

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

UNITED STATES OF AMERICA,

Plaintiff,

v.

**CAMPBELL SOUP SUPPLY COMPANY,
L.L.C.,**

Defendant.

Civil Action No. _____

INTRODUCTION

The Campbell Soup manufacturing plant (“Facility”) in Napoleon, Ohio has failed to comply with its permitted wastewater limits for years. Its wastewater treatment plant is not designed to handle the wastewater generated by current operations and the discharges from the Facility regularly exceed permitted limits for harmful pollutants. Those pollutants flow into the Maumee River and its tributaries where they impact the plants and wildlife that depend on those waters, diminish the downstream water quality of Lake Erie, and potentially threaten human health. The United States brings this case to remedy past harm, prevent future harm, and obtain a civil penalty for these violations.

COMPLAINT

1. The United States of America, by authority of the Attorney General of the United States and at the request of the Administrator of the United States Environmental Protection Agency (“EPA”), brings this action for injunctive relief and civil penalties against Campbell Soup Supply Company, L.L.C. (“Campbell” or “Defendant”) pursuant to Sections 309(b) and (d)

of the Federal Water Pollution Control Act (“Clean Water Act” or “Act”), 33 U.S.C. § 1319(b) and (d), for the illicit discharge of pollutants from the Campbell Facility located in Napoleon, Ohio in violation of limits in its National Pollutant Discharge Elimination System permit (“NPDES Permit” or “Permit”).

2. Since at least August 2018, the Facility has discharged wastewater into the Maumee River that includes several pollutants, such as carbonaceous biochemical oxygen demand (“CBOD”), dissolved oxygen (“DO”), total suspended solids (“TSS”), ammonia (referred to in the Permit and the Facility’s discharge monitoring reports as “nitrogen, ammonia (NH₃)”), *E. coli*, total residual chlorine, phosphorus, oil and grease, and pH, at levels in violation of the concentration and load limits set by the Facility’s NPDES Permit.

3. The Facility discharges wastewater directly into the Maumee River through two outfalls and discharges through four other outfalls into tributaries of the Maumee River. The Facility’s wastewater discharges contribute to poor water quality and can harm river wildlife by, among other harms, introducing concentrations of CBOD at levels that can lead to suffocation of aquatic animals.

4. The *E. coli* in the Facility’s wastewater discharges can pose a threat to human health as the bacteria is known to cause respiratory illness, urinary tract infections, and other human illnesses.

5. The Facility’s wastewater discharges flow downstream into Lake Erie and have the potential to contribute to dangerous algal blooms there.

JURISDICTION AND VENUE

6. This Court has subject matter jurisdiction for this action under Section 309(b) of the Clean Water Act, 33 U.S.C. § 1319(b), and under 28 U.S.C. §§ 1331 (Federal Question), 1345 (United States as Plaintiff), and 1355 (Fine, Penalty, or Forfeiture).

7. Venue is proper in this District pursuant to 28 U.S.C. §§ 1391(b) and 1395(a), as well as Section 309(b) of the Act, 33 U.S.C. § 1319(b), because it is the judicial district in which Defendant is located and operates and is where much of the alleged harm is occurring.

8. Authority to bring this action is vested in the United States Department of Justice under Section 506 of the Act, 33 U.S.C. § 1366, and 28 U.S.C. § 516.

9. Notice of commencement of this action has been provided to the State of Ohio pursuant to Section 309(b) of the Act, 33 U.S.C. § 1319(b).

DEFENDANT

10. Campbell is incorporated in Delaware and operates a food processing and canning plant located at 12-773 State Route 110, Napoleon, Ohio 43545.

11. At all times relevant to this Complaint, Defendant has done business in the Northern District of Ohio and continues to operate the Facility there today.

STATUTORY AND REGULATORY BACKGROUND

12. Congress enacted the Clean Water Act “to restore and maintain the chemical, physical, and biological integrity of the Nation’s waters.” 33 U.S.C. § 1251(a).

