

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION**

ENVIRONMENT AMERICA, D/B/A
ENVIRONMENT OHIO, AND LAKE ERIE
WATERKEEPER,

Plaintiffs,

v.

CAMPBELL SOUP SUPPLY COMPANY
L.L.C.,

Defendant.

Civil No. 3:24-cv-00515

Judge Jack Zouhary

UNITED STATES OF AMERICA,

Plaintiff,

v.

CAMPBELL SOUP SUPPLY COMPANY
L.L.C.,

Defendant.

Civil No. 3:24-cv-00523

Judge Jack Zouhary

**JOINT STIPULATION OF FACTS AND LAW
REGARDING STANDING AND LIABILITY**

Plaintiffs Environment America d/b/a Environment Ohio and Lake Erie Waterkeeper (collectively, “Citizen Plaintiffs”), Plaintiff the United States of America, and Defendant Campbell Soup Supply Company L.L.C. (“Defendant” or “Campbell’s”), by and through their

undersigned counsel, agree to the following stipulations of fact and/or law for purposes of the above-referenced civil actions:

1. **Stipulation Regarding Standing.** The parties stipulate and agree that the Citizen Plaintiffs have an “interest which is or may be adversely affected” pursuant to 33 U.S.C. § 1365(g) and have Article III standing to commence this action as parties invoking federal jurisdiction.

a. Consistent with the U.S. Supreme Court’s decision in *Hunt v. Wash. State Apple Advert. Comm’n*, 432 U.S. 333, 343 (1977), the Citizen Plaintiffs can demonstrate they have standing to bring suit on behalf of two of their members in a representational capacity because “(a) [these] members would otherwise have standing to sue in their own right; (b) the interests [Citizen Plaintiffs] seek[] to protect [with this lawsuit] are germane to [each] organization’s purpose; and (c) neither the claim asserted nor the relief requested requires the participation of individual members in the lawsuit.” Environment America d/b/a Environment Ohio is a nonprofit corporation that advocates to protect and preserve Lake Erie and the Maumee River specifically, and Lake Erie Waterkeeper is a nonprofit corporation that advocates for fishable, swimmable, drinkable water for the Lake Erie watershed, which includes the Maumee River. ECF No. 1 (Citizen Plaintiffs), ¶¶ 17, 21, 25, and 27. Citizen Plaintiffs are “persons” within the meaning of 33 U.S.C. § 1362(5); ECF No. 26, ¶¶ 19, 26.

b. Consistent with the U.S. Supreme Court’s decision in *Lujan v. Defs. of Wildlife*, 504 U.S. 555, 560–61 (1992), Citizen Plaintiffs can demonstrate that two of their members (1) have suffered an “injury in fact” that is (a) concrete and particularized and (b) actual or imminent, not conjectural or hypothetical; (2) the injury is fairly traceable to the

challenged action of the defendant; and (3) it is likely, as opposed to merely speculative, that the injury will be redressed by a favorable decision:

(1) Tony Szilagye is a member of Lake Erie Waterkeeper and Environment Ohio; is a resident of Rossford, Ohio, which is approximately 35 miles downstream of the Defendant's food manufacturing facility located at 12-773 State Route 110, Napoleon, Ohio 43545 (the "Facility"); hikes, bikes, picnics, and kayaks along the Maumee River and downstream from the Facility; and has stated that he believes that pollution of the river makes these activities less enjoyable than they otherwise would be. ECF No. 1 (Citizen Plaintiffs), ¶ 113.

(2) Sandy Bihn is a member of Lake Erie Waterkeeper and Environment Ohio; is a resident of Oregon, Ohio, which is approximately 40 miles downstream of the Facility; seeks to have fishable, swimmable, drinkable water for the Lake Erie watershed; has worked in her personal and professional capacity to establish a healthy sturgeon population in the Maumee River; and has stated that she believes that pollution of the river adversely affects her aesthetic and recreational enjoyment of the river and the surrounding watershed. ECF No. 1 (Citizen Plaintiffs), ¶ 114.

c. Nothing set forth herein shall be construed as a stipulation by the parties or an admission by Campbell's that there was any injury to the environment. *See Friends of the Earth, Inc. v. Laidlaw Env't Servs. (TOC), Inc.*, 528 U.S. 167, 181 (2000) ("The relevant showing for purposes of Article III standing . . . is not injury to the environment but injury to the plaintiff.").

2. **Stipulation of Facts Regarding Liability.** The parties stipulate and agree to treat the following facts as established, and they need not be further proven at trial, subject to any supplementation or amendment permitted under the Federal Rules of Civil Procedure:

a. Defendant is incorporated in Delaware. ECF No. 26, ¶ 32; ECF No. 27, ¶ 10.

b. Defendant is a “person” within the meaning of the Clean Water Act, 33 U.S.C. § 1362(5). ECF No. 26, ¶ 33; ECF No. 27, ¶ 21.

c. Defendant owns and operates a food manufacturing facility located at 12-773 State Route 110, Napoleon, Ohio 43545 (the “Facility”). ECF No. 26, ¶ 48; ECF No. 27, ¶ 22.

d. 33 U.S.C. § 1342(a) creates the federal National Pollutant Discharge Elimination System (“NPDES”) permitting program and provides that the permit-issuing authority may issue a NPDES permit that authorizes the discharge of any pollutant into navigable waters if in compliance with the Clean Water Act. ECF No. 26, ¶ 9(a); ECF No. 27, ¶ 14.

e. The Ohio Environmental Protection Agency (“Ohio EPA”) is authorized to administer the NPDES permitting program in Ohio. ECF No. 26, ¶ 9(b); ECF No. 27, ¶ 46.

f. The NPDES permit that Ohio EPA issued to Defendant authorizes the discharge of wastewater from the Facility through outfalls designated in the permit in accordance with effluent limitations and monitoring requirements. ECF No. 26, ¶ 14(a); ECF. No. 27, ¶ 48.

g. Defendant discharges treated wastewater from Outfalls 001, 002 into the Maumee River, and, during certain periods of the year, into tributaries of the Maumee River from Outfalls 006, 007, 008, and 009, pursuant to a NPDES permit issued by Ohio EPA. ECF No. 26, ¶¶ 51 and 58; ECF No. 27, ¶¶ 34, 35, and 36.

h. The Maumee River and the tributaries of the Maumee River into which Outfalls 006, 007, 008, and 009 discharge are traditionally “navigable waters” within the meaning of Section 502(7) of the Clean Water Act, and “navigable waters” is defined as the “waters of the United States.” 33 U.S.C. § 1362(7). ECF No. 27, ¶¶ 17(e) and 40.

i. Defendant’s NPDES permit includes monitoring requirements for Final Outfalls 001, 002, 006, 007, 008, and 009, as well as Outfall 099, which is a fictitious, calculated station where the wastewater treatment plant’s removal efficiencies are applied to internal monitoring data collected at internal station 605 of the wastewater leaving the can manufacturing operations of Silgan Containers, Inc. (or one of its affiliates or subsidiaries) before it is combined with other wastewater from the Facility and routed through the wastewater treatment plant. ECF No. 26, ¶ 67; ECF No. 27, ¶ 38 and 52.

j. Defendant’s NPDES permit provides that “[m]onitoring data required by this permit shall be submitted monthly on Ohio EPA 4500 Discharge Monitoring Report (DMR) forms using the electronic DMR (e-DMR) internet application.” ECF No. 26, ¶ 14(b).

k. The DMRs and amended DMRs submitted by Defendant to Ohio EPA from January 2018 through the present include certifications made on behalf of Defendant by the “Responsible Official or Authorized Representative.” Response to Citizen Plaintiffs RFA 1.

l. Defendant’s NPDES permit authorizes the discharge of wastewater from the Facility through the outfalls designated in the permit in accordance with effluent limitations that include concentration and loading discharge limitations for parameters that include both pollutants and effluent characteristics. ECF No. 26, ¶ 14(a); ECF No. 27, ¶ 49.

m. Defendant’s NPDES permit contains effluent limitations and monitoring requirements for pH, carbonaceous biochemical oxygen demand (“CBOD”), total suspended

solids (“TSS”), dissolved oxygen (“DO”), ammonia, *E. coli*, total residual chlorine, phosphorous, and oil and grease, as well as monitoring requirements for spray application rate. ECF No. 27, ¶ 53; Responses to Citizen Plaintiffs and DOJ RFAs, Appendix A (Exhibits A and B).

n. 33 U.S.C. § 1362(6) defines “pollutant” as, *inter alia*, “solid waste . . . chemical wastes . . . and industrial . . . waste discharged into water,” which can include TSS, *E. coli*, total residual chlorine, phosphorus, oil and grease, ammonia, CBOD, and pH. DO is an additional parameter regulated by Defendant’s NPDES permit. ECF No. 27, ¶ 30.

o. The appendices provided by Defendant in response to (a) the First Set of Requests for Admissions propounded by Citizen Plaintiffs, served on March 31, 2025 (Exhibit A); and (b) to the First Set of Requests for Admissions propounded by Plaintiff United States of America, served on March 31, 2025 (Exhibit B), are true and correct to the best of Defendant’s knowledge and belief. Responses to Citizen Plaintiffs and DOJ RFAs, Exhibits A and B.

3. **Stipulations of Law Regarding Liability.** The parties stipulate and agree to treat the following as established, subject to any supplementation or amendment permitted under the Federal Rules of Civil Procedure:

a. 33 U.S.C. § 1311 provides that “the discharge of any pollutant by any person shall be unlawful,” except in compliance with, among other statutory provisions, 33 U.S.C. § 1342. ECF No. 26, ¶ 10; ECF No. 27, ¶ 13.

b. 33 U.S.C. § 1319 authorizes the Administrator of the U.S. Environmental Protection Agency (“EPA”) to commence a civil action for a “violation of any condition or limitation which implements section 1311”

c. 33 U.S.C. § 1365 authorizes any person “having an interest which is or may be adversely affected,” who can establish Article III standing, and who has provided sixty

days' notice to EPA and to the state, to commence a civil action against any person alleged to be "in violation of . . . an effluent standard or limitation," which includes "a permit or condition of a permit issued under section 1342," provided that neither EPA nor the state had commenced and was diligently prosecuting a civil action to bring that person into compliance.

d. Defendant stipulates to liability (as opposed to remedy) under the Clean Water Act, 33 U.S.C. §§ 1319(b) & (d) and 1365(a) for violations of 33 U.S.C. § 1311 and Defendant's applicable NPDES permit issued under 33 U.S.C. § 1342 for those reported DMR values (as amended, where so identified in Exhibits A and B) that do not conform with the conditions set forth in Defendant's individual NPDES permit to the extent previously admitted by Defendant in Exhibits A and B.

4. **Reservation of Rights.** Nothing set forth herein shall be construed as an admission by any party as to any fact or legal conclusion not expressly set forth herein, including with respect to the amount of any civil penalty, the application of the statutory penalty factors set forth in 33 U.S.C. § 1319(d), and the scope of, or appropriateness of, injunctive relief. Nothing set forth herein shall be construed as precluding the admission of evidence offered by any Party with respect to the amount of any civil penalty, the application of the statutory penalty factors set forth in 33 U.S.C. § 1319(d), and the scope of, or appropriateness of, injunctive relief.

Dated: September XX, 2025

Respectfully submitted,

FOR PLAINTIFFS

FOR DEFENDANT

FOR THE UNITED STATES OF AMERICA:

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Exhibit A

To Joint Stipulation of Facts and Law Regarding
Standing and Liability

| Table 1 Campbell Reported Discharges - CBOD (Outfall 001) January 2018 - December 2024 | | | | | | | |
|--|-----------------|-----------------|--------------------|------|--------|--|--|
| Date | Limit Type | Permitted Limit | Reported Discharge | Unit | Source | Request for Admission 2: Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation | Corrected Values for Each Denial: Provide corrections in this column or in separate narrative |
| Notice Letter | | | | | | | |
| 2/28/2018 | Monthly Average | 25 | 29 | mg/L | ECHO | Admitted | |
| 3/7/2018 | Daily Maximum | 40 | 47 | mg/L | DMR | Admitted | |
| 3/31/2018 | Monthly Average | 25 | 26 | mg/L | ECHO | Admitted | |
| 8/16/2018 | Daily Maximum | 40 | 57 | mg/L | DMR | Admitted | |
| 8/31/2018 | Daily Maximum | 1520 | 1900 | kg/d | ECHO | Admitted | |
| 7/23/2019 | Daily Maximum | 40 | 60 | mg/L | DMR | Admitted | |
| 7/31/2019 | Monthly Average | 25 | 34 | mg/L | ECHO | Admitted | |
| 7/31/2019 | Daily Maximum | 1520 | 1700 | kg/d | ECHO | Admitted | |
| 8/1/2019 | Daily Maximum | 40 | 61 | mg/L | DMR | Admitted | |
| 8/31/2019 | Monthly Average | 25 | 28 | mg/L | ECHO | Admitted | |
| 10/17/2019 | Daily Maximum | 40 | 58 | mg/L | DMR | Admitted | |
| 6/9/2020 | Daily Maximum | 40 | 63 | mg/L | DMR | Admitted | |
| 6/11/2020 | Daily Maximum | 40 | 62 | mg/L | DMR | Admitted | |
| 6/30/2020 | Monthly Average | 25 | 35 | mg/L | ECHO | Admitted | |
| 6/30/2020 | Daily Maximum | 1520 | 2000 | kg/d | ECHO | Admitted | |
| 6/30/2020 | Monthly Average | 947 | 1100 | kg/d | ECHO | Admitted | |
| 9/15/2020 | Daily Maximum | 40 | 57 | mg/L | DMR | Admitted | |
| 9/30/2020 | Monthly Average | 25 | 26 | mg/L | ECHO | Admitted | |
| 10/1/2020 | Daily Maximum | 40 | 47 | mg/L | DMR | Admitted | |
| 10/8/2020 | Daily Maximum | 40 | 46 | mg/L | DMR | Admitted | |
| 10/31/2020 | Monthly Average | 25 | 31 | mg/L | ECHO | Admitted | |
| 12/21/2020 | Daily Maximum | 40 | 53 | mg/L | DMR | Admitted | |
| 12/23/2020 | Daily Maximum | 40 | 81 | mg/L | DMR | Admitted | |
| 12/31/2020 | Monthly Average | 25 | 36 | mg/L | ECHO | Admitted | |
| 12/31/2020 | Daily Maximum | 1520 | 1600 | kg/d | ECHO | Admitted | |
| 1/31/2021 | Daily Maximum | 40 | 71 | mg/L | ECHO | Admitted | |
| 1/31/2021 | Monthly Average | 25 | 35 | mg/L | ECHO | Admitted | |
| 1/31/2021 | Daily Maximum | 1520 | 1900 | kg/d | ECHO | Admitted | |
| 2/2/2021 | Daily Maximum | 40 | 100 | mg/L | DMR | Admitted | |
| 2/4/2021 | Daily Maximum | 40 | 110 | mg/L | DMR | Admitted | |
| 2/9/2021 | Daily Maximum | 40 | 110 | mg/L | DMR | Admitted | |
| 2/11/2021 | Daily Maximum | 40 | 64 | mg/L | DMR | Admitted | |
| 2/17/2021 | Daily Maximum | 40 | 78 | mg/L | DMR | Admitted | |
| 2/18/2021 | Daily Maximum | 40 | 100 | mg/L | DMR | Admitted | |
| 2/25/2021 | Daily Maximum | 40 | 120 | mg/L | DMR | Admitted | |
| 2/28/2021 | Monthly Average | 25 | 90 | mg/L | ECHO | Admitted | |
| 2/28/2021 | Monthly Average | 947 | 2240 | kg/d | ECHO | Admitted | |
| 2/28/2021 | Daily Maximum | 1520 | 3040 | kg/d | ECHO | Admitted | |
| 3/4/2021 | Daily Maximum | 40 | 97 | mg/L | DMR | Admitted | |
| 3/9/2021 | Daily Maximum | 40 | 84 | mg/L | DMR | Admitted | |
| 3/11/2021 | Daily Maximum | 40 | 99 | mg/L | DMR | Admitted | |
| 3/23/2021 | Daily Maximum | 40 | 60 | mg/L | DMR | Admitted | |
| 3/31/2021 | Monthly Average | 25 | 58 | mg/L | ECHO | Admitted | |
| 3/31/2021 | Monthly Average | 947 | 1500 | kg/d | ECHO | Admitted | |
| 3/31/2021 | Daily Maximum | 1520 | 2600 | kg/d | ECHO | Admitted | |
| 4/15/2021 | Daily Maximum | 40 | 47 | mg/L | DMR | Admitted | |
| 4/30/2021 | Monthly Average | 25 | 27 | mg/L | ECHO | Admitted | |
| 5/27/2021 | Daily Maximum | 40 | 52 | mg/L | DMR | Admitted | |
| 5/31/2021 | Daily Maximum | 1520 | 1700 | kg/d | ECHO | Admitted | |
| 6/10/2021 | Daily Maximum | 40 | 69 | mg/L | DMR | Admitted | |
| 6/17/2021 | Daily Maximum | 40 | 81 | mg/L | DMR | Admitted | |
| 6/30/2021 | Monthly Average | 25 | 36.9 | mg/L | ECHO | Admitted | |
| 6/30/2021 | Daily Maximum | 1520 | 2390 | kg/d | ECHO | Admitted | |
| 6/30/2021 | Monthly Average | 947 | 1130 | kg/d | ECHO | Admitted | |
| 12/23/2021 | Daily Maximum | 40 | 48 | mg/L | DMR | Admitted | |
| 12/31/2021 | Monthly Average | 25 | 30 | mg/L | ECHO | Admitted | |
| 1/11/2022 | Daily Maximum | 40 | 53 | mg/L | DMR | Admitted | |
| 1/13/2022 | Daily Maximum | 40 | 58 | mg/L | DMR | Admitted | |
| 1/18/2022 | Daily Maximum | 40 | 68 | mg/L | DMR | Admitted | |
| 1/20/2022 | Daily Maximum | 40 | 110 | mg/L | DMR | Admitted | |
| 1/25/2022 | Daily Maximum | 40 | 65 | mg/L | DMR | Admitted | |
| 1/27/2022 | Daily Maximum | 40 | 110 | mg/L | DMR | Admitted | |
| 1/31/2022 | Monthly Average | 25 | 64 | mg/L | ECHO | Admitted | |
| 1/31/2022 | Daily Maximum | 1520 | 3150 | kg/d | ECHO | Admitted | |
| 1/31/2022 | Monthly Average | 947 | 1760 | kg/d | ECHO | Admitted | |
| 2/1/2022 | Daily Maximum | 40 | 64 | mg/L | DMR | Admitted | |

