

**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:

/s/Pedro Segura

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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	

							Reported daily maximum on DMR was 42 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values.
2/7/2022	Daily Maximum	40	44	mg/L	Non-Compliance Notification	Deny in Part	
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	
							Reported daily maximum on DMR was 37 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values.
2/22/2022	Daily Maximum	40	47	mg/L	Non-Compliance Notification	Deny in Part	
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	
							Reported daily maximum on DMR was 46 mg/L. Non-compliance notifications do not reflectCampbell's final monthly effluent reporting values.
7/26/2022	Daily Maximum	40	76	mg/L	Non-Compliance Notification	Deny in Part	
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	
							Reported daily maximum on DMR was 61 mg/L. Non-compliance notifications do not reflect Campbell's final monthly effluent reporting values.
9/13/2022	Daily Maximum	40	57	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.
9/15/2022	Daily Maximum	40	61	mg/L	Non-Compliance Notification	Deny in Part	
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	
							Plaintiffs incorrectly note reported value. Reported daily maximum on DMR was 88 mg/L.
4/27/2023	Daily Maximum	40	80	mg/L	DMR	Deny in Part	

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	
<b>Complaint</b>							
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	
<b>Reported post-Complaint</b>							
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	

<b>Table 2</b> <b>Campbell Reported Discharges - Dissolved Oxygen (Outfalls 001 and 006-009)</b> <b>January 2018 - December 2024</b>								
<b>Date</b>	<b>Outfall</b>	<b>Limit Type</b>	<b>Permitted Limit</b>	<b>Reported Discharge</b>	<b>Unit</b>	<b>Source</b>	<b>Request for Admission 3: Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation</b>	<b>Corrected Values for Each Denial: Provide corrections in this column or in separate narrative</b>
<b>Notice Letter</b>								
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	

								Plaintiffs incorrectly note reported value. Reported daily minimum on DMR was 5.0 mg/L.
2/28/2023	001	Daily Minimum	5	3.7	mg/L	DMR	Deny in Part	
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	

<b>Table 3</b> <b>Campbell Reported Discharges - E. coli (Outfall 001)</b> <b>January 2018 - December 2024</b>							
<b>Date</b>	<b>Limit Type</b>	<b>Permitted Limit</b>	<b>Reported Discharge</b>	<b>Unit</b>	<b>Source</b>	<b>Request for Admission 4:</b> Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation	<b>Corrected Values for Each Denial:</b> Provide corrections in this column or in separate narrative
<b>Notice Letter</b>							
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 <a href="https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/edmr/doc/ACODES.pdf">https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/edmr/doc/ACODES.pdf</a> . 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 <a href="https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/edmr/doc/ACODES.pdf">https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/edmr/doc/ACODES.pdf</a> . 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 dicussed 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	

<b>Table 4</b> <b>Campbell Reported Discharges - Phosphorus (Outfalls 001 and 006-009)</b> <b>January 2018 - December 2024</b>								
<b>Date</b>	<b>Outfall</b>	<b>Limit Type</b>	<b>Permitted Limit</b>	<b>Reported Discharge</b>	<b>Unit</b>	<b>Source</b>	<b>Request for Admission 5: Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation</b>	<b>Corrected Values for Each Denial: Provide corrections in this column or in separate narrative</b>
<b>Notice Letter</b>								
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	
<b>Complaint</b>								
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	
<b>Reported post-Complaint</b>								
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	

<b>Table 5</b> <b>Campbell Reported Discharges - Nitrogen (as ammonia, NH3) (Outfall 001)</b> <b>January 2018 - December 2024</b>							
<b>Date</b>	<b>Limit Type</b>	<b>Permitted Limit</b>	<b>Reported Discharge</b>	<b>Unit</b>	<b>Source</b>	<b>Request for Admission 6:</b> Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation	<b>Corrected Values for Each Denial:</b> Provide corrections in this column or in separate narrative
<b>Notice Letter</b>							
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	
<b>Complaint</b>							
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	
<b>Reported post-Complaint</b>							
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	