13. To accomplish this goal, Section 301(a) of the Act, 33 U.S.C. § 1311(a), prohibits the discharge of any pollutant by any person to navigable waters except as in compliance with, among other things, the terms and conditions of a NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342.

14. Section 402(a) of the Act, 33 U.S.C. § 1342(a), creates the NPDES permitting program and provides that the permit-issuing authority may issue a NPDES permit that authorizes the discharge of any pollutant directly into navigable waters, but only in compliance with the applicable requirements of the Clean Water Act, and/or such other conditions as the Administrator determines are necessary to carry out the provisions of the Act.

15. A state may establish its own NPDES permitting program and, after receiving EPA approval, issue NPDES permits. 33 U.S.C. § 1342(b).

16. When a state is authorized to administer a NPDES permitting program, EPA retains concurrent authority to enforce state-issued permits. 33 U.S.C. §§ 1319, 1342(i).

17. The Clean Water Act defines certain terms at Section 502 including the following:

- a. A “person” is defined to include a corporation. 33 U.S.C. § 1362(5);
- b. A “discharge of a pollutant” includes “any addition of any pollutant to navigable waters from any point source.” 33 U.S.C. § 1362(12);
- c. A “pollutant” includes a wide variety of substances, including chemical waste, industrial waste, and solid waste. 33 U.S.C. § 1362(6);
- d. A “point source” includes “any discrete conveyance . . . a pipe, ditch, channel, tunnel, [and] conduit . . . from which pollutants are or may be discharged.” 33 U.S.C. § 1362(14); and
- e. “Navigable waters” is defined as “the waters of the United States.” 33 U.S.C. § 1362(7).

18. Clean Water Act Section 309(b), 33 U.S.C. § 1319(b), authorizes the commencement of a civil action for appropriate relief, including a permanent or temporary injunction, against any person who violates Section 301(a) of the Act, 33 U.S.C. § 1311(a), or

violates any permit condition or limitation in a NPDES permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342; *see also* 33 U.S.C. § 1319(a)(1), (a)(3).

19. Section 309(b) of the Act also provides that any person who violates Section 301 of the Act, 33 U.S.C. § 1311, or violates any condition or limitation in a permit issued pursuant to Section 402 of the Act, 33 U.S.C. § 1342, shall be subject to a civil penalty payable to the United States. 33 U.S.C. § 1319(d).

20. Finally, pursuant to Section 309(d) of the Act, 33 U.S.C. § 1319(d), as amended by the Federal Civil Penalties Inflation Adjustment Act of 1990 (28 U.S.C. § 2461 note: Pub. L. 101-410, enacted October 5, 1990; 104 Stat. 890), the Debt Collection Improvement Act of 1996 (31 U.S.C. § 3701 note: Pub. L. 101-134, enacted April 26, 1996, 110 Stat. 1321), and the Federal Civil Penalties Inflation Adjustment Act Improvements Act of 2015, 28 U.S.C. § 2461, and as reflected in 40 C.F.R. § 19.4, the maximum civil penalty is \$64,618 per day for each violation occurring after November 2, 2015 (and assessed on or after January 6, 2023). 88 Fed. Reg. 986, 989 (Jan. 6, 2023).

GENERAL ALLEGATIONS

Facility Ownership and Operations

21. Defendant is a “person” within the meaning of the Act. 33 U.S.C. § 1362(5).

22. Defendant owns and operates a food processing and canning plant located at 12-773 State Route 110, Napoleon, Ohio 43545 (“Facility”).

23. To the west of the Facility, across State Route 110, is the Maumee River, which curves around the Facility’s northern boundary and eventually empties into Lake Erie.

24. The Facility is located near residential communities, including the adjacent city of Napoleon, Ohio, with a population of approximately 9,000, as well as Grand Rapids, Ohio,

approximately 14 miles downstream from the Facility with a population of approximately 1,000, and Toledo, Ohio, approximately 38 miles downstream with a population of approximately 266,000.

25. The Facility conducts various food processing related operations including heat process canning, which involves washing, blending, and filling cans and other containers to produce fruit and vegetable juices, sauces, and soups.