| | | | | | | | |
|------------|-----------------|------|-------|------|-----------------------------|--------------|--|
| 2/7/2022 | Daily Maximum | 40 | 44 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily maximum on DMR was 42 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 2/8/2022 | Daily Maximum | 40 | 44 | mg/L | Non-Compliance Notification | Admitted | |
| 2/15/2022 | Daily Maximum | 40 | 41 | mg/L | Non-Compliance Notification | Admitted | |
| 2/17/2022 | Daily Maximum | 40 | 60 | mg/L | DMR | Admitted | |
| 2/22/2022 | Daily Maximum | 40 | 47 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily maximum on DMR was 37 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 2/28/2022 | Monthly Average | 25 | 38 | mg/L | ECHO | Admitted | |
| 2/28/2022 | Monthly Average | 947 | 1100 | kg/d | ECHO | Admitted | |
| 2/28/2022 | Daily Maximum | 1520 | 2000 | kg/d | ECHO | Admitted | |
| 3/3/2022 | Daily Maximum | 40 | 72 | mg/L | DMR | Admitted | |
| 3/17/2022 | Daily Maximum | 40 | 60 | mg/L | DMR | Admitted | |
| 3/31/2022 | Monthly Average | 25 | 33 | mg/L | ECHO | Admitted | |
| 3/31/2022 | Daily Maximum | 1520 | 2100 | kg/d | ECHO | Admitted | |
| 4/7/2022 | Daily Maximum | 40 | 56 | mg/L | DMR | Admitted | |
| 4/21/2022 | Daily Maximum | 40 | 44 | mg/L | Non-Compliance Notification | Admitted | |
| 5/12/2022 | Daily Maximum | 40 | 43 | mg/L | Non-Compliance Notification | Admitted | |
| 5/26/2022 | Daily Maximum | 40 | 42 | mg/L | Non-Compliance Notification | Admitted | |
| 5/31/2022 | Monthly Average | 25 | 28 | mg/L | ECHO | Admitted | |
| 6/9/2022 | Daily Maximum | 40 | 48 | mg/L | Non-Compliance Notification | Admitted | |
| 6/28/2022 | Daily Maximum | 40 | 68 | mg/L | Non-Compliance Notification | Admitted | |
| 6/30/2022 | Monthly Average | 25 | 41 | mg/L | ECHO | Admitted | |
| 6/30/2022 | Daily Maximum | 1520 | 2000 | kg/d | ECHO | Admitted | |
| 6/30/2022 | Monthly Average | 947 | 1100 | kg/d | ECHO | Admitted | |
| 7/14/2022 | Daily Maximum | 40 | 72 | mg/L | Non-Compliance Notification | Admitted | |
| 7/21/2022 | Daily Maximum | 40 | 76 | mg/L | Non-Compliance Notification | Admitted | |
| 7/26/2022 | Daily Maximum | 40 | 76 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily maximum on DMR was 46 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 7/28/2022 | Daily Maximum | 40 | 80 | mg/L | Non-Compliance Notification | Admitted | |
| 7/31/2022 | Monthly Average | 25 | 48 | mg/L | ECHO | Admitted | |
| 7/31/2022 | Monthly Average | 947 | 1200 | kg/d | ECHO | Admitted | |
| 7/31/2022 | daily Maximum | 1520 | 2000 | kg/d | ECHO | Admitted | |
| 8/2/2022 | Daily Maximum | 40 | 59 | mg/L | Non-Compliance Notification | Admitted | |
| 8/4/2022 | Daily Maximum | 40 | 110 | mg/L | Non-Compliance Notification | Admitted | |
| 8/9/2022 | Daily Maximum | 40 | 69 | mg/L | Non-Compliance Notification | Admitted | |
| 8/11/2022 | Daily Maximum | 40 | 67 | mg/L | Non-Compliance Notification | Admitted | |
| 8/16/2022 | Daily Maximum | 40 | 53 | mg/L | Non-Compliance Notification | Admitted | |
| 8/31/2022 | Monthly Average | 25 | 64.4 | mg/L | ECHO | Admitted | |
| 8/31/2022 | Monthly Average | 947 | 1400 | kg/d | ECHO | Admitted | |
| 8/31/2022 | Daily Maximum | 1520 | 2960 | kg/d | ECHO | Admitted | |
| 9/8/2022 | Daily Maximum | 40 | 57 | mg/L | Non-Compliance Notification | Admitted | |
| 9/13/2022 | Daily Maximum | 40 | 61 | mg/L | Non-Compliance Notification | Admitted | |
| 9/13/2022 | Daily Maximum | 40 | 57 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily maximum on DMR was 61 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 9/15/2022 | Daily Maximum | 40 | 61 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily maximum on DMR was 53 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 9/30/2022 | Monthly Average | 25 | 34 | mg/L | ECHO | Admitted | |
| 10/31/2022 | Daily Maximum | 40 | 44 | mg/L | ECHO | Admitted | |
| 11/3/2022 | Daily Maximum | 40 | 48 | mg/L | Non-Compliance Notification | Admitted | |
| 11/10/2022 | Daily Maximum | 40 | 45 | mg/L | Non-Compliance Notification | Admitted | |
| 11/30/2022 | Daily Maximum | 40 | 64 | mg/L | ECHO | Admitted | |
| 11/30/2022 | Monthly Average | 25 | 39 | mg/L | ECHO | Admitted | |
| 11/30/2022 | Monthly Average | 947 | 1100 | kg/d | ECHO | Admitted | |
| 11/30/2022 | Daily Maximum | 1520 | 2000 | kg/d | ECHO | Admitted | |
| 12/6/2022 | Daily Maximum | 40 | 44 | mg/L | Non-Compliance Notification | Admitted | |
| 12/31/2022 | Daily Maximum | 40 | 77 | mg/L | ECHO | Admitted | |
| 12/31/2022 | Monthly Average | 25 | 50 | mg/L | ECHO | Admitted | |
| 12/31/2022 | Monthly Average | 947 | 1500 | kg/d | ECHO | Admitted | |
| 12/31/2022 | Daily Maximum | 1520 | 2300 | kg/d | ECHO | Admitted | |
| 1/12/2023 | Daily Maximum | 40 | 53 | mg/L | DMR | Admitted | |
| 1/20/2023 | Daily Maximum | 40 | 110.5 | mg/L | DMR | Admitted | |
| 1/31/2023 | Monthly Average | 25 | 41.56 | mg/L | ECHO | Admitted | |
| 1/31/2023 | Monthly Average | 947 | 1368 | kg/d | ECHO | Admitted | |
| 1/31/2023 | Daily Maximum | 1520 | 3826 | kg/d | ECHO | Admitted | |
| 2/2/2023 | Daily Maximum | 40 | 56 | mg/L | DMR | Admitted | |
| 2/7/2023 | Daily Maximum | 40 | 52 | mg/L | DMR | Admitted | |
| 2/21/2023 | Daily Maximum | 40 | 60 | mg/L | DMR | Admitted | |
| 2/23/2023 | Daily Maximum | 40 | 52 | mg/L | DMR | Admitted | |
| 2/28/2023 | Monthly Average | 25 | 39 | mg/L | ECHO | Admitted | |
| 2/28/2023 | Daily Maximum | 1520 | 1800 | kg/d | ECHO | Admitted | |
| 2/28/2023 | Monthly Average | 947 | 1200 | kg/d | ECHO | Admitted | |
| 3/2/2023 | Daily Maximum | 40 | 72 | mg/L | DMR | Admitted | |
| 3/23/2023 | Daily Maximum | 40 | 46 | mg/L | DMR | Admitted | |
| 3/31/2023 | Monthly Average | 25 | 31 | mg/L | ECHO | Admitted | |
| 3/31/2023 | Monthly Average | 947 | 960 | kg/d | ECHO | Admitted | |
| 3/31/2023 | Daily Maximum | 1520 | 2400 | kg/d | ECHO | Admitted | |
| 4/13/2023 | Daily Maximum | 40 | 44 | mg/L | DMR | Admitted | |
| 4/20/2023 | Daily Maximum | 40 | 69 | mg/L | DMR | Admitted | |
| 4/27/2023 | Daily Maximum | 40 | 80 | mg/L | DMR | Deny in Part | Plaintiffs incorrectly note reported value. Reported daily maximum on DMR was 88 mg/L. |

| | | | | | | | |
|--------------------------------|-----------------|------|------|------|------|----------|---|
| 4/30/2023 | Daily Maximum | 40 | 88 | mg/L | ECHO | Deny | There was no value reported on 4/30/2023. The result on 4/27/2023 on the DMR was 88 mg/L. |
| 4/30/2023 | Monthly Average | 25 | 42 | mg/L | ECHO | Admitted | |
| 4/30/2023 | Daily Maximum | 1520 | 2600 | kg/d | ECHO | Admitted | |
| 4/30/2023 | Monthly Average | 947 | 1100 | kg/d | ECHO | Admitted | |
| Complaint | | | | | | | |
| 5/4/2023 | Daily Maximum | 40 | 44 | mg/L | DMR | Admitted | |
| 5/31/2023 | Monthly Average | 25 | 26 | mg/L | DMR | Admitted | |
| 7/20/2023 | Daily Maximum | 40 | 42 | mg/L | DMR | Admitted | |
| 8/10/2023 | Daily Maximum | 40 | 110 | mg/L | DMR | Admitted | |
| 8/15/2023 | Daily Maximum | 40 | 58 | mg/L | DMR | Admitted | |
| 8/17/2023 | Daily Maximum | 40 | 42 | mg/L | DMR | Admitted | |
| 8/24/2024 | Daily Maximum | 40 | 43 | mg/L | DMR | Admitted | |
| 8/31/2023 | Daily Maximum | 1520 | 2590 | kg/d | ECHO | Admitted | |
| 8/31/2023 | Monthly Average | 25 | 34.9 | mg/L | DMR | Admitted | |
| 1/4/2024 | Daily Maximum | 40 | 53 | mg/L | DMR | Admitted | |
| 1/18/2024 | Daily Maximum | 40 | 41 | mg/L | DMR | Admitted | |
| 1/25/2024 | Daily Maximum | 40 | 53 | mg/L | DMR | Admitted | |
| 1/31/2024 | Monthly Average | 25 | 32.6 | mg/L | DMR | Admitted | |
| 2/8/2024 | Daily Maximum | 40 | 56 | mg/L | DMR | Admitted | |
| 2/29/2024 | Monthly Average | 25 | 32.5 | mg/L | DMR | Admitted | |
| Reported post-Complaint | | | | | | | |
| 3/15/2024 | Daily Maximum | 40 | 83.6 | mg/L | DMR | Admitted | |
| 3/31/2024 | Daily Maximum | 1520 | 2050 | kg/d | ECHO | Admitted | |
| 4/4/2024 | Daily Maximum | 40 | 46 | mg/L | DMR | Admitted | |
| 4/18/2024 | Daily Maximum | 40 | 41 | mg/L | DMR | Admitted | |
| 4/25/2024 | Daily Maximum | 40 | 79 | mg/L | DMR | Admitted | |
| 4/30/2024 | Daily Maximum | 1520 | 2400 | kg/d | ECHO | Admitted | |
| 7/2/2024 | Daily Maximum | 40 | 44 | mg/L | DMR | Admitted | |
| 8/8/2024 | Daily Maximum | 40 | 67 | mg/L | DMR | Admitted | |
| 12/31/2024 | Daily Maximum | 40 | 58 | mg/L | ECHO | Admitted | |
| 12/31/2024 | Daily Maximum | 1520 | 1600 | kg/d | ECHO | Admitted | |

| Table 2 Campbell Reported Discharges - Dissolved Oxygen (Outfalls 001 and 006-009) January 2018 - December 2024 | | | | | | | | |
|---|---------|---------------|-----------------|--------------------|------|-----------------------------|--|---|
| Date | Outfall | Limit Type | Permitted Limit | Reported Discharge | Unit | Source | Request for Admission 3: Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation | Corrected Values for Each Denial: Provide corrections in this column or in separate narrative |
| Notice Letter | | | | | | | | |
| 7/31/2018 | 006 | Daily Minimum | 5 | 2.6 | mg/L | ECHO | Admitted | |
| 8/8/2018 | 008 | Daily Minimum | 5 | 4.3 | mg/L | DMR | Admitted | |
| 8/14/2018 | 008 | Daily Minimum | 5 | 3.9 | mg/L | DMR | Admitted | |
| 8/17/2018 | 008 | Daily Minimum | 5 | 3.8 | mg/L | DMR | Admitted | |
| 8/23/2018 | 009 | Daily Minimum | 5 | 4.7 | mg/L | DMR | Admitted | |
| 8/28/2018 | 008 | Daily Minimum | 5 | 4.9 | mg/L | DMR | Admitted | |
| 8/29/2018 | 008 | Daily Minimum | 5 | 4.8 | mg/L | DMR | Admitted | |
| 8/31/2018 | 008 | Daily Minimum | 5 | 2.7 | mg/L | ECHO | Admitted | |
| 9/18/2018 | 009 | Daily Minimum | 5 | 4.7 | mg/L | DMR | Admitted | |
| 9/19/2018 | 009 | Daily Minimum | 5 | 4.3 | mg/L | DMR | Admitted | |
| 8/27/2019 | 008 | Daily Minimum | 5 | 4.1 | mg/L | DMR | Admitted | |
| 8/28/2019 | 008 | Daily Minimum | 5 | 4.3 | mg/L | DMR | Admitted | |
| 8/30/2019 | 008 | Daily Minimum | 5 | 4.1 | mg/L | DMR | Admitted | |
| 9/30/2019 | 006 | Daily Minimum | 5 | 3.5 | mg/L | ECHO | Admitted | |
| 10/1/2019 | 006 | Daily Minimum | 5 | 4.8 | mg/L | DMR | Admitted | |
| 6/25/2021 | 006 | Daily Minimum | 5 | 4.59 | mg/L | DMR | Admitted | |
| 6/26/2021 | 006 | Daily Minimum | 5 | 3.23 | mg/L | DMR | Admitted | |
| 6/30/2021 | 006 | Daily Minimum | 5 | 4.49 | mg/L | DMR | Admitted | |
| 7/10/2021 | 006 | Daily Minimum | 5 | 4.89 | mg/L | DMR | Admitted | |
| 7/17/2021 | 006 | Daily Minimum | 5 | 4.54 | mg/L | DMR | Admitted | |
| 7/19/2021 | 006 | Daily Minimum | 5 | 4.16 | mg/L | DMR | Admitted | |
| 7/21/2021 | 006 | Daily Minimum | 5 | 2.62 | mg/L | DMR | Admitted | |
| 8/30/2021 | 006 | Daily Minimum | 5 | 4.77 | mg/L | DMR | Admitted | |
| 8/31/2021 | 001 | Daily Minimum | 5 | 3 | mg/L | ECHO | Admitted | |
| 9/3/2021 | 008 | Daily Minimum | 5 | 4.39 | mg/L | DMR | Admitted | |
| 9/8/2021 | 006 | Daily Minimum | 5 | 4.9 | mg/L | DMR | Admitted | |
| 9/8/2021 | 008 | Daily Minimum | 5 | 3.89 | mg/L | DMR | Admitted | |
| 9/10/2021 | 006 | Daily Minimum | 5 | 4.7 | mg/L | DMR | Admitted | |
| 9/21/2021 | 006 | Daily Minimum | 5 | 4.3 | mg/L | DMR | Admitted | |
| 9/30/2021 | 006 | Daily Minimum | 5 | 3.1 | mg/L | ECHO | Admitted | |
| 10/11/2021 | 008 | Daily Minimum | 5 | 4.9 | mg/L | DMR | Admitted | |
| 10/12/2021 | 008 | Daily Minimum | 5 | 4.8 | mg/L | DMR | Admitted | |
| 10/14/2021 | 008 | Daily Minimum | 5 | 3.8 | mg/L | DMR | Admitted | |
| 10/15/2021 | 008 | Daily Minimum | 5 | 4.1 | mg/L | DMR | Admitted | |
| 10/16/2021 | 008 | Daily Minimum | 5 | 4.6 | mg/L | DMR | Admitted | |
| 10/17/2021 | 008 | Daily Minimum | 5 | 3.9 | mg/L | DMR | Admitted | |
| 10/19/2021 | 008 | Daily Minimum | 5 | 3.8 | mg/L | DMR | Admitted | |
| 10/20/2021 | 006 | Daily Minimum | 5 | 4.6 | mg/L | DMR | Admitted | |
| 10/21/2021 | 008 | Daily Minimum | 5 | 3.4 | mg/L | DMR | Admitted | |
| 10/22/2021 | 008 | Daily Minimum | 5 | 4.7 | mg/L | DMR | Admitted | |
| 10/31/2021 | 008 | Daily Minimum | 5 | 4.8 | mg/L | DMR | Admitted | |
| 11/11/2021 | 001 | Daily Minimum | 5 | 4.1 | mg/L | DMR | Admitted | |
| 11/30/2021 | 001 | Daily Minimum | 5 | 0.2 | mg/L | ECHO | Admitted | |
| 12/31/2021 | 001 | Daily Minimum | 5 | 2.4 | mg/L | ECHO | Admitted | |
| 1/23/2022 | 001 | Daily Minimum | 5 | 4.7 | mg/L | DMR | Admitted | |
| 2/20/2022 | 001 | Daily Minimum | 5 | 4.3 | mg/L | DMR | Admitted | |
| 2/28/2022 | 001 | Daily Minimum | 5 | 2.2 | mg/L | ECHO | Admitted | |
| 3/23/2022 | 001 | Daily Minimum | 5 | 3 | mg/L | Notification | Admitted | |
| 5/27/2022 | 001 | Daily Minimum | 5 | 3.5 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 6.1 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 5/28/2022 | 001 | Daily Minimum | 5 | 0.3 | mg/L | Notification | Admitted | |
| 5/31/2022 | 008 | Daily Minimum | 5 | 4.67 | mg/L | ECHO | Admitted | |

| | | | | | | | | |
|-----------|-----|---------------|---|------|------|-----------------------------|--------------|---|
| 6/2/2022 | 001 | Daily Minimum | 5 | 2 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 6.7 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 6/30/2022 | 001 | Daily Minimum | 5 | 2.7 | mg/L | ECHO | Admitted | |
| 6/30/2022 | 008 | Daily Minimum | 5 | 4.03 | mg/L | ECHO | Admitted | |
| 7/1/2022 | 001 | Daily Minimum | 5 | 4 | mg/L | Notification | Admitted | |
| 7/2/2022 | 001 | Daily Minimum | 5 | 4.6 | mg/L | Notification | Admitted | |
| 7/4/2022 | 001 | Daily Minimum | 5 | 3.9 | mg/L | Notification | Admitted | |
| 7/5/2022 | 006 | Daily Minimum | 5 | 4.4 | mg/L | Notification | Admitted | |
| 7/7/2022 | 001 | Daily Minimum | 5 | 3.7 | mg/L | Notification | Admitted | |
| 7/8/2022 | 008 | Daily Minimum | 5 | 2.8 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 3.2 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 7/9/2022 | 001 | Daily Minimum | 5 | 4.2 | mg/L | Non-Compliance Notification | Admitted | |
| 7/12/2022 | 006 | Daily Minimum | 5 | 4.3 | mg/L | Non-Compliance Notification | Admitted | |
| 7/18/2022 | 001 | Daily Minimum | 5 | 3.9 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 5.5 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 7/20/2022 | 001 | Daily Minimum | 5 | 3.6 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 4.6 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 7/28/2022 | 001 | Daily Minimum | 5 | 3.6 | mg/L | Non-Compliance Notification | Admitted | |
| 7/31/2022 | 009 | Daily Minimum | 5 | 4.7 | mg/L | ECHO | Admitted | |
| 8/1/2022 | 008 | Daily Minimum | 5 | 3 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 4.5 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 8/3/2022 | 009 | Daily Minimum | 5 | 4.2 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 4.7 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 8/5/2022 | 001 | Daily Minimum | 5 | 0.4 | mg/L | Non-Compliance Notification | Admitted | |
| 8/10/2022 | 001 | Daily Minimum | 5 | 0.3 | mg/L | Non-Compliance Notification | Admitted | |
| 8/16/2022 | 008 | Daily Minimum | 5 | 4.9 | mg/L | Non-Compliance Notification | Admitted | |
| 8/18/2022 | 008 | Daily Minimum | 5 | 3.4 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 4.5 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 8/20/2022 | 007 | Daily Minimum | 5 | 4.6 | mg/L | Non-Compliance Notification | Admitted | |
| 8/23/2022 | 001 | Daily Minimum | 5 | 3.5 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 3.6 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 8/25/2022 | 001 | Daily Minimum | 5 | 3.4 | mg/L | Non-Compliance Notification | Admitted | |
| 8/31/2022 | 008 | Daily Minimum | 5 | 3.02 | mg/L | ECHO | Admitted | |
| 9/9/2022 | 001 | Daily Minimum | 5 | 4.1 | mg/L | Non-Compliance Notification | Admitted | |
| 9/11/2022 | 001 | Daily Minimum | 5 | 3.2 | mg/L | Non-Compliance Notification | Admitted | |
| 9/13/2022 | 001 | Daily Minimum | 5 | 1.4 | mg/L | Non-Compliance Notification | Admitted | |
| 9/15/2022 | 001 | Daily Minimum | 5 | 2.1 | mg/L | Non-Compliance Notification | Admitted | |
| 9/24/2022 | 001 | Daily Minimum | 5 | 0.3 | mg/L | Non-Compliance Notification | Admitted | |
| 11/1/2022 | 001 | Daily Minimum | 5 | 1.2 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily minimum on DMR was 1.5 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 11/6/2022 | 001 | Daily Minimum | 5 | 2.2 | mg/L | Non-Compliance Notification | Admitted | |

| | | | | | | | | |
|--------------------------------|-----|---------------|---|------|------|------|--------------|---|
| 2/28/2023 | 001 | Daily Minimum | 5 | 3.7 | mg/L | DMR | Deny in Part | Plaintiffs incorrectly note reported value. Reported daily minimum on DMR was 5.0 mg/L. |
| 4/22/2023 | 001 | Daily Minimum | 5 | 3.7 | mg/L | DMR | Admitted | |
| Complaint | | | | | | | | |
| 5/10/2023 | 001 | Daily Minimum | 5 | 4.2 | mg/L | DMR | Admitted | |
| 6/12/2023 | 001 | Daily Minimum | 5 | 0.8 | mg/L | DMR | Admitted | |
| 7/4/2023 | 007 | Daily Minimum | 5 | 4.85 | mg/L | DMR | Admitted | |
| 7/6/2023 | 007 | Daily Minimum | 5 | 3.9 | mg/L | DMR | Admitted | |
| 8/10/2023 | 001 | Daily Minimum | 5 | 3.6 | mg/L | DMR | Admitted | |
| 8/11/2023 | 001 | Daily Minimum | 5 | 3.8 | mg/L | DMR | Admitted | |
| 8/12/2023 | 001 | Daily Minimum | 5 | 4.4 | mg/L | DMR | Admitted | |
| 8/21/2023 | 007 | Daily Minimum | 5 | 4.6 | mg/L | DMR | Admitted | |
| 8/24/2023 | 001 | Daily Minimum | 5 | 1.8 | mg/L | DMR | Admitted | |
| 8/25/2023 | 009 | Daily Minimum | 5 | 4.7 | mg/L | DMR | Admitted | |
| 8/30/2023 | 001 | Daily Minimum | 5 | 4 | mg/L | DMR | Admitted | |
| 8/31/2023 | 008 | Daily Minimum | 5 | 4.3 | mg/L | DMR | Admitted | |
| 10/4/2023 | 001 | Daily Minimum | 5 | 2.6 | mg/L | DMR | Admitted | |
| 10/4/2023 | 009 | Daily Minimum | 5 | 4 | mg/L | DMR | Admitted | |
| 12/6/2023 | 001 | Daily Minimum | 5 | 3.3 | mg/L | DMR | Admitted | |
| 12/8/2023 | 001 | Daily Minimum | 5 | 2.9 | mg/L | DMR | Admitted | |
| Reported post-Complaint | | | | | | | | |
| 3/6/2024 | 001 | Daily Minimum | 5 | 3.9 | mg/L | DMR | Admitted | |
| 3/14/2024 | 001 | Daily Minimum | 5 | 3.2 | mg/L | DMR | Admitted | |
| 5/25/2024 | 001 | Daily Minimum | 5 | 2.3 | mg/L | DMR | Admitted | |
| 5/26/2024 | 001 | Daily Minimum | 5 | 3 | mg/L | DMR | Admitted | |
| 6/9/2024 | 001 | Daily Minimum | 5 | 0.2 | mg/L | DMR | Admitted | |
| 6/10/2024 | 001 | Daily Minimum | 5 | 0.2 | mg/L | DMR | Admitted | |
| 6/11/2024 | 001 | Daily Minimum | 5 | 0.2 | mg/L | DMR | Admitted | |
| 6/12/2024 | 001 | Daily Minimum | 5 | 0.3 | mg/L | DMR | Admitted | |
| 6/13/2024 | 001 | Daily Minimum | 5 | 0.2 | mg/L | DMR | Admitted | |
| 6/14/2024 | 001 | Daily Minimum | 5 | 0.4 | mg/L | DMR | Admitted | |
| 6/15/2024 | 001 | Daily Minimum | 5 | 0.9 | mg/L | DMR | Admitted | |
| 7/12/2024 | 008 | Daily Minimum | 5 | 4.8 | mg/L | DMR | Admitted | |
| 7/16/2024 | 008 | Daily Minimum | 5 | 4.6 | mg/L | DMR | Admitted | |
| 7/20/2024 | 001 | Daily Minimum | 5 | 0.3 | mg/L | DMR | Admitted | |
| 7/24/2024 | 008 | Daily Minimum | 5 | 4.8 | mg/L | DMR | Admitted | |
| 7/29/2024 | 008 | Daily Minimum | 5 | 4.2 | mg/L | DMR | Admitted | |
| 7/30/2024 | 008 | Daily Minimum | 5 | 4.3 | mg/L | DMR | Admitted | |
| 7/31/2024 | 008 | Daily Minimum | 5 | 4.8 | mg/L | DMR | Admitted | |
| 8/1/2024 | 008 | Daily Minimum | 5 | 4 | mg/L | DMR | Admitted | |
| 8/2/2024 | 008 | Daily Minimum | 5 | 4.1 | mg/L | DMR | Admitted | |
| 8/3/2024 | 008 | Daily Minimum | 5 | 4.6 | mg/L | DMR | Admitted | |
| 8/6/2024 | 008 | Daily Minimum | 5 | 4.1 | mg/L | DMR | Admitted | |
| 8/9/2024 | 007 | Daily Minimum | 5 | 3.1 | mg/L | DMR | Admitted | |
| 8/10/2024 | 007 | Daily Minimum | 5 | 4 | mg/L | DMR | Admitted | |
| 8/11/2024 | 007 | Daily Minimum | 5 | 4.5 | mg/L | DMR | Admitted | |
| 8/15/2024 | 009 | Daily Minimum | 5 | 4.9 | mg/L | DMR | Admitted | |
| 8/25/2024 | 001 | Daily Minimum | 5 | 4 | mg/L | DMR | Admitted | |
| 8/26/2024 | 009 | Daily Minimum | 5 | 4.2 | mg/L | DMR | Admitted | |
| 8/28/2024 | 008 | Daily Minimum | 5 | 4.9 | mg/L | DMR | Admitted | |
| 8/28/2024 | 009 | Daily Minimum | 5 | 4.8 | mg/L | DMR | Admitted | |
| 8/29/2024 | 007 | Daily Minimum | 5 | 4 | mg/L | DMR | Admitted | |
| 8/29/2024 | 008 | Daily Minimum | 5 | 2.6 | mg/L | DMR | Admitted | |
| 8/29/2024 | 009 | Daily Minimum | 5 | 3.9 | mg/L | DMR | Admitted | |
| 8/31/2024 | 001 | Daily Minimum | 5 | 1.3 | mg/L | DMR | Admitted | |
| 9/1/2024 | 001 | Daily Minimum | 5 | 0.4 | mg/L | DMR | Admitted | |
| 9/2/2024 | 001 | Daily Minimum | 5 | 0.5 | mg/L | DMR | Admitted | |
| 11/30/2024 | 001 | Daily Minimum | 5 | 2.2 | mg/L | ECHO | Admitted | |