<b>Table 7</b> <b>Campbell Reported Discharges - Oil and Grease (Outfall 099)</b> <b>January 2018 - December 2024</b>							
<b>Date</b>	<b>Limit Type</b>	<b>Permitted Limit</b>	<b>Reported Discharge</b>	<b>Unit</b>	<b>Source</b>	<b>Request for Admission 8:</b> Admit Reported Discharge value corresponds to Reported DMR Value or Ohio EPA calculation	<b>Corrected Values for Each Denial:</b> Provide corrections in this column or in separate narrative
<b>Notice Letter</b>							
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.□
<b>Complaint</b>							
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.□
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# **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

Issuing Period	Outfall	Parameter/Constituent Description	Average Daily Flow (MGD)	Limit Type	Reported DMR Value	Permit Limit	Limit Value Unit
8/16/2018	1	Solids, total suspended	8.9 DAILY MX		50	45	mg/L
8/16/2018	1	BOD, carbonaceous, 05 day, 20 C	8.9 DAILY MX		57	40	mg/L
8/16/2018	1	BOD, carbonaceous, 05 day, 20 C	8.9 DAILY MX		1900	1520	kg/d
8/20/2018	6	pH, maximum	0.413 DAILY MX		11	9	SU
8/12/2018	8	Oxygen, dissolved (DO)	0.2 DAILY MN		2.7	5	mg/L
8/6/2018	8	pH, minimum	0.103 DAILY MN		6.2	6.5	SU
8/23/2018	9	Oxygen, dissolved (DO)	0.337 DAILY MN		4.7	5	mg/L
8/7/2018	9	pH, minimum	0.471 DAILY MN		4.4	6.5	SU
9/30/2018	1	Nitrogen, ammonia total (as N)	6.82667 MO AVG		80.1	60.6	kg/d
9/30/2018	1	Nitrogen, ammonia total (as N)	6.82667 MO AVG		2.81	1.6	mg/L
9/4/2018	1	Nitrogen, ammonia total (as N)	7.3 DAILY MX		12.4	3.5	mg/L
9/4/2018	1	Nitrogen, ammonia total (as N)	7.3 DAILY MX		343	90.9	kg/d
9/30/2018	1	Phosphorus, total (as P)	6.82667 MO AVG		1.1	1	mg/L
9/18/2018	1	E. coli, MTEC-MF	8 WK GEOMN		285	284	MPN/100mL
9/11/2018	6	pH, maximum	1.3 DAILY MX		9.5	9	SU
9/10/2018	6	pH, minimum	1.2 DAILY MN		6.2	6.5	SU
9/19/2018	9	Oxygen, dissolved (DO)	0.47 DAILY MN		4.3	5	mg/L
10/2/2018	1	Nitrogen, ammonia total (as N)	7 DAILY MX		93	90.9	kg/d
10/31/2018	1	Nitrogen, ammonia total (as N)	6.45161 MO AVG		1.9	1.6	mg/L
10/31/2018	1	Phosphorus, total (as P)	6.45161 MO AVG		1.1	1	mg/L
10/11/2018	1	Phosphorus, total (as P)	6.5 DAILY MX		1.6	1.5	mg/L