26. A tenant company, a manufacturing arm of Silgan Containers Inc. (“Silgan”), also operates within the Facility and produces two-piece aluminum cans used in the Facility’s operations.

Pollutants Generated and Wastewater Treatment

27. The Facility generates millions of gallons of wastewater every year that contains dozens of chemicals and constituents and is a combination of stormwater, manufacturing process water, and other industrial wastewater (collectively “wastewater”).

28. The Facility generates wastewater through several processes, including evaporators, washdown in processing areas, boiler blowdown, chiller water, cleaning and peeling vegetables, water treatment, laundry, and restrooms.

29. Silgan generates wastewater from its aluminum operations that Campbell is responsible for capturing and treating.

30. The Facility’s wastewater contains CBOD, DO, TSS, ammonia, *E. coli*, total residual chlorine, phosphorous, oil and grease, and pH, which are all “pollutants” as defined under the Clean Water Act. 33 U.S.C. § 1362(6).

31. During warmer months, the Facility’s and Silgan’s wastewater is routed to either the Facility’s on-site wastewater treatment plant (“WWTP”) or to the Facility’s spray field

overland flow system. During months when there are freezing conditions, all wastewater is routed to the WWTP.

32. The WWTP treats the wastewater using any or some of the following steps: grit removal, grinding, screening, trickling filtration, flotation, anaerobic digestion, sedimentation, disinfection, and dichlorination.

33. After treatment, the wastewater from both the WWTP and the overland spray system frequently continues to contain several pollutants, including CBOD, DO, TSS, ammonia, *E. coli*, total residual chlorine, phosphorus, oil and grease, and pH, at levels in violation of the limits allowable by the NPDES Permit.

Facility Discharge Infrastructure and Locations

34. The Facility discharges treated wastewater from the WWTP directly into the Maumee River from a pipe labeled Outfall 001.

35. The Facility discharges untreated reverse osmosis concentrate, boiler-feed concentrate, and stormwater directly into the Maumee River from Outfall 002.

36. Outfalls 006–009 receive flow from the overland spray system and each outfall discharges into an unnamed tributary of the Maumee River.

37. These four unnamed tributaries empty into the Maumee River.

38. Outfall 099 is an internal sampling station, called 605 in the Permit, for wastewater from Silgan's canmaking operations where wastewater is sampled before it is combined with other process wastewaters from the Facility and routed to the WWTP. Pollutant levels for wastewater sampled at this Outfall are determined by applying the WWTP's known treatment and removal efficiencies to the sampled values.

39. The Facility monitors the pollutant concentrations and loads from Outfalls 001-002, 006, 007, 008, 009, and 099.

Receiving Waters

40. The Maumee River is a traditionally “navigable water” with a perennial flow within the meaning of Section 502(7) of the Act, 33 U.S.C. § 1362(7).

41. The Maumee River flows directly into Lake Erie at a confluence called the Maumee Bay.

42. Lake Erie is a “navigable water” within the meaning of Section 502(7) the Act. 33 U.S.C. § 1362(7).

43. The Maumee River is designated by the State of Ohio as a Modified Warmwater Habitat, an Agricultural Water Supply, an Industrial Water Supply, and for use by people as a Primary Contact Recreation under Ohio’s Water Quality Standards (OAC 3745-1-11).

44. Certain segments of the Maumee River have been identified as “impaired” by the Ohio Environmental Protection Agency (“Ohio EPA”) due, in part, to high concentrations of phosphorus that contribute to harmful algal blooms in the Lake Erie basin.

The Facility’s NPDES Permit

45. Ohio EPA is authorized to administer the NPDES permitting program and has done so since March 11, 1974. Clean Water Act Section 402(b), 33 U.S.C. § 1342(b).

46. Pursuant to its authority to administer the NDPEs permitting program, Ohio EPA first issued the Facility a NPDES Permit in October 1976 (Permit No. 2IH00021).