| Table 3 Campbell Reported Discharges - E. coli (Outfall 001) January 2018 - December 2024 | | | | | | | |
|---|---------------|-----------------|--------------------|-----------|-----------------------------|--|--|
| Date | Limit Type | Permitted Limit | Reported Discharge | Unit | Source | Request for Admission 4: Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation | Corrected Values for Each Denial: Provide corrections in this column or in separate narrative |
| Notice Letter | | | | | | | |
| 6/7/2018 | Weekly Geomn | 284 | 383 | MPN/100ml | DMR | Admitted | |
| 6/19/2018 | Weekly Geomn | 284 | 910 | MPN/100ml | DMR | Deny in Part | There are two E. coli readings in the third week of June 2018, 910 and AA. AA is a coded for "below detectable limit." See https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/edmr/doc/ACODES.pdf . When calculating the geomean, "1" should be used in lieu of a below detectable limit. The geomean of 910 and 1 is 30.16 MPN/100ml. |
| 7/12/2018 | Weekly Geomn | 284 | 5470 | MPN/100ml | DMR | Admitted | |
| 9/18/2018 | Weekly Geomn | 284 | 285 | MPN/100ml | DMR | Admitted | |
| 7/23/2019 | Weekly Geomn | 284 | 650 | MPN/100ml | DMR | Admitted | |
| 8/18/2019 | Weekly Geomn | 284 | 537 | MPN/100ml | DMR | Admitted | |
| 7/9/2020 | Weekly Geomn | 284 | 960 | MPN/100ml | DMR | Admitted | |
| 8/4/2020 | Weekly Geomn | 284 | 2720 | MPN/100ml | DMR | Admitted | |
| 10/8/2020 | Weekly Geomn | 284 | 8160 | MPN/100ml | DMR | Admitted | |
| 5/13/2021 | Weekly Geomn | 284 | 1150 | MPN/100ml | DMR | Admitted | |
| 5/20/2021 | Weekly Geomn | 284 | 3440 | MPN/100ml | DMR | Admitted | |
| 5/27/2021 | Weekly Geomn | 284 | 7700 | MPN/100ml | DMR | Admitted | |
| 5/31/2021 | Monthly Geomn | 126 | 1405 | MPN/100ml | ECHO | Admitted | |
| 6/3/2021 | Weekly Geomn | 284 | 5790 | MPN/100ml | DMR | Admitted | |
| 6/10/2021 | Weekly Geomn | 284 | 15500 | MPN/100ml | DMR | Admitted | |
| 6/17/2021 | Weekly Geomn | 284 | 19200 | MPN/100ml | DMR | Admitted | |
| 6/24/2021 | Weekly Geomn | 284 | 2990 | MPN/100ml | DMR | Deny in Part | There are two E. coli readings in the fourth week of June 2021, 2290 and 42. The geomean of 2290 and 42 is 354 MPN/100ml. |
| 6/30/2021 | Monthly Geomn | 126 | 1426.9 | MPN/100ml | ECHO | Admitted | |
| 7/20/2021 | Weekly Geomn | 284 | 12000 | MPN/100ml | DMR | Admitted | |
| 7/22/2021 | Weekly Geomn | 284 | 9800 | MPN/100ml | DMR | Deny | There are two E. coli readings in the fourth week of July 2021, 9800 and 3440. The geomean of 9800 and 3440 is 5806 MPN/100ml. Plaintiffs' allegation is duplicative of its allegation below. |
| 7/27/2021 | Weekly Geomn | 284 | 3440 | MPN/100ml | DMR | Deny in Part | There are two E. coli readings in the fourth week of July 2021, 9800 and 3440. The geomean of 9800 and 3440 is 5806 MPN/100ml. |
| 7/31/2021 | Monthly Geomn | 126 | 1331.3 | MPN/100ml | ECHO | Admitted | |
| 8/3/2021 | Weekly Geomn | 284 | 420 | MPN/100ml | DMR | Admitted | |
| 8/12/2021 | Weekly Geomn | 284 | 5480 | MPN/100ml | DMR | Deny | There are two E. coli readings in the second week of August 2021, 75 and 5480. The geomean of 75 and 5480 is 641 MPN/100ml, which is reported in the subsequent row. |
| 8/31/2021 | Weekly Geomn | 284 | 641.1 | MPN/100ml | ECHO | Admitted | |
| 8/31/2021 | Monthly Geomn | 126 | 205.6 | MPN/100ml | ECHO | Admitted | |
| 9/1/2021 | Weekly Geomn | 284 | 489 | MPN/100ml | DMR | Admitted | |
| 9/9/2021 | Weekly Geomn | 284 | 388 | MPN/100ml | DMR | Admitted | |
| 9/30/2021 | Monthly Geomn | 126 | 206 | MPN/100ml | ECHO | Admitted | |
| 5/24/2022 | Weekly Geomn | 284 | 876 | MPN/100ml | Non-Compliance Notification | Deny in Part | There are two E. coli readings in the fourth week of May 2022, 867 and 1047. The geomean of 867 and 1047 is 952 MPN/100ml. |
| 5/31/2022 | Weekly Geomn | 284 | 2420 | MPN/100ml | ECHO | Admitted | |
| 5/31/2022 | Monthly Geomn | 126 | 1261 | MPN/100ml | ECHO | Admitted | |
| 6/30/2022 | Weekly Geomn | 284 | 3537 | MPN/100ml | ECHO | Admitted | |
| 6/30/2022 | Monthly Geomn | 126 | 1830 | MPN/100ml | ECHO | Admitted | |
| 7/7/2022 | Weekly Geomn | 284 | 2420 | MPN/100ml | Notification | Admitted | |
| 7/19/2022 | Weekly Geomn | 284 | 2420 | MPN/100ml | Notification | Admitted | |
| 7/31/2022 | Monthly Geomn | 126 | 1259 | MPN/100ml | ECHO | Admitted | |
| 8/3/2022 | Weekly Geomn | 284 | 2420 | MPN/100ml | Non-Compliance Notification | Deny | Plaintiffs' allegation is duplicative. There are two E. coli readings in the first week of August 2022, 2420 and 24200. The geomean of 2420 and 24200 is 7652 MPN/100ml, which is reported in row 44. |
| 8/4/2022 | Weekly Geomn | 284 | 24200 | MPN/100ml | Non-Compliance Notification | Deny in Part | There are two E. coli readings in the first week of August 2022, 2420 and 24200. The geomean of 2420 and 24200 is 7652 MPN/100ml. |
| 8/16/2022 | Weekly Geomn | 284 | 6130 | MPN/100ml | Non-Compliance Notification | Deny in Part | There are three E. coli readings in the third week of June 2018, 6130, 631, and AA. AA is a coded for "below detectable limit." See https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/edmr/doc/ACODES.pdf . When calculating the geomean, "1" should be used in lieu of a below detectable limit. The geomean of 6130, 631, and AA is 157 MPN/100ml. |
| 8/31/2022 | Weekly Geomn | 284 | 7653 | MPN/100ml | ECHO | Deny | Plaintiffs' allegation is duplicative. As discussed in row 41 and 42 there are two E. coli readings in the first week of August 2022, 2420 and 24200. The geomean of 2420 and 24200 is 7652 MPN/100ml. Plaintiffs obtained this value from the Non-Compliance Notification and ECHO, and are alleging duplicative violations. |

| | | | | | | | |
|------------------|---------------|-----|------|-----------|--------------|----------|--|
| 8/31/2022 | Monthly Geomn | 126 | 218 | MPN/100ml | ECHO | Admitted | |
| 9/6/2022 | Weekly Geomn | 284 | 2420 | MPN/100ml | Notification | Admitted | |
| 9/27/2022 | Weekly Geomn | 284 | 1557 | MPN/100ml | Notification | Admitted | |
| 9/30/2022 | Monthly Geomn | 126 | 1250 | MPN/100ml | ECHO | Admitted | |
| Complaint | | | | | | | |
| 5/31/2023 | Weekly Geomn | 284 | 1733 | MPN/100ml | DMR | Admitted | |
| 8/14/2023 | Weekly Geomn | 284 | 1414 | MPN/100ml | DMR | Admitted | |
| 9/30/2023 | Weekly Geomn | 284 | 370 | MPN/100ml | DMR | Admitted | |
| 10/31/2023 | Weekly Geomn | 284 | 2420 | MPN/100ml | DMR | Admitted | |

Table 4
Campbell Reported Discharges - Phosphorus (Outfalls 001 and 006-009)
January 2018 - December 2024

| Date | Outfall | Limit Type | Permitted Limit | Reported Discharge | Unit | Source | Request for Admission 5: Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation | Corrected Values for Each Denial: Provide corrections in this column or in separate narrative |
|----------------------|----------------|-------------------|------------------------|---------------------------|-------------|---------------|--|--|
| Notice Letter | | | | | | | | |
| 9/30/2018 | 001 | Monthly Average | 1 | 1.1 | mg/L | ECHO | Admitted | |
| 10/31/2018 | 001 | Daily Maximum | 1.5 | 1.6 | mg/L | ECHO | Admitted | |
| 10/31/2018 | 001 | Monthly Average | 1 | 1.1 | mg/L | ECHO | Admitted | |
| 6/30/2019 | 001 | Daily Maximum | 1.5 | 1.8 | mg/L | ECHO | Admitted | |
| 6/30/2019 | 001 | Monthly Average | 1 | 1.1 | mg/L | ECHO | Admitted | |
| 7/31/2019 | 001 | Daily Maximum | 1.5 | 1.6 | mg/L | ECHO | Admitted | |
| 7/31/2019 | 001 | Monthly Average | 1 | 1.3 | mg/L | ECHO | Admitted | |
| 8/31/2019 | 006 | Monthly Average | 1 | 1.1 | mg/L | ECHO | Admitted | |
| 9/30/2019 | 001 | Daily Maximum | 1.5 | 1.8 | mg/L | ECHO | Admitted | |
| 9/30/2019 | 001 | Monthly Average | 1 | 1.28 | mg/L | ECHO | Admitted | |
| 10/31/2019 | 001 | Daily Maximum | 1.5 | 1.9 | mg/L | ECHO | Admitted | |
| 10/31/2019 | 001 | Monthly Average | 1 | 1.4 | mg/L | ECHO | Admitted | |
| 10/31/2019 | 007 | Monthly Average | 1 | 1.2 | mg/L | ECHO | Admitted | |
| 5/26/2020 | 001 | Daily Maximum | 1.5 | 3.03 | mg/L | DMR | Admitted | |
| 5/31/2020 | 001 | Monthly Average | 1 | 1.24 | mg/L | ECHO | Admitted | |
| 5/31/2020 | 001 | Daily Maximum | 56.8 | 82.6 | kg/d | ECHO | Admitted | |
| 6/9/2020 | 001 | Daily Maximum | 1.5 | 1.52 | mg/L | DMR | Admitted | |
| 6/11/2020 | 001 | Daily Maximum | 1.5 | 1.88 | mg/L | DMR | Admitted | |
| 6/25/2020 | 001 | Daily Maximum | 1.5 | 1.55 | mg/L | DMR | Admitted | |
| 6/30/2020 | 001 | Monthly Average | 1 | 1.45 | mg/L | ECHO | Admitted | |
| 6/30/2020 | 001 | Monthly Average | 37.9 | 43.9 | kg/d | ECHO | Admitted | |
| 6/30/2020 | 001 | Daily Maximum | 56.8 | 60.5 | kg/d | ECHO | Admitted | |
| 7/31/2020 | 006 | Monthly Average | 1 | 1.17 | mg/L | ECHO | Admitted | |
| 7/31/2020 | 008 | Monthly Average | 1 | 1.02 | mg/L | ECHO | Admitted | |
| 9/15/2020 | 001 | Daily Maximum | 1.5 | 1.85 | mg/L | DMR | Admitted | |
| 9/17/2020 | 001 | Daily Maximum | 1.5 | 1.61 | mg/L | DMR | Admitted | |
| 9/30/2020 | 001 | Monthly Average | 1 | 1.4 | mg/L | ECHO | Admitted | |
| 9/30/2020 | 008 | Monthly Average | 1 | 1.06 | mg/L | ECHO | Admitted | |
| 10/8/2020 | 001 | Daily Maximum | 1.5 | 1.71 | mg/L | DMR | Admitted | |
| 10/13/2020 | 001 | Daily Maximum | 1.5 | 1.61 | mg/L | DMR | Admitted | |
| 10/15/2020 | 001 | Daily Maximum | 1.5 | 1.61 | mg/L | DMR | Admitted | |
| 10/31/2020 | 001 | Monthly Average | 1 | 1.26 | mg/L | ECHO | Admitted | |
| 10/31/2020 | 008 | Monthly Average | 1 | 1.47 | mg/L | ECHO | Admitted | |
| 2/4/2021 | 001 | Daily Maximum | 1.5 | 1.62 | mg/L | DMR | Admitted | |
| 2/9/2021 | 001 | Daily Maximum | 1.5 | 1.85 | mg/L | DMR | Admitted | |
| 2/28/2021 | 001 | Monthly Average | 1 | 1.35 | mg/L | ECHO | Admitted | |
| 3/31/2021 | 001 | Monthly Average | 1 | 1.1 | mg/L | ECHO | Admitted | |
| 6/17/2021 | 001 | Daily Maximum | 1.5 | 1.52 | mg/L | DMR | Admitted | |
| 7/13/2021 | 001 | Daily Maximum | 1.5 | 1.59 | mg/L | DMR | Admitted | |
| 7/31/2021 | 001 | Monthly Average | 1 | 1.05 | mg/L | ECHO | Admitted | |
| 9/14/2021 | 001 | Daily Maximum | 1.5 | 1.75 | mg/L | DMR | Admitted | |
| 9/30/2021 | 001 | Monthly Average | 1 | 1.06 | mg/L | ECHO | Admitted | |
| 9/30/2021 | 008 | Daily Maximum | 3.84 | 5.17 | kg/d | ECHO | Admitted | |
| 5/31/2022 | 001 | Monthly Average | 1 | 1.03 | mg/L | ECHO | Admitted | |
| 6/7/2022 | 001 | Daily Maximum | 1.5 | 2.79 | mg/L | Notification | Admitted | |
| 6/28/2022 | 001 | Daily Maximum | 1.5 | 1.57 | mg/L | Notification | Admitted | |
| 6/30/2022 | 001 | Monthly Average | 1 | 1.5 | mg/L | ECHO | Admitted | |
| 7/21/2022 | 001 | Daily Maximum | 1.5 | 1.96 | mg/L | Notification | Admitted | |
| 7/26/2022 | 001 | Daily Maximum | 1.5 | 1.96 | mg/L | Notification | Admitted | |
| 7/28/2022 | 001 | Daily Maximum | 1.5 | 2.22 | mg/L | Notification | Admitted | |
| 7/31/2022 | 001 | Monthly Average | 1 | 1.54 | mg/L | ECHO | Admitted | |
| 8/2/2022 | 001 | Daily Maximum | 1.5 | 1.95 | mg/L | Notification | Admitted | |
| 8/4/2022 | 001 | Daily Maximum | 1.5 | 1.92 | mg/L | Notification | Admitted | |

| | | | | | | | | |
|--------------------------------|-----|-----------------|------|------|------|-----------------------------|--------------|--|
| 8/18/2022 | 008 | Daily Maximum | 1.5 | 1.84 | mg/L | Notification | Admitted | |
| 8/23/2022 | 008 | Daily Maximum | 1.5 | 1.84 | mg/L | Notification | Admitted | |
| 8/23/2022 | 009 | Daily Maximum | 1.5 | 1.76 | mg/L | Non-Compliance Notification | Deny in Part | Reported daily maximum on DMR was 1.6 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values. |
| 8/25/2022 | 008 | Daily Maximum | 1.5 | 1.84 | mg/L | Notification | Admitted | |
| 8/31/2022 | 001 | Monthly Average | 1 | 1.35 | mg/L | ECHO | Admitted | |
| 8/31/2022 | 006 | Daily Maximum | 1.5 | 1.53 | mg/L | ECHO | Admitted | |
| 8/31/2022 | 008 | Monthly Average | 1 | 1.25 | mg/L | ECHO | Admitted | |
| 8/31/2022 | 009 | Monthly Average | 1 | 1.03 | mg/L | ECHO | Admitted | |
| 9/1/2022 | 001 | Daily Maximum | 1.5 | 1.69 | mg/L | Non-Compliance Notification | Admitted | |
| 9/1/2022 | 008 | Daily Maximum | 1.5 | 1.92 | mg/L | Non-Compliance Notification | Admitted | |
| 9/13/2022 | 001 | Daily Maximum | 1.5 | 1.8 | mg/L | Non-Compliance Notification | Admitted | |
| 9/15/2022 | 001 | Daily Maximum | 1.5 | 1.8 | mg/L | Non-Compliance Notification | Admitted | |
| 9/15/2022 | 008 | Daily Maximum | 1.5 | 1.6 | mg/L | Non-Compliance Notification | Admitted | |
| 9/22/2022 | 008 | Daily Maximum | 1.5 | 2.2 | mg/L | Non-Compliance Notification | Admitted | |
| 9/30/2022 | 001 | Monthly Average | 1 | 1.5 | mg/L | ECHO | Admitted | |
| 9/30/2022 | 008 | Monthly Average | 1 | 1.6 | mg/L | ECHO | Admitted | |
| 9/30/2022 | 008 | Monthly Average | 2.56 | 3.2 | kg/d | ECHO | Admitted | |
| 9/30/2022 | 008 | Daily Maximum | 3.84 | 4.7 | kg/d | ECHO | Admitted | |
| 12/31/2022 | 001 | Daily Maximum | 1.5 | 1.6 | mg/L | ECHO | Admitted | |
| 4/30/2023 | 001 | Daily Maximum | 1.5 | 1.66 | mg/L | ECHO | Admitted | |
| 4/30/2023 | 001 | Monthly Average | 1 | 1.09 | mg/L | ECHO | Admitted | |
| Complaint | | | | | | | | |
| 5/9/2023 | 001 | Daily Maximum | 1.5 | 1.58 | mg/L | DMR | Admitted | |
| 5/23/2023 | 001 | Daily Maximum | 1.5 | 1.71 | mg/L | DMR | Admitted | |
| 5/31/2023 | 001 | Monthly Average | 1 | 1.15 | mg/L | DMR | Admitted | |
| 6/27/2023 | 001 | Daily Maximum | 1.5 | 1.77 | mg/L | DMR | Admitted | |
| 6/30/2023 | 001 | Monthly Average | 1 | 1.19 | mg/L | DMR | Admitted | |
| 7/11/2023 | 001 | Daily Maximum | 1.5 | 3.63 | mg/L | DMR | Admitted | |
| 7/13/2023 | 001 | Daily Maximum | 1.5 | 1.61 | mg/L | DMR | Admitted | |
| 7/31/2023 | 001 | Monthly Average | 1 | 1.31 | mg/L | DMR | Admitted | |
| 8/24/2023 | 001 | Daily Maximum | 1.5 | 1.76 | mg/L | DMR | Admitted | |
| 8/31/2023 | 001 | Monthly Average | 1 | 1.01 | mg/L | DMR | Admitted | |
| 9/7/2023 | 001 | Daily Maximum | 1.5 | 1.54 | mg/L | DMR | Admitted | |
| 9/14/2023 | 001 | Daily Maximum | 1.5 | 1.54 | mg/L | DMR | Admitted | |
| 9/30/2023 | 001 | Monthly Average | 1 | 1.17 | mg/L | DMR | Admitted | |
| 10/5/2023 | 001 | Daily Maximum | 1.5 | 1.78 | mg/L | DMR | Admitted | |
| 10/5/2023 | 009 | Daily Maximum | 1.5 | 1.98 | mg/L | DMR | Admitted | |
| 10/6/2023 | 001 | Daily Maximum | 1.5 | 1.6 | mg/L | DMR | Admitted | |
| 10/31/2023 | 001 | Monthly Average | 1 | 1.27 | mg/L | DMR | Admitted | |
| Reported post-Complaint | | | | | | | | |
| 7/23/2024 | 008 | Daily Maximum | 1.5 | 1.9 | mg/L | DMR | Admitted | |
| 7/25/2024 | 007 | Daily Maximum | 1.5 | 1.6 | mg/L | DMR | Admitted | |
| 7/25/2024 | 008 | Daily Maximum | 1.5 | 1.7 | mg/L | DMR | Admitted | |
| 7/27/2024 | 008 | Daily Maximum | 1.5 | 1.6 | mg/L | DMR | Admitted | |
| 7/28/2024 | 001 | Daily Maximum | 1.5 | 1.7 | mg/L | DMR | Admitted | |
| 7/28/2024 | 001 | Daily Maximum | 1.5 | 1.6 | mg/L | DMR | Deny | Plaintiffs' allegation is duplicative. Plaintiffs allege a different violation on the same day (7/28) in the row directly above. Reported daily maximum on DMR was 1.7 mg/L. |
| 7/28/2024 | 009 | Daily Maximum | 1.5 | 1.6 | mg/L | DMR | Admitted | |
| 7/31/2024 | 001 | Monthly Average | 1 | 1.13 | mg/L | DMR | Admitted | |
| 7/31/2024 | 007 | Monthly Average | 1 | 1.05 | mg/L | DMR | Admitted | |
| 7/31/2024 | 007 | Daily Maximum | 3.42 | 4.2 | kg/d | ECHO | Admitted | |
| 7/31/2024 | 007 | Monthly Average | 2.28 | 3.4 | kg/d | ECHO | Admitted | |
| 7/31/2024 | 008 | Monthly Average | 1 | 1.32 | mg/L | DMR | Admitted | |
| 7/31/2024 | 009 | Monthly Average | 1 | 1.02 | mg/L | DMR | Admitted | |
| 8/1/2024 | 008 | Daily Maximum | 1.5 | 1.58 | mg/L | DMR | Admitted | |
| 8/6/2024 | 009 | Daily Maximum | 1.5 | 1.51 | mg/L | DMR | Admitted | |
| 8/13/2024 | 007 | Daily Maximum | 1.5 | 1.82 | mg/L | DMR | Admitted | |
| 8/14/2024 | 009 | Daily Maximum | 1.5 | 1.55 | mg/L | DMR | Admitted | |

