SMITH & LOWNEY, P.L.L.C.
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August 7, 2017

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AUG - 9 2017
EPA Region 10
Office of the Regional Administrator

Via Certified Mail - Return Receipt Requested

James Dahl
Production Operations Manager
Cargill, Inc
PO Box 39
Ferndale, WA 98248-0039

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

On May 24, 2017, the attached Notice of Intent to Sue under the Clean Water Act and Request for Copy of Stormwater Pollution Prevention Plan was sent without precipitation data as referenced in Section I.A of the notice letter. Enclosed, please find the notice letter with the precipitation data attached.

Very truly yours,

Smith & Lowney, PLLC

By: _____
Richard A. Smith
Katherine Brennan

cc: Scott Pruitt, Administrator, U.S. EPA
Michelle Pirzadeh, Acting Region 10 Administrator, U.S. EPA
Maia Bellon, Director, Washington Department of Ecology
Registered Agent (CT Corporation System, 711 Capitol Way S, Ste. 204, Olympia, WA 98501-1267)

SMITH & LOWNEY, P.L.L.C.
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May 24, 2017

Via Certified Mail - Return Receipt Requested

James Dahl
Production Operations Manager
Cargill, Inc
PO Box 39
Ferndale, WA 98248-0039

Re: **NOTICE OF INTENT TO SUE UNDER THE CLEAN WATER ACT AND REQUEST FOR COPY OF STORMWATER POLLUTION PREVENTION PLAN**

Dear Managing Agent:

We represent Puget Soundkeeper Alliance ("Soundkeeper"), 130 Nickerson Street, Suite 107, Seattle, WA 98109, (206) 297-7002, and RE Sources for Sustainable Communities ("RE Sources"), 2309 Meridian St., Bellingham, WA 98225, (360) 733-8307. Any response or correspondence related to this matter should be directed to us at the letterhead address. This letter is to provide you with sixty days notice of Soundkeeper and RE Sources' intent to file a citizen suit against Cargill Inc, ("Cargill") also doing business as "Cargill Animal Nutrition" and "Ferndale Grain," under section 505 of the Clean Water Act ("CWA"), 33 USC § 1365, for the violations described below. This letter is also a request for a copy of the complete and current stormwater pollution prevention plan ("SWPPP") required by Cargill's National Pollution Discharge Elimination System ("NPDES") permit.

Cargill's discharge of stormwater associated with industrial activity was first authorized by Washington's Industrial Stormwater General Permit issued by the Washington Department of Ecology ("Ecology") in the 1990's. Cargill was covered by the Washington Industrial Stormwater General Permit issued by Ecology on October 21, 2009, effective January 1, 2010, modified May 16, 2012, effective July 1, 2012, and expiring on January 1, 2015, under National Pollutant Discharge Elimination System Permit No. WAR000355 (the "2010 Permit"). Ecology granted Cargill coverage under the current iteration of the ISGP, issued by Ecology on December 3, 2014, effective January 2, 2015, and set to expire on December 31, 2019 (the "2015 Permit") and maintains the same permit number, WAR000355.

Cargill has violated and continues to violate the CWA (see Sections 301 and 402 of the CWA, 33 USC §§ 1311 and 1342) and the terms and conditions of the 2010 Permit and the 2015 Permit (collectively, the "Permits") with respect to operations of, and discharges of stormwater and pollutants from, its facility located at or about 5744 3rd Ave, Ferndale, WA

98248 (the "facility") as described herein, to Shell (also known as "unnamed" and "Schell") ditch, and/or Schell Creek, and/or the City of Ferndale Municipal Separate Storm Sewer System ("MS4"), and/or the Second Street ditch. The facility subject to this notice includes any contiguous or adjacent properties owned or operated by Cargill.

I. COMPLIANCE WITH STANDARDS.

A. Violations of Water Quality Standards.

Condition S10.A of the Permits prohibit discharges that cause or contribute to violations of water quality standards. Water quality standards are the foundation of the CWA and Washington's efforts to protect clean water. In particular, water quality standards represent the U.S. Environmental Protection Agency ("EPA") and Ecology's determination, based on scientific studies, of the thresholds at which pollution starts to cause significant adverse effects on fish or other beneficial uses. For each water body in Washington, Ecology designates the "beneficial uses" that must be protected through the adoption of water quality standards.

A discharger must comply with both narrative and numeric criteria water quality standards. WAC 173-201A-010; WAC 173-201A-510 ("No waste discharge permit can be issued that causes or contributes to a violation of water quality criteria, except as provided for in this chapter."). Narrative water quality standards provide legal mandates that supplement the numeric criteria. Furthermore, the narrative water quality standard applies with equal force even if Ecology has established a numeric water quality standard. Specifically, Condition S10.A of the Permits require that Cargill's discharges not cause or contribute to an excursion of Washington State water quality standards.

Cargill discharges to Shell ditch, which flows to the Schell Marsh and to the Lummi River (marked "Red River" on some maps) and to Lummi Bay, and/or Schell Creek, and/or the City of Ferndale MS4 via 3rd Street and drainage systems north of Washington Street, to Washington Street, which ultimately drains to the Nooksack River and the Lummi River, and/or the Second Street ditch, which flows to the Ferndale Settling Pond, and/or tributaries thereto. Cargill discharges stormwater that contains elevated levels of turbidity, zinc, copper, oil, and out of range pH as indicated in the table of benchmark excursions below. These discharges cause and/or contribute to violations of water quality standards for turbidity, zinc, copper, oil, and pH in the receiving water bodies and have occurred each and every day during the last five years on which there was 0.1 inch or more of precipitation, and continue to occur. *See* WAC 173-201A-200(1)(b), (e), (g); (2); (3); (4); WAC 173-201A-210(1)(a), (b), (e), (f); (2); (3); (4); WAC 173-201A-240; WAC 173-201A-260; WAC 173-201A-600; WAC 173-201A-602; WAC 173-201A-610; WAC 173-201A-612. Precipitation data from that time period is appended to this notice of intent to sue and identifies these days.

Table 1: Benchmark Exceedances

Quarter in which Sample Collected	Turbidity Concentration (Benchmark 25 NTU)	pH (Benchmark Range between 5-9 SU)	Oil Sheen (Y/N)	Zinc (Benchmark 117 ug/L)	Copper (Benchmark 14 ug/L)
1Q 2010	4.8	6.2	N	**125**	6
2Q 2010	9.6	5.7	N	**419**	10
3Q2010	2.6	6.2	N	**233**	8.6
4Q 2010	11.2	5.9	N	**238**	14
1Q 2011	A	A	N	**533**	A
2Q 2011	A	A	N	**883**	A
3Q 2011	**31**	E	E	**935**	E*
4Q 2011	E	E	E	E	E
1Q 2012	18	A	N	**386**	A
2Q 2012	A	A	N	**279**	A
3Q 2012	ND	ND	ND	ND	ND
4Q 2012	14.6	5.8, 6.2	N	**155.5**	13.15
1Q 2013	7.2	6.6	N	**721**	13
2Q 2013	11.6	E	N	**375**	11.95
3Q 2013	12.8	A	N	**443.5**	**28.3**
4Q 2013	4.4	A	N	**175**	7.9
1Q 2014	6.2	A	N	**294**	8.8
2Q 2014	11	A	N	**479**	6.7
3Q 2014	11	A	N	**381**	6.2
4Q 2014	**28**	E	N	**387**	11.4
1Q 2015	16	A	N	**530**	9.1
2Q 2015	ND	ND	ND	ND	ND
3Q 2015	**31**	6.4	N	**457**	12.4
4Q 2015	15.05	7.3, 6.8	N	**121**	8.68
1Q 2016	5.7	6.5	N	**160**	2.9
2Q 2016	ND	ND	ND	ND	ND
3Q 2016	23	7.1	N	**190**	9.4
4Q 2016	19.5	6.7/6.8	N	**185**	11.65
1Q 2017	13	6.6	N	**250**	10

Key:
A = Consistent Attainment claimed, but did not meet requirements for consistent attainment, therefore a failure to sample.
E = Analysis Not Complete / Not Conducted / Not Reported
E* = A "No Discharge" was reported for one parameter but a sample was collected and tested for another parameter.
ND = No Discharge.