47. The Permit has been renewed several times since that time, most recently in 2022 when the Facility added Outfall 002 as a discharge location.

48. The Permit authorizes, subject to specific limitations and conditions, the discharge of wastewater from the Facility through outfalls designated in the permit.

49. The Permit includes Effluent Limitations that constitute upper limits and/or acceptable ranges for concentrations and loads for individual pollutants that the Facility may discharge to its outfalls and for designated sampling locations.

50. Violations can occur daily or based on monthly averages. Violations of the monthly average constitute 30 days of violations.

51. The Effluent Limitations in the Permit that are relevant to this action are those for CBOD, TSS, DO, pH, ammonia, *E. coli*, total residual chlorine, phosphorous, and oil and grease.

52. The Permit requires Campbell to monitor its wastewater stream for Effluent Limitation compliance at Outfalls 001, 002, 006–009 and 099.

53. The Permit contains the following Effluent Limitations.

a. pH

i. The Permit's allowable range for pH for Outfall 099, is a pH of no greater than 10.0 and no lower than 7.0.

ii. The Permit's allowable range pH for Outfalls 001, 002, 006, 007, 008, and 009 is a pH of no greater than 9.0 and no lower than 6.5.

b. CBOD. The Permit limits CBOD discharges from outfalls 001 and 006–009 to a concentration of no more than 40 mg/l in a five-day period and no more than a monthly average of 25 mg/l.

i. The Permit also sets the load for CBOD on a per-outfall basis as follows:

- ii. Outfall 001: may not to exceed 1520 kg/day or a monthly average of 947 kg/day.
- iii. Outfall 006: may not exceed 421 kg/day or a monthly average of 263 kg/day.
- iv. Outfall 007: may not exceed 91.3 kg/day or a monthly average of 57.0 kg/day.
- v. Outfall 008: may not exceed 102 kg/day or a monthly average of 63.9 kg/day.
- vi. Outfall 009: may not exceed 196.8 kg/day or a monthly average of 123 kg/day.

c. TSS. The Permit limits TSS discharge concentrations and loads on a per-outfall basis as follows:

- i. Outfall 001: may not exceed concentrations of 45 mg/l per day or a monthly average of 30 mg/l, and load may not exceed 1710 kg/day daily and a monthly average of 1140 kg/day.
- ii. Outfall 006: may not exceed concentrations of 45 mg/l per day or a monthly average of 30 mg/l, and load may not exceed 474 kg/day per day or a monthly average of 316 kg/day.
- iii. Outfall 007: may not exceed concentrations of 45 mg/l per day or a monthly average of 30mg/l, and load may not exceed 103 kg/day or a monthly average of 68.2 kg/day.

- iv. Outfall 008: may not exceed concentrations of 45 mg/l per day or a monthly average of 30 mg/l, and load may not exceed 115 kg/day or a monthly average of 76.7 kg/day.
 - v. Outfall 009: may not exceed concentrations of 45 mg/l per day or a monthly average of 30 mg/l, and load may not exceed 221.4 kg/day per day or a monthly average of 147.6 kg/day.
 - vi. Outfall 099: load may not exceed 10.51 kg/day for day or 5.00.
- d. DO. The Permit sets a limit on DO discharges from Outfalls 001 and 006–009 to no less than 5.0 mg/l per day.
- e. Ammonia. The Permit limits discharge concentrations for “Nitrogen, Ammonia (NH₃)” at Outfall 001 to no more than 3.5 mg/l daily and a monthly average of 1.6 mg/l and limits load to no more than 90.9 kg/day and a monthly average of 60.6 kg/day for the months May–October (“summer” as defined by the Permit). The Permit does not include ammonia limits for the other months of the year.
- f. E. coli. The Permit limits discharge concentrations for *E. coli* at Outfall 001 to a weekly average of no more than 284 #/100 ml (where # refers to number of colonies) weekly and a monthly average of 126 #/100ml for the summer months and does not include limits for the other months of the year.
- g. Total Residue Chlorine. The Permit sets limits discharge concentrations for Total Residue Chlorine at Outfall 001 to a concentration of no more than .038 mg/l daily and the load to no more than 1.44 kg/day.
- h. Phosphorous. The Permit limits concentration and load of Phosphorous on a per-outfall basis as follows:

- i. Outfall 001: may not exceed concentrations of 1.5 mg/l per day or a monthly average of 1.0 mg/l, and load may not exceed 56.8 kg/day daily and a monthly average of 37.9 kg/day.
- ii. Outfall 006: may not exceed concentrations of 1.5 mg/l per day or a monthly average of 1.0 mg/l, and load may not exceed 15.8 kg/day per day or a monthly average of 10.5 kg/day.
- iii. Outfall 007: may not exceed concentrations of 1.5 mg/l per day or a monthly average of 1.0 mg/l, and load may not exceed 3.42 kg/day l per day or a monthly average of 682.282 kg/day.
- iv. Outfall 008: may not exceed concentrations of 1.5 mg/l per day or a monthly average of 1.0 mg/l, and load may not exceed 3.84 kg/day or a monthly average of 2.56 kg/day.
- v. Outfall 009: may not exceed concentrations of 1.5 mg/l per day or a monthly average of 1.0 mg/l, and load may not exceed 7.38 kg/day per day or a monthly average of 4.92 kg/day.
- vi. Outfall 099: load may not exceed 4.28 kg/day for day or a monthly average of 1.75 kg/day.

i. Oil and Grease. The Permit limits Oil and Grease concentration and load from Outfalls 001 and 099. Outfall 001 concentrations may not exceed 10 mg/l per day and load may not exceed 378.5 kg/day. Outfall 099's load may not exceed 5.13 kg/day daily or a monthly average of 3.08 kg/day.

EPA Facility Inspections

54. EPA sent a Clean Water Act Section 308 and Safe Drinking Water Act 1445(a) Information Request to Campbell on July 9, 2020, and Campbell responded to the Request on September 11, 2020.

55. EPA inspected the Facility over two consecutive days in June 2021.

56. During that inspection, EPA noted several concerns including improper sampling procedures and preservation methods, improper documentation of sampling activities on chains of custody, and various Effluent Limitation violations.

Discharges in Violation of the NPDES Permit

57. Campbell has repeatedly violated its NPDES Permit Effluent Limitations for CBOD, DO, TSS, ammonia, *E. coli*, total residual chlorine, phosphorous, oil and grease, and pH for at least the period August 2018 through the date of filing this Complaint.

58. These exceedances of the NPDES Permit Effluent Limitations are detailed in Appendix A. The information in Appendix A and the following Paragraphs is based on self-reporting by the Facility through certified discharge monitoring reports.

59. The discharge monitoring reports include certification that the signer has “personally examined and [is] familiar with the information submitted herein” and that they are “aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.”

Violations at Outfall 001 and 002

60. According to publicly available information, including discharge monitoring reports and noncompliance notifications, Campbell has repeatedly violated its NPDES Permit

Effluent Limitations for pH, chlorine, phosphorus, ammonia, CBOD, TSS, DO, and *E. coli* bacteria, between August 2018 and June 2023 at Outfall 001.

61. Campbell has discharged wastewater with pH levels that fall outside the range proscribed by the NPDES Permit at Outfall 001 on at least 10 occasions and on at least five occasions at Outfall 002 between August 2018 and June 2023.

62. Campbell's chlorine discharges exceeded the NPDES Permit limit at Outfall 001 on at least 13 occasions between August 2018 and June 2023.

63. Campbell's phosphorous discharges exceeded the NPDES Permit limit at Outfall 001 on at least 48 occasions between August 2018 and June 2023.

64. Campbell's nitrogen discharges exceeded the NPDES Permit limit at Outfall 001 on at least 21 occasions between August 2018 and June 2023.

65. Campbell's DO discharges were below the NPDES Permit limit at Outfall 001 on at least 16 occasions between August 2018 and June 2023.