| | | | | | | | | |
|-----------|-----|-----------------|------|------|------|------|----------|--|
| 8/15/2024 | 009 | Daily Maximum | 1.5 | 1.75 | mg/L | DMR | Admitted | |
| 8/16/2024 | 009 | Daily Maximum | 1.5 | 1.63 | mg/L | DMR | Admitted | |
| 8/17/2024 | 009 | Daily Maximum | 1.5 | 1.75 | mg/L | DMR | Admitted | |
| 8/27/2024 | 009 | Daily Maximum | 1.5 | 1.63 | mg/L | DMR | Admitted | |
| 8/29/2024 | 009 | Daily Maximum | 1.5 | 1.93 | mg/L | DMR | Admitted | |
| 8/31/2024 | 007 | Monthly Average | 1 | 1.14 | mg/L | DMR | Admitted | |
| 8/31/2024 | 008 | Monthly Average | 1 | 1.02 | mg/L | DMR | Admitted | |
| 8/31/2024 | 009 | Monthly Average | 1 | 1.39 | mg/L | DMR | Admitted | |
| 8/31/2024 | 009 | Daily Maximum | 7.38 | 7.95 | kg/d | ECHO | Admitted | |

| Table 5 Campbell Reported Discharges - Nitrogen (as ammonia, NH3) (Outfall 001) January 2018 - December 2024 | | | | | | | |
|--|-----------------|-----------------|--------------------|------|--------|--|--|
| Date | Limit Type | Permitted Limit | Reported Discharge | Unit | Source | Request for Admission 6: Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation | Corrected Values for Each Denial: Provide corrections in this column or in separate narrative |
| Notice Letter | | | | | | | |
| 9/4/2018 | Daily Maximum | 3.5 | 12.4 | mg/L | DMR | Admitted | |
| 9/30/2018 | Monthly Average | 1.6 | 2.81 | mg/L | ECHO | Admitted | |
| 9/30/2018 | Daily Maximum | 90.9 | 343 | kg/d | ECHO | Admitted | |
| 9/30/2018 | Monthly Average | 60.6 | 80.1 | kg/d | ECHO | Admitted | |
| 10/31/2018 | Daily Maximum | 90.9 | 93 | kg/d | ECHO | Admitted | |
| 10/31/2018 | Monthly Average | 1.6 | 1.9 | mg/L | ECHO | Admitted | |
| 5/28/2019 | Daily Maximum | 3.5 | 9.6 | mg/L | DMR | Admitted | |
| 5/31/2019 | Daily Maximum | 90.9 | 240 | kg/d | ECHO | Admitted | |
| 9/3/2019 | Daily Maximum | 3.5 | 4.9 | mg/L | DMR | Admitted | |
| 9/30/2019 | Daily Maximum | 90.9 | 130 | kg/d | ECHO | Admitted | |
| 10/10/2019 | Daily Maximum | 3.5 | 3.9 | mg/L | DMR | Admitted | |
| 10/31/2019 | Monthly Average | 1.6 | 2.2 | mg/L | ECHO | Admitted | |
| 5/21/2020 | Daily Maximum | 3.5 | 4.9 | mg/L | DMR | Admitted | |
| 5/26/2020 | Daily Maximum | 3.5 | 3.6 | mg/L | DMR | Admitted | |
| 5/31/2020 | Daily Maximum | 90.9 | 140 | kg/d | ECHO | Admitted | |
| 5/31/2020 | Monthly Average | 1.6 | 2 | mg/L | ECHO | Admitted | |
| 8/17/2020 | Daily Maximum | 3.5 | 8.8 | mg/L | DMR | Admitted | |
| 8/31/2020 | Daily Maximum | 90.9 | 220 | kg/d | ECHO | Admitted | |
| 8/31/2020 | Monthly Average | 1.6 | 1.9 | mg/L | ECHO | Admitted | |
| 7/13/2021 | Daily Maximum | 3.5 | 3.9 | mg/L | DMR | Admitted | |
| 7/31/2021 | Daily Maximum | 90.9 | 100 | kg/d | ECHO | Admitted | |
| 7/5/2022 | Daily Maximum | 3.5 | 3.6 | mg/L | DMR | Admitted | |
| Complaint | | | | | | | |
| 7/11/2023 | Daily Maximum | 3.5 | 8.1 | mg/L | DMR | Admitted | |
| 7/31/2023 | Monthly Average | 1.6 | 1.98 | mg/L | DMR | Admitted | |
| 7/31/2023 | Daily Maximum | 90.9 | 110 | kg/d | ECHO | Admitted | |
| 9/5/2023 | Daily Maximum | 3.5 | 5.7 | mg/L | DMR | Admitted | |
| 9/30/2023 | Daily Maximum | 90.9 | 120 | kg/d | ECHO | Admitted | |
| 10/17/2023 | Daily Maximum | 3.5 | 4.2 | mg/L | DMR | Admitted | |
| Reported post-Complaint | | | | | | | |
| 5/6/2024 | Daily Maximum | 3.5 | 6.21 | mg/L | DMR | Admitted | |
| 5/7/2024 | Daily Maximum | 3.5 | 4.1 | mg/L | DMR | Admitted | |
| 5/13/2024 | Daily Maximum | 3.5 | 6.28 | mg/L | DMR | Admitted | |
| 5/20/2024 | Daily Maximum | 3.5 | 4.21 | mg/L | DMR | Admitted | |
| 5/28/2024 | Daily Maximum | 3.5 | 11.8 | mg/L | DMR | Admitted | |
| 5/31/2024 | Monthly Average | 1.6 | 3.13 | mg/L | DMR | Admitted | |
| 5/31/2024 | Daily Maximum | 90.9 | 229 | kg/d | ECHO | Admitted | |
| 5/31/2024 | Monthly Average | 60.6 | 71.2 | kg/d | ECHO | Admitted | |
| 6/17/2024 | Daily Maximum | 3.5 | 6.94 | mg/L | DMR | Admitted | |
| 6/30/2024 | Daily Maximum | 90.9 | 124 | kg/d | ECHO | Admitted | |
| 9/3/2024 | Daily Maximum | 3.5 | 8.2 | mg/L | DMR | Admitted | |

| Table 6 Campbell Reported Discharges - Total Suspended Solids (Outfalls 001, 009, and 099) January 2018 - December 2024 | | | | | | | | |
|---|---------|-----------------|-----------------|--------------------|------|-------------|--|--|
| Date | Outfall | Limit Type | Permitted Limit | Reported Discharge | Unit | Source | Request for Admission 7: Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation | Corrected Values for Each Denial: Provide corrections in this column or in separate narrative |
| Notice Letter | | | | | | | | |
| 8/16/2018 | 001 | Daily Maximum | 45 | 50 | mg/L | DMR | Admitted | |
| 4/16/2019 | 001 | Daily Maximum | 45 | 52 | mg/L | DMR | Admitted | |
| 7/3/2019 | 001 | Daily Maximum | 45 | 47 | mg/L | DMR | Admitted | |
| 7/31/2019 | 001 | Monthly Average | 30 | 36 | mg/L | ECHO | Admitted | |
| 10/10/2019 | 099 | Daily Maximum | 10.51 | 38.78 | kg/d | DMR Loading | Deny in Part | Campbell's noted in its Answer this value was not accurate. Flow was misreported on original DMR and revised on 12/23/24. This changed the loading calculations. Actual flow was 0.094 MGD on 10/10. Daily maximum loading, based on corrected flow, was 3.88 kg/day.□ |
| 10/17/2019 | 001 | Daily Maximum | 45 | 56 | mg/L | DMR | Admitted | |
| 10/31/2019 | 001 | Monthly Average | 30 | 31 | mg/L | ECHO | Admitted | |
| 10/31/2019 | 099 | Monthly Average | 5 | 39.6 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Flow was misreported on original DMR and revised on 12/23/24. This changed the loading calculations. Actual flows were 0.094 MGD on 10/10 and 0.087 MGD on 10/24. Monthly average loading, based on corrected flow, was 3.97 kg/day. |
| 10/31/2019 | 099 | Daily Maximum | 10.51 | 40.5 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Flow was misreported on original DMR and revised on 12/23/24. This changed the loading calculations. Actual flow was 0.087 MGD on 10/24. Daily maximum loading, based on corrected flow, was 4.05 kg/day.□ |
| 11/30/2019 | 009 | Monthly Average | 30 | 43 | mg/L | ECHO | Admitted | |
| 6/9/2020 | 001 | Daily Maximum | 45 | 63 | mg/L | DMR | Admitted | |
| 6/23/2020 | 001 | Daily Maximum | 45 | 46 | mg/L | DMR | Admitted | |
| 6/30/2020 | 001 | Monthly Average | 30 | 36 | mg/L | ECHO | Admitted | |
| 6/30/2020 | 001 | Daily Maximum | 1710 | 1800 | kg/d | ECHO | Admitted | |
| 12/21/2020 | 001 | Daily Maximum | 45 | 68 | mg/L | DMR | Admitted | |
| 12/23/2020 | 001 | Daily Maximum | 45 | 46 | mg/L | DMR | Admitted | |
| 12/31/2020 | 001 | Monthly Average | 30 | 34 | mg/L | ECHO | Admitted | |
| 1/12/2021 | 001 | Daily Maximum | 45 | 88 | mg/L | DMR | Admitted | |
| 1/19/2021 | 001 | Daily Maximum | 45 | 60 | mg/L | DMR | Admitted | |
| 1/21/2021 | 001 | Daily Maximum | 45 | 68 | mg/L | DMR | Admitted | |
| 1/31/2021 | 001 | Monthly Average | 30 | 46 | mg/L | ECHO | Admitted | |
| 1/31/2021 | 001 | Monthly Average | 1140 | 1200 | kg/d | ECHO | Admitted | |
| 1/31/2021 | 001 | Daily Maximum | 1710 | 2200 | kg/d | ECHO | Admitted | |
| 2/2/2021 | 001 | Daily Maximum | 45 | 76 | mg/L | DMR | Admitted | |
| 2/4/2021 | 001 | Daily Maximum | 45 | 84 | mg/L | DMR | Admitted | |
| 2/9/2021 | 001 | Daily Maximum | 45 | 132 | mg/L | DMR | Admitted | |
| 2/11/2021 | 001 | Daily Maximum | 45 | 64 | mg/L | DMR | Admitted | |
| 2/17/2021 | 001 | Daily Maximum | 45 | 69 | mg/L | DMR | Admitted | |
| 2/18/2021 | 001 | Daily Maximum | 45 | 76 | mg/L | DMR | Admitted | |
| 2/23/2021 | 001 | Daily Maximum | 45 | 88 | mg/L | DMR | Admitted | |
| 2/25/2021 | 001 | Daily Maximum | 45 | 74 | mg/L | DMR | Admitted | |
| 2/28/2021 | 001 | Monthly Average | 30 | 82.9 | mg/L | ECHO | Admitted | |
| 2/28/2021 | 001 | Monthly Average | 1140 | 2050 | kg/d | ECHO | Admitted | |
| 2/28/2021 | 001 | Daily Maximum | 1710 | 2950 | kg/d | ECHO | Admitted | |
| 2/28/2021 | 099 | Monthly Average | 5 | 5.093 | kg/d | ECHO | Admitted | |
| 3/2/2021 | 001 | Daily Maximum | 45 | 72 | mg/L | DMR | Admitted | |
| 3/4/2021 | 001 | Daily Maximum | 45 | 60 | mg/L | DMR | Admitted | |
| 3/9/2021 | 001 | Daily Maximum | 45 | 76 | mg/L | DMR | Admitted | |
| 3/11/2021 | 001 | Daily Maximum | 45 | 84 | mg/L | DMR | Admitted | |
| 3/23/2021 | 001 | Daily Maximum | 45 | 56 | mg/L | DMR | Admitted | |
| 3/25/2021 | 001 | Daily Maximum | 45 | 64 | mg/L | DMR | Admitted | |
| 3/31/2021 | 001 | Monthly Average | 30 | 62 | mg/L | ECHO | Admitted | |
| 3/31/2021 | 001 | Monthly Average | 1140 | 1600 | kg/d | ECHO | Admitted | |
| 3/31/2021 | 001 | Daily Maximum | 1710 | 2200 | kg/d | ECHO | Admitted | |
| 4/5/2021 | 001 | Daily Maximum | 45 | 52 | mg/L | DMR | Admitted | |
| 4/6/2021 | 001 | Daily Maximum | 45 | 52 | mg/L | DMR | Admitted | |
| 4/15/2021 | 001 | Daily Maximum | 45 | 52 | mg/L | DMR | Admitted | |
| 4/30/2021 | 001 | Monthly Average | 30 | 39 | mg/L | ECHO | Admitted | |
| 5/20/2021 | 001 | Daily Maximum | 45 | 64 | mg/L | DMR | Admitted | |
| 5/27/2021 | 001 | Daily Maximum | 45 | 68 | mg/L | DMR | Admitted | |
| 5/31/2021 | 001 | Monthly Average | 30 | 32 | mg/L | ECHO | Admitted | |
| 5/31/2021 | 001 | Daily Maximum | 1710 | 2200 | kg/d | ECHO | Admitted | |
| 6/10/2021 | 001 | Daily Maximum | 45 | 100 | mg/L | DMR | Admitted | |
| 6/17/2021 | 001 | Daily Maximum | 45 | 84 | mg/L | DMR | Admitted | |
| 6/22/2021 | 001 | Daily Maximum | 45 | 48 | mg/L | DMR | Admitted | |
| 6/30/2021 | 001 | Monthly Average | 30 | 48.5 | mg/L | ECHO | Admitted | |
| 6/30/2021 | 001 | Monthly Average | 1140 | 1500 | kg/d | ECHO | Admitted | |
| 6/30/2021 | 001 | Daily Maximum | 1710 | 3410 | kg/d | ECHO | Admitted | |
| 7/22/2021 | 001 | Daily Maximum | 45 | 62 | mg/L | DMR | Admitted | |
| 7/31/2021 | 001 | Monthly Average | 30 | 32 | mg/L | ECHO | Admitted | |
| 7/31/2021 | 001 | Daily Maximum | 1710 | 1800 | kg/d | ECHO | Admitted | |
| 8/31/2021 | 099 | Monthly Average | 5 | 5.12 | kg/d | ECHO | Admitted | |
| 10/21/2021 | 009 | Daily Maximum | 45 | 72 | mg/L | DMR | Admitted | |
| 10/31/2021 | 099 | Daily Maximum | 10.51 | 22.7 | kg/d | ECHO | Admitted | |
| 10/31/2021 | 099 | Monthly Average | 5 | 16.3 | kg/d | ECHO | Admitted | |
| 11/11/2021 | 099 | Daily Maximum | 10.51 | 11.89 | kg/d | DMR Loading | Admitted | |

| | | | | | | | | |
|------------|-----|-----------------|-------|-------|------|-----------------------------|--------------|--|
| 11/30/2021 | 099 | Monthly Average | 5 | 18.3 | kg/d | ECHO | Admitted | |
| 11/30/2021 | 099 | Daily Maximum | 10.51 | 24.71 | kg/d | ECHO | Admitted | |
| 12/2/2021 | 099 | Daily Maximum | 10.51 | 20.59 | kg/d | DMR Loading | Admitted | |
| 12/31/2021 | 099 | Daily Maximum | 10.51 | 36 | kg/d | ECHO | Admitted | |
| 12/31/2021 | 099 | Monthly Average | 5 | 28.3 | kg/d | ECHO | Admitted | |
| 1/6/2022 | 099 | Daily Maximum | 10.51 | 22.67 | kg/d | DMR Loading | Admitted | |
| 1/20/2022 | 001 | Daily Maximum | 45 | 52 | mg/L | DMR | Admitted | |
| 1/25/2022 | 001 | Daily Maximum | 45 | 51 | mg/L | DMR | Admitted | |
| 1/27/2022 | 001 | Daily Maximum | 45 | 74 | mg/L | DMR | Admitted | |
| 1/31/2022 | 001 | Monthly Average | 30 | 41 | mg/L | ECHO | Admitted | |
| 1/31/2022 | 001 | Daily Maximum | 1710 | 2100 | kg/d | ECHO | Admitted | |
| 1/31/2022 | 099 | Monthly Average | 5 | 62.8 | kg/d | ECHO | Admitted | |
| 1/31/2022 | 099 | Daily Maximum | 10.51 | 102.9 | kg/d | ECHO | Admitted | |
| 2/1/2022 | 001 | Daily Maximum | 45 | 64 | mg/L | DMR | Admitted | |
| 2/10/2022 | 001 | Daily Maximum | 45 | 46 | mg/L | DMR | Admitted | |
| 2/17/2022 | 001 | Daily Maximum | 45 | 52 | mg/L | DMR | Admitted | |
| 2/22/2022 | 001 | Daily Maximum | 45 | 47 | mg/L | DMR | Admitted | |
| 2/24/2022 | 099 | Daily Maximum | 10.51 | 30.04 | kg/d | DMR Loading | Admitted | |
| 2/28/2022 | 001 | Monthly Average | 30 | 42 | mg/L | ECHO | Admitted | |
| 2/28/2022 | 001 | Daily Maximum | 1710 | 1800 | kg/d | ECHO | Admitted | |
| 2/28/2022 | 001 | Monthly Average | 1140 | 1200 | kg/d | ECHO | Admitted | |
| 2/28/2022 | 099 | Daily Maximum | 10.51 | 41 | kg/d | ECHO | Admitted | |
| 2/28/2022 | 099 | Monthly Average | 5 | 36 | kg/d | ECHO | Admitted | |
| 3/10/2022 | 099 | Daily Maximum | 10.51 | 29.49 | kg/d | DMR Loading | Admitted | |
| 3/17/2022 | 001 | Daily Maximum | 45 | 124 | mg/L | DMR | Admitted | |
| 3/17/2022 | 001 | Daily Maximum | 45 | 110 | mg/L | Non-Compliance Notification | Deny | Plaintiffs' allegation is duplicative. Plaintiffs allege a different violation on the same day (3/17), duplicating the row directly above. Reported daily maximum on DMR was 124 mg/L. |
| 3/31/2022 | 001 | Monthly Average | 30 | 32.9 | mg/L | ECHO | Admitted | |
| 3/31/2022 | 001 | Daily Maximum | 1710 | 3580 | kg/d | ECHO | Admitted | |
| 3/31/2022 | 099 | Daily Maximum | 10.51 | 40.02 | kg/d | ECHO | Admitted | |
| 3/31/2022 | 099 | Monthly Average | 5 | 34.76 | kg/d | ECHO | Admitted | |
| 4/21/2022 | 001 | Daily Maximum | 45 | 46 | mg/L | DMR | Admitted | |
| 4/30/2022 | 099 | Monthly Average | 5 | 5.47 | kg/d | ECHO | Admitted | |
| 5/10/2022 | 001 | Daily Maximum | 45 | 56 | mg/L | Non-Compliance Notification | Admitted | |
| 5/31/2022 | 001 | Daily Maximum | 45 | 58 | mg/L | ECHO | Admitted | |
| 5/31/2022 | 001 | Monthly Average | 30 | 31 | mg/L | ECHO | Admitted | |
| 5/31/2022 | 001 | Daily Maximum | 1710 | 1900 | kg/d | ECHO | Admitted | |
| 5/31/2022 | 099 | Monthly Average | 5 | 23.9 | kg/d | ECHO | Admitted | |
| 5/31/2022 | 099 | Daily Maximum | 10.51 | 24.1 | kg/d | ECHO | Admitted | |
| 6/28/2022 | 001 | Daily Maximum | 45 | 48 | mg/L | Non-Compliance Notification | Admitted | |
| 6/30/2022 | 001 | Monthly Average | 30 | 32 | mg/L | ECHO | Admitted | |
| 6/30/2022 | 099 | Monthly Average | 5 | 10.03 | kg/d | ECHO | Admitted | |
| 6/30/2022 | 099 | Daily Maximum | 10.51 | 16.1 | kg/d | ECHO | Admitted | |
| 7/14/2022 | 001 | Daily Maximum | 45 | 58 | mg/L | Non-Compliance Notification | Admitted | |
| 7/28/2022 | 001 | Daily Maximum | 45 | 53 | mg/L | Non-Compliance Notification | Admitted | |
| 7/31/2022 | 001 | Monthly Average | 30 | 40 | mg/L | ECHO | Admitted | |
| 7/31/2022 | 099 | Monthly Average | 5 | 17 | kg/d | ECHO | Admitted | |
| 7/31/2022 | 099 | Daily Maximum | 10.51 | 26 | kg/d | ECHO | Admitted | |
| 8/2/2022 | 001 | Daily Maximum | 45 | 57 | mg/L | Non-Compliance Notification | Admitted | |
| 8/5/2022 | 001 | Daily Maximum | 45 | 59 | mg/L | Non-Compliance Notification | Admitted | |
| 8/31/2022 | 001 | Daily Maximum | 45 | 62 | mg/L | ECHO | Admitted | |
| 8/31/2022 | 001 | Monthly Average | 30 | 44 | mg/L | ECHO | Admitted | |
| 9/15/2022 | 001 | Daily Maximum | 45 | 53 | mg/L | Non-Compliance Notification | Admitted | |
| 9/30/2022 | 001 | Monthly Average | 30 | 35 | mg/L | ECHO | Admitted | |
| 9/30/2022 | 099 | Monthly Average | 5 | 6.08 | kg/d | ECHO | Admitted | |
| 10/6/2022 | 099 | Daily Maximum | 10.51 | 15.06 | kg/d | DMR Loading | Admitted | |
| 10/31/2022 | 099 | Monthly Average | 5 | 22 | kg/d | ECHO | Admitted | |
| 10/31/2022 | 099 | Daily Maximum | 10.51 | 28 | kg/d | ECHO | Admitted | |
| 11/8/2022 | 001 | Daily Maximum | 45 | 54 | mg/L | ECHO | Admitted | |
| 11/30/2022 | 001 | Monthly Average | 30 | 31 | mg/L | ECHO | Admitted | |
| 11/30/2022 | 099 | Monthly Average | 5 | 5.9 | kg/d | ECHO | Deny in Part | Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 3.55 mg/L on 11/3 and 4.75 mg/L on 11/17. Monthly average loading, based on corrected concentrations, was 2.32 kg/day. □ |
| 12/6/2022 | 001 | Daily Maximum | 45 | 52 | mg/L | Non-Compliance Notification | Admitted | |
| 12/31/2022 | 001 | Daily Maximum | 45 | 172 | mg/L | ECHO | Admitted | |
| 12/31/2022 | 001 | Monthly Average | 30 | 53.8 | mg/L | ECHO | Admitted | |
| 12/31/2022 | 001 | Monthly Average | 1140 | 1460 | kg/d | ECHO | Admitted | |
| 12/31/2022 | 001 | Daily Maximum | 1710 | 3920 | kg/d | ECHO | Admitted | |
| 12/31/2022 | 099 | Daily Maximum | 10.51 | 14.3 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentration was 12.5 mg/L on 12/1. Daily maximum loading, based on corrected concentrations, was 5.49 kg/day. □ |
| 12/31/2022 | 099 | Monthly Average | 5 | 11.8 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 12.5 mg/L on 12/1 and 8.15 mg/L on 12/20. Monthly average loading, based on corrected concentrations, was 4.55 kg/day. □ |
| 1/19/2023 | 099 | Daily Maximum | 10.51 | 29.66 | kg/d | DMR Loading | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentration was 31.4 mg/L on 1/19. Daily maximum loading, based on corrected concentrations, was 11.42 kg/day. |
| 1/31/2023 | 099 | Monthly Average | 5 | 20.83 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 12.2 mg/L on 1/5 and 31.4 mg/L on 1/19. Monthly average loading, based on corrected concentrations, was 8.02 kg/day. |
| 2/2/2023 | 001 | Daily Maximum | 45 | 50 | mg/L | DMR | Admitted | |