B. Compliance with Standards.

Condition S10.C of the Permits require Cargill to apply all known and reasonable methods of prevention, control and treatment ("AKART") to all discharges, including preparation and implementation of an adequate SWPPP and best management practices ("BMPs"). Cargill has violated and continues to violate these conditions by failing to apply AKART to its discharges or to implement an adequate SWPPP and BMPs as evidenced by the elevated levels of pollutants in its discharge indicated in the table above and as described below in this notice of intent to sue.

Condition S1.A of the Permits require that all discharges and activities authorized be consistent with the terms and conditions of the permits. Cargill has violated these conditions by discharging and acting inconsistent with the conditions of the Permits as described in this notice of intent to sue.

II. STORMWATER POLLUTION PREVENTION PLAN VIOLATIONS.

On information and belief, Cargill is in violation of the Permits' SWPPP provisions as follows:

1. Condition S3.A.1 of the Permits require Cargill to develop and implement a SWPPP as specified. Condition S3.A.2 of the Permits require the SWPPP to specify BMPs necessary to provide AKART and ensure that discharges do not cause or contribute to violations of water quality standards. On information and belief, Cargill has violated these requirements of the Permits each and every day during the last five years and continues to violate them as it has failed to prepare and/or implement a SWPPP that includes AKART BMPs and BMPs necessary to comply with state water quality standards.

2. Condition S3.A of the Permits require Cargill to have and implement a SWPPP that is consistent with permit requirements, fully implemented as directed by permit conditions, and updated as necessary to maintain compliance with permit conditions. On information and belief, Cargill has violated these requirements of the Permits each and every day during the last five years and continues to violate them because its SWPPP is not consistent with permit requirements, has not been fully implemented and has not been updated as necessary.

3. The SWPPP fails to satisfy the requirements of Condition S3 of the Permits because it does not adequately describe BMPs. Condition S3.B.4 of the Permits require that the SWPPP include a description of the BMPs that are necessary for the facility to eliminate or reduce the potential to contaminate stormwater. Condition S3.A.3 of the Permits require that the SWPPP include BMPs consistent with approved stormwater technical manuals, including but not limited to the Stormwater Management Manual for Western Washington, available at http://www.ecy.wa.gov/programs/wq/stormwater/manual.html, and Suggested Practices to Reduce Zinc Concentrations in Industrial Stormwater Discharges, available at https://fortress.wa.gov/ecy/publications/summarypages/0810025.html, or document how

stormwater BMPs included in the SWPPP are demonstratively equivalent to the practices contained in the approved stormwater technical manuals, including the proper selection, implementation, and maintenance of all applicable and appropriate BMPs. Cargill's SWPPP does not comply with these requirements because it does not adequately describe BMPs and does not include BMPs consistent with approved stormwater technical manuals nor does it include BMPs that are demonstratively equivalent to such BMPs with documentation of BMP adequacy.

4. Cargill's SWPPP fails to satisfy the requirements of Condition S3.B.2 of the Permits because it fails to include a facility assessment as mandated. The SWPPP fails to include an adequate facility assessment because it does not describe the industrial activities conducted at the site, the general layout of the facility including buildings and storage of raw materials, the flow of goods and materials through the facility, regular business hours and seasonal variations in business hours or in industrial activities as required.

5. Cargill's SWPPP fails to satisfy the requirements of Condition S3.B.1 of the Permits because it does not include a site map that identifies significant features, the stormwater drainage and discharge structures, the stormwater drainage areas for each stormwater discharge point off-site, a unique identifying number for each discharge point, each sampling location with a unique identifying number, paved areas and buildings, areas of pollutant contact associated with specific industrial activities, conditionally approved non-stormwater discharges, surface water locations, areas of existing and potential soil erosion, vehicle maintenance areas, and lands and waters adjacent to the site that may be helpful in identifying discharge points or drainage routes.

6. Cargill's SWPPP fails to comply with Condition S3.B.2.b of the Permits because it does not include an inventory of industrial activities that identifies all areas associated with industrial activities that have been or may potentially be sources of pollutants as required. The SWPPP does not identify all areas associated with loading and unloading of dry bulk materials or liquids, outdoor storage of materials or products, outdoor manufacturing and processing, onsite dust or particulate generating processes, on-site waste treatment, storage, or disposal, vehicle and equipment fueling, maintenance, and/or cleaning, roofs or other surfaces exposed to air emissions from a manufacturing building or a process area, and roofs or other surfaces composed of materials that may be mobilized by stormwater as required by these conditions.

7. Cargill's SWPPP does not comply with Condition S3.B.2.c of the Permits because it does not include an adequate inventory of materials. The SWPPP does not include an inventory of materials that lists the types of materials handled at the site that potentially may be exposed to precipitation or runoff and that could result in stormwater pollution, a short narrative for material describing the potential for the pollutants to be present in stormwater discharge that is updated when data becomes available to verify the presence or absence of the pollutants, a narrative description of any potential sources of pollutants from past activities, materials and spills that were previously handled, treated, stored, or disposed of in a manner to allow ongoing exposure to stormwater as required. The SWPPP does not include the method and location of on-site storage or disposal of such materials and a list of

significant spills and significant leaks of toxic or hazardous pollutants as these permit conditions require.

8. Cargill's SWPPP does not comply with Condition S3.B.3 of the Permits because it does not identify specific individuals by name or title whose responsibilities include SWPPP development, implementation, maintenance and modification.

9. Condition S3.B.4 of the 2010 Permit required that permittees include in their SWPPPs and implement certain mandatory BMPs no later than July 1, 2010 unless site conditions render the BMP unnecessary, infeasible, or an alternative and equally effective BMP is provided. Condition S3.B.4 of the 2015 Permit also requires that permittees include in their SWPPPs and implement mandatory BMPs subject to the same conditions. Cargill is in violation of this requirement because it has failed to include in its SWPPP and implement the mandatory BMPs of the Permits, including but not limited to vacuuming paved surfaces with a vacuum sweeper to remove accumulated pollutants (including but not limited to animal and animal feed waste) a minimum of once per quarter (Condition S3.B.4.b.i.2.a) and failing to immediately clean up spills and leaks (including but not limited to grain spills on and around the railroad tracks at the facility) (Condition S3.B.4.b.i.3.d).

10. Cargill's SWPPP does not comply with Condition S3.B.4.b.i of the Permits because it does not include required operational source control BMPs in the following categories: good housekeeping (including definition of ongoing maintenance and cleanup of areas that may contribute pollutants to stormwater discharges, and a schedule/frequency for each housekeeping task); preventive maintenance (including BMPs to inspect and maintain stormwater drainage, source controls, treatment systems, and plant equipment and systems, and the schedule/frequency for each task); spill prevention and emergency cleanup plan (including BMPs to prevent spills that can contaminate stormwater, for material handling procedures, storage requirements, cleanup equipment and procedures, and spill logs); employee training (including an overview of what is in the SWPPP, how employees make a difference in complying with the SWPPP, spill response procedures, good housekeeping, maintenance requirements, and material management practices, how training will be conducted, the frequency/schedule of training, and a log of the dates on which specific employees received training); inspections and recordkeeping (including documentation of procedures to ensure compliance with permit requirements for inspections and recordkeeping, identification of personnel who conduct inspections, provision of a tracking or follow-up procedure to ensure that a report is prepared and appropriate action taken in response to visual monitoring, definition of how Cargill will comply with signature and record retention requirements, and certification of compliance with the SWPPP and Permit).

11. Cargill's SWPPP does not comply with Condition S3.B.4.b.i.7 of the Permits because it does not include measures to identify and eliminate the discharge of process wastewater, domestic wastewater, noncontact cooling water, and other illicit discharges to stormwater sewers, or to surface waters and ground waters of the state.

12. Cargill's SWPPP does not comply with Condition S3.B.4.b.ii of the Permits because it does not include required structural source control BMPs to minimize the

exposure of manufacturing, processing, and material storage areas to rain, snow, snowmelt, and runoff. Cargill's SWPPP does not comply with Condition S3.B.4.b.iii of the Permits because it does not include treatment BMPs as required.

13. Cargill's SWPPP fails to comply with Condition S3.B.4.b.v of the Permits because it does not include BMPs to prevent the erosion of soils or other earthen materials and prevent off-site sedimentation and violations of water quality standards.