10/4/2018	6	pH, maximum	0.3 DAILY MX		9.1	9	SU
11/24/2018	1	pH, maximum	3.6 DAILY MX		9.6	9	SU
1/20/2019	1	pH, minimum	6.1 DAILY MN		6.3	6.5	SU
4/16/2019	1	Solids, total suspended	3 DAILY MX		52	45	mg/L
5/28/2019	1	Nitrogen, ammonia total (as N)	7.4 DAILY MX		240	90.9	kg/d
5/28/2019	1	Nitrogen, ammonia total (as N)	7.4 DAILY MX		9.6	3.5	mg/L
6/6/2019	1	Phosphorus, total (as P)	7.9 DAILY MX		1.8	1.5	mg/L
6/30/2019	1	Phosphorus, total (as P)	6.67667 MO AVG		1.1	1	mg/L
7/31/2019	1	Solids, total suspended	6.53333 MO AVG		36	30	mg/L
7/3/2019	1	Solids, total suspended	5.3 DAILY MX		47	45	mg/L
7/3/2019	1	Phosphorus, total (as P)	5.3 DAILY MX		1.6	1.5	mg/L
7/31/2019	1	Phosphorus, total (as P)	6.53333 MO AVG		1.3	1	mg/L
7/23/2019	1	E. coli, MTEC-MF	7.7 WK GEOMN		650	284	MPN/100mL
7/23/2019	1	BOD, carbonaceous, 05 day, 20 C	7.7 DAILY MX		60	40	mg/L
7/23/2019	1	BOD, carbonaceous, 05 day, 20 C	7.7 DAILY MX		1700	1520	kg/d
7/31/2019	1	BOD, carbonaceous, 05 day, 20 C	6.53333 MO AVG		34	25	mg/L
8/18/2019	1	E. coli, MTEC-MF	6.4 WK GEOMN		537	284	MPN/100mL
8/31/2019	1	BOD, carbonaceous, 05 day, 20 C	6.59032 MO AVG		28	25	mg/L
8/1/2019	1	BOD, carbonaceous, 05 day, 20 C	6.2 DAILY MX		61	40	mg/L
8/31/2019	6	Phosphorus, total (as P)	1.10667 MO AVG		1.1	1	mg/L
8/27/2019	8	Oxygen, dissolved (DO)	0.308 DAILY MN		4.1	5	mg/L
9/3/2019	1	Nitrogen, ammonia total (as N)	7.2 DAILY MX		130	90.9	kg/d
9/3/2019	1	Nitrogen, ammonia total (as N)	7.2 DAILY MX		4.9	3.5	mg/L
9/12/2019	1	Phosphorus, total (as P)	7.6 DAILY MX		1.8	1.5	mg/L
9/30/2019	1	Phosphorus, total (as P)	6.51 MO AVG		1.28	1	mg/L
9/14/2019	6	Oxygen, dissolved (DO)	0.05 DAILY MN		3.5	5	mg/L
9/18/2019	7	pH, maximum	0.017 DAILY MX		10	9	SU
9/4/2019	8	Application rate area sprayed	0.03 DAILY MX		0.8	0.75	in/d
9/25/2019	9	Application rate area sprayed	0.08 DAILY MX		0.9	0.75	in/d
10/17/2019	1	Solids, total suspended	6.3 DAILY MX		56	45	mg/L
10/31/2019	1	Solids, total suspended	6.29 MO AVG		31	30	mg/L
10/10/2019	1	Nitrogen, ammonia total (as N)	5.5 DAILY MX		3.9	3.5	mg/L
10/31/2019	1	Nitrogen, ammonia total (as N)	6.29 MO AVG		2.2	1.6	mg/L
10/31/2019	1	Phosphorus, total (as P)	6.29 MO AVG		1.4	1	mg/L