| | | | | | | | | |
|--------------------------------|-----|-----------------|-------|--------|------|-------------|--------------|---|
| 2/7/2023 | 001 | Daily Maximum | 45 | 47 | mg/L | DMR | Admitted | |
| 2/28/2023 | 001 | Monthly Average | 30 | 38 | mg/L | ECHO | Admitted | |
| 2/28/2023 | 001 | Monthly Average | 1140 | 1200 | kg/d | ECHO | Admitted | |
| 2/28/2023 | 099 | Monthly Average | 5 | 7.1 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 7.2 mg/L on 2/2 and 8.6 mg/L on 2/23. Monthly average loading, based on corrected concentrations, was 2.73 kg/day. |
| 3/2/2023 | 001 | Daily Maximum | 45 | 80 | mg/L | DMR | Admitted | |
| 3/2/2023 | 001 | Daily Maximum | 1710 | 2651 | mg/L | DMR Loading | Admitted | |
| 3/7/2023 | 001 | Daily Maximum | 45 | 51 | mg/L | DMR | Admitted | |
| 3/31/2023 | 001 | Daily Maximum | 1710 | 2700 | kg/d | ECHO | Deny | Plaintiffs' allegation is duplicative. Plaintiffs allege a different violation on the same day (3/2), duplicating the violation in row 145. ECHO reports the highest daily value for each month on the last day of the month. |
| 3/31/2023 | 001 | Monthly Average | 30 | 36 | mg/L | ECHO | Admitted | |
| 4/6/2023 | 001 | Daily Maximum | 45 | 49 | mg/L | DMR | Admitted | |
| 4/13/2023 | 001 | Daily Maximum | 45 | 68 | mg/L | DMR | Admitted | |
| 4/13/2023 | 001 | Daily Maximum | 1710 | 1932.7 | kg/d | DMR Loading | Admitted | |
| 4/20/2023 | 099 | Daily Maximum | 10.51 | 10.8 | kg/d | DMR Loading | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentration was 2.75 mg/L on 4/6. Daily maximum loading, based on corrected concentrations, was 1.26 kg/day. |
| 4/27/2023 | 001 | Daily Maximum | 45 | 80 | mg/L | DMR | Admitted | |
| 4/27/2023 | 001 | Daily Maximum | 1710 | 2379.7 | kg/d | DMR Loading | Admitted | |
| 4/30/2023 | 001 | Daily Maximum | 1710 | 2400 | kg/d | ECHO | Deny | Plaintiffs' allegation is duplicative. Plaintiffs allege a different violation on the same day (4/27), duplicating the row directly above. ECHO reports the highest daily value for each month on the last day of the month. |
| 4/30/2023 | 001 | Monthly Average | 30 | 47 | mg/L | ECHO | Admitted | |
| 4/30/2023 | 099 | Monthly Average | 5 | 7.05 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 2.75 mg/L on 4/6 and 1.3 mg/L on 4/20. Monthly average loading, based on corrected concentrations, was 0.90 kg/day. |
| Complaint | | | | | | | | |
| 5/4/2023 | 001 | Daily Maximum | 45 | 50 | mg/L | DMR | Admitted | |
| 5/9/2023 | 001 | Daily Maximum | 45 | 56 | mg/L | DMR | Admitted | |
| 5/31/2023 | 001 | Monthly Average | 30 | 34 | mg/L | DMR | Admitted | |
| 8/10/2023 | 001 | Daily Maximum | 45 | 49 | mg/L | DMR | Admitted | |
| 11/7/2023 | 001 | Daily Maximum | 45 | 57 | mg/L | DMR | Admitted | |
| 12/31/2023 | 099 | Daily Maximum | 10.51 | 16.77 | kg/d | ECHO | Deny in Part | Concentration was misreported on original DMR and revised on 5/1/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentration was 14.1 mg/L on 12/27. Daily maximum loading, based on corrected concentrations, was 6.49 kg/day. |
| 12/31/2023 | 099 | Monthly Average | 5 | 12.17 | kg/d | ECHO | Deny in Part | Concentration was misreported on original DMR and revised on 5/1/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 5.1 mg/L on 12/14 and 14.1 mg/L on 12/27. Monthly average loading, based on corrected concentrations, was 4.68 kg/day. □ |
| 1/31/2024 | 001 | Daily Maximum | 45 | 48 | mg/L | DMR | Admitted | |
| 1/31/2024 | 099 | Monthly Average | 5 | 6.862 | kg/d | ECHO | Deny in Part | Concentration was misreported on original DMR and revised on 5/1/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 4.1 mg/L on 1/4 and 6.9 mg/L on 1/18. Monthly average loading, based on corrected concentrations, was 2.64 kg/day. □ |
| Reported post-Complaint | | | | | | | | |
| 5/30/2024 | 001 | Daily Maximum | 45 | 50 | mg/L | DMR | Admitted | |
| 7/4/2024 | 001 | Daily Maximum | 45 | 58 | mg/L | DMR | Admitted | |

| Table 7 Campbell Reported Discharges - Oil and Grease (Outfall 099) January 2018 - December 2024 | | | | | | | |
|--|-----------------|-----------------|--------------------|------|-------------|--|--|
| Date | Limit Type | Permitted Limit | Reported Discharge | Unit | Source | Request for Admission 8: Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation | Corrected Values for Each Denial: Provide corrections in this column or in separate narrative |
| Notice Letter | | | | | | | |
| 6/30/2018 | Monthly Average | 3.08 | 3.4 | kg/d | ECHO | Admitted | |
| 10/10/2019 | Daily Maximum | 5.13 | 16.72 | kg/d | DMR Loading | Admitted | Campbell's noted in its Answer this value was not accurate. Flow was misreported on original DMR and revised on 12/23/24. This changed the loading calculations. Actual flow was 0.094 MGD on 10/10. Daily maximum loading, based on corrected flow, was 1.67 kg/day. |
| 10/31/2019 | Daily Maximum | 5.13 | 17 | kg/d | ECHO | Deny | Plaintiff alleges a different violation on the same day (10/10), duplicating the row directly above. ECHO reports the highest daily value for each month on the last day of the month. |
| 10/31/2019 | Monthly Average | 3.08 | 11 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Flow was misreported on original DMR and revised on 12/23/24. This changed the loading calculations. Actual flows were 0.094 MGD on 10/10 and 0.087 MGD on 10/24. Monthly average loading, based on corrected flow, was 1.08 kg/day. □ |
| 4/30/2021 | Monthly Average | 3.08 | 3.7 | kg/d | ECHO | Admitted | |
| 11/11/2021 | Daily Maximum | 5.13 | 8.74 | kg/d | DMR Loading | Admitted | |
| 11/30/2021 | Monthly Average | 3.08 | 5.55 | kg/d | ECHO | Admitted | |
| 12/16/2021 | Daily Maximum | 5.13 | 13.27 | kg/d | DMR Loading | Admitted | |
| 12/31/2021 | Monthly Average | 3.08 | 7.9 | kg/d | ECHO | Admitted | |
| 2/28/2022 | Monthly Average | 3.08 | 4.17 | kg/d | ECHO | Admitted | |
| 2/28/2022 | Daily Maximum | 5.13 | 7.9 | kg/d | ECHO | Admitted | |
| 3/10/2022 | Daily Maximum | 5.13 | 5.63 | kg/d | DMR Loading | Admitted | |
| 3/31/2022 | Monthly Average | 3.08 | 21.1 | kg/d | ECHO | Admitted | |
| 3/31/2022 | Daily Maximum | 5.13 | 36.6 | kg/d | ECHO | Admitted | |
| 5/31/2022 | Daily Maximum | 5.13 | 102 | kg/d | ECHO | Admitted | |
| 5/31/2022 | Monthly Average | 3.08 | 51.1 | kg/d | ECHO | Admitted | |
| 7/31/2022 | Monthly Average | 3.08 | 5.7 | kg/d | ECHO | Admitted | |
| 7/31/2022 | Daily Maximum | 5.13 | 9.8 | kg/d | ECHO | Admitted | |
| 12/31/2022 | Monthly Average | 3.08 | 4.96 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 6 mg/L on 12/1 and 7.5 mg/L on 12/20. Monthly average loading, based on corrected concentrations, was 2.98 kg/day. □ |
| 12/31/2022 | Daily Maximum | 5.13 | 5.54 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentration was 7.5 mg/L on 12/20. Daily maximum loading, based on corrected concentrations, was 3.32 kg/day. |
| 1/5/2023 | Daily Maximum | 5.13 | 9.73 | kg/d | DMR Loading | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentration was 15.42 mg/L on 1/5. Daily maximum loading, based on corrected concentrations, was 5.8 kg/day. |
| 1/19/2023 | Daily Maximum | 5.13 | 16.3 | kg/d | DMR Loading | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentration was 26.94 mg/L on 1/19. Daily maximum loading, based on corrected concentrations, was 9.80 kg/day. |
| 1/31/2023 | Monthly Average | 3.08 | 13 | kg/d | ECHO | Deny in Part | Campbell's noted in its Answer this value was not accurate. Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 15.42 mg/L on 1/5 and 26.94 mg/L on 1/19. Monthly average loading, based on corrected concentrations, was 7.82 kg/day. □ |
| Complaint | | | | | | | |
| 6/30/2023 | Daily Maximum | 5.13 | 9.23 | kg/d | ECHO | Deny in Part | Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentration was 10.38 mg/L on 6/22. Daily maximum loading, based on corrected concentrations, was 5.54 kg/day. |

| | | | | | | | |
|-----------|-----------------|------|------|------|------|----------|--|
| 6/30/2023 | Monthly Average | 3.08 | 4.78 | kg/d | ECHO | Admitted | Concentration was misreported on original DMR and revised on 4/30/24. In November 2022, Ohio EPA updated the removal efficiencies in Campbell's NPDES permit. This changed the loading calculations. Actual concentrations were 0.372 mg/L on 6/8 and 10.38 mg/L on 6/22. Monthly average loading, based on corrected concentrations, was 2.87 kg/day. □ |
|-----------|-----------------|------|------|------|------|----------|--|

Exhibit B

To Joint Stipulation of Facts and Law Regarding
Standing and Liability

APPENDIX A
DISCHARGE MONITORING REPORT VALUES AND REQUEST FOR ADMISSION
OF VALUE REPORTED AND ACCURACY OF REPORTED VALUES

REQUEST FOR ADMISSION 3:
 Admit Row Corresponds to Reported DMR Value

REQUEST FOR ADMISSION 4:
 Admit Row Reflects Self-Monitoring Values

Corrected Values for Each Denial: provide corrections in this column or in separate narrative

