistance to your facility. It is recommended that the City:

- **Investigate the integrity of the weir wall at CSO 008.**
- **Replace the missing signs at CSOs on the Ottawa River.**
- **Develop the hydraulic model such that CSO occurrence and volume may be predicted for all CSOs and SSOs.**

If you have questions or concerns regarding this letter, I can be reached by telephone at (614) 644-2138 or e-mail at david.brumbaugh@epa.ohio.gov.

Sincerely,

David Brumbaugh
Environmental Specialist 3
NPDES, Central Office
Ohio EPA, Division of Surface Water

encl: Attachment A: City of Lima Nine Minimum Controls Inspection Summary
Attachment B: NPDES Compliance Inspection Report (CSO/NMC)

ec: Kim Furry, Lima – WWTP Manager
Eric Bontrager, Lima – Environmental Compliance Manager
Shawn Dershem, Lima – Assistant Supervisor
Tom Poffenbarger, Ohio EPA – DSW/NWDO
Alex Smaili, Ohio EPA -DSW/NWDO
Ryan Gierhart, Ohio EPA – DSW/NWDO
Peggy Christie, Ohio EPA – DSW/NWDO

Attachment A
City of Lima Nine Minimum Controls Inspection Summary

On June 9, 2022, Ohio EPA Division of Surface Water (DSW) conducted an NMC/CSO Inspection at the Lima WWTP and collection system. Part II – Other Requirements Item E, in the permittee's NPDES permit (2PE00000*ND), indicates that the entire wastewater treatment system shall be operated and maintained so that the total loading of pollutants discharged during wet weather is minimized. This is to be accomplished through use of what is known as the Nine Minimum Controls (NMCs). Part II.B. of the National Combined Sewer Overflow (CSO) Control Policy discusses implementation requirements for these control measures, which are listed and discussed below.

1. Proper operation & regular maintenance programs for the sewer system and CSOs.
Staff employed by the City operate and maintain the wastewater treatment plant (WWTP) and collection system. All CSOs are inspected quarterly during dry weather and after rains of ¼" or more. All 32 pump stations are inspected at least weekly, though all are equipped with alarms, backup power connections, and are monitored via SCADA. Per the CD, the City has a schedule to inspect the full collection system every 8-10 years, which includes jet-cleaning and camera work. Maintenance is tracked through daily log books which are scanned for retention and summarized in monthly reports. In accordance with the CD, the City developed and is implementing a Capacity, Maintenance, and Operations Management (CMOM) program. The City has also developed a CSO Operational Plan.

2. Maximize use of the collection system for storage.
The City has recently installed a 13-MG equalization basin and utilizes approximately 3-MG of interceptor in-line storage prior to activation of the main five CSO structures. Routine sewer cleaning removes accumulated debris that occupy capacity in the system. The five main CSOs have flapgates and CSO 008 has a check valve to prevent river water intrusion (RWI). Several other overflow structures have flapgates or duckbills, though not all have an RWI device. Many of the overflow weirs, including the five main CSOs, have been set to appropriate elevations. However, there are several weirs which will likely need to be raised, though those determinations will be made as the hydraulic model is developed and SSO basins are evaluated. The weir wall at CSO 008 (Baxter Street) is tall but appears to have buckled, perhaps allowing discharge below the top of the weir wall. **Recommend investigating the integrity of the weir wall at CSO 008.**

3. Review and modification of pretreatment requirements to assure CSO impacts are minimized.
The City maintains a pretreatment program for 21 industrial users (IUs). All permits for batch-discharging IUs include conditions for wet weather. For example, Ford is a batch discharger that withholds flow during wet weather. P&G must request permission from the City to contribute flow to the system during a precipitation event.

4. Maximize flow at the WWTP for treatment.
The Lima WWTP is an activated sludge facility with an average daily design flow of 18.5 MGD. Treatment systems include influent screening, grit & scum removal, primary sedimentation, activated sludge, secondary clarification, biological nitrification towers, ferrous chloride addition, and chlorine disinfection (with dechlorination). The permittee has recently developed and implemented the *Lima WWTP Flow Maximization Plan* (FMP), which was approved by U.S. EPA on March 2, 2022. Based on the FMP, the facility has several wet weather operation modes, depending on the influent flow rate:

< 30 MGD: all flow passes through all treatment processes, in series.