10/17/2019	1	Phosphorus, total (as P)	6.3 DAILY MX		1.9	1.5	mg/L
10/17/2019	1	BOD, carbonaceous, 05 day, 20 C	6.3 DAILY MX		58	40	mg/L
10/1/2019	6	Oxygen, dissolved (DO)	0.6 DAILY MN		4.8	5	mg/L
10/31/2019	7	Phosphorus, total (as P)	0.4 MO AVG		1.2	1	mg/L
10/31/2019	99	Solids, total suspended	0.763 MO AVG		39.6	5	kg/d
10/24/2019	99	Solids, total suspended	0.87 DAILY MX		40.5	10.51	kg/d
10/10/2019	99	Oil and grease (soxhlet extr.) tot.	0.94 DAILY MX		17	5.13	kg/d
10/31/2019	99	Oil and grease (soxhlet extr.) tot.	0.763 MO AVG		11	3.08	kg/d
11/30/2019	9	Solids, total suspended	0.342 MO AVG		43	30	mg/L
12/8/2019	1	Chlorine, total residual	7 DAILY MX		1.9	1.44	kg/d
12/8/2019	1	Chlorine, total residual	7 DAILY MX		0.07	0.038	mg/L
12/26/2019	1	pH, minimum	3.2 DAILY MN		6.3	6.5	SU
5/21/2020	1	Nitrogen, ammonia total (as N)	7.7 DAILY MX		4.9	3.5	mg/L
5/21/2020	1	Nitrogen, ammonia total (as N)	7.7 DAILY MX		140	90.9	kg/d
5/31/2020	1	Nitrogen, ammonia total (as N)	6.61065 MO AVG		2	1.6	mg/L
5/26/2020	1	Phosphorus, total (as P)	7.2 DAILY MX		3.03	1.5	mg/L
5/31/2020	1	Phosphorus, total (as P)	6.61065 MO AVG		1.24	1	mg/L
5/26/2020	1	Phosphorus, total (as P)	7.2 DAILY MX		82.6	56.8	kg/d
5/17/2020	1	Chlorine, total residual	7.4 DAILY MX		0.4	0.038	mg/L
5/17/2020	1	Chlorine, total residual	7.4 DAILY MX		11	1.44	kg/d
6/9/2020	1	Solids, total suspended	7.5 DAILY MX		1800	1710	kg/d
6/30/2020	1	Solids, total suspended	7.6 MO AVG		36	30	mg/L
6/9/2020	1	Solids, total suspended	7.5 DAILY MX		63	45	mg/L
6/30/2020	1	Phosphorus, total (as P)	7.6 MO AVG		43.9	37.9	kg/d
6/11/2020	1	Phosphorus, total (as P)	8.5 DAILY MX		60.5	56.8	kg/d
6/11/2020	1	Phosphorus, total (as P)	8.5 DAILY MX		1.88	1.5	mg/L
6/30/2020	1	Phosphorus, total (as P)	7.6 MO AVG		1.45	1	mg/L
6/11/2020	1	BOD, carbonaceous, 05 day, 20 C	8.5 DAILY MX		2000	1520	kg/d
6/30/2020	1	BOD, carbonaceous, 05 day, 20 C	7.6 MO AVG		35	25	mg/L
6/30/2020	1	BOD, carbonaceous, 05 day, 20 C	7.6 MO AVG		1100	947	kg/d
6/9/2020	1	BOD, carbonaceous, 05 day, 20 C	7.5 DAILY MX		63	40	mg/L
7/9/2020	1	E. coli, MTEC-MF	7.6 WK GEOMN		960	284	MPN/100mL
7/31/2020	6	Phosphorus, total (as P)	0.78713 MO AVG		1.17	1	mg/L
7/31/2020	8	Phosphorus, total (as P)	0.2104 MO AVG		1.02	1	mg/L