14. Cargill's SWPPP fails to satisfy the requirements of Condition S3.B.5 of the Permits because it fails to include a stormwater sampling plan as required. The SWPPP does not include a sampling plan that identifies points of discharge to surface waters, storm sewers, or discrete ground water infiltration locations, documents why each discharge point is not sampled, identifies each sampling point by its unique identifying number, identifies staff responsible for conducting stormwater sampling, specifies procedures for sampling collection and handling, specifies procedures for sending samples to the a laboratory, identifies parameters for analysis, holding times and preservatives, laboratory quantization levels, and analytical methods, and that specifies the procedure for submitting the results to Ecology.

III. MONITORING AND REPORTING VIOLATIONS.

A. Failure to Collect Quarterly Samples.

Condition S4.B of the Permits require Cargill to collect a sample of its stormwater discharge once during every calendar quarter. Conditions S3.B.5.b and S4.B.2.c of the Permits require Cargill to collect stormwater samples at each distinct point of discharge offsite except for substantially identical outfalls, in which case only one of the substantially identical outfalls must be sampled. These conditions set forth sample collection criteria, but require the collection of a sample even if the criteria cannot be met. On information and belief, the facility has at least two distinct points of discharge off-site, Outfalls A and B. On information and belief, there are additional unnamed distinct discharge points.

Cargill violated these requirements by failing to collect stormwater samples at any of its discharge points during the 4th Quarter 2011.

Cargill has also violated and continues to violate these conditions because it does not sample each distinct point of discharge off-site. Un-sampled points of discharge include those from the parking lot north of Washington Street to a storm sewer that runs south to the Washington Street storm sewer; from the point of discharge formerly described as Discharge Point B, which discharges via an open ditch or sewer to the Vanderyacht stormwater facility, which discharges to the Nooksack River; and from the south paved area ("Area A") to the storm system along Third Street downstream of the current discharge site. These violations have occurred and continue to occur each and every quarter during the last five years that Cargill was and is required to sample its stormwater discharges, including the quarters in which it collected stormwater discharge samples from some, but not each, point of discharge. These violations will continue until Cargill commences monitoring all distinct points of discharge.

B. Failure to Analyze Quarterly Samples.

Condition S5.A.1 of the Permits require Cargill to analyze stormwater samples collected quarterly for turbidity, pH, total copper, oil sheen, and total zinc.

Cargill violated these conditions by failing to analyze stormwater samples as describe in Table 2 below:

Table 2 – Parameters Not Analyzed

Quarter	Parameter
1st Quarter 2011	Turbidity, pH, Copper
2nd Quarter 2011	Turbidity, pH, Copper
3rd Quarter 2011	pH, Oil Sheen, Copper
4th Quarter 2011	Turbidity, pH, Oil Sheen, Zinc, Copper
1st Quarter 2012	pH, Copper
2nd Quarter 2012	Turbidity, pH, Copper
2nd Quarter 2013	pH
3rd Quarter 2013	pH
4th Quarter 2013	pH
1st Quarter 2014	pH
2nd Quarter 2014	pH
3rd Quarter 2014	pH
4th Quarter 2014	pH
1st Quarter 2015	pH

C. Failure to Report Sample Analysis Result.

Condition S9.A pf the Permits require Cargill to report discharge sampling data obtained during each monitoring period on a Discharge Monitoring Report or a Solids Monitoring Form provided, or otherwise approved, by Ecology. Condition S9.D requires Cargill to collect results of samples taken at a designated sampling point more frequently than required by this permit and to include the results in the calculation and reporting of the data submitted in Cargill's DMR. Cargill has violated these conditions by failing to report the analysis results for a sample collected on November 3, 2014 and failing to include the results in the data submitted in Cargill's DMR, including the presence of an oil sheen, 140 NTU of turbidity, and 500 ug/l of Total Zinc.

D. Failure to Monitor for Parameters Required for Food and Kindred Products.

Condition S5.B and Table 3 of the Permits establish the following additional parameters and benchmarks for Standard Industrial Classification (SIC) code 2048 that are

applicable to Cargill due to the nature of its activities at this site, which include the manufacturing and/or mixing of prepared feeds, feed ingredients, and adjuncts for animals: Biochemical Oxygen demand ("BOD5"), Nitrate & Nitrite Nitrogen, and Phosphorus (Total). Cargill is obligated to analyze its quarterly stormwater discharge samples for these parameters and has violated Condition S5.B of the Permits described above by failing to conduct analyses of these additional parameters as required.

E. Failure to Comply with Visual Monitoring Requirements.

Condition S7.A of the Permits requires that monthly visual inspection be conducted at the facility by qualified personnel. Each inspection is to include observations made at stormwater sampling locations and areas where stormwater associated with industrial activity is discharged, observations for the presence of floating materials, visible oil sheen, discoloration, turbidity, odor, etc. in the stormwater discharges, observations for the presence of illicit discharges, a verification that the descriptions of potential pollutant sources required by the permit are accurate, a verification that the site map in the SWPPP reflects current conditions, and an assessment of all BMPs that have been implemented (noting the effectiveness of the BMPs inspected, the locations of BMPs that need maintenance, the reason maintenance is needed and a schedule for maintenance, and locations where additional or different BMPs are needed).

Condition S7.C of the Permits requires that Cargill record the results of each inspection in an inspection report or checklist that is maintained on-site and that documents the observations, verifications, and assessments required. The report/checklist must include the time and date of the inspection, the locations inspected, a statement that, in the judgment of the person conducting the inspection and the responsible corporate officer, the facility is either in compliance or out of compliance with the SWPPP and the Permits, a summary report and schedule of implementation of the remedial actions that Cargill plans to take if the site inspection indicates that the facility is out of compliance, the name, title, signature and certification of the person conducting the facility inspection, and a certification and signature of the responsible corporate officer or a duly authorized representative.

Cargill is in violation of these requirements of Condition S7 of the Permits because, during the last five years, it has failed to conduct each of the requisite visual monitoring and inspections, failed to prepare and maintain the requisite inspection reports or checklists, and failed to make the requisite certifications and summaries.

IV. CORRECTIVE ACTION VIOLATIONS.

A. Violations of the Level One Requirements.

Condition S8.B of the Permits require Cargill take specified actions, called a "Level One Corrective Action," each time quarterly stormwater sample results exceed a benchmark value or are outside the benchmark range. Condition S5.A and Table 2 of the Permits establish the following benchmarks: turbidity 25 NTU; pH 5 – 9 SU; total copper 14 μg/L; and total zinc 117 μg/L.

As described by Condition S8.B of the Permits, a Level One Corrective Action requires Cargill: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits and contains the correct BMPs from the applicable Stormwater Management Manual; (2) make appropriate revisions to the SWPPP to include additional operational source control BMPs with the goal of achieving the applicable benchmark values in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level One Corrective Action in the Annual Report required under Condition S9.B of the Permits. Condition S8.B.4 of the Permits require Cargill implement the revised SWPPP as soon as possible, and no later than the DMR due date for the quarter the benchmark was exceeded.

Cargill has violated the requirements of the Permits described above by failing to conduct a Level One Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, and the required summarization in the annual report each time since January 1, 2012, its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH, Zinc, Turbidity, and Copper, including the benchmark excursions listed in Table 1 above.

B. Violations of the Level Two Requirements.

Condition S8.C of the Permits require Cargill take specified actions, called a "Level Two Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any two quarters during a calendar year.

As described by Condition S8.C of the Permits, a Level Two Corrective Action requires Cargill: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional structural source control BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Two Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the Permits. Condition S8.C.4 of the Permits require Cargill implement the revised SWPPP according to condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establish the benchmarks applicable to Cargill described in section IV.A of this notice of intent to sue letter.

Cargill has violated the requirements of the Permits described above by failing to conduct a Level Two Corrective Action in accordance with permit conditions, including the required review, revision and certification of the SWPPP, the required implementation of additional BMPs, including additional structural source control BMPs, and the required summarization in the annual report each time since January 1, 2012, its quarterly stormwater

sampling results were greater than a benchmark or outside the benchmark range for pH for any two quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, Cargill's failure to fulfill these Level Two Corrective Action obligations for Zinc triggered by its stormwater sampling during calendar years 2010, 2011, 2012, 2013, 2014, 2015, and 2016.

C. Violations of the Level Three Requirements.

Condition S8.D of the Permits require Cargill take specified actions, called a "Level Three Corrective Action," each time quarterly stormwater sample results exceed an applicable benchmark value or are outside the benchmark range for pH for any three quarters during a calendar year.