66. Campbell's CBOD discharges exceeded the NPDES Permit limit at Outfall 001 on at least 95 occasions between August 2018 and June 2023.

67. Campbell's TSS discharges exceeded the NPDES Permit limit at Outfall 001 on at least 75 occasions between August 2018 and June 2023.

68. Campbell's *E. coli* discharges exceeded the NPDES Permit limit at Outfall 001 on at least 27 occasions between August 2018 and June 2023.

69. Campbell discharged wastewater with a pH that violated the permitted range at Outfall 002 on at least 5 occasions between November 2022 and June 2023.

Violations at Outfalls 006–009

70. According to publicly available information, including discharge monitoring reports and noncompliance notifications, Campbell has discharged wastewater with pH outside the range proscribed by the NPDES Permit limit at Outfalls 006–009 on at least 21 occasions between August 2018 and June 2023.

71. Campbell discharged wastewater with phosphorous from its spray overland flow system exceeding the NPDES Permit concentration and/or load limits at Outfalls 006–009 on at least 16 occasions between August 2018 and June 2023.

72. Campbell discharged wastewater with DO at levels below the NPDES Permit limit at Outfalls 006–009 on at least 21 occasions between August 2018 and June 2023.

73. Campbell discharged wastewater with CBOD at levels that exceeded the NPDES Permit limit at Outfalls 008 and 009 on at least 3 occasions between August 2018 and June 2023.

74. Campbell discharged wastewater with TSS discharges at levels that exceeded the NPDES Permit limit at Outfall 009 on at least 2 occasions between August 2018 and June 2023.

Violations at Outfall 099

75. According to publicly available information, including discharge monitoring reports and noncompliance notifications, the Facility has repeatedly violated its NPDES Permit limitations governing discharges at the internal Outfall 099.

76. Canmaking wastewater from Silgan's operations included levels of TSS that exceeded the NPDES Permit limit at Outfall 099 on at least 34 occasions between August 2018 and June 2023.

77. Canmaking wastewater from Silgan's operations included levels of oil and grease that exceeded the NPDES Permit limit at Outfall 099 on at least 21 occasions between August 2018 and June 2023.

78. Upon information and belief, the Facility continues to discharge pollutants into the Maumee River at levels in violation of the limits in its NPDES Permit.

FIRST CLAIM FOR RELIEF

Discharges of Pollutants in Violation of the NPDES Permit and CWA Section 301

79. Paragraphs 1–78 are realleged and incorporated as if fully set forth herein.

80. As set forth above, the NPDES Permit sets Effluent Limitations for the enumerated pollutants consisting of concentrations, loads, or both.

81. From August 2018 through the present, Campbell submitted certified discharge monitoring reports to Ohio EPA identifying hundreds of discharges from Outfalls 001 and 002 containing concentrations and/or loads of CBOD, TSS, DO, ammonia, oil and grease, *E. coli*, phosphorus, and at times with pH levels outside of the authorized range. Appendix A details each instance of these violations.

82. The discharges identified in Appendix A are in violation of the effluent limitations in Defendant's NPDES Permit and violate Section 301(a) of the Act, 33 U.S.C. §§ 1311(a).

83. Upon information and belief, Campbell will continue to discharge pollutants in quantities in violation of its NPDES Permit unless enjoined by this Court.

84. Pursuant to Section 309(b) and (d) of the Act, 33 U.S.C. § 1319(b) and (d), Campbell is liable for injunctive relief to prevent future violations and remedy past harm and for civil penalties of up to \$64,618 per day for each violation of Section 301 of the Act, 33 U.S.C. § 1311(a).

SECOND CLAIM FOR RELIEF

Failure to Comply with NPDES Permit Limitations

85. Paragraphs 1–78 are realleged and incorporated as if fully set forth herein.

86. From August 2018 through the present, Campbell has submitted certified discharge monitoring reports to Ohio EPA identifying hundreds of discharges from Outfalls 006–009 and Outfall 099 containing violative concentrations and/or loads of CBOD, TSS, DO, ammonia, oil and grease, *E. coli*, phosphorus, and at times with pH levels outside of the authorized range. Appendix A details each instance of these violations.