30-40 MGD: all flow receives secondary treatment via conventional activated sludge (capacity 40 MGD) and up to 30 MGD passes through the nitrification towers. However, 10 MGD is routed around the nitrification towers (proposed to be monitored as station 603 in the draft renewal permit) and mixes with nitrification tower effluent at the chlorine contact tanks.

40-70 MGD: Flows up to 40 MGD receive secondary treatment via conventional activated sludge. Flows from 40 to 70 MGD are directed to auxiliary primary clarifiers, then to the nitrification towers, bypassing secondary treatment. Bypass flow, proposed to be monitored as station 604 in the draft renewal permit, is blended with secondary treatment effluent at the chlorine contact tanks.

Often, the WWTP cannot reach peak capacity before the five main CSOs activate, due to the quick reactivity of the interceptor hydraulic grade line to rain. Other CSOs or SSOs farther out in the system can discharge prior to the WWTP reaching peak capacity if heavy precipitation is localized around an outfall.

5. Prohibition of CSOs during dry weather.
All known CSOs and SSOs are inspected quarterly. If a dry weather overflow (DWO) is observed, a crew is dispatched to investigate and remove debris if necessary. Screens at the five main CSOs and the storage basin are cleaned if debris accumulation threatens to blind the screens.

6. Control of solid and floatable materials in CSOs.
The City implements a program for regular cleaning of the sewer system, with a CD requirement to camera and jet the full system every 8-10 years. goal of 15,000 LF per day. The five main CSOs and the storage basin are equipped with screens to minimize the discharge of debris.

7. Pollution prevention.
The City operates street cleaning and leaf removal operations. Catch basins are inspected regularly and cleaned when needed but are the responsibility of the field services department. The City collaborates with Allen County Health Department for hazardous waste control and proper mercury removal.

8. Public Notification to ensure that the public receives adequate notification of CSO occurrences and impacts.
The City's CSO Public Notification Plan was approved by Ohio EPA on October 19, 2018. In accordance with the plan, activation notifications and an annual report are posted to the City's website, and emails are sent to designated individuals. The plan indicated there are no potentially-impacted public access areas. Signs are placed at CSOs, though the signs at a few of the five main CSOs were observed to be missing during the inspection. **It is recommended that the City replace the missing signs.** Signs are placed where SSOs discharge to streams or ditches but not at storm sewer outfalls that convey SSOs sewage. The City collaborates with the Allen County Soil and Water Conservation District and the Ottawa River Coalition to produce educational materials for the public.

9. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls.
Discharge occurrence and volume at the five main CSOs is monitored using level sensors. Occurrences at all other CSOs and SSOs are monitored using a floating block mechanism. For the purpose of public notification, volume for these structures are estimated to be 2% of the volume from the five main CSOs. TSS and CBOD5 is monitored at the five main CSOs in accordance with the current permit. The City has eight rain gauges, two at the WWTP and the rest distributed among sewer basins around the system; the rain gauges at the WWTP report precipitation at 5-minute intervals. The City is currently

implementing a flow metering project to facilitate development and calibration of a hydraulic model of the collection system. **It is recommended that the hydraulic model be developed such that CSO occurrence and volume may be predicted for all CSOs and SSOs.** Submission of this data in eDMR will facilitate Ohio EPA's tracking of the CSO reduction program.

State of Ohio Environmental Protection Agency
Central Office

NPDES Compliance Inspection Report

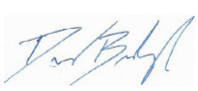
Section A: National Data System Coding					
Permit #	**NPDES #**	**Month/Day/Year**	**Inspection Type**	**Inspector**	**Facility Type**
OH0026069	2PE00000*ND	6/9/22	CSO/NMC	S	1
Watershed:	041000070306 Lima Reservoir-Ottawa River				

Section B: Facility Data		
Name and Location of Facility Inspected	**Entry Time**	**Permit Effective Date**
Lima WWTP 1200 Fort Amanda Road Lima, Ohio 45804	11:00 am	September 1, 2017
	Exit Time	**Permit Expiration Date**
	3:30 pm	August 31, 2022
Name(s) and Title(s) of On-Site Representatives	**Phone Number(s)**	
Kim Furry, WWTP Manager Eric Bontrager, Environmental Compliance Manager Shawn Dershem, Assistant Supervisor	kim.furry@cityhall.lima.oh.us, 419-221-5198 eric.bontrager@cityhall.lima.oh.us, 419-221-5136 shawn.dershem@cityhall.lima.oh.us, 419-221-5191	
Name, Address and Title of Responsible Official	**Phone Number**	
City of Lima 50 Town Square Lima, Ohio 45804	419-228-5462	