8/31/2020	1	Nitrogen, ammonia total (as N)	6.19355 MO AVG		1.9	1.6	mg/L
8/17/2020	1	Nitrogen, ammonia total (as N)	6.6 DAILY MX		220	90.9	kg/d
8/17/2020	1	Nitrogen, ammonia total (as N)	6.6 DAILY MX		8.8	3.5	mg/L
8/4/2020	1	E. coli, MTEC-MF	5.4 WK GEOMN		2720	284	MPN/100mL
8/24/2020	7	Application rate area sprayed	0 DAILY MX		0.755	0.75	in/d
9/15/2020	1	Phosphorus, total (as P)	7.1 DAILY MX		1.85	1.5	mg/L
9/30/2020	1	Phosphorus, total (as P)	6.34 MO AVG		1.4	1	mg/L
9/15/2020	1	BOD, carbonaceous, 05 day, 20 C	7.1 DAILY MX		57	40	mg/L
9/30/2020	1	BOD, carbonaceous, 05 day, 20 C	6.34 MO AVG		26	25	mg/L
9/30/2020	8	Phosphorus, total (as P)	0.15579 MO AVG		1.06	1	mg/L
10/31/2020	1	Phosphorus, total (as P)	6.32903 MO AVG		1.26	1	mg/L
10/8/2020	1	Phosphorus, total (as P)	6.4 DAILY MX		1.71	1.5	mg/L
10/8/2020	1	E. coli, MTEC-MF	6.4 WK GEOMN		8160	284	MPN/100mL
10/1/2020	1	BOD, carbonaceous, 05 day, 20 C	5.9 DAILY MX		47	40	mg/L
10/31/2020	1	BOD, carbonaceous, 05 day, 20 C	6.2903 MO AVG		31	25	mg/L
10/31/2020	8	Phosphorus, total (as P)	6.3 MO AVG		1.47	1	mg/L
10/27/2020	9	BOD, carbonaceous, 05 day, 20 C	0 DAILY MX		42	40	mg/L
12/31/2020	1	Solids, total suspended	6.058 MO AVG		34	30	mg/L
12/21/2020	1	Solids, total suspended	6 DAILY MX		68	45	mg/L
12/31/2020	1	BOD, carbonaceous, 05 day, 20 C	6.058 MO AVG		36	25	mg/L
12/23/2020	1	BOD, carbonaceous, 05 day, 20 C	5.1 DAILY MX		1600	1520	kg/d
12/23/2020	1	BOD, carbonaceous, 05 day, 20 C	5.1 DAILY MX		81	40	mg/L
1/31/2021	1	Solids, total suspended	6.2 MO AVG		1200	1140	kg/d
1/31/2021	1	Solids, total suspended	6.2 MO AVG		46	30	mg/L
1/12/2021	1	Solids, total suspended	6.5 DAILY MX		2200	1710	kg/d
1/12/2021	1	Solids, total suspended	6.5 DAILY MX		88	45	mg/L
1/21/2021	1	BOD, carbonaceous, 05 day, 20 C	7.2 DAILY MX		71	40	mg/L
1/21/2021	1	BOD, carbonaceous, 05 day, 20 C	7.2 DAILY MX		1900	1520	kg/d
1/31/2021	1	BOD, carbonaceous, 05 day, 20 C	6.2 MO AVG		35	25	mg/L
2/28/2021	1	Solids, total suspended	6.37 MO AVG		2050	1140	kg/d
2/9/2021	1	Solids, total suspended	5.9 DAILY MX		132	45	mg/L
2/9/2021	1	Solids, total suspended	5.9 DAILY MX		2950	1710	kg/d
2/28/2021	1	Solids, total suspended	6.37 MO AVG		82.9	30	mg/L