As described by Condition S8.D of the Permits, a Level Three Corrective Action requires Cargill: (1) review the SWPPP for the facility and ensure that it fully complies with Condition S3 of the Permits; (2) make appropriate revisions to the SWPPP to include additional treatment BMPs with the goal of achieving the applicable benchmark value(s) in future discharges and additional operational and/or structural source control BMPs if necessary for proper function and maintenance of treatment BMPs, and sign and certify the revised SWPPP in accordance with Condition S3.A.6 of the Permits; and (3) summarize the Level Three Corrective Action (planned or take) in the Annual Report required under Condition S9.B of the Permits, including information on how monitoring, assessment, or evaluation information was (or will be) used to determine whether existing treatment BMPs will be modified/enhanced, or it new/additional treatment BMPs will be installed. Condition S8.D.2.b of the Permits require that a licensed professional engineer, geologist, hydrogeologist, of certified professional in storm water quality must design and stamp the portion of the SWPPP that addresses stormwater treatment structures or processes.

Condition S8.D.3 of the Permits require that, before installing BMPs that require the site-specific design or sizing of structures, equipment, or processes to collect, convey, treat, reclaim, or dispose of industrial stormwater, the Cargill submit an engineering report, plans, and specifications, and an operations and maintenance manual to Ecology for review in accordance with chapter 173-204 of the Washington Administrative Code. The engineering report must be submitted no later than the May 15 prior to the Level Three Corrective Action Deadline. The plans and specifications and the operations and maintenance manual must be submitted to Ecology at least 30 days before construction/installation.

Condition S8.D.5 of the Permits require Cargill fully implement the revised SWPPP according to condition S3 of the Permits and the applicable stormwater management manual as soon as possible, and no later than September 30th of the following year.

The Permits establish the benchmarks applicable to Cargill described in section IV.A of this notice of intent to sue letter.

Cargill has violated the requirements of the Permits described above by failing to conduct a Level Three Corrective Action in accordance with permit conditions, including: the

required review, revision and certification of the SWPPP; the requirement to have a specified professional design and stamp the portion of the SWPPP pertaining to treatment; the required implementation of additional BMPs, including additional treatment BMPs; the required submission of an engineering report, plans, specifications, and an operations and maintenance plan; and the required summarization in the annual report each time since January 1, 2012 its quarterly stormwater sampling results were greater than a benchmark or outside the benchmark range for pH for any three quarters during a calendar year. As indicated in Table 1 above, these violations include, but are not limited to, Cargill's failure to fulfill these Level Three Corrective Action obligations for Zinc triggered by its stormwater sampling during calendar years 2010, 2011, 2012, 2013, 2014, 2015, and 2016. Moreover, when Cargill attempted to fulfill these obligations, Cargill failed to do so timely.

D. Violations of Corrective Action Requirements from Prior Permits

Condition S8.A of the Permits requires Defendant to continue to operate and maintain source control and treatment BMPs related to Level One, Two, and Three responses implemented prior to Defendant's current ISGP. Defendant has violated this requirement by failing to maintain and operate a Level Three corrective action for Zinc triggered by its stormwater sampling in calendar years 2009, 2010, and 2011.

V. ILLICIT AND PROHIBITED DISCHARGES.

Condition S5.E of the Permits prohibits the discharge of process wastewater (including stormwater that comingles with process wastewater) and illicit discharges. Appendix 2 to the Permits defines "illicit discharges" as "any discharge that is not composed entirely of stormwater." Condition S5.F of the Permits requires Cargill to manage stormwater to prevent the discharge of synthetic, natural or processed oil or oil containing products as identified by an oil sheen, and trash and floating debris, prohibiting those discharges. Cargill's discharges of manure, molasses, tallow, grain solids, and other accumulated solids violate these Permit conditions. Accumulated solids have been observed around the facility, including what may be manure deposited around the facility from the tires of trucks that return from dropping off loads at dairy farms. Additionally, spilled grain solids are deposited on the railroad tracks when deliveries of grain are offloaded, resulting in pollution from the grain and from animals who feed on the grain. Molasses and tallow tanks have been observed to discharge to the stormwater drain when leaking or rinsed out. On information and belief, these prohibited discharges occurred each and every day over the past five years Cargill has received, processed, or loaded animal feed and are reasonably likely to continue to occur.

Condition S7.B.3.b of the Permits also require Cargill to eliminate illicit discharges within 30 days of discovery; and Condition S3.B.4.b.i.7 of the Permits require Cargill's SWPPP to include measures to identify and eliminate illicit discharges to surface waters. Cargill violated these requirements by failing to eliminate its illicit discharges altogether over the last five years.

Additionally, Condition S7.B.3.a of the Permits requires Cargill to notify the Department of Ecology within seven days of any discovery of an illicit discharge. Cargill

violated this requirement by failing to notify Ecology about its illicit discharges within seven days of each occurrence over the past five years.

VI. VIOLATIONS OF THE ANNUAL REPORT REQUIREMENTS.

Condition S9.B of the Permits require Cargill to submit an accurate and complete annual report to Ecology no later than May 15 of each year. The annual report must include corrective action documentation as required in Condition S8.B – D of the Permits. If a corrective action is not yet completed at the time of submission of the annual report, Cargill must describe the status of any outstanding corrective action. Specific information to be included in the annual report is identification of the conditions triggering the need for corrective action, description of the problem and identification of dates discovered, summary of any Level 1, 2, or 3 corrective actions completed during the previous calendar year, including the dates corrective actions completed, and description of the status of any Level 2 or 3 corrective actions triggered during the previous calendar year, including identification of the date Cargill expects to complete corrective actions.

Cargill has violated this condition. The annual report submitted by Cargill for 2012, on May 15, 2013, does not include the required information. Specifically, the report does not describe all of the stormwater problems identified, such as exceedances of Zinc levels outside of the permissible range, or all of the violations or corrections required based on the January 10, 2012 inspection. The annual report submitted by Cargill for 2013, received by Ecology on May 09, 2014, does not include the required information. Specifically, the report does not describe all of the stormwater problems identified, such as exceedances of Copper levels outside of the permissible range. The annual report submitted by Cargill for 2014, on May 15, 2015, does not include the required information. Specifically, the report does not describe all of the stormwater problems identified, such as exceedances of Zinc and Turbidity levels outside of the permissible range. The annual report submitted by Cargill for 2015, on May 13, 2016, does not include the required information. Specifically, the report does not describe all of the stormwater problems identified, such as exceedances of Zinc and Turbidity levels outside of the permissible range.

VII. VIOLATIONS OF THE RECORDKEEPING REQUIREMENTS.

A. Failure to Record Information.

Condition S4.B.3 of the Permits require Cargill record and retain specified information for each stormwater sample taken, including the sample date and time, a notation describing if Cargill collected the sample within the first 30 minutes of stormwater discharge event, an explanation of why Cargill could not collect a sample within the first 30 minutes of a stormwater discharge event, the sample location, method of sampling and of preservation, and the individual performing the sampling. Upon information and belief, Cargill is in violation of these conditions as it has not recorded each of these specified items for each sample taken during the last five years.

B. Failure to Retain Records.

Condition S9.C of the Permits require Cargill to retain for a minimum of five years a copy of the current Permit, a copy of Cargill's coverage letter, records of all sampling information, inspection reports including required documentation, any other documentation of compliance with permit requirements, all equipment calibration records, all BMP maintenance records, all original recordings for continuous sampling instrumentation, copies of all laboratory results, copies of all required reports, and records of all data used to complete the application for the Permit. Upon information and belief, Cargill is in violation of these conditions because it has failed to retain records of such information, reports, and other documentation during the last five years.

VIII. FAILURE TO REPORT PERMIT VIOLATIONS.

Condition S9.E of the Permits requires Cargill to take certain actions in the event Cargill is unable to comply with any of the terms and conditions of the Permits which may endanger human health or the environment, or exceed any numeric effluent limitation in the permit. In such circumstances, Cargill must immediately take action to minimize potential pollution or otherwise stop the noncompliance and correct the problem, and Cargill must immediately notify the appropriate Ecology regional office of the failure to comply. Cargill must then submit a detailed written report to Ecology, including specified details, within 5 days of the time Cargill became aware of the circumstances unless Ecology requests an earlier submission.