| Inaring Period | Outfall | Parameter/Constituent Description | Average Daily Flow (MGD) | Limit Type | Reported DMR Value | Permit Limit | Limit Value Unit | Admitted | Admitted |
|----------------|---------|-------------------------------------|--------------------------|------------|--------------------|--------------|------------------|----------|--------------|
| 8/16/2018 | 1 | Solids, total suspended | 8.9 DAILY MX | | 57 | 45 | mg/L | Admitted | Admitted |
| 8/16/2018 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.9 DAILY MX | | 50 | 40 | mg/L | Admitted | Admitted |
| 8/16/2018 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.9 DAILY MX | | 1900 | 1520 | kg/d | Admitted | Admitted |
| 8/20/2018 | 6 | pH, maximum | 0.413 DAILY MX | | 9 | 11 | SU | Admitted | Admitted |
| 8/12/2018 | 8 | Oxygen, dissolved (DO) | 0.2 DAILY MN | | 2.7 | 5 | mg/L | Admitted | Admitted |
| 8/6/2018 | 8 | pH, minimum | 0.103 DAILY MN | | 6.2 | 6.5 | SU | Admitted | Admitted |
| 8/23/2018 | 9 | Oxygen, dissolved (DO) | 0.337 DAILY MN | | 4.7 | 5 | mg/L | Admitted | Admitted |
| 8/7/2018 | 9 | pH, minimum | 0.471 DAILY MN | | 4.4 | 6.5 | SU | Admitted | Admitted |
| 9/30/2018 | 1 | Nitrogen, ammonia total (as N) | 6.52667 MO AVG | | 80.1 | 60.6 | kg/d | Admitted | Admitted |
| 9/30/2018 | 1 | Nitrogen, ammonia total (as N) | 6.82667 MO AVG | | 2.81 | 1.6 | mg/L | Admitted | Admitted |
| 9/4/2018 | 1 | Nitrogen, ammonia total (as N) | 7.3 DAILY MX | | 12.4 | 3.5 | mg/L | Admitted | Admitted |
| 9/4/2018 | 1 | Nitrogen, ammonia total (as N) | 7.3 DAILY MX | | 343 | 90.9 | kg/d | Admitted | Admitted |
| 9/30/2018 | 1 | Phosphorus, total (as P) | 6.82667 MO AVG | | 1.1 | 1 | mg/L | Admitted | Admitted |
| 9/18/2018 | 1 | E. coli, MTEC-MF | 8 WK GEOMN | | 285 | 284 | MPN/100mL | Admitted | Admitted |
| 9/11/2018 | 6 | pH, maximum | 1.3 DAILY MX | | 9.5 | 9 | SU | Admitted | Admitted |
| 9/10/2018 | 6 | pH, minimum | 1.2 DAILY MN | | 6.2 | 6.5 | SU | Admitted | Admitted |
| 9/19/2018 | 9 | Oxygen, dissolved (DO) | 0.47 DAILY MN | | 4.3 | 5 | mg/L | Admitted | Admitted |
| 10/2/2018 | 1 | Nitrogen, ammonia total (as N) | 7 DAILY MX | | 99 | 90.9 | kg/d | Admitted | Admitted |
| 10/31/2018 | 1 | Nitrogen, ammonia total (as N) | 6.45161 MO AVG | | 1.9 | 1.6 | mg/L | Admitted | Admitted |
| 10/31/2018 | 1 | Phosphorus, total (as P) | 6.45161 MO AVG | | 1.1 | 1 | mg/L | Admitted | Admitted |
| 10/11/2018 | 1 | Phosphorus, total (as P) | 6.5 DAILY MX | | 1.6 | 1.5 | mg/L | Admitted | Admitted |
| 10/4/2018 | 6 | pH, maximum | 0.3 DAILY MX | | 9.1 | 9 | SU | Admitted | Admitted |
| 11/24/2018 | 1 | pH, maximum | 3.6 DAILY MX | | 9.6 | 9 | SU | Admitted | Admitted |
| 1/20/2019 | 1 | pH, minimum | 6.1 DAILY MN | | 6.3 | 6.5 | SU | Admitted | Admitted |
| 4/16/2019 | 1 | Solids, total suspended | 3 DAILY MX | | 52 | 45 | mg/L | Admitted | Admitted |
| 5/28/2019 | 1 | Nitrogen, ammonia total (as N) | 7.4 DAILY MX | | 240 | 90.9 | kg/d | Admitted | Admitted |
| 5/28/2019 | 1 | Nitrogen, ammonia total (as N) | 7.4 DAILY MX | | 9.6 | 3.5 | mg/L | Admitted | Admitted |
| 6/6/2019 | 1 | Phosphorus, total (as P) | 7.9 DAILY MX | | 1.8 | 1.5 | mg/L | Admitted | Admitted |
| 6/30/2019 | 1 | Phosphorus, total (as P) | 6.67667 MO AVG | | 1.1 | 1 | mg/L | Admitted | Admitted |
| 7/31/2019 | 1 | Solids, total suspended | 6.53333 MO AVG | | 36 | 30 | mg/L | Admitted | Admitted |
| 7/3/2019 | 1 | Solids, total suspended | 5.3 DAILY MX | | 47 | 45 | mg/L | Admitted | Admitted |
| 7/3/2019 | 1 | Phosphorus, total (as P) | 5.3 DAILY MX | | 1.6 | 1.5 | mg/L | Admitted | Admitted |
| 7/31/2019 | 1 | Phosphorus, total (as P) | 6.53333 MO AVG | | 1.3 | 1 | mg/L | Admitted | Admitted |
| 7/23/2019 | 1 | E. coli, MTEC-MF | 7.7 WK GEOMN | | 650 | 284 | MPN/100mL | Admitted | Admitted |
| 7/23/2019 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.7 DAILY MX | | 60 | 40 | mg/L | Admitted | Admitted |
| 7/2/2019 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.7 DAILY MX | | 1700 | 1520 | kg/d | Admitted | Admitted |
| 7/31/2019 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.53333 MO AVG | | 34 | 25 | mg/L | Admitted | Admitted |
| 8/18/2019 | 1 | E. coli, MTEC-MF | 6.4 WK GEOMN | | 537 | 284 | MPN/100mL | Admitted | Admitted |
| 8/31/2019 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.59032 MO AVG | | 28 | 25 | mg/L | Admitted | Admitted |
| 8/1/2019 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.2 DAILY MX | | 61 | 40 | mg/L | Admitted | Admitted |
| 8/31/2019 | 6 | Phosphorus, total (as P) | 1.10667 MO AVG | | 1.1 | 1 | mg/L | Admitted | Admitted |
| 8/27/2019 | 8 | Oxygen, dissolved (DO) | 0.308 DAILY MN | | 4.1 | 5 | mg/L | Admitted | Admitted |
| 9/3/2019 | 1 | Nitrogen, ammonia total (as N) | 7.2 DAILY MX | | 130 | 90.9 | kg/d | Admitted | Admitted |
| 9/3/2019 | 1 | Nitrogen, ammonia total (as N) | 7.2 DAILY MX | | 4.9 | 3.5 | mg/L | Admitted | Admitted |
| 9/12/2019 | 1 | Phosphorus, total (as P) | 7.6 DAILY MX | | 1.8 | 1.5 | mg/L | Admitted | Admitted |
| 9/30/2019 | 1 | Phosphorus, total (as P) | 6.51 MO AVG | | 1.28 | 1 | mg/L | Admitted | Admitted |
| 9/14/2019 | 6 | Oxygen, dissolved (DO) | 0.05 DAILY MN | | 3.5 | 5 | mg/L | Admitted | Admitted |
| 9/18/2019 | 7 | pH, maximum | 0.017 DAILY MX | | 10 | 9 | SU | Admitted | Admitted |
| 9/4/2019 | 8 | Application rate area sprayed | 0.03 DAILY MX | | 0.8 | 0.75 | in/d | Admitted | Deny in Part |
| 9/25/2019 | 9 | Application rate area sprayed | 0.08 DAILY MX | | 0.9 | 0.75 | in/d | Admitted | Deny in Part |
| 10/17/2019 | 1 | Solids, total suspended | 6.3 DAILY MX | | 56 | 45 | mg/L | Admitted | Admitted |
| 10/31/2019 | 1 | Solids, total suspended | 6.29 MO AVG | | 31 | 30 | mg/L | Admitted | Admitted |
| 10/10/2019 | 1 | Nitrogen, ammonia total (as N) | 5.5 DAILY MX | | 3.9 | 3.5 | mg/L | Admitted | Admitted |
| 10/31/2019 | 1 | Nitrogen, ammonia total (as N) | 6.29 MO AVG | | 2.2 | 1.6 | mg/L | Admitted | Admitted |
| 10/31/2019 | 1 | Phosphorus, total (as P) | 6.29 MO AVG | | 1.4 | 1 | mg/L | Admitted | Admitted |
| 10/17/2019 | 1 | Phosphorus, total (as P) | 6.3 DAILY MX | | 1.9 | 1.5 | mg/L | Admitted | Admitted |
| 10/17/2019 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.3 DAILY MX | | 58 | 40 | mg/L | Admitted | Admitted |
| 10/1/2019 | 6 | Oxygen, dissolved (DO) | 0.6 DAILY MN | | 4.8 | 5 | mg/L | Admitted | Admitted |
| 10/31/2019 | 7 | Phosphorus, total (as P) | 0.4 MO AVG | | 1.2 | 1 | mg/L | Admitted | Admitted |
| 10/31/2019 | 99 | Solids, total suspended | 0.763 MO AVG | | 39.6 | 5 | kg/d | Admitted | Deny in Part |
| 10/24/2019 | 99 | Solids, total suspended | 0.87 DAILY MX | | 40.5 | 10.51 | kg/d | Admitted | Deny in Part |
| 10/10/2019 | 99 | Oil and grease (soxhlet extr.) tot. | 0.94 DAILY MX | | 17 | 5.13 | kg/d | Admitted | Deny in Part |
| 10/31/2019 | 99 | Oil and grease (soxhlet extr.) tot. | 0.763 MO AVG | | 11 | 3.08 | kg/d | Admitted | Deny in Part |
| 11/30/2019 | 9 | Solids, total suspended | 0.342 MO AVG | | 43 | 30 | mg/L | Admitted | Admitted |
| 12/8/2019 | 1 | Chlorine, total residual | 7 DAILY MX | | 1.9 | 1.44 | kg/d | Admitted | Admitted |
| 12/8/2019 | 1 | Chlorine, total residual | 7 DAILY MX | | 0.07 | 0.088 | mg/L | Admitted | Admitted |
| 12/26/2019 | 1 | pH, minimum | 3.2 DAILY MN | | 6.3 | 6.5 | SU | Admitted | Admitted |
| 5/21/2020 | 1 | Nitrogen, ammonia total (as N) | 7.7 DAILY MX | | 4.9 | 3.5 | mg/L | Admitted | Admitted |
| 5/21/2020 | 1 | Nitrogen, ammonia total (as N) | 7.7 DAILY MX | | 140 | 90.9 | kg/d | Admitted | Admitted |
| 5/31/2020 | 1 | Nitrogen, ammonia total (as N) | 6.61065 MO AVG | | 2 | 1.6 | mg/L | Admitted | Admitted |
| 5/26/2020 | 1 | Phosphorus, total (as P) | 7.2 DAILY MX | | 3.03 | 1.5 | mg/L | Admitted | Admitted |
| 5/31/2020 | 1 | Phosphorus, total (as P) | 6.61065 MO AVG | | 1.24 | 1 | mg/L | Admitted | Admitted |
| 5/26/2020 | 1 | Phosphorus, total (as P) | 7.2 DAILY MX | | 82.6 | 56.8 | kg/d | Admitted | Admitted |
| 5/17/2020 | 1 | Chlorine, total residual | 7.4 DAILY MX | | 0.4 | 0.038 | mg/L | Admitted | Admitted |
| 5/17/2020 | 1 | Chlorine, total residual | 7.4 DAILY MX | | 11 | 1.44 | kg/d | Admitted | Admitted |
| 6/9/2020 | 1 | Solids, total suspended | 7.5 DAILY MX | | 1800 | 1710 | kg/d | Admitted | Admitted |
| 6/30/2020 | 1 | Solids, total suspended | 7.6 MO AVG | | 36 | 30 | mg/L | Admitted | Admitted |
| 6/9/2020 | 1 | Solids, total suspended | 7.5 DAILY MX | | 63 | 45 | mg/L | Admitted | Admitted |
| 6/30/2020 | 1 | Phosphorus, total (as P) | 7.6 MO AVG | | 43.9 | 37.9 | kg/d | Admitted | Admitted |
| 6/11/2020 | 1 | Phosphorus, total (as P) | 8.5 DAILY MX | | 60.5 | 56.8 | kg/d | Admitted | Admitted |
| 6/11/2020 | 1 | Phosphorus, total (as P) | 8.5 DAILY MX | | 1.88 | 1.5 | mg/L | Admitted | Admitted |
| 6/30/2020 | 1 | Phosphorus, total (as P) | 7.6 MO AVG | | 1.45 | 1 | mg/L | Admitted | Admitted |
| 6/11/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.5 DAILY MX | | 2000 | 1520 | kg/d | Admitted | Admitted |
| 6/30/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.6 MO AVG | | 35 | 25 | mg/L | Admitted | Admitted |
| 6/30/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.6 MO AVG | | 1100 | 947 | kg/d | Admitted | Admitted |
| 6/9/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.5 DAILY MX | | 63 | 40 | mg/L | Admitted | Admitted |
| 7/9/2020 | 1 | E. coli, MTEC-MF | 7.6 WK GEOMN | | 960 | 284 | MPN/100mL | Admitted | Admitted |
| 7/31/2020 | 6 | Phosphorus, total (as P) | 0.78713 MO AVG | | 1.17 | 1 | mg/L | Admitted | Admitted |
| 7/31/2020 | 8 | Phosphorus, total (as P) | 0.2108 MO AVG | | 1.02 | 1 | mg/L | Admitted | Admitted |
| 8/31/2020 | 1 | Nitrogen, ammonia total (as N) | 6.19555 MO AVG | | 1.9 | 1.6 | mg/L | Admitted | Admitted |
| 8/17/2020 | 1 | Nitrogen, ammonia total (as N) | 6.6 DAILY MX | | 220 | 90.9 | kg/d | Admitted | Admitted |
| 8/17/2020 | 1 | Nitrogen, ammonia total (as N) | 6.6 DAILY MX | | 8.8 | 3.5 | mg/L | Admitted | Admitted |
| 8/4/2020 | 1 | E. coli, MTEC-MF | 5.4 WK GEOMN | | 2720 | 284 | MPN/100mL | Admitted | Admitted |
| 8/24/2020 | 7 | Application rate area sprayed | 0 DAILY MX | | 0.755 | 0.75 | in/d | Admitted | Deny in Part |
| 9/15/2020 | 1 | Phosphorus, total (as P) | 7.1 DAILY MX | | 1.85 | 1.5 | mg/L | Admitted | Admitted |
| 9/30/2020 | 1 | Phosphorus, total (as P) | 6.34 MO AVG | | 1.4 | 1 | mg/L | Admitted | Admitted |
| 9/15/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.1 DAILY MX | | 57 | 40 | mg/L | Admitted | Admitted |
| 9/30/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.34 MO AVG | | 26 | 25 | mg/L | Admitted | Admitted |
| 9/30/2020 | 8 | Phosphorus, total (as P) | 0.15779 MO AVG | | 1.06 | 1 | mg/L | Admitted | Admitted |
| 10/31/2020 | 1 | Phosphorus, total (as P) | 6.2901 MO AVG | | 1.26 | 1 | mg/L | Admitted | Admitted |
| 10/8/2020 | 1 | Phosphorus, total (as P) | 6.4 DAILY MX | | 1.71 | 1.5 | mg/L | Admitted | Admitted |
| 10/8/2020 | 1 | E. coli, MTEC-MF | 6.4 WK GEOMN | | 8160 | 284 | MPN/100mL | Admitted | Admitted |
| 10/1/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 5.9 DAILY MX | | 47 | 40 | mg/L | Admitted | Admitted |
| 10/1/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.2901 MO AVG | | 31 | 25 | mg/L | Admitted | Admitted |
| 10/31/2020 | 8 | Phosphorus, total (as P) | 0 MO AVG | | 1.47 | 1 | mg/L | Admitted | Admitted |
| 10/27/2020 | 9 | BOD, carbonaceous, 05 day, 20 C | 0 DAILY MX | | 42 | 40 | mg/L | Admitted | Admitted |
| 12/31/2020 | 1 | Solids, total suspended | 6.058 MO AVG | | 34 | 30 | mg/L | Admitted | Admitted |
| 12/1/2020 | 1 | Solids, total suspended | 0 DAILY MX | | 68 | 45 | mg/L | Admitted | Admitted |
| 12/1/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.058 MO AVG | | 36 | 25 | mg/L | Admitted | Admitted |
| 12/23/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 5.1 DAILY MX | | 1600 | 1520 | kg/d | Admitted | Admitted |
| 12/23/2020 | 1 | BOD, carbonaceous, 05 day, 20 C | 5.1 DAILY MX | | 81 | 40 | mg/L | Admitted | Admitted |
| 1/31/2021 | 1 | Solids, total suspended | 6.2 MO AVG | | 1200 | 1140 | kg/d | Admitted | Admitted |
| 1/31/2021 | 1 | Solids, total suspended | 6.2 MO AVG | | 46 | 30 | mg/L | Admitted | Admitted |
| 1/12/2021 | 1 | Solids, total suspended | 6.5 DAILY MX | | 2200 | 1710 | kg/d | Admitted | Admitted |
| 1/12/2021 | 1 | Solids, total suspended | 6.5 DAILY MX | | 88 | 45 | mg/L | Admitted | Admitted |
| 1/21/2021 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.2 DAILY MX | | 71 | 40 | mg/L | Admitted | Admitted |
| 1/21/2021 | | | | | | | | | |

| | | | | | | | | |
|------------|----|------------------------------------|----------------|--------|-------|-----------|----------|----------|
| 6/30/2021 | 1 | E. coli, MTEC-MF | 7.45 MO GEOMN | 1426.9 | 126 | MPN/100mL | Admitted | Admitted |
| 6/17/2021 | 1 | E. coli, MTEC-MF | 7.8 WK GEOMN | 19200 | 284 | MPN/100mL | Admitted | Admitted |
| 6/17/2021 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.8 DAILY MX | 81 | 40 | mg/L | Admitted | Admitted |
| 6/30/2021 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.45 MO AVG | 36.9 | 35 | mg/L | Admitted | Admitted |
| 6/17/2021 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.8 DAILY MX | 2390 | 1520 | kg/d | Admitted | Admitted |
| 6/30/2021 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.5 MO AVG | 1130 | 947 | kg/d | Admitted | Admitted |
| 6/26/2021 | 6 | Oxygen, dissolved (DO) | 0.425 DAILY MN | 3.23 | 5 | mg/L | Admitted | Admitted |
| 7/22/2021 | 1 | Solids, total suspended | 7.6 DAILY MX | 62 | 45 | mg/L | Admitted | Admitted |
| 7/31/2021 | 1 | Solids, total suspended | 6.7 MO AVG | 32 | 30 | mg/L | Admitted | Admitted |
| 7/31/2021 | 1 | Solids, total suspended | 7.6 DAILY MX | 1800 | 1710 | kg/d | Admitted | Admitted |
| 7/13/2021 | 1 | Nitrogen, ammonia total (as N) | 6.8 DAILY MX | 3.9 | 3.5 | mg/L | Admitted | Admitted |
| 7/13/2021 | 1 | Nitrogen, ammonia total (as N) | 6.8 DAILY MX | 100 | 90.9 | kg/d | Admitted | Admitted |
| 7/13/2021 | 1 | Phosphorus, total (as P) | 6.8 DAILY MX | 1.59 | 1.5 | mg/L | Admitted | Admitted |
| 7/31/2021 | 1 | Phosphorus, total (as P) | 6.7 MO AVG | 1.05 | 1 | mg/L | Admitted | Admitted |
| 7/20/2021 | 1 | E. coli, MTEC-MF | 7.3 WK GEOMN | 12000 | 284 | MPN/100mL | Admitted | Admitted |
| 7/31/2021 | 1 | E. coli, MTEC-MF | 6.7 MO GEOMN | 1331.3 | 126 | MPN/100mL | Admitted | Admitted |
| 7/31/2021 | 1 | Chlorine, total residual | 6.7 MO AVG | 0.03 | 0.021 | mg/L | Admitted | Admitted |
| 7/12/2021 | 1 | Chlorine, total residual | 4.6 DAILY MX | 0.23 | 0.038 | mg/L | Admitted | Admitted |
| 7/13/2021 | 1 | Chlorine, total residual | 6.8 DAILY MX | 5.1 | 1.44 | kg/d | Admitted | Admitted |
| 7/21/2021 | 6 | Oxygen, dissolved (DO) | 0.096 DAILY MN | 2.62 | 5 | mg/L | Admitted | Admitted |
| 8/18/2021 | 1 | Oxygen, dissolved (DO) | 6.28 DAILY MN | 3 | 5 | mg/L | Admitted | Admitted |
| 8/12/2021 | 1 | E. coli, MTEC-MF | 7.48 WK GEOMN | 6411.1 | 284 | MPN/100mL | Admitted | Admitted |
| 8/31/2021 | 1 | E. coli, MTEC-MF | 6.58 MO GEOMN | 205.6 | 126 | MPN/100mL | Admitted | Admitted |
| 8/8/2021 | 1 | Chlorine, total residual | 7.09 DAILY MX | 2.1 | 1.44 | kg/d | Admitted | Admitted |
| 8/8/2021 | 1 | Chlorine, total residual | 7.09 DAILY MX | 0.08 | 0.038 | mg/L | Admitted | Admitted |
| 8/30/2021 | 6 | Oxygen, dissolved (DO) | 1.3 DAILY MN | 4.77 | 5 | mg/L | Admitted | Admitted |
| 8/31/2021 | 99 | Solids, total suspended | 0.106 MO AVG | 5.22 | 5 | kg/d | Admitted | Admitted |
| 9/30/2021 | 1 | Phosphorus, total (as P) | 6.328 MO AVG | 1.06 | 1 | mg/L | Admitted | Admitted |
| 9/14/2021 | 1 | Phosphorus, total (as P) | 7.37 DAILY MX | 1.75 | 1.5 | mg/L | Admitted | Admitted |
| 9/12/2021 | 1 | E. coli, MTEC-MF | 7.25 WK GEOMN | 489 | 284 | MPN/100mL | Admitted | Admitted |
| 9/30/2021 | 1 | E. coli, MTEC-MF | 6.328 MO GEOMN | 206 | 126 | MPN/100mL | Admitted | Admitted |
| 9/6/2021 | 1 | Chlorine, total residual | 3.228 DAILY MX | 0.15 | 0.038 | mg/L | Admitted | Admitted |
| 9/6/2021 | 1 | Chlorine, total residual | 3.228 DAILY MX | 1.8 | 1.44 | kg/d | Admitted | Admitted |
| 9/5/2021 | 6 | Oxygen, dissolved (DO) | 0.28 DAILY MN | 3.1 | 5 | mg/L | Admitted | Admitted |
| 9/8/2021 | 8 | Oxygen, dissolved (DO) | 0.486 DAILY MN | 3.89 | 5 | mg/L | Admitted | Admitted |
| 9/23/2021 | 8 | Phosphorus, total (as P) | 2.008 DAILY MX | 5.17 | 3.84 | kg/d | Admitted | Admitted |
| 9/23/2021 | 8 | pH, minimum | 2.008 DAILY MN | 6 | 6.5 | SU | Admitted | Admitted |
| 9/23/2021 | 8 | BOD, carbonaceous, 05 day, 20 C | 2.008 DAILY MX | 170 | 102.3 | kg/d | Admitted | Admitted |
| 9/23/2021 | 9 | BOD, carbonaceous, 05 day, 20 C | 2.671 DAILY MX | 260 | 196.8 | kg/d | Admitted | Admitted |
| 10/20/2021 | 6 | Oxygen, dissolved (DO) | 0.129 DAILY MN | 4.6 | 5 | mg/L | Admitted | Admitted |
| 10/21/2021 | 8 | Oxygen, dissolved (DO) | 0.274 DAILY MN | 3.4 | 5 | mg/L | Admitted | Admitted |
| 10/1/2021 | 8 | pH, minimum | 0.385 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 10/21/2021 | 9 | Solids, total suspended | 0.107 DAILY MX | 72 | 45 | mg/L | Admitted | Admitted |
| 10/31/2021 | 99 | Solids, total suspended | 0.115 MO AVG | 16.3 | 5 | kg/d | Admitted | Admitted |
| 10/28/2021 | 99 | Solids, total suspended | 0.111 DAILY MX | 22.7 | 10.51 | kg/d | Admitted | Admitted |
| 11/15/2021 | 1 | Oxygen, dissolved (DO) | 7.452 DAILY MN | 0.2 | 5 | mg/L | Admitted | Admitted |
| 11/18/2021 | 99 | Solids, total suspended | 0.157 DAILY MX | 24.71 | 10.51 | kg/d | Admitted | Admitted |
| 11/30/2021 | 99 | Solids, total suspended | 0.112 MO AVG | 18.3 | 5 | kg/d | Admitted | Admitted |
| 11/11/2021 | 99 | Oil and grease (sodlet extr.) tot. | 0.157 DAILY MX | 8.74 | 5.33 | kg/d | Admitted | Admitted |
| 11/30/2021 | 99 | Oil and grease (sodlet extr.) tot. | 0.112 MO AVG | 5.25 | 3.08 | kg/d | Admitted | Admitted |
| 12/11/2021 | 1 | Oxygen, dissolved (DO) | 8.363 DAILY MN | 2.4 | 5 | mg/L | Admitted | Admitted |
| 12/31/2021 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.116 DAILY MX | 30 | 25 | mg/L | Admitted | Admitted |
| 12/31/2021 | 99 | Solids, total suspended | 0.112 MO AVG | 48 | 40 | kg/d | Admitted | Admitted |
| 12/16/2021 | 99 | Solids, total suspended | 0.128 DAILY MX | 36 | 10.51 | kg/d | Admitted | Admitted |
| 12/16/2021 | 99 | Oil and grease (sodlet extr.) tot. | 0.128 DAILY MX | 13.3 | 5.13 | kg/d | Admitted | Admitted |
| 12/31/2021 | 99 | Oil and grease (sodlet extr.) tot. | 0.112 MO AVG | 7.9 | 3.08 | kg/d | Admitted | Admitted |
| 1/23/2022 | 1 | Oxygen, dissolved (DO) | 7.777 DAILY MN | 4.7 | 5 | mg/L | Admitted | Admitted |
| 1/31/2022 | 1 | Solids, total suspended | 6.806 MO AVG | 41 | 30 | mg/L | Admitted | Admitted |
| 1/27/2022 | 1 | Solids, total suspended | 7.573 DAILY MX | 2100 | 1710 | kg/d | Admitted | Admitted |
| 1/27/2022 | 1 | Solids, total suspended | 7.573 DAILY MX | 74 | 45 | mg/L | Admitted | Admitted |
| 1/20/2022 | 1 | pH, minimum | 7.507 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 1/31/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.507 DAILY MX | 3150 | 1520 | kg/d | Admitted | Admitted |
| 1/31/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.806 MO AVG | 64 | 25 | mg/L | Admitted | Admitted |
| 1/31/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.806 MO AVG | 1760 | 947 | kg/d | Admitted | Admitted |
| 1/20/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.507 DAILY MX | 110 | 40 | mg/L | Admitted | Admitted |
| 1/31/2022 | 99 | Solids, total suspended | 0.145 MO AVG | 62.8 | 5 | kg/d | Admitted | Admitted |
| 1/20/2022 | 99 | Solids, total suspended | 0.166 DAILY MX | 102.9 | 10.51 | kg/d | Admitted | Admitted |
| 2/28/2022 | 1 | Oxygen, dissolved (DO) | 6.948 DAILY MN | 2.2 | 5 | mg/L | Admitted | Admitted |
| 2/28/2022 | 1 | Solids, total suspended | 6.952 MO AVG | 42 | 30 | mg/L | Admitted | Admitted |
| 2/1/2022 | 1 | Solids, total suspended | 7.526 DAILY MX | 1800 | 1710 | kg/d | Admitted | Admitted |
| 2/28/2022 | 1 | Solids, total suspended | 6.952 MO AVG | 1200 | 1140 | kg/d | Admitted | Admitted |
| 2/1/2022 | 1 | Solids, total suspended | 7.526 DAILY MX | 64 | 45 | mg/L | Admitted | Admitted |
| 2/13/2022 | 1 | pH, minimum | 7.167 DAILY MN | 6.2 | 6.5 | SU | Admitted | Admitted |
| 2/17/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 9 DAILY MX | 2000 | 1520 | kg/d | Admitted | Admitted |
| 2/28/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.952 MO AVG | 1100 | 947 | kg/d | Admitted | Admitted |
| 2/28/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.952 MO AVG | 38 | 25 | mg/L | Admitted | Admitted |
| 2/10/2022 | 99 | Solids, total suspended | 0.173 DAILY MX | 41 | 10.51 | kg/d | Admitted | Admitted |
| 2/28/2022 | 99 | Solids, total suspended | 0.142 MO AVG | 36 | 5 | kg/d | Admitted | Admitted |
| 2/28/2022 | 99 | Oil and grease (sodlet extr.) tot. | 0.128 DAILY MX | 7.9 | 5.33 | kg/d | Admitted | Admitted |
| 2/28/2022 | 99 | Oil and grease (sodlet extr.) tot. | 0.142 MO AVG | 4.17 | 3.08 | kg/d | Admitted | Admitted |
| 3/23/2022 | 1 | Oxygen, dissolved (DO) | 7.419 DAILY MN | 3 | 5 | mg/L | Admitted | Admitted |
| 3/17/2022 | 1 | Solids, total suspended | 7.635 DAILY MX | 3580 | 1710 | kg/d | Admitted | Admitted |
| 3/17/2022 | 1 | Solids, total suspended | 7.635 DAILY MX | 124 | 45 | mg/L | Admitted | Admitted |
| 3/31/2022 | 1 | Solids, total suspended | 6.564 MO AVG | 32.9 | 30 | mg/L | Admitted | Admitted |
| 3/3/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.596 DAILY MX | 2100 | 1520 | kg/d | Admitted | Admitted |
| 3/3/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.596 DAILY MX | 72 | 40 | mg/L | Admitted | Admitted |
| 3/31/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.564 MO AVG | 33 | 25 | mg/L | Admitted | Admitted |
| 3/28/2022 | 99 | Solids, total suspended | 9.105 DAILY MX | 40.02 | 10.51 | kg/d | Admitted | Admitted |
| 3/31/2022 | 99 | Solids, total suspended | 0.0941 MO AVG | 34.76 | 5 | kg/d | Admitted | Admitted |
| 3/31/2022 | 99 | Oil and grease, hexane extr method | 0.0941 MO AVG | 21.1 | 3.08 | kg/d | Admitted | Admitted |
| 3/28/2022 | 99 | Oil and grease, hexane extr method | 0.105 DAILY MX | 36.6 | 5.13 | kg/d | Admitted | Admitted |
| 4/21/2022 | 1 | Solids, total suspended | 6.859 DAILY MX | 46 | 45 | mg/L | Admitted | Admitted |
| 4/7/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.035 DAILY MX | 56 | 40 | mg/L | Admitted | Admitted |
| 4/30/2022 | 99 | Solids, total suspended | 0.0933 MO AVG | 5.47 | 5 | kg/d | Admitted | Admitted |
| 5/28/2022 | 1 | Oxygen, dissolved (DO) | 0.664 DAILY MN | 0.3 | 5 | mg/L | Admitted | Admitted |
| 5/12/2022 | 1 | Solids, total suspended | 8.534 DAILY MX | 1900 | 1710 | kg/d | Admitted | Admitted |
| 5/31/2022 | 1 | Solids, total suspended | 6.374 MO AVG | 31 | 30 | mg/L | Admitted | Admitted |
| 5/31/2022 | 1 | Phosphorus, total (as P) | 6.374 MO AVG | 1.03 | 1 | mg/L | Admitted | Admitted |
| 5/5/2022 | 1 | E. coli, MTEC-MF | 7.692 WK GEOMN | 2420 | 284 | MPN/100mL | Admitted | Admitted |
| 5/31/2022 | 1 | E. coli, MTEC-MF | 6.374 MO GEOMN | 1261 | 126 | MPN/100mL | Admitted | Admitted |
| 5/27/2022 | 1 | pH, minimum | 6.329 DAILY MN | 6.1 | 6.5 | SU | Admitted | Admitted |
| 5/12/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.534 DAILY MX | 43 | 40 | mg/L | Admitted | Admitted |
| 5/31/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.374 MO AVG | 28 | 25 | mg/L | Admitted | Admitted |
| 5/23/2022 | 6 | pH, maximum | 0 DAILY MX | 10.49 | 9 | SU | Admitted | Admitted |
| 5/21/2022 | 8 | Oxygen, dissolved (DO) | 0.38 DAILY MN | 4.67 | 5 | mg/L | Admitted | Admitted |
| 5/5/2022 | 99 | Solids, total suspended | 0.102 DAILY MX | 24.1 | 10.51 | kg/d | Admitted | Admitted |
| 5/31/2022 | 99 | Solids, total suspended | 0.0851 MO AVG | 23.9 | 5 | kg/d | Admitted | Admitted |
| 5/31/2022 | 99 | Oil and grease, hexane extr method | 0.0851 MO AVG | 51.1 | 3.08 | kg/d | Admitted | Admitted |
| 5/5/2022 | 99 | Oil and grease, hexane extr method | 0.102 DAILY MX | 102 | 5.13 | kg/d | Admitted | Admitted |
| 6/30/2022 | 1 | Oxygen, dissolved (DO) | 7.319 DAILY MN | 2.7 | 5 | mg/L | Admitted | Admitted |
| 6/28/2022 | 1 | Solids, total suspended | 7.676 DAILY MX | 48 | 45 | mg/L | Admitted | Admitted |
| 6/30/2022 | 1 | Solids, total suspended | 6.393 MO AVG | 32 | 30 | mg/L | Admitted | Admitted |
| 6/7/2022 | 1 | Phosphorus, total (as P) | 7.784 DAILY MX | 82.2 | 56.8 | kg/d | Admitted | Admitted |
| 6/30/2022 | 1 | Phosphorus, total (as P) | 6.393 MO AVG | 1.5 | 1 | mg/L | Admitted | Admitted |
| 6/7/2022 | 1 | Phosphorus, total (as P) | 7.784 DAILY MX | 15 | 1.5 | mg/L | Admitted | Admitted |
| 6/30/2022 | 1 | Phosphorus, total (as P) | 6.393 MO AVG | 46 | 37.9 | kg/d | Admitted | Admitted |
| 6/7/2022 | 1 | E. coli, MTEC-MF | 7.784 WK GEOMN | 3537 | 284 | MPN/100mL | Admitted | Admitted |
| 6/30/2022 | 1 | E. coli, MTEC-MF | 6.393 MO GEOMN | 1830 | 126 | MPN/100mL | Admitted | Admitted |
| 6/2/2022 | 1 | pH, minimum | 6.61 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 6/30/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.393 MO AVG | 1100 | 947 | kg/d | Admitted | Admitted |
| 6/28/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.676 DAILY MX | 68 | 40 | mg/L | Admitted | Admitted |
| 6/28/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.676 DAILY MX | 2000 | 1520 | kg/d | Admitted | Admitted |
| 6/30/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.393 MO AVG | 41 | 25 | mg/L | Admitted | Admitted |
| 6/14/2022 | 8 | Oxygen, dissolved (DO) | 0.339 DAILY MN | 4.03 | 5 | mg/L | Admitted | Admitted |
| 6/4/2022 | 9 | pH, minimum | 0.077 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 6/30/2022 | 99 | Solids, total suspended | 0.0703 MO AVG | 10.03 | 5 | kg/d | Admitted | Admitted |
| 6/2/2022 | 99 | Solids, total suspended | 0.094 DAILY MX | 16.1 | 10.51 | kg/d | Admitted | Admitted |
| 7/28/2022 | 1 | Oxygen, dissolved (DO) | 6.411 DAILY MN | 3.6 | 5 | mg/L | Admitted | Admitted |
| 7/31/2022 | 1 | Solids, total suspended | 6.439 MO AVG | 40 | 30 | mg/L | Admitted | Admitted |
| 7/14/2022 | 1 | Solids, total suspended | 7.393 DAILY MX | 58 | 45 | mg/L | Admitted | Admitted |
| 7/5/2022 | 1 | Nitrogen, ammonia total (as N) | 3.178 DAILY MX | 3.6 | 3.5 | mg/L | Admitted | Admitted |
| 7/28/2022 | 1 | Phosphorus, total (as P) | 6.411 DAILY MX | 2.22 | 1.5 | mg/L | Admitted | Admitted |
| 7/31/2022 | 1 | Phosphorus, total (as P) | 6.439 MO AVG | 1.54 | 1 | mg/L | Admitted | Admitted |
| 7/13/2022 | 1 | E. coli, MTEC-MF | 7.749 WK GEOMN | 2420 | 284 | MPN/100mL | Admitted | Admitted |
| 7/31/2022 | 1 | E. coli, MTEC-MF | 6.439 MO GEOMN | 1259 | 126 | MPN/100mL | Admitted | Admitted |
| 7/15/2022 | 1 | pH, maximum | 7.209 DAILY MX | 9.1 | 9 | SU | Admitted | Admitted |
| 7/13/2022 | 1 | pH, minimum | 7.749 DAILY MN | 6.2 | 6.5 | SU | Admitted | Admitted |
| 7/28/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.411 DAILY MX | 80 | 40 | mg/L | Admitted | Admitted |
| 7/14/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.393 DAILY MX | 2000 | 1520 | kg/d | Admitted | Admitted |
| 7/31/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.439 MO AVG | 48 | 25 | mg/L | | |