2/9/2021	1	Phosphorus, total (as P)	5.9 DAILY MX		1.85	1.5	mg/L
2/28/2021	1	Phosphorus, total (as P)	6.37 MO AVG		1.35	1	mg/L
2/28/2021	1	BOD, carbonaceous, 05 day, 20 C	6.37 MO AVG		90	25	mg/L
2/28/2021	1	BOD, carbonaceous, 05 day, 20 C	6.37 MO AVG		2240	947	kg/d
2/25/2021	1	BOD, carbonaceous, 05 day, 20 C	6.7 DAILY MX		120	40	mg/L
2/25/2021	1	BOD, carbonaceous, 05 day, 20 C	6.7 DAILY MX		3040	1520	kg/d
2/28/2021	99	Solids, total suspended	0.0969 MO AVG		5.093	5	kg/d
3/31/2021	1	Solids, total suspended	6.8 MO AVG		62	30	mg/L
3/1/2021	1	Solids, total suspended	6.9 DAILY MX		84	45	mg/L
3/1/2021	1	Solids, total suspended	6.9 DAILY MX		2200	1710	kg/d
3/31/2021	1	Solids, total suspended	6.8 MO AVG		1600	1140	kg/d
3/31/2021	1	Phosphorus, total (as P)	6.8 MO AVG		1.1	1	mg/L
3/31/2021	1	BOD, carbonaceous, 05 day, 20 C	6.8 MO AVG		58	25	mg/L
3/1/2021	1	BOD, carbonaceous, 05 day, 20 C	6.9 DAILY MX		99	40	mg/L
3/1/2021	1	BOD, carbonaceous, 05 day, 20 C	6.9 DAILY MX		2600	1520	kg/d
3/31/2021	1	BOD, carbonaceous, 05 day, 20 C	6.8 MO AVG		1500	947	kg/d
4/30/2021	1	Solids, total suspended	5.94 MO AVG		39	30	mg/L
4/15/2021	1	Solids, total suspended	7.5 DAILY MX		52	45	mg/L
4/30/2021	1	BOD, carbonaceous, 05 day, 20 C	5.94 MO AVG		27	25	mg/L
4/15/2021	1	BOD, carbonaceous, 05 day, 20 C	7.5 DAILY MX		47	40	mg/L
4/30/2021	99	Oil and grease (soxhlet extr.) tot.	0.103 MO AVG		3.7	3.08	kg/d
5/31/2021	1	Solids, total suspended	6.2 MO AVG		32	30	mg/L
5/27/2021	1	Solids, total suspended	8.7 DAILY MX		2200	1710	kg/d
5/27/2021	1	Solids, total suspended	8.7 DAILY MX		68	45	mg/L
5/31/2021	1	E. coli, MTEC-MF	6.2 MO GEOMN		1405	126	MPN/100mL
5/27/2021	1	E. coli, MTEC-MF	8.7 WK GEOMN		7700	284	MPN/100mL
5/27/2021	1	BOD, carbonaceous, 05 day, 20 C	8.7 DAILY MX		52	40	mg/L
5/27/2021	1	BOD, carbonaceous, 05 day, 20 C	8.7 DAILY MX		1700	1520	kg/d
6/10/2021	1	Solids, total suspended	9 DAILY MX		100	45	mg/L
6/10/2021	1	Solids, total suspended	9 DAILY MX		3410	1710	kg/d
6/30/2021	1	Solids, total suspended	7.45 MO AVG		1500	1140	kg/d
6/30/2021	1	Solids, total suspended	7.45 MO AVG		48.5	30	mg/L
6/17/2021	1	Phosphorus, total (as P)	7.8 DAILY MX		1.52	1.5	mg/L