On information and belief, Cargill routinely violates these requirements, including each and every time Cargill discharges illicit and/or non-stormwater discharges, as described in section V to this notice of intent to sue, above; each and every time Cargill failed to comply with the corrective action requirements described in section IV of this notice of intent to sue; and each and every time Cargill discharged stormwater with concentrations of pollutants in excess of the Permit benchmarks, as described in Table 1, above. All these violations may endanger human health or the environment.

IX. FAILURE TO APPLY FOR MODIFICATION OF PERMIT COVERAGE.

Condition S4.B.2.d requires Cargill to notify Ecology of any changes or updates to sample locations, discharge points, and/or outfalls by submitting an "Industrial Stormwater General Permit Discharge/Sample Point Update Form" to Ecology. Cargill changed its sampling location without requesting a Modification of Coverage. Cargill has violated this requirement each and every day since Cargill discontinued the use of Discharge point B, and since Cargill changed its sampling location on or about October 1, 2015.

X. REQUEST FOR SWPPP.

Pursuant to Condition S9.F of the 2015 Permit, Soundkeeper and RE Sources hereby request that Cargill, Inc. provide a copy of, or access to, its SWPPP complete with all

incorporated plans, monitoring reports, checklists, and training and inspection logs. The copy of the SWPPP and any other communications about this request should be directed to the undersigned at the letterhead address.

Should Cargill fail to provide the requested complete copy of, or access to, its SWPPP as required by Condition S9.F of the 2015 Permit, it will be in violation of that condition, which violation shall also be subject to this notice of intent to sue and any ensuing lawsuit.

XI. CONCLUSION.

The above-described violations reflect those indicated by the information currently available to Soundkeeper and RE Sources. These violations are ongoing. Soundkeeper and RE Sources intend to sue for all violations, including those yet to be uncovered and those committed after the date of this Notice of Intent to Sue.

Under Section 309(d) of the CWA, 33 USC § 1319(d), each of the above-described violations subjects the violator to a penalty of up to $37,500 per day for each violation that occurred before November 2, 2015, and $51,570 per day for each violation that occurred thereafter. In addition to civil penalties, Soundkeeper and RE Sources will seek injunctive relief to prevent further violations under Sections 505(a) and (d) of the CWA, 33 USC § 1365(a) and (d), and such other relief as is permitted by law. Also, Section 505(d) of the CWA, 33 USC § 1365(d), permits prevailing parties to recover costs, including attorney's fees.

Soundkeeper and RE Sources believe that this NOTICE OF INTENT TO SUE sufficiently states grounds for filing suit. We intend, at the close of the 60-day notice period, or shortly thereafter, to file a citizen suit against Cargill, Inc. under Section 505(a) of the Clean Water Act for violations.

During the 60-day notice period, we would be willing to discuss effective remedies for the violations addressed in this letter and settlement terms. If you wish to pursue such discussions in the absence of litigation, we suggest that you initiate those discussions within 10 days of receiving this notice so that a meeting can be arranged and so that negotiations may be completed promptly. We do not intend to delay the filing of a complaint if discussions are continuing when the notice period ends.

Very truly yours,

SMITH & LOWNEY, PLLC

By: _____
Richard A. Smith
Katherine Brennan

cc: Scott Pruitt, Administrator, U.S. EPA
Michelle Pirzadeh, Acting Region 10 Administrator, U.S. EPA

Maia Bellon, Director, Washington Department of Ecology
Registered Agent (CT Corporation System, 505 Union Ave SE, Ste. 120, Olympia, WA 98501)

2012	Precip. (in)
Jan	sum
1	0
2	0.08
3	0.1
4	0.45
5	0.05
6	0
7	0.09
8	0.01
9	0.01
10	0
11	0
12	0
13	0.14
14	0.57
15	0.07
16	0.21
17	0.03
18	0
19	0
20	0.17
21	0
22	0.03
23	0
24	0.07
25	0.14
26	0
27	0
28	0.04
29	0.7
30	0
31	0.01

2012	Precip. (in)
Feb	sum
1	0.53
2	0
3	0
4	0
5	0
6	0
7	0
8	0.03
9	0.19
10	0.03
11	0
12	0.08
13	0.08
14	0.3
15	0
16	0.09
17	0.27
18	0.2
19	0.01
20	0.25
21	0.78
22	0.02
23	0
24	0.32
25	0.27
26	0.03
27	0
28	0
29	0.18

2012	Precip. (in)
Mar	sum
1	0.11
2	0.17
3	0.11
4	0.2
5	0.55
6	0.05
7	0
8	0
9	0.43
10	0.5
11	0.13
12	0.15
13	0.28
14	0
15	0.22
16	0.25
17	0.25
18	0.03
19	0
20	0.02
21	0.02
22	0
23	0
24	0
25	0
26	0.06
27	0.01
28	0
29	0.74
30	0.24
31	0.24

2012	Precip. (in)
Apr	sum
1	0.4
2	0
3	0.46
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0.19
12	0.21
13	0
14	0
15	0
16	0.32
17	0.02
18	0.04
19	0.95
20	0.12
21	0
22	0
23	0
24	0.42
25	0.07
26	0.13
27	0
28	0.01
29	0.03
30	0.18

2012	Precip. (in)
May	sum
1	0

2	0
3	0.38
4	0.01
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0.25
21	0.59
22	0.17
23	0.01
24	0
25	0
26	0
27	0
28	0
29	0
30	0.16
31	0.2

2012	Precip. (in)
Jun	sum
1	0.25
2	0.04
3	0
4	0.07
5	0.02
6	0
7	0.37
8	0.17
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0.69
17	0.04
18	0.16
19	0
20	0
21	0
22	0.55
23	0.46
24	0
25	0
26	0
27	0
28	0.05
29	0.01
30	0.2

2012	Precip. (in)
Jul	sum
1	0
2	0.19
3	0.85
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0.01
14	0
15	0
16	0
17	0
18	0
19	0
20	0.08
21	0
22	0.34
23	0.15
24	0
25	0.03
26	0
27	0
28	0
29	0
30	0
31	0

2012	Precip. (in)
Aug	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0.01
30	0
31	0

2012	Precip. (in)
Sep	sum
1	0
2	0

3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0
30	0
2012	**Precip. (in)**
Oct	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0.09
13	0.21
14	0.26
15	0.25
16	0.32
17	0.09
18	0.45
19	0.14
20	0.36
21	0.65
22	0.15
23	0.37
24	0.13
25	0
26	0.29
27	0.78
28	0.12
29	0.47
30	0.5
31	0.68
2012	**Precip. (in)**
Nov	sum
1	0.06
2	0.08
3	0.1
4	0.32
5	0
6	0.05
7	0
8	0
9	0
10	0
11	0.47
12	0.14
13	0.07
14	0
15	0
16	0
17	0.45
18	0
19	0.69
20	0
21	0.17
22	0
23	0.01
24	0
25	0.01
26	0
27	0
28	0
29	0
30	0.01
2012	**Precip. (in)**
Dec	sum
1	0.04
2	0.1
3	0.04
4	0.12
5	0.01
6	0.1
7	0.1
8	0
9	0
10	0
11	0.21
12	0.04
13	0.08
14	0.12
15	0
16	0.21
17	0.19
18	0.06
19	0
20	0.05
21	0
22	0.04
23	0
24	0
25	0.16
26	0.06
27	0.03
28	0
29	0
30	0
31	0
2013	**Precip. (in)**
Jan	sum
1	0
2	0
3	0
4	0.04

5	**0.05**
6	**0.08**
7	**0.21**
8	**0.68**
9	**0.05**
10	**0.06**
11	**0**
12	**0**
13	**0**
14	**0**
15	**0**
16	**0**
17	**0**
18	**0**
19	**0**
20	**0**
21	**0**
22	**0**
23	**0.13**
24	**0.01**
25	**0**
26	**0.06**
27	**0.08**
28	**0.01**
29	**0.03**
30	**0**
31	**0.01**
2013	**Precip. (in)**
Feb	sum
1	**0.45**
2	**0**
3	**0.1**
4	**0**
5	**0.02**
6	**0.02**
7	**0.01**
8	**0**
9	**0.05**
10	**0**
11	**0.05**
12	**0.01**
13	**0**
14	**0.15**
15	**0**