| | | | | | | | | |
|------------|----|------------------------------------|----------------|-------|-------|-----------|----------|--------------|
| 10/7/2022 | 9 | pH, maximum | 0.271 DAILY MX | 10 | 9 | SU | Admitted | Admitted |
| 10/22/2022 | 9 | pH, minimum | 0.14 DAILY MN | 6.1 | 6.5 | SU | Admitted | Admitted |
| 10/31/2022 | 99 | Solids, total suspended | 0.127 MO AVG | 22 | 5 | kg/d | Admitted | Admitted |
| 10/20/2022 | 99 | Solids, total suspended | 0.145 DAILY MX | 28 | 10.51 | kg/d | Admitted | Admitted |
| 11/3/2022 | 1 | Oxygen, dissolved (DO) | 8.435 DAILY MN | 1.2 | 5 | mg/L | Admitted | Admitted |
| 11/8/2022 | 1 | Solids, total suspended | 8.236 DAILY MX | 54 | 45 | mg/L | Admitted | Admitted |
| 11/30/2022 | 1 | Solids, total suspended | 6.281 MO AVG | 31 | 30 | mg/L | Admitted | Admitted |
| 11/24/2022 | 1 | pH, minimum | 1.698 DAILY MN | 6.3 | 6.5 | SU | Admitted | Admitted |
| 11/2/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.271 DAILY MX | 2000 | 1520 | kg/d | Admitted | Admitted |
| 11/30/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.281 MO AVG | 39 | 25 | mg/L | Admitted | Admitted |
| 11/2/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.271 DAILY MX | 64 | 40 | mg/L | Admitted | Admitted |
| 11/30/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.281 MO AVG | 1100 | 947 | kg/d | Admitted | Admitted |
| 11/30/2022 | 2 | pH, maximum | 0.358 DAILY MX | 5.3 | 9 | SU | Admitted | Admitted |
| 11/30/2022 | 99 | Solids, total suspended | 0.128 MO AVG | 5.9 | 5 | kg/d | Admitted | Deny in Part |
| 12/27/2022 | 1 | Solids, total suspended | 6.027 DAILY MX | 3920 | 1710 | kg/d | Admitted | Admitted |
| 12/31/2022 | 1 | Solids, total suspended | 6.826 MO AVG | 1460 | 1140 | kg/d | Admitted | Admitted |
| 12/31/2022 | 1 | Solids, total suspended | 6.826 MO AVG | 53.8 | 30 | mg/L | Admitted | Admitted |
| 12/27/2022 | 1 | Solids, total suspended | 6.027 DAILY MX | 172 | 45 | mg/L | Admitted | Admitted |
| 12/27/2022 | 1 | Phosphorus, total (as P) | 6.027 DAILY MX | 1.6 | 1.5 | mg/L | Admitted | Admitted |
| 12/31/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.826 MO AVG | 1500 | 947 | kg/d | Admitted | Admitted |
| 12/31/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.826 MO AVG | 50 | 25 | mg/L | Admitted | Admitted |
| 12/1/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.949 DAILY MX | 2900 | 1520 | kg/d | Admitted | Admitted |
| 12/1/2022 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.949 DAILY MX | 77 | 40 | mg/L | Admitted | Admitted |
| 12/24/2022 | 2 | pH, maximum | 0.012 DAILY MX | 9.3 | 9 | SU | Admitted | Admitted |
| 12/1/2022 | 99 | Solids, total suspended | 0.116 DAILY MX | 14.3 | 10.51 | kg/d | Admitted | Deny in Part |
| 12/31/2022 | 99 | Solids, total suspended | 0.101 MO AVG | 11.8 | 5 | kg/d | Admitted | Deny in Part |
| 12/31/2022 | 99 | Oil and grease, hexane extr method | 0.101 MO AVG | 4.96 | 3.08 | kg/d | Admitted | Deny in Part |
| 12/20/2022 | 99 | Oil and grease, hexane extr method | 0.117 DAILY MX | 5.54 | 5.13 | kg/d | Admitted | Deny in Part |
| 1/31/2023 | 1 | Solids, total suspended | 7.486 MO AVG | 30.1 | 30 | mg/L | Admitted | Admitted |
| 1/31/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.486 MO AVG | 1368 | 947 | kg/d | Admitted | Admitted |
| 1/20/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 9.147 DAILY MX | 110.5 | 40 | mg/L | Admitted | Admitted |
| 1/20/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 9.147 DAILY MX | 3826 | 1520 | kg/d | Admitted | Admitted |
| 1/31/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.486 MO AVG | 41.56 | 25 | mg/L | Admitted | Admitted |
| 1/6/2023 | 2 | pH, maximum | 0.285 DAILY MX | 9.9 | 9 | SU | Admitted | Admitted |
| 1/19/2023 | 99 | Solids, total suspended | 0.096 DAILY MX | 29.66 | 10.51 | kg/d | Admitted | Deny in Part |
| 1/31/2023 | 99 | Solids, total suspended | 0.0953 MO AVG | 20.83 | 5 | kg/d | Admitted | Deny in Part |
| 1/31/2023 | 99 | Oil and grease, hexane extr method | 0.0953 MO AVG | 13 | 3.08 | kg/d | Admitted | Deny in Part |
| 1/19/2023 | 99 | Oil and grease, hexane extr method | 0.096 DAILY MX | 16.3 | 5.13 | kg/d | Admitted | Deny in Part |
| 2/1/2023 | 1 | Oxygen, dissolved (DO) | 8.757 DAILY MN | 3.7 | 5 | mg/L | Admitted | Admitted |
| 2/28/2023 | 1 | Solids, total suspended | 7.702 MO AVG | 1200 | 1140 | kg/d | Admitted | Admitted |
| 2/28/2023 | 1 | Solids, total suspended | 7.702 MO AVG | 38 | 30 | mg/L | Admitted | Admitted |
| 2/2/2023 | 1 | Solids, total suspended | 8.268 DAILY MX | 50 | 45 | mg/L | Admitted | Admitted |
| 2/28/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.702 MO AVG | 1200 | 947 | kg/d | Admitted | Admitted |
| 2/21/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.614 DAILY MX | 60 | 40 | mg/L | Admitted | Admitted |
| 2/2/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.268 DAILY MX | 1800 | 1520 | kg/d | Admitted | Admitted |
| 2/28/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.702 MO AVG | 39 | 25 | mg/L | Admitted | Admitted |
| 2/14/2023 | 2 | pH, maximum | 0.495 DAILY MX | 10.4 | 9 | SU | Admitted | Admitted |
| 2/28/2023 | 99 | Solids, total suspended | 0.0943 MO AVG | 7.1 | 5 | kg/d | Admitted | Deny in Part |
| 3/31/2023 | 1 | Solids, total suspended | 6.942 MO AVG | 36 | 30 | mg/L | Admitted | Admitted |
| 3/2/2023 | 1 | Solids, total suspended | 8.755 DAILY MX | 2700 | 1710 | kg/d | Admitted | Admitted |
| 3/2/2023 | 1 | Solids, total suspended | 8.755 DAILY MX | 80 | 45 | mg/L | Admitted | Admitted |
| 3/31/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.942 MO AVG | 31 | 25 | mg/L | Admitted | Admitted |
| 3/2/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.755 DAILY MX | 72 | 40 | mg/L | Admitted | Admitted |
| 3/31/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.942 MO AVG | 960 | 947 | kg/d | Admitted | Admitted |
| 3/2/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.755 DAILY MX | 2400 | 1520 | kg/d | Admitted | Admitted |
| 4/22/2023 | 1 | Oxygen, dissolved (DO) | 3.706 DAILY MN | 3.7 | 5 | mg/L | Admitted | Admitted |
| 4/27/2023 | 1 | Solids, total suspended | 7.859 DAILY MX | 80 | 45 | mg/L | Admitted | Admitted |
| 4/30/2023 | 1 | Solids, total suspended | 5.092 MO AVG | 47 | 30 | mg/L | Admitted | Admitted |
| 4/27/2023 | 1 | Solids, total suspended | 7.859 DAILY MX | 2400 | 1710 | kg/d | Admitted | Admitted |
| 4/27/2023 | 1 | Phosphorus, total (as P) | 7.859 DAILY MX | 1.66 | 1.5 | mg/L | Admitted | Admitted |
| 4/30/2023 | 1 | Phosphorus, total (as P) | 5.092 MO AVG | 1.09 | 1 | mg/L | Admitted | Admitted |
| 4/27/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.859 DAILY MX | 2600 | 1520 | kg/d | Admitted | Admitted |
| 4/30/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 5.092 MO AVG | 42 | 25 | mg/L | Admitted | Admitted |
| 4/27/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.859 DAILY MX | 88 | 40 | mg/L | Admitted | Admitted |
| 4/30/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 5.092 MO AVG | 1100 | 947 | kg/d | Admitted | Admitted |
| 4/30/2023 | 99 | Solids, total suspended | 0.106 MO AVG | 7.05 | 5 | kg/d | Admitted | Deny in Part |
| 4/20/2023 | 99 | Solids, total suspended | 0.11 DAILY MX | 10.8 | 10.51 | kg/d | Admitted | Deny in Part |
| 5/10/2023 | 1 | Oxygen, dissolved (DO) | 7.823 DAILY MN | 4.2 | 5 | mg/L | Admitted | Admitted |
| 5/31/2023 | 1 | Solids, total suspended | 5.883 MO AVG | 34 | 30 | mg/L | Admitted | Admitted |
| 5/9/2023 | 1 | Solids, total suspended | 7.978 DAILY MX | 56 | 45 | mg/L | Admitted | Admitted |
| 5/31/2023 | 1 | Phosphorus, total (as P) | 5.883 MO AVG | 1.15 | 1 | mg/L | Admitted | Admitted |
| 5/2/2023 | 1 | Phosphorus, total (as P) | 6.492 DAILY MX | 1.71 | 1.5 | mg/L | Admitted | Admitted |
| 5/1/2023 | 1 | E. coli, MTEC-MF | 8.119 WK GEOMN | 1733 | 284 | MPN/100mL | Admitted | Admitted |
| 5/31/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 5.883 MO AVG | 26 | 25 | mg/L | Admitted | Admitted |
| 5/4/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 8.127 DAILY MX | 44 | 40 | mg/L | Admitted | Admitted |
| 5/19/2023 | 2 | pH, maximum | 0.34 DAILY MX | 9.2 | 9 | SU | Admitted | Admitted |
| 6/12/2023 | 1 | Oxygen, dissolved (DO) | 4.515 DAILY MN | 0.8 | 5 | mg/L | Admitted | Admitted |
| 6/27/2023 | 1 | Phosphorus, total (as P) | 4.623 DAILY MX | 1.77 | 1.5 | mg/L | Admitted | Admitted |
| 6/30/2023 | 1 | Phosphorus, total (as P) | 4.444 MO AVG | 1.19 | 1 | mg/L | Admitted | Admitted |
| 6/30/2023 | 99 | Oil and grease, hexane extr method | 0.143 MO AVG | 4.78 | 3.08 | kg/d | Admitted | Deny in Part |
| 6/22/2023 | 99 | Oil and grease, hexane extr method | 0.141 DAILY MX | 9.23 | 5.13 | kg/d | Admitted | Deny in Part |
| 7/1/2023 | 1 | Nitrogen, ammonia total (as N) | 3.7 DAILY MX | 110 | 90.9 | kg/d | Admitted | Admitted |
| 7/31/2023 | 1 | Nitrogen, ammonia total (as N) | 3.75 MO AVG | 2 | 1.6 | mg/L | Admitted | Admitted |
| 7/1/2023 | 1 | Nitrogen, ammonia total (as N) | 3.7 DAILY MX | 8.1 | 3.5 | mg/L | Admitted | Admitted |
| 7/31/2023 | 1 | Phosphorus, total (as P) | 3.753 MO AVG | 1.31 | 1 | mg/L | Admitted | Admitted |
| 7/1/2023 | 1 | Phosphorus, total (as P) | 3.7 DAILY MX | 3.63 | 1.5 | mg/L | Admitted | Admitted |
| 7/1/2023 | 1 | pH, minimum | 2.842 DAILY MN | 5.7 | 6.5 | SU | Admitted | Admitted |
| 7/20/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 3.969 DAILY MX | 42 | 40 | mg/L | Admitted | Admitted |
| 7/25/2023 | 6 | pH, minimum | 0.433 DAILY MN | 6.13 | 6.5 | SU | Admitted | Admitted |
| 7/6/2023 | 7 | Oxygen, dissolved (DO) | 0.1 DAILY MN | 3.9 | 5 | mg/L | Admitted | Admitted |
| 7/27/2023 | 7 | Application rate area sprayed | 0.1 DAILY MX | 1.82 | 1.5 | in/d | Admitted | Admitted |
| 7/20/2023 | 7 | pH, minimum | 0.271 DAILY MN | 6.09 | 6.5 | SU | Admitted | Admitted |
| 7/18/2023 | 9 | pH, minimum | 0.046 DAILY MN | 6.34 | 6.5 | SU | Admitted | Admitted |
| 8/24/2023 | 1 | Oxygen, dissolved (DO) | 6.812 DAILY MN | 1.8 | 5 | mg/L | Admitted | Admitted |
| 8/10/2023 | 1 | Solids, total suspended | 6.23 DAILY MX | 49 | 45 | mg/L | Admitted | Admitted |
| 8/31/2023 | 1 | Phosphorus, total (as P) | 4.979 MO AVG | 1.01 | 1 | mg/L | Admitted | Admitted |
| 8/24/2023 | 1 | Phosphorus, total (as P) | 6.812 DAILY MX | 1.76 | 1.5 | mg/L | Admitted | Admitted |
| 8/14/2023 | 1 | E. coli, MTEC-MF | 6.541 WK GEOMN | 1414 | 284 | MPN/100mL | Admitted | Admitted |
| 8/31/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 4.979 MO AVG | 34.9 | 25 | mg/L | Admitted | Admitted |
| 8/10/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.23 DAILY MX | 110 | 90 | kg/d | Admitted | Admitted |
| 8/10/2023 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.23 DAILY MX | 2590 | 1520 | kg/d | Admitted | Admitted |
| 8/15/2023 | 6 | Application rate area sprayed | 0.923 DAILY MX | 1.67 | 1.5 | in/d | Admitted | Admitted |
| 8/9/2023 | 6 | pH, minimum | 0.596 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 8/21/2023 | 7 | Oxygen, dissolved (DO) | 0.426 DAILY MN | 4.6 | 5 | mg/L | Admitted | Admitted |
| 8/16/2023 | 7 | Application rate area sprayed | 0.319 DAILY MX | 2.19 | 1.5 | in/d | Admitted | Admitted |
| 8/16/2023 | 7 | pH, minimum | 0.319 DAILY MN | 6.3 | 6.5 | SU | Admitted | Admitted |
| 8/31/2023 | 8 | Oxygen, dissolved (DO) | 0.195 DAILY MN | 4.3 | 5 | mg/L | Admitted | Admitted |
| 8/25/2023 | 9 | Oxygen, dissolved (DO) | 0.665 DAILY MN | 4.7 | 5 | mg/L | Admitted | Admitted |
| 8/24/2023 | 9 | pH, minimum | 0.874 DAILY MN | 6.1 | 6.5 | SU | Admitted | Admitted |
| 9/5/2023 | 8 | Nitrogen, ammonia total (as N) | 5.465 DAILY MN | 120 | 90.9 | kg/d | Admitted | Admitted |
| 9/5/2023 | 1 | Nitrogen, ammonia total (as N) | 5.465 DAILY MX | 5.7 | 3.5 | mg/L | Admitted | Admitted |
| 9/7/2023 | 1 | Phosphorus, total (as P) | 5.515 DAILY MX | 1.54 | 1.5 | mg/L | Admitted | Admitted |
| 9/30/2023 | 1 | Phosphorus, total (as P) | 4.897 MO AVG | 1.17 | 1 | mg/L | Admitted | Admitted |
| 9/28/2023 | 1 | E. coli, MTEC-MF | 6.701 WK GEOMN | 370 | 284 | MPN/100mL | Admitted | Admitted |
| 9/18/2023 | 1 | pH, minimum | 5.304 DAILY MN | 6.2 | 6.5 | SU | Admitted | Admitted |
| 9/27/2023 | 6 | pH, minimum | 0.348 DAILY MN | 6.1 | 6.5 | SU | Admitted | Admitted |
| 9/21/2023 | 7 | Application rate area sprayed | 0.406 DAILY MX | 1.82 | 1.5 | in/d | Admitted | Admitted |
| 9/17/2023 | 7 | pH, minimum | 0.113 DAILY MN | 6.2 | 6.5 | SU | Admitted | Admitted |
| 9/1/2023 | 8 | pH, minimum | 0.325 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 9/19/2023 | 9 | pH, minimum | 0.183 DAILY MN | 5.7 | 6.5 | SU | Admitted | Admitted |
| 10/4/2023 | 1 | Oxygen, dissolved (DO) | 6.054 DAILY MN | 2.6 | 5 | mg/L | Admitted | Admitted |
| 10/17/2023 | 1 | Nitrogen, ammonia total (as N) | 4.736 DAILY MX | 4.2 | 3.5 | mg/L | Admitted | Admitted |
| 10/5/2023 | 1 | Phosphorus, total (as P) | 6.147 DAILY MX | 1.78 | 1.5 | mg/L | Admitted | Admitted |
| 10/31/2023 | 1 | Phosphorus, total (as P) | 4.46 MO AVG | 1.27 | 1 | mg/L | Admitted | Admitted |
| 10/4/2023 | 1 | E. coli, MTEC-MF | 6.054 WK GEOMN | 2420 | 284 | MPN/100mL | | |