Section C: Areas Evaluated During Inspection (S = Satisfactory, M = Marginal, U = Unsatisfactory, N = Not Evaluated)					
N	Permit	N	Flow Measurement	N	Pretreatment
	Records/Reports	N	Laboratory		Compliance Schedule
	Operations & Maintenance	N	Effluent/Receiving Waters		Self-Monitoring Program
N	Facility Site Review	N	Sludge Storage/Disposal	N	Other
	Collection System				

Section D: Summary of Findings (Attach additional sheets if necessary)

- Investigate the integrity of the weir wall at CSO 008.
- Replace the missing signs at CSOs on the Ottawa River.
- Develop the hydraulic model such that CSO occurrence and volume may be predicted for all CSOs and SSOs.

Inspector	Reviewer
David Brumbaugh Environmental Specialist III NPDES Ohio EPA, Central Office Division of Surface Water	Ryan Gierhart, P.E. Environmental Specialist III NPDES Ohio EPA, Northwest District Office Division of Surface Water
Signature:  Date: 8/1/22	Signature:  Date: 7/29/2022

Ohio EPA	CSO INSPECTION CHECKLIST				PAGE __ OF 9
CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
CSO IDENTIFICATION					
1. Are all CSO, SSO, and Bypass locations identified and permitted? Include the total number of each.	X				18 permitted CSOs (outfall 036 has been eliminated) One permitted bypass: 604, secondary treatment bypass (headworks bypass 057 has been eliminated 32 SSOs: not permitted
2. Does the facility have maps/schematics of the sewer system depicting Combined Sewer System (CSS) areas and Sanitary Sewer System (SSS) areas including CSO, bypass and SSO locations and receiving stream(s)?	X				
3. Are all CSOs identified by latitude/longitude, identification number, and receiving stream?	X				CSOs identified in Part II, Items D and E, lat/long included in draft renewal
SANITARY SEWER OVERFLOWS (SSOs) & WATER IN BASEMENT (WIB)					
4. Have there been any SSOs since the last inspection?	X				Numerous SSO structures in multiple basins, to be addressed after CSOs
5. Have there been any WIB complaints since the last inspection?	X				3 to 6 per year that are the City's responsibility
6. Is there a WIB response plan?	X				Field Services or Environmental Compliance receive calls; camera truck is dispatched within 24 hours to inspect main and lateral; if City's responsibility, will dispatch vac truck to clear sewer
DRY WEATHER OVERFLOWS (DWOs)					
7. How often does the facility check CSO locations during dry weather?					Quarterly, recently started
8. If DWOs are identified, has the facility properly notified Ohio EPA of all DWO discharges? How?		X			

CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
9. If DWOs are occurring, does the facility have a corrective action plan to eliminate them? If yes, describe plan including defined tasks and schedules.			X		
DESCRIPTION OF SYSTEM					
10. What percentage of the system has combined sewers?					60%
11. Is there an inventory of the whole sewer system (e.g. sewer system map), and, if so, are the following items identified?					GIS mapping
a. All combined sewers and all sanitary sewers,	X				Storm, sanitary are color coded
b. All storm sewers connected to combined sewers,	X				
c. All major interceptors and trunk sewers,	X				
d. All sewer sizes, slopes and materials,	X				Full system isn't known but GIS includes this info for those sewers the City knows
e. All manholes and catch basins,	X				
f. All CSOs, SSOs, treatment plant bypasses and outfalls and the receiving stream(s).	X				
g. All control structures (regulators, diversion structures, weirs, valves....),	X				

CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
h. All pump and lift stations and their capacities,	X				
i. All locations for sampling, monitoring, sensors, and telemetering devices,	X				
j. All remote CSO treatment facilities including unit processes and capacities,	X				13-MG storage basin (gravity in, pump out) – at least partially represented in GIS, perhaps not fully
12. Is the capacity of each interceptor sufficient to handle all dry weather flows?	X				
13. Is the peak treatment capacity known for each unit process at the WWTP? Include peak hydraulic flow, peak sustained treatable flow and average design flow.	X				City recently developed Flow Maximization Plan to optimize treatment to peak flows ADDF = 18.5 MGD Secondary peak = 40 MGD sustainable (can reach 48-50 for a short time) Nitrification towers peak = 30 MGD Max peak flow (including partially-treated bypass) = 70 MGD
14. Are portions of the interceptors or other lines adequately sized relative to the WWTP capacity? If not, identify undersized interceptors.	X				Interceptors can deliver more than WWTP peak capacity Interceptor in-line storage (~3 MG) is used before filling EQ (13 MG), then CSOs activate
15. Is the wet weather treatment capacity of the WWTP fully used before CSOs occur?		X			Hydraulic grade line can rise too fast to deliver enough flow to the WWTP, staff will ramp up Baxter St PS in advance of rain SSOs or CSOs other than the main 5 can discharge first if heavy rain is localized
16. How many publicly owned pump stations are in the collection system?					32
17. Are all pump stations adequately sized and operating as designed? Are mechanisms in place to ensure the continuous pump operation? Does this include operable and/or telemetered alarms?	X				All alarmed, connected to SCADA A few will likely need to be upsized, that determination will be made as sewer basins are evaluated through CD implementation

CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
18. Is standby power available for pump stations and CSO controls?	X				All have at least a hookup for a portable generator, a few have permanent generators installed
OPERATION & MAINTENANCE					
19. Has the facility developed an Operational Plan or O&M manual? Does it address O&M of the collection system and overflows?	X				Have developed a CMOM as required by the CD, includes a CSO Operations Plan
20. When was the O&M manual last reviewed and updated?					WWTP O&M = 2019 CMOM = 2018
21. Is the facility implementing the O&M manual?	X				
22. Does the facility conduct regular inspections of the sewer system? If yes, what is the inspection method and frequency/schedule for the following:	X				
a. CSO (and SSO) outfall structures,	X				Quarterly in dry weather After ¼" rain
b. Regulator and diversion structures,	X				
c. Pump/lift stations,	X				At least weekly (WWTP staff manages lift stations and overflows)
d. Sewers (e.g. televise), and	X				Full system must be inspected every 8-10 years, per CD
e. Surface water anti-intrusion devices (e.g. flapgates, etc.)?	X				Flapgates at 5 main CSOs are inspected same as CSO structure A few other structures have flapgates, one overflow has a duckbill Baxter overflow has a check valve, cannot see it
23. Are malfunctions of equipment repaired or replaced in a timely manner? If yes, give example.	X				Pumps and parts get replaced as soon as an order can be delivered (delays lately)

CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
24. Does the facility check for and eliminate illegal connections? If yes, describe method and frequency.	X				Discovery is generally complaint driven, though camera work can reveal connections City may install a check valve if the lateral condition is good and connection is not illegal
25. Does the facility properly operate all CSO control facilities during both dry and wet weather?	X				
26. Does the facility have schedules for routine maintenance such as catch basin cleaning and cleaning of trunk and interceptor sewers?	X				179 catch basins on a cleaning rotation, approximately monthly Jetting sewers is part of the CD camera inspection requirements City has 3 vac trucks (2 field services, 1 WWTP)
27. Does the facility have schedules for pollution prevention measures such as: regular street cleaning in combined sewer areas with added emphasis on leaf removal, industrial flow control, drainage area marking, etc.?	X				Leaf removal provided by City Goal to clean all streets once per month 21 industrial users - Ford is a batch discharger, withholds flows during wet weather - P&G have to ask permission prior to discharge in wet weather - all IU permits for batch dischargers have conditions for wet weather
28. Are the stop planks, weirs, etc. set at the highest level practical without causing basement backups or excessive street flooding?		X			Some will likely be raised as basins are evaluated. The weir wall at Baxter Pump Station (CSO 008) is tall but perhaps buckling, might be allowing discharge below the top of the wall? **Recommend investigating the integrity of the CSO 008 weir wall**
29. Does the facility have (and describe) procedures for:					
a. Cleaning screening equipment after, and if necessary, during each storm,	X				The 5 main CSOs have self-cleaning screens Large bar rack at EQ basin, self-cleaning only if the basin fills completely… if basin partially fills several times, staff will jet to avoid too much accumulation
b. Regulating diversion and bypass valves, and	X				
c. Reducing solids deposition in the CSS?	X				

CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
30. Can the overall condition of the entire sewer collection system and CSOs be described as good, if not, why?	X				There are issues but its ok
31. Are inspections documented, and, if so, does documentation include:					
a. Results of various types of inspections,	X				
b. Dates and times, and	X				
c. Corrective action taken if problems found?	X				no tracking currently, will be a new effort
32. Is a log book of maintenance and repair on the sewer system and CSO structures maintained, and, if so, does the log book contain:	X				Maintenance log book sheets are scanned and saved, summarized in a monthly report
a. Identification of type of problems like collapsed and blocked sewers, basement backups, street flooding... (or indicate routine maintenance),	X				
b. Repair made (or maintenance activity conducted), and	X				
c. Time and date?	X				
RECORDS					
33. Are flow records kept for each lift station?	X				Hour meters and flow meters, connected to SCADA

CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
34. Are all overflows monitored in accordance with the permit?	X				
35. How are CSOs monitored (chalk, block, level sensor, etc.)?					Level sensors at the 5 main CSOs, floating blocks at all other CSOs, SSOs
36. Are the following records kept for each CSO location:					
a. Discharge frequency,	X				Level sensors at the 5 main CSOs, floating blocks at all other CSOs, SSOs
b. Flow magnitude (volume); how is this measured?,	X				Only for the 5 main CSOs (calculated from level data) For other CSOs, volume estimated for public notification, assumed as 2% of 5 main CSOs volume **Recommend that hydraulic model development include capability to predict occurrences and volume**
c. Pollutant characterization,	X				TSS, CBOD5 per permit
d. Precipitation,	X				Two rain gages at WWTP (frequency = 5 minutes) 6 other gauges at Koop, Lost Creek, 15th & Main, EQ basin, Cole Street, and Hickory Knoll
e. Specific causes of overflows,		X			
37. Are records of CSO control facilities (e.g., excess flow retention basin levels) maintained?					SCADA tracks EQ levels
38. Does the facility keep specific records on DWOs, SSOs and/or plant bypasses, and are they properly reported on the eDMRs?	X				E. coli and ammonia sampled at one SSO monthly
39. Is the facility implementing its Public Notification Plan? What records are being kept and where?	X				PN Plan approved October 19, 2018 Notifications and annual report posted to City website Emails go to Allen County Health Dept and several individuals uptown
40. Has notification signage been placed at all CSO outfalls and impacted public access areas?	X				Signs at a few of the main CSOs were missing. **Recommend replacing missing signs** Signs are placed at SSOs that discharge to ditch or stream but *not* if it goes to storm sewer. No public access areas listed in the PN Plan.

CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
41. Is the agency notified of all overflows in accordance with the permit?	X				
COMPLIANCE SCHEDULES					
42. Have there been any major repairs to the collection system since the last inspection?	X				Recent sewer lining projects – two of three phases complete
43. Is the facility meeting the terms and conditions of an enforcement action compliance schedule to correct sewers, CSOs, SSOs, DWOs, and/or bypassing? If no, describe.	X				Federal Consent Order entered January 13, 2015
44. Is the facility meeting the compliance schedules established in the CSO Section of the facility's NPDES permit?			X		
45. Does a permit or enforcement agreement require implementation of each of the nine minimum controls?	X				Part II, E
46. Has documentation on the implementation of the nine minimum controls been submitted?	X				CSO Public Notification Annual Report
47. Is the facility implementing the nine minimum controls as follows:					
a. Proper operation and regular maintenance programs for the sewer system and CSOs,	X				

CHECK THE APPROPRIATE BOX (Y = YES, N = NO)	Y	N	N/A	UTD	(N/A = Not Applicable, UTD = Unable To Determine) COMMENTS:
b. Maximum use of the collection system for storage,	X				
c. Review and modification of pretreatment requirements to assure CSO impacts are minimized,	X				
d. Maximize flow to the WWTP for treatment,	X				Flow Maximization Plan approved by U.S. EPA OECA on March 2, 2022
e. Prohibition of CSOs during dry weather,	X				
f. Control of solid and floatable materials in CSOs,	X				
g. Pollution prevention,	X				Hazardous waste removal, collaborate on mercury management with Allen Co. Health Dept,
h. Public notification to ensure that the public receives adequate notification of CSO occurrences and impacts,	X				Contract with local Soil & Water Conservation District for education Contribute to educational videos with the Ottawa River Coalition
i. Monitoring to effectively characterize CSO impacts and the efficacy of CSO controls?	X				Currently implementing a flow metering project to facilitate model development, calibration
48. Has the facility developed (or is developing) a Long Term Control Plan (LTCP)?	X				Schedule incorporated into CD as Appendix B
49. Is the facility implementing the LTCP?	X				EQ basin substantial completion in July 2021
50. Has the permittee requested an extension of time?		X			