16	**0.07**
17	**0**
18	**0**
19	**0**
20	**0.05**
21	**0.15**
22	**0.33**
23	**0**
24	**0**
25	**0.19**
26	**0**
27	**0.04**
28	**0.57**
2013	**Precip. (in)**
Mar	sum
1	**0.24**
2	**0.28**
3	**0**
4	**0**
5	**T**
6	**0.33**
7	**0.08**
8	**0**
9	**0**
10	**0**
11	**0.27**
12	**0.55**
13	**0.52**
14	**0.17**
15	**0.18**
16	**0.22**
17	**T**
18	**0.12**
19	**0.03**
20	**0.13**
21	**0.01**
22	**0.03**
23	**0**
24	**0**
25	**0**
26	**0**
27	**0**
28	**0**
29	**0**

30	**0**
31	**0**
2013	**Precip. (in)**
Apr	sum
1	**0**
2	**T**
3	**0.02**
4	**0.26**
5	**0.54**
6	**0.3**
7	**0.37**
8	**T**
9	**T**
10	**0.33**
11	**0**
12	**0.36**
13	**0.19**
14	**0.01**
15	**0.14**
16	**0**
17	**T**
18	**0.47**
19	**0.41**
20	**0.06**
21	**0.33**
22	**0**
23	**0**
24	**0**
25	**0**
26	**0**
27	**0.24**
28	**0.08**
29	**0.08**
30	**T**
2013	**Precip. (in)**
May	sum
1	**0**
2	**0**
3	**0**
4	**0**
5	**0**
6	**0**
7	**0**
8	**0**

9	0
10	0
11	0.06
12	0.57
13	0.19
14	0.01
15	0.03
16	0.02
17	0.07
18	0.06
19	0
20	0.01
21	0.44
22	0.18
23	0.04
24	0
25	T
26	0.49
27	0.26
28	0.02
29	0.05
30	0.07
31	T

2013	Precip. (in)
Jun	sum
1	T
2	0
3	0
4	0
5	0
6	0
7	T
8	T
9	0
10	0
11	0
12	0.13
13	T
14	0.01
15	0
16	0.01
17	0.05
18	0
19	0.01
20	0.95
21	0
22	0
23	0.16
24	0.12
25	0.09
26	0.02
27	0.07
28	0
29	0
30	0

2013	Precip. (in)
Jul	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0.05
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	0
30	0
31	T

2013	Precip. (in)
Aug	sum
1	0
2	0.27
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	T
11	0.03
12	0
13	0
14	0.13
15	T
16	0.01
17	T
18	0
19	T
20	0
21	0
22	0
23	T
24	0.09
25	0
26	0.01
27	0.1
28	0.09
29	0.21
30	0.23
31	0

2013	Precip. (in)
Sep	sum
1	0
2	0.01
3	0.17
4	T
5	0.34
6	0.17
7	0.04
8	0
9	0

10	0
11	0
12	0
13	0
14	0
15	0.32
16	0.42
17	0
18	0
19	0
20	0.07
21	0.04
22	0.43
23	0.4
24	0
25	0
26	0
27	0.55
28	0.55
29	0.38
30	0.53

2013	Precip. (in)
Oct	sum
1	0.26
2	0.41
3	0
4	0
5	0
6	T
7	0.88
8	0.15
9	0
10	0.01
11	0
12	0.04
13	0
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0
25	0
26	T
27	0.05
28	0
29	0
30	0.09
31	0.28

2013	Precip. (in)
Nov	sum
1	0.11
2	0.91
3	0
4	0.02
5	0.17
6	T
7	0.52
8	0.06
9	0
10	T
11	0
12	0.08
13	0.15
14	0.01
15	0.87
16	0.02
17	0.1
18	1.16
19	0.19
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0.01
29	0.14
30	0.48

2013	Precip. (in)
Dec	sum
1	0.49
2	0.24
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0.13
13	0.16
14	0.02
15	0.04
16	0
17	0.01
18	0.06
19	0
20	0.29
21	0.26
22	0.65
23	0.2
24	0
25	0.01
26	0.09
27	0.42
28	0
29	0.02
30	0.01
31	0.04

2014	Precip. (in)
Jan	sum
1	0.02
2	0.77
3	T
4	0
5	0
6	0
7	0.3
8	0.12
9	0.05
10	0.18
11	0.59

12	**0.21**
13	**0**
14	**0**
15	**0**
16	**0**
17	**0**
18	**0**
19	**0**
20	**0**
21	**0**
22	**T**
23	**0**
24	**0**
25	**0**
26	**0**
27	**0.01**
28	**0.01**
29	**0.47**
30	**0.18**
31	**0**

2014	**Precip. (in)**
Feb	sum
1	**0**
2	**0**
3	**0**
4	**0**
5	**0**
6	**0**
7	**T**
8	**0**
9	**T**
10	**0.32**
11	**0.07**
12	**0.03**
13	**0.03**
14	**0.05**
15	**0.29**
16	**0.39**
17	**0.28**
18	**0.22**
19	**T**
20	**0.03**
21	**0**
22	**0.34**
23	**0.1**
24	**0.49**
25	**0.03**
26	**0**
27	**0**
28	**0**

2014	**Precip. (in)**
Mar	sum
1	**T**
2	**0.62**
3	**0.29**
4	**0.36**
5	**0.58**
6	**0.44**
7	**T**
8	**0.55**
9	**T**
10	**0.01**
11	**0**
12	**0**
13	**0**
14	**0.17**
15	**0.45**
16	**0.43**
17	**0**
18	**0.05**
19	**0.53**
20	**0**
21	**0**
22	**0.05**
23	**0**
24	**T**
25	**0.16**
26	**0.42**
27	**0.07**
28	**0.07**
29	**0.02**
30	**0.11**
31	**0**

2014	**Precip. (in)**
Apr	sum
1	**0**
2	**0**
3	**0.04**
4	**0.01**
5	**0.14**
6	**0.02**
7	**0.03**
8	**0.15**
9	**0**
10	**0**
11	**0**
12	**0**
13	**0**
14	**0**
15	**0.07**
16	**0.49**
17	**0.55**
18	**0**
19	**0.06**
20	**0**
21	**0.06**
22	**0.16**
23	**0.37**
24	**1.15**
25	**0.06**
26	**0.03**
27	**0.03**
28	**0**
29	**0**
30	**0**

2014	**Precip. (in)**
May	sum
1	**0**
2	**0.21**
3	**0.11**
4	**0.86**
5	**0.25**
6	**0**
7	**0**
8	**0.53**
9	**0.29**
10	**0.05**
11	**0**
12	**0**
13	**T**
14	**0**
15	**0**

16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0.15
24	0
25	T
26	0.02
27	0
28	0.02
29	T
30	0
31	0

2014	Precip. (in)
Jun	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0.07
11	0
12	T
13	0.38
14	0.03
15	T
16	0.31
17	T
18	0
19	0.12
20	T
21	0
22	0
23	T
24	0.03
25	0
26	0
27	0.06
28	0.05
29	0.03
30	0

2014	Precip. (in)
Jul	sum
1	0
2	0
3	0
4	T
5	0.01
6	T
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	0.09
20	0
21	0
22	T
23	0.72
24	0.31
25	0
26	0
27	0
28	0
29	0
30	0
31	0

2014	Precip. (in)
Aug	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0.01
13	0.51
14	0.04
15	0.11
16	T
17	0
18	0
19	T
20	0
21	0
22	0
23	0
24	0
25	0
26	0
27	0
28	0
29	T
30	T
31	0.01

2014	Precip. (in)
Sep	sum
1	0
2	0.58
3	0.39
4	0.02
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0.01

17	T
18	T
19	T
20	0
21	0
22	T
23	0.4
24	0.3
25	T
26	0.51
27	0
28	0
29	0.12
30	T

2014	Precip. (in)
Oct	sum
1	0
2	0
3	0.02
4	T
5	0
6	0
7	0
8	0
9	0
10	0.02
11	0.17
12	0.04
13	0.95
14	0.07
15	0.2
16	0
17	0.16
18	0
19	0.46
20	0.65
21	0.04
22	0.37
23	0.04
24	0.1
25	0.54
26	0.59
27	0.02
28	0.1
29	0.06
30	0.49
31	0.48

2014	Precip. (in)
Nov	sum
1	0
2	0.21
3	0.49
4	0.21
5	0.06
6	0.28
7	0
8	0
9	0.28
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0
19	T
20	0.12
21	0.21
22	0.01
23	0.23
24	0.25
25	1.06
26	0.05
27	0.25
28	0.66
29	0
30	0