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|------------|----|---------------------------------|----------------|--------|-------|------------|--------------|--------------|
| 10/20/2023 | 8 | pH, minimum | 0.55 DAILY MN | 5.8 | 6.5 | SU | Admitted | Admitted |
| 10/4/2023 | 9 | Oxygen, dissolved (DO) | 0.167 DAILY MN | 4 | 5 | mg/L | Admitted | Admitted |
| 10/7/2023 | 9 | Phosphorus, total (as P) | 0.723 DAILY MX | 1.98 | 1.5 | mg/L | Admitted | Admitted |
| 10/7/2023 | 9 | pH, minimum | 0.337 DAILY MN | 5.8 | 6.5 | SU | Admitted | Admitted |
| 11/7/2023 | 1 | Solids, total suspended | 4.611 DAILY MX | 57 | 45 | mg/L | Admitted | Admitted |
| 11/24/2023 | 1 | pH, minimum | 2.51 DAILY MN | 6.3 | 6.5 | SU | Admitted | Admitted |
| 12/8/2023 | 1 | Oxygen, dissolved (DO) | 6.822 DAILY MN | 2.9 | 5 | mg/L | Admitted | Admitted |
| 12/31/2023 | 99 | Solids, total suspended | 0.12 MO AVG | 12.17 | 5 | kg/d | Admitted | Deny in Part |
| 12/27/2023 | 99 | Solids, total suspended | 0.12 DAILY MX | 16.77 | 10.51 | kg/d | Admitted | Deny in Part |
| 1/5/2024 | 1 | pH, minimum | 7.032 DAILY MN | 6.1 | 6.5 | SU | Admitted | Admitted |
| 1/22/2024 | 1 | pH, minimum | 5.936 DAILY MN | 6.3 | 6.5 | SU | Admitted | Admitted |
| 1/24/2024 | 1 | pH, minimum | 7.439 DAILY MN | 6.1 | 6.5 | SU | Admitted | Admitted |
| 1/29/2024 | 1 | pH, minimum | 6.812 DAILY MN | 6.2 | 6.5 | SU | Admitted | Admitted |
| 1/31/2024 | 1 | pH, maximum | 3.894 DAILY MX | 9.1 | 9 | SU | Deny in Part | Deny in Part |
| 1/13/2024 | 1 | Solids, total suspended | 7.05 DAILY MX | 48 | 45 | mg/L | Deny in Part | Deny in Part |
| 1/4/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.081 DAILY MX | 53 | 40 | mg/l | Admitted | Admitted |
| 1/18/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.797 DAILY MX | 41 | 40 | mg/l | Admitted | Admitted |
| 1/25/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.154 DAILY MX | 53 | 40 | mg/l | Admitted | Admitted |
| 1/31/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.106 MO AVG | 32.6 | 25 | mg/L | Admitted | Admitted |
| 1/30/2024 | 2 | pH, minimum | 0.239 DAILY MX | 9.1 | 9 | SU | Deny in Part | Deny in Part |
| 1/31/2024 | 99 | Solids, total suspended | 0.19 MO AVG | 6.86 | 5 | kg/d | Admitted | Deny in Part |
| 2/29/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 5.742 MO AVG | 33 | 25 | mg/L | Admitted | Admitted |
| 2/8/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.649 DAILY MX | 56 | 40 | mg/L | Admitted | Admitted |
| 3/14/2024 | 1 | Oxygen, dissolved (DO) | 8.414 DAILY MN | 3.2 | 5 | mg/L | Admitted | Admitted |
| 3/15/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.482 DAILY MX | 83.6 | 40 | mg/L | Admitted | Admitted |
| 3/15/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 6.482 DAILY MX | 2050 | 1520 | kg/d | Admitted | Admitted |
| 4/25/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.949 DAILY MX | 2400 | 1520 | kg/d | Admitted | Admitted |
| 4/25/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 7.949 DAILY MX | 79 | 40 | mg/L | Admitted | Admitted |
| 4/15/2024 | 2 | pH, maximum | 0.44 DAILY MX | 9.1 | 9 | SU | Admitted | Admitted |
| 5/14/2024 | 1 | pH, minimum | 5.457 DAILY MN | 6.3 | 6.5 | SU | Admitted | Admitted |
| 5/25/2024 | 1 | Oxygen, dissolved (DO) | 0.675 DAILY MN | 2.3 | 5 | mg/L | Admitted | Admitted |
| 5/6/2024 | 1 | Nitrogen, ammonia total (as N) | 6.61 DAILY MX | 6.21 | 3.5 | mg/L | Admitted | Admitted |
| 5/7/2024 | 1 | Nitrogen, ammonia total (as N) | 6.779 DAILY MX | 4.1 | 3.5 | mg/L | Admitted | Admitted |
| 5/13/2024 | 1 | Nitrogen, ammonia total (as N) | 5.389 DAILY MX | 6.28 | 3.5 | mg/L | Admitted | Admitted |
| 5/20/2024 | 1 | Nitrogen, ammonia total (as N) | 6.965 DAILY MX | 4.21 | 3.5 | mg/L | Admitted | Admitted |
| 5/28/2024 | 1 | Nitrogen, ammonia total (as N) | 5.131 DAILY MN | 11.8 | 3.5 | mg/L | Admitted | Admitted |
| 5/6/2024 | 1 | Nitrogen, ammonia total (as N) | 6.61 DAILY MX | 155.5 | 90.9 | kg/d | Admitted | Admitted |
| 5/7/2024 | 1 | Nitrogen, ammonia total (as N) | 6.779 DAILY MX | 105.3 | 90.9 | kg/d | Admitted | Admitted |
| 5/13/2024 | 1 | Nitrogen, ammonia total (as N) | 5.389 DAILY MX | 128.2 | 90.9 | kg/d | Admitted | Admitted |
| 5/20/2024 | 1 | Nitrogen, ammonia total (as N) | 6.965 DAILY MX | 111.1 | 90.9 | kg/d | Admitted | Admitted |
| 5/28/2024 | 1 | Nitrogen, ammonia total (as N) | 5.131 DAILY MN | 229.3 | 90.9 | kg/d | Admitted | Admitted |
| 5/31/2024 | 1 | Nitrogen, ammonia total (as N) | 5.087 MO AVG | 3.13 | 1.6 | mg/L | Admitted | Admitted |
| 5/31/2024 | 1 | Nitrogen, ammonia total (as N) | 5.087 MO AVG | 77.677 | 60.6 | kg/d | Admitted | Admitted |
| 6/15/2024 | 1 | Oxygen, dissolved (DO) | 0.334 DAILY MN | 0.9 | 5 | mg/L | Admitted | Admitted |
| 6/9/2024 | 1 | Oxygen, dissolved (DO) | 0.352 DAILY MN | 0.2 | 5 | mg/L | Admitted | Admitted |
| 6/10/2024 | 1 | Oxygen, dissolved (DO) | 0.222 DAILY MN | 0.2 | 5 | mg/L | Admitted | Admitted |
| 6/11/2024 | 1 | Oxygen, dissolved (DO) | 0.298 DAILY MN | 0.2 | 5 | mg/L | Admitted | Admitted |
| 6/12/2024 | 1 | Oxygen, dissolved (DO) | 0.278 DAILY MN | 0.3 | 5 | mg/L | Admitted | Admitted |
| 6/12/2024 | 1 | Oxygen, dissolved (DO) | 0.228 DAILY MN | 0.2 | 5 | mg/L | Admitted | Admitted |
| 6/12/2024 | 1 | Oxygen, dissolved (DO) | 0.333 DAILY MN | 0.4 | 5 | mg/L | Admitted | Admitted |
| 6/17/2024 | 1 | Nitrogen, ammonia total (as N) | 4.718 DAILY MX | 6.9 | 3.5 | mg/L | Admitted | Admitted |
| 6/10/2024 | 1 | pH, minimum | 0.222 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 6/13/2024 | 1 | pH, minimum | 0.228 DAILY MN | 6.2 | 6.5 | SU | Admitted | Admitted |
| 6/14/2024 | 1 | pH, minimum | 0.333 DAILY MN | 6.3 | 6.5 | SU | Admitted | Admitted |
| 6/3/2024 | 6 | pH, minimum | 0.036 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 6/4/2024 | 6 | pH, minimum | 0.608 DAILY MN | 6.3 | 6.5 | SU | Admitted | Admitted |
| 6/5/2024 | 6 | pH, minimum | 0.983 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 6/4/2024 | 7 | pH, minimum | 0.05 DAILY MN | 6.3 | 6.5 | SU | Admitted | Admitted |
| 7/20/2024 | 1 | Oxygen, dissolved (DO) | 3.962 DAILY MN | 0.3 | 5 | mg/L | Admitted | Admitted |
| 7/4/2024 | 1 | Oxygen, dissolved (DO) | 2.275 DAILY MN | 4.3 | 5 | mg/L | Admitted | Admitted |
| 7/19/2024 | 1 | Oxygen, dissolved (DO) | 4.3 DAILY MN | 4.3 | 5 | mg/L | Admitted | Admitted |
| 7/12/2024 | 8 | Oxygen, dissolved (DO) | 0.312 DAILY MN | 4.8 | 5 | mg/L | Admitted | Admitted |
| 7/16/2024 | 8 | Oxygen, dissolved (DO) | 0.1 DAILY MN | 4.6 | 5 | mg/L | Admitted | Admitted |
| 7/24/2024 | 8 | Oxygen, dissolved (DO) | 0.225 DAILY MN | 4.8 | 5 | mg/L | Admitted | Admitted |
| 7/29/2024 | 8 | Oxygen, dissolved (DO) | 0.295 DAILY MN | 4.2 | 5 | mg/L | Admitted | Admitted |
| 7/30/2024 | 8 | Oxygen, dissolved (DO) | 0.353 DAILY MN | 4.3 | 5 | mg/L | Admitted | Admitted |
| 7/31/2024 | 8 | Oxygen, dissolved (DO) | 0.317 DAILY MN | 4.8 | 5 | mg/L | Admitted | Admitted |
| 7/4/2024 | 1 | Solids, total suspended | 2.275 DAILY MN | 58 | 45 | mg/L | Admitted | Admitted |
| 7/23/2024 | 6 | Solids, total suspended | 0.078 DAILY MX | 47 | 45 | mg/L | Admitted | Admitted |
| 7/31/2024 | 1 | Phosphorus, total (as P) | 4.501 MO AVG | 1.1 | 1 | mg/L | Admitted | Admitted |
| 7/28/2024 | 1 | Phosphorus, total (as P) | 5.038 DAILY MX | 1.7 | 1.5 | mg/L | Admitted | Admitted |
| 7/31/2024 | 7 | Phosphorus, total (as P) | 0.67 MO AVG | 1.05 | 1 | mg/L | Admitted | Admitted |
| 7/31/2024 | 7 | Phosphorus, total (as P) | 0.67 MO AVG | 2.66 | 2.38 | kg/d | Admitted | Admitted |
| 7/25/2024 | 7 | Phosphorus, total (as P) | 0.694 DAILY MX | 1.6 | 1.5 | mg/L | Admitted | Admitted |
| 7/25/2024 | 7 | Phosphorus, total (as P) | 0.694 DAILY MX | 4.2 | 3.42 | kg/d | Admitted | Admitted |
| 7/31/2024 | 8 | Phosphorus, total (as P) | 0.322 MO AVG | 1.6 | 1 | mg/L | Deny in Part | Deny in Part |
| 7/25/2024 | 8 | Phosphorus, total (as P) | 0.448 DAILY MX | 1.9 | 1.5 | mg/L | Admitted | Admitted |
| 7/25/2024 | 8 | Phosphorus, total (as P) | 0.258 DAILY MX | 1.7 | 1.5 | mg/L | Admitted | Admitted |
| 7/27/2024 | 8 | Phosphorus, total (as P) | 0.286 DAILY MX | 1.6 | 1.5 | mg/L | Admitted | Admitted |
| 7/28/2024 | 8 | Phosphorus, total (as P) | 0.277 DAILY MX | 1.6 | 1.5 | mg/L | Admitted | Admitted |
| 7/28/2024 | 9 | Phosphorus, total (as P) | 0.568 DAILY MX | 1.6 | 1.5 | mg/L | Admitted | Admitted |
| 7/10/2024 | 7 | Application rate area sprayed | 1.358 DAILY MX | 2.4 | 1.5 | inches/day | Admitted | Admitted |
| 7/11/2024 | 7 | Application rate area sprayed | 0.9 DAILY MX | 1.7 | 1.5 | inches/day | Admitted | Admitted |
| 7/18/2024 | 7 | Application rate area sprayed | 0.759 DAILY MX | 1.7 | 1.5 | inches/day | Admitted | Admitted |
| 7/23/2024 | 7 | Application rate area sprayed | 1.082 DAILY MX | 2 | 1.5 | inches/day | Admitted | Admitted |
| 7/26/2024 | 7 | Application rate area sprayed | 0.86 DAILY MX | 1.7 | 1.5 | inches/day | Admitted | Admitted |
| 7/30/2024 | 7 | Application rate area sprayed | 0.886 DAILY MX | 1.7 | 1.5 | inches/day | Admitted | Admitted |
| 7/31/2024 | 7 | Application rate area sprayed | 0.814 DAILY MX | 1.7 | 1.5 | inches/day | Admitted | Admitted |
| 7/10/2024 | 8 | Application rate area sprayed | 1.081 DAILY MX | 1.9 | 1.5 | inches/day | Admitted | Admitted |
| 7/13/2024 | 6 | pH, minimum | 0.065 DAILY MN | 6.4 | 6.5 | SU | Admitted | Admitted |
| 7/2/2024 | 1 | BOD, carbonaceous, 05 day, 20 C | 4.822 DAILY MX | 44 | 40 | mg/L | Admitted | Admitted |
| 7/31/2024 | 7 | BOD, carbonaceous, 05 day, 20 C | 4.501 MO AVG | 65 | 25 | mg/L | Admitted | Admitted |
| 7/31/2024 | 7 | BOD, carbonaceous, 05 day, 20 C | 4.501 MO AVG | 170.7 | 57 | kg/d | Admitted | Admitted |
| 7/25/2024 | 7 | BOD, carbonaceous, 05 day, 20 C | 0.694 DAILY MX | 130 | 40 | mg/L | Admitted | Admitted |
| 7/25/2024 | 7 | BOD, carbonaceous, 05 day, 20 C | 0.694 DAILY MX | 344.5 | 91.3 | kg/d | Admitted | Admitted |
| 8/25/2024 | 1 | Oxygen, dissolved (DO) | 2.03 DAILY MN | 4 | 5 | mg/L | Admitted | Admitted |
| 8/31/2024 | 1 | Oxygen, dissolved (DO) | 1.27 DAILY MN | 1.3 | 5 | mg/L | Admitted | Admitted |
| 8/9/2024 | 7 | Oxygen, dissolved (DO) | 0.602 DAILY MN | 3.1 | 5 | mg/L | Admitted | Admitted |
| 8/10/2024 | 7 | Oxygen, dissolved (DO) | 0.681 DAILY MN | 4 | 5 | mg/L | Admitted | Admitted |
| 8/11/2024 | 7 | Oxygen, dissolved (DO) | 0.491 DAILY MN | 4.5 | 5 | mg/L | Admitted | Admitted |
| 8/29/2024 | 7 | Oxygen, dissolved (DO) | 0.055 DAILY MN | 4 | 5 | mg/L | Admitted | Admitted |
| 8/26/2024 | 9 | Oxygen, dissolved (DO) | 0.354 DAILY MN | 4.2 | 5 | mg/L | Admitted | Admitted |
| 8/15/2024 | 9 | Oxygen, dissolved (DO) | 0.424 DAILY MN | 4.9 | 5 | mg/L | Admitted | Admitted |
| 8/28/2024 | 9 | Oxygen, dissolved (DO) | 0.661 DAILY MN | 4.8 | 5 | mg/L | Admitted | Admitted |
| 8/29/2024 | 9 | Oxygen, dissolved (DO) | 0.376 DAILY MN | 3.9 | 5 | mg/L | Admitted | Admitted |
| 8/1/2024 | 8 | Oxygen, dissolved (DO) | 0.232 DAILY MN | 4 | 5 | mg/L | Admitted | Admitted |
| 8/2/2024 | 8 | Oxygen, dissolved (DO) | 0.595 DAILY MN | 4.1 | 5 | mg/L | Admitted | Admitted |
| 8/3/2024 | 8 | Oxygen, dissolved (DO) | 0.311 DAILY MN | 4.6 | 5 | mg/L | Admitted | Admitted |
| 8/6/2024 | 8 | Oxygen, dissolved (DO) | 0.162 DAILY MN | 4.1 | 5 | mg/L | Admitted | Admitted |
| 8/29/2024 | 8 | Oxygen, dissolved (DO) | 0.099 DAILY MN | 4.9 | 5 | mg/L | Admitted | Admitted |
| 8/29/2024 | 8 | Oxygen, dissolved (DO) | 0.096 DAILY MN | 2.6 | 5 | mg/L | Admitted | Admitted |
| 8/22/2024 | 6 | Solids, total suspended | 1.579 DAILY MX | 62 | 45 | mg/L | Admitted | Admitted |
| 8/31/2024 | 7 | Solids, total suspended | 0.365 MO AVG | 33 | 30 | mg/L | Admitted | Admitted |
| 8/13/2024 | 7 | Solids, total suspended | 0.276 DAILY MX | 74 | 45 | mg/L | Admitted | Admitted |
| 8/31/2024 | 7 | Phosphorus, total (as P) | 0.365 MO AVG | 1.1 | 1 | mg/L | Admitted | Admitted |
| 8/13/2024 | 7 | Phosphorus, total (as P) | 0.276 DAILY MX | 1.82 | 1.5 | mg/L | Admitted | Admitted |
| 8/1/2024 | 8 | Phosphorus, total (as P) | 0.232 DAILY MX | 1.58 | 1.5 | mg/L | Admitted | Admitted |
| 8/31/2024 | 9 | Phosphorus, total (as P) | 0.526 MO AVG | 1.39 | 1 | mg/L | Admitted | Admitted |
| 8/6/2024 | 9 | Phosphorus, total (as P) | 0.469 DAILY MX | 1.51 | 1.5 | mg/L | Admitted | Admitted |
| 8/14/2024 | 9 | Phosphorus, total (as P) | 0.248 DAILY MX | 1.55 | 1.5 | mg/L | Admitted | Admitted |
| 8/15/2024 | 9 | Phosphorus, total (as P) | 0.424 DAILY MX | 1.75 | 1.5 | mg/L | Admitted | Admitted |
| 8/16/2024 | 9 | Phosphorus, total (as P) | 1.288 DAILY MX | 1.63 | 1.5 | mg/L | Admitted | Admitted |
| 8/17/2024 | 9 | Phosphorus, total (as P) | 0.75 DAILY MX | 1.75 | 1.5 | mg/L | Admitted | Admitted |
| 8/27/2024 | 9 | Phosphorus, total (as P) | 0.163 DAILY MX | 1.63 | 1.5 | mg/L | Admitted | Admitted |
| 8/29/2024 | 9 | Phosphorus, total (as P) | 0.376 DAILY MX | 1.93 | 1.5 | mg/L | Admitted | Admitted |
| 8/16/2024 | 7 | Application rate area sprayed | 1.144 DAILY MX | 2.2 | 1.5 | inches/day | Admitted | Admitted |
| 8/1/2024 | 6 | pH, minimum | 0.194 DAILY MN | 6.3 | 6.5 | SU | Admitted | Admitted |