Campbell's identified a miscalculated application rate, and will amend the DMR. Correct application rate was 0.4 inches/acre.

Campbell's identified a miscalculated application rate, and will amend the DMR. Correct application rate was 0.2 inches/acre.

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

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	25	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	641.1	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)	1.9 DAILY MN	4.77	5	mg/L	Admitted	Admitted
8/31/2021	99	Solids, total suspended	0.106 MO AVG	5.12	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
9/1/2021	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 (soxhlet extr.) tot.	0.157 DAILY MX	8.74	5.13	kg/d	Admitted	Admitted
11/30/2021	99	Oil and grease (soxhlet extr.) tot.	0.112 MO AVG	5.55	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	6.79 MO AVG	30	25	mg/L	Admitted	Admitted
12/23/2021	1	BOD, carbonaceous, 05 day, 20 C	7.116 DAILY MX	48	40	mg/L	Admitted	Admitted
12/31/2021	99	Solids, total suspended	0.112 MO AVG	28.3	5	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 (soxhlet extr.) tot.	0.128 DAILY MX	13.3	5.13	kg/d	Admitted	Admitted
12/31/2021	99	Oil and grease (soxhlet extr.) tot.	0.112 MO AVG	7.9	3.08	kg/d	Admitted	Admitted
1/23/2022	1	Oxygen, dissolved (DO)	7.779 DAILY MN	4.7	5	mg/L	Admitted	Admitted
1/31/2022	1	Solids, total suspended	6.806 MO AVG	41	30	kg/d	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	0.143 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
2/1/2022	1	BOD, carbonaceous, 05 day, 20 C	7.526 DAILY MX	64	40	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
2/24/2022	99	Oil and grease (soxhlet extr.) tot.	0.128 DAILY MX	7.9	5.13	kg/d	Admitted	Admitted
2/28/2022	99	Oil and grease (soxhlet 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	kg/d	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	0.105 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
1/47/2022	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
5/12/2022	1	Solids, total suspended	8.534 DAILY MX	58	45	mg/L	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	2.529 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	5.29	1.5	mg/L	Admitted	Admitted
6/30/2022	1	Phosphorus, total (as P)	6.393 MO AVG	40.6	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	40	80	kg/d	Admitted	Admitted
7/14/2022	1	BOD, carbonaceous, 05 day, 20 C	7.					

10/7/2022	9	pH, maximum	0.271 DAILY MX	10	9	SU	Admitted	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 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.	
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	9.3	9	SU	Admitted	Admitted		
11/30/2022	99	Solids, total suspended	0.128 MO AVG	5.9	5	kg/d	Admitted	Deny in Part	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.	
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	2300	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		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	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	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 31.4 mg/L on 1/19. Daily max loading, based on corrected concentrations, was 11.42 kg/day.	
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	7.7021 MO AVG	1200	1140	kg/d	Admitted	Admitted		
2/28/2023	1	Solids, total suspended	7.7021 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	7.7021 MO AVG	1200	947	kg/d	Admitted	Admitted		
2/21/2023	1	BOD, carbonaceous, 05 day, 20 C	7.614 DAILY MX	40	60	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	7.7021 MO AVG	39	25	mg/L	Admitted	Admitted		
2/14/2023	2	pH, maximum	0.495 DAILY MX	10.4	9	SU	Admitted	Admitted	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.	
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	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.	
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		
5/23/2023	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	7	pH, minimum	0.122 DAILY MN	5.08	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	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 13.72 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.	
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		
7/11/2023	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)	3.753 MO AVG	2	1.6	mg/L	Admitted	Admitted		
7/11/2023	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		
7/11/2023	1	Phosphorus, total (as P)	3.7 DAILY MX	3.63	1.5	mg/L	Admitted	Admitted		
7/16/2023	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 DAILY MX	1.82	1.5	in/d	Admitted	Admitted		
7/20/2023	7	pH, minimum	0.271 DAILY MN	6.03	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	40	mg/L	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,								

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
10/5/2023	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
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.								
12/31/2023	99	Solids, total suspended	0.12 MO AVG	12.17	5	kg/d	Admitted	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 max loading, based on corrected concentrations, was 6.49 kg/day.								
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	7.438 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
Plaintiff incorrectly notes date of exceedance. A pH of 9.1 was reported on 1/13/2024.								
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
Plaintiff incorrectly notes this is a pH minimum exceedance. This is a maximum pH exceedance.								
1/30/2024	2	pH, minimum	0.239 DAILY MX	9.1	9	SU	Deny in Part	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 max loading, based on corrected concentrations, was 6.49 kg/day.								
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	6.642 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	5	2.3	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 MX	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 MX	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
6/13/2024	1	Oxygen, dissolved (DO)	0.228 DAILY MN	0.4	5	mg/L	Admitted	Admitted
6/14/2024	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
6/5/2024	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 MX	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	2.28	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
7/23/2024	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	341.5	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
8/28/2024	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	Ad	