2014	Precip. (in)
Dec	sum
1	0
2	0
3	0
4	0.09
5	0.01
6	0.4
7	0
8	0.37
9	0.11
10	0.93
11	0.53
12	0.01
13	0
14	0
15	0
16	0.02
17	0.02
18	0.28
19	0.48
20	0.29
21	T
22	0
23	0.78
24	0.05
25	0.05
26	0.02
27	0.33
28	0.02
29	0
30	0
31	0

2015	Precip. (in)
Jan	sum
1	0
2	0.21
3	0.02
4	1.25
5	1.19
6	0
7	0
8	0
9	0.01
10	0.09
11	0.1
12	0.02
13	0
14	0
15	0.03
16	0.01
17	0.44
18	0.59

19	**0.06**
20	**T**
21	**0.01**
22	**0.15**
23	**0.84**
24	**0.43**
25	**0**
26	**0**
27	**0.03**
28	**0**
29	**0**
30	**0**
31	**0.02**
2015	**Precip. (in)**
Feb	sum
1	**0.09**
2	**0.17**
3	**0.09**
4	**0.16**
5	**0.32**
6	**0.14**
7	**0.53**
8	**0.09**
9	**0.15**
10	**0.24**
11	**0**
12	**0.12**
13	**0.11**
14	**T**
15	**0**
16	**0**
17	**0**
18	**0.03**
19	**T**
20	**0.02**
21	**0**
22	**0**
23	**0**
24	**0**
25	**0.08**
26	**0.03**
27	**0.11**
28	**0**
2015	**Precip. (in)**

Mar	sum
1	**T**
2	**0**
3	**0**
4	**0**
5	**0**
6	**0**
7	**0**
8	**0**
9	**0**
10	**0**
11	**0.12**
12	**0**
13	**0.06**
14	**0.26**
15	**1.14**
16	**T**
17	**0**
18	**0**
19	**0.24**
20	**0.16**
21	**0.35**
22	**0.05**
23	**0.19**
24	**0.01**
25	**1.15**
26	**0.01**
27	**0.34**
28	**0.01**
29	**0.46**
30	**0.06**
31	**0.16**
2015	**Precip. (in)**
Apr	sum
1	**0.02**
2	**0**
3	**0.11**
4	**T**
5	**0**
6	**0**
7	**0**
8	**0**
9	**0**
10	**0.06**

11	**0.04**
12	**T**
13	**0.18**
14	**0.01**
15	**0**
16	**0**
17	**T**
18	**0**
19	**0**
20	**0**
21	**0.2**
22	**0**
23	**0.12**
24	**0.23**
25	**0.12**
26	**T**
27	**0.11**
28	**0.01**
29	**0.02**
30	**0**
2015	**Precip. (in)**
May	sum
1	**0**
2	**0**
3	**0**
4	**0.11**
5	**0.24**
6	**0**
7	**0**
8	**0**
9	**0**
10	**0**
11	**0.04**
12	**0.01**
13	**0.07**
14	**0**
15	**0**
16	**0**
17	**0**
18	**0**
19	**0**
20	**0**
21	**0**
22	**T**

23	T
24	0
25	0.04
26	0
27	0
28	0
29	0
30	0
31	0
2015	**Precip. (in)**
Jun	sum
1	0.04
2	0.12
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0
18	0.1
19	0
20	0
21	0
22	0
23	0
24	T
25	0
26	0
27	0
28	T
29	0
30	0
2015	**Precip. (in)**
Jul	sum
1	0
2	0
3	0
4	0
5	0
6	0
7	0
8	0
9	0
10	0
11	0.04
12	T
13	0.26
14	0
15	0
16	0
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0.36
25	0.01
26	T
27	0
28	0
29	0
30	0
31	0
2015	**Precip. (in)**
Aug	sum
1	0
2	0
3	0
4	0
5	0.08
6	0
7	0
8	T
9	T
10	T
11	0
12	0
13	0
14	0.14
15	0
16	0
17	0
18	0
19	0
20	0
21	T
22	0
23	0
24	0
25	0
26	0
27	T
28	0.27
29	0.33
30	0.26
31	0.45
2015	**Precip. (in)**
Sep	sum
1	0.38
2	0.25
3	0.28
4	0.01
5	T
6	0.57
7	0
8	0.05
9	0
10	0
11	0
12	0
13	0
14	0
15	0
16	0
17	0.03
18	T
19	0.14
20	0.42
21	0.01
22	0
23	0

24	**0.25**
25	**0.06**
26	**0.05**
27	**0**
28	**0**
29	**0**
30	**0**
2015	**Precip. (in)**
Oct	sum
1	**0**
2	**0**
3	**0**
4	**0**
5	**0**
6	**0.01**
7	**0.54**
8	**T**
9	**0.01**
10	**0.26**
11	**0**
12	**0.24**
13	**0**
14	**0**
15	**0**
16	**0**
17	**0**
18	**0**
19	**0.06**
20	**T**
21	**0.04**
22	**0**
23	**0**
24	**0.01**
25	**0.55**
26	**0.03**
27	**0.02**
28	**0.54**
29	**0.15**
30	**0.13**
31	**0.82**
2015	**Precip. (in)**
Nov	sum
1	**0.3**
2	**0**
3	**0.06**
4	**T**
5	**0.16**
6	**0.05**
7	**0.55**
8	**0.11**
9	**0.01**
10	**0.17**
11	**0.01**
12	**0.32**
13	**0.87**
14	**0.5**
15	**0.28**
16	**0.13**
17	**0.7**
18	**T**
19	**0.08**
20	**0**
21	**0**
22	**0**
23	**0.25**
24	**0.02**
25	**0**
26	**0**
27	**0**
28	**0**
29	**0**
30	**0**
2015	**Precip. (in)**
Dec	sum
1	**0.33**
2	**0.03**
3	**0.16**
4	**0.06**
5	**0.04**
6	**0.05**
7	**0.1**
8	**0.53**
9	**0.24**
10	**0.36**
11	**0**
12	**0.3**
13	**0.55**
14	**T**
15	**0.21**
16	**0**
17	**0.69**
18	**0.59**
19	**0**
20	**0.21**
21	**0.23**
22	**0.2**
23	**0.33**
24	**0.33**
25	**T**
26	**0**
27	**0.55**
28	**0.01**
29	**0**
30	**0**
31	**0**
2016	**Precip. (in)**
Jan	sum
1	**0**
2	**0**
3	**T**
4	**T**
5	**0.12**
6	**T**
7	**0**
8	**0**
9	**0**
10	**0**
11	**0.1**
12	**0.23**
13	**0.01**
14	**0**
15	**0.02**
16	**0.33**
17	**0.19**
18	**0.01**
19	**0.02**
20	**0.12**
21	**0.26**
22	**0.44**
23	**0.03**
24	**0.04**
25	**T**

26	**0.31**
27	**0.04**
28	**0.19**
29	**0.33**
30	**0.27**
31	**0.05**
2016	**Precip. (in)**
Feb	sum
1	**0.22**
2	**0**
3	**0.13**
4	**0.08**
5	**0.22**
6	**0**
7	**0.01**
8	**0**
9	**0**
10	**0.1**
11	**0.22**
12	**0.58**
13	**0.59**
14	**0.42**
15	**1.64**
16	**0**
17	**0.69**
18	**0.27**
19	**0.02**
20	**0.1**
21	**0.02**
22	**T**
23	**0**
24	**0**
25	**0**
26	**0.11**
27	**0.04**
28	**0.07**
29	**0.01**
2016	**Precip. (in)**
Mar	sum
1	**0.5**
2	**0.09**
3	**0.11**
4	**0.12**
5	**0.03**

6	**0.09**
7	**0.5**
8	**T**
9	**0.45**
10	**0.06**
11	**0.24**
12	**0.05**
13	**0.18**
14	**0.06**
15	**0.1**
16	**0.03**
17	**0**
18	**0**
19	**T**
20	**0.08**
21	**0.24**
22	**0.03**
23	**0.2**
24	**0.03**
25	**T**
26	**0.22**
27	**0.39**
28	**0.04**
29	**0**
30	**0**
31	**0**
2016	**Precip. (in)**
Apr	sum
1	**0**
2	**T**
3	**0.19**
4	**0.69**
5	**0.12**
6	**0**
7	**0**
8	**0**
9	**0**
10	**0**
11	**T**
12	**0.5**
13	**0.06**
14	**0.01**
15	**0**
16	**0**

17	**0**
18	**0**
19	**0**
20	**0**
21	**0.02**
22	**0.01**
23	**0.61**
24	**0.16**
25	**0.02**
26	**0**
27	**0**
28	**T**
29	**0.05**
30	**0**
2016	**Precip. (in)**
May	sum
1	**0**
2	**T**
3	**T**
4	**0.1**
5	**0**
6	**0**
7	**0**
8	**0.02**
9	**0**
10	**0**
11	**T**
12	**0**
13	**0**
14	**T**
15	**0**
16	**0**
17	**0**
18	**0.15**
19	**0.12**
20	**0.01**
21	**0.01**
22	**0**
23	**0.01**
24	**0**
25	**0**
26	**T**
27	**0.09**
28	**0.54**

29	**0.01**
30	**0**
31	**0**
2016	**Precip. (in)**
Jun	sum
1	**0.05**
2	**0.06**
3	**0**
4	**0**
5	**0**
6	**0**
7	**0**
8	**0.04**
9	**T**
10	**0.1**
11	**T**
12	**0**
13	**0.05**
14	**T**
15	**0**
16	**T**
17	**0.01**
18	**0.4**
19	**0**
20	**0**
21	**0**
22	**T**
23	**0.21**
24	**T**
25	**0**
26	**0**
27	**0**
28	**0**
29	**0**
30	**0**
2016	**Precip. (in)**
Jul	sum
1	**T**
2	**0**
3	**0.02**
4	**0.17**
5	**0.05**
6	**0**
7	**0.13**

8	**0.01**
9	**0.19**
10	**T**
11	**0.01**
12	**0.03**
13	**T**
14	**T**
15	**0**
16	**0**
17	**0**
18	**0**
19	**0**
20	**0**
21	**0.04**
22	**0**
23	**0**
24	**0**
25	**0**
26	**0**
27	**0**
28	**0**
29	**0**
30	**0**
31	**0**
2016	**Precip. (in)**
Aug	sum
1	**0**
2	**T**
3	**0.02**
4	**0**
5	**0**
6	**0**
7	**0**
8	**0**
9	**0**
10	**0**
11	**0**
12	**0**
13	**0**
14	**0**
15	**0**
16	**0**
17	**0**
18	**0**

19	**0**
20	**0**
21	**0**
22	**0**
23	**0**
24	**0**
25	**0**
26	**0**
27	**0**
28	**0.04**
29	**0**
30	**0**
31	**0.16**
2016	**Precip. (in)**
Sep	sum
1	**0.08**
2	**0.07**
3	**0**
4	**0**
5	**T**
6	**0.04**
7	**0.11**
8	**0.03**
9	**0**
10	**T**
11	**0**
12	**0**
13	**0**
14	**0**
15	**0**
16	**0.03**
17	**0.74**
18	**T**
19	**0.27**
20	**T**
21	**0**
22	**0**
23	**0.22**
24	**0.03**
25	**T**
26	**T**
27	**0**
28	**0**
29	**0**

30	**0**
2016	**Precip. (in)**
Oct	sum
1	**T**
2	**0**
3	**0.07**
4	**0.09**
5	**0**
6	**0.16**
7	**0.08**
8	**1.45**
9	**0**
10	**T**
11	**0**
12	**0.13**
13	**0.85**
14	**0.9**
15	**0.27**
16	**0.12**
17	**0.2**
18	**0.37**
19	**0.31**
20	**0.9**
21	**0.16**
22	**T**
23	**0.01**
24	**0.03**
25	**T**
26	**0.29**
27	**0.04**
28	**T**
29	**0.23**
30	**0.27**
31	**0.46**
2016	**Precip. (in)**
Nov	sum
1	**0.34**
2	**0.65**
3	**0.01**
4	**0.03**
5	**2.05**
6	**T**
7	**0.05**
8	**0**

9	**0.43**
10	**0**
11	**0.08**
12	**0.22**
13	**0.26**
14	**0.11**
15	**0.28**
16	**0.09**
17	**0.02**
18	**T**
19	**T**
20	**T**
21	**T**
22	**0.65**
23	**0.09**
24	**0.2**
25	**0.29**
26	**1.67**
27	**0.05**
28	**T**
29	**T**
30	**0.19**
2016	**Precip. (in)**
Dec	sum
1	**0.02**
2	**0.28**
3	**0.54**
4	**0.13**
5	**0.03**
6	**0**
7	**0**
8	**T**
9	**0.25**
10	**0.33**
11	**0.35**
12	**0.03**
13	**0**
14	**0**
15	**0**
16	**0**
17	**0**
18	**0.02**
19	**0.31**
20	**0.14**

21	**0**
22	**0.07**
23	**0.88**
24	**0**
25	**0**
26	**0.04**
27	**0.13**
28	**T**
29	**0.24**
30	**0.03**
31	**0.14**
2017	**Precip. (in)**
Jan	sum
1	**0.06**
2	**0**
3	**0**
4	**0**
5	**0**
6	**0**
7	**0**
8	**0.21**
9	**0.32**
10	**0**
11	**0**
12	**0**
13	**0**
14	**0**
15	**0**
16	**0.11**
17	**0.19**
18	**0.5**
19	**0.21**
20	**T**
21	**0.03**
22	**0.03**
23	**0**
24	**0**
25	**0**
26	**0**
27	**0**
28	**0**
29	**0.02**
30	**0**
31	**0**

2017	Precip. (in)
Feb	sum
1	0
2	0
3	0.32
4	0.46
5	0.22
6	0
7	0
8	0.04
9	0.74
10	0.04
11	0
12	0
13	0
14	0.19
15	0.3
16	0.19
17	0.08
18	0.13
19	0.04
20	0.03
21	0.01
22	T
23	0
24	0.14
25	0.14
26	0.22
27	0.09
28	0.04

2017	Precip. (in)
Mar	sum
1	0.07
2	0.05
3	0.59
4	0.07
5	0.31
6	0.14
7	0.03
8	0.26
9	0.32
10	0.04
11	0.28
12	0.04
13	0.23
14	0.49
15	0.24
16	0
17	0.47
18	0.21
19	0.01
20	0.08
21	0.11
22	0.02
23	0.13
24	0.27
25	0.01
26	0.36
27	0.1
28	0.32
29	0.56
30	0.07
31	0.01

2017	Precip. (in)
Apr	sum
1	0.31
2	0
3	0
4	0.03
5	0.22
6	0.01
7	0.27
8	0.09
9	0.11
10	0.01
11	0
12	0.27
13	0.76
14	0.34
15	0.26
16	0
17	T
18	T
19	T
20	0.01
21	0
22	T
23	T
24	T
25	T
26	T
27	0.01
28	T
29	0.02
30	0

2017	Precip. (in)
May	sum
1	0.01
2	T
3	0.05
4	0.02
5	0.04
6	0
7	0
8	T
9	0
10	0
11	0.02
12	T
13	0.01
14	0.01
15	0
16	0.14
17	0
18	0
19	0
20	0
21	0
22	0
23	0
24	0.01
25	0
26	0
27	0
28	0
29	0
30	0.23
31	0.09

2017	Precip. (in)
Jun	sum
1	0.05
2	0.01

3	**0**
4	**0**
5	**0**
6	**0**
7	**0**
8	**0.48**
9	**0.02**
10	**T**
11	**0**
12	**0**
13	**T**
14	**0.01**
15	**0.2**
16	**0.11**
17	**T**
18	**0.07**
19	**T**
20	**T**
21	**T**
22	**0**
23	**0**
24	**0**
25	**0**
26	**0**
27	**0**
28	**0**
29	**0**
30	**0**

2017	**Precip. (in)**
Jul	sum
1	**0**
2	**0**
3	**0**
4	**0**
5	**0**
6	**0**
7	**0**
8	**0**
9	**0**
10	**T**
11	**0**
12	**0**
13	**0**
14	**0**
15	**0**
16	**0**
17	**0**
18	**0**
19	**0**
20	**0.06**
21	**T**
22	**0.02**
23	**0**
24	**0**
25	**0**
26	**0**
27	**0**
28	**0**
29	**0**
30	**0**
31	**0**

2017	**Precip. (in)**
Aug	sum
1	**0**
2	**0**
3	**0**
4	**0**
5	**0**
6	**0**
7	**0**