87. These discharges are violations of the NPDES Permit and Section 309(a), 33 U.S.C. § 1319(a).

88. Upon information and belief, Campbell will continue to discharge pollutants in quantities in violation of its NPDES Permit unless enjoined by this Court.

89. Pursuant to Section 309(b) and (d) of the Act, 33 U.S.C. § 1319(b) and (d), Campbell is liable for injunctive relief to prevent future violations and remedy past harm and for civil penalties of up to \$64,618 per day for each violation of Section 301 of the Act, 33 U.S.C. § 1311(a).

REQUEST FOR RELIEF

WHEREFORE, the United States of America respectfully requests that this Court:

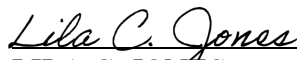
A. Permanently enjoin Campbell from discharging pollutants except as expressly authorized by the Clean Water Act and the limitations and conditions of its NPDES Permit or any currently applicable NPDES permit;

B. Order Campbell to take all necessary actions to comply with its NPDES Permit or any currently applicable NPDES permit;

- C. Order Campbell to take all necessary action to mitigate the past environmental harm caused by its illegal discharges and NPDES Permit violations;
- D. Assess civil penalties against Campbell of up to \$64,618 per day for each violation alleged in this Complaint;
- E. Award the United States its costs in this action; and
- F. Grant such other relief as the Court may deem appropriate.

Respectfully submitted,

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APPENDIX A
Table of Violations

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
8/31/2018	1	Solids, total suspended	DAILY MX	50	45	1
8/31/2018	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	57	40	1
8/31/2018	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	1900	1520	1
8/31/2018	6	pH, maximum	DAILY MX	11	9	1
8/31/2018	8	Oxygen, dissolved (DO)	DAILY MN	2.7	5	1
8/31/2018	8	pH, minimum	DAILY MN	6.2	6.5	1
8/31/2018	9	Oxygen, dissolved (DO)	DAILY MN	4.7	5	1
8/31/2018	9	pH, minimum	DAILY MN	4.4	6.5	1
9/30/2018	1	Nitrogen, ammonia total (as N)	MO AVG	80.1	60.6	30
9/30/2018	1	Nitrogen, ammonia total (as N)	MO AVG	2.81	1.6	30
9/30/2018	1	Nitrogen, ammonia total (as N)	DAILY MX	12.4	3.5	1
9/30/2018	1	Nitrogen, ammonia total (as N)	DAILY MX	343	90.9	1
9/30/2018	1	Phosphorus, total (as P)	MO AVG	1.1	1	30
9/30/2018	1	E. coli, MTEC-MF	WK GEOMN	285	284	7
9/30/2018	6	pH, maximum	DAILY MX	9.5	9	1
9/30/2018	6	pH, minimum	DAILY MN	6.2	6.5	1
9/30/2018	9	Oxygen, dissolved (DO)	DAILY MN	4.3	5	1
10/31/2018	1	Nitrogen, ammonia total (as N)	DAILY MX	93	90.9	1
10/31/2018	1	Nitrogen, ammonia total (as N)	MO AVG	1.9	1.6	31
10/31/2018	1	Phosphorus, total (as P)	MO AVG	1.1	1	31
10/31/2018	1	Phosphorus, total (as P)	DAILY MX	1.6	1.5	1
10/31/2018	6	pH, maximum	DAILY MX	9.1	9	1
11/30/2018	1	pH, maximum	DAILY MX	9.6	9	1
1/31/2019	1	pH, minimum	DAILY MN	6.3	6.5	1
4/30/2019	1	Solids, total suspended	DAILY MX	52	45	1
5/31/2019	1	Nitrogen, ammonia total (as N)	DAILY MX	240	90.9	1
5/31/2019	1	Nitrogen, ammonia total (as N)	DAILY MX	9.6	3.5	1
6/30/2019	1	Phosphorus, total (as P)	DAILY MX	1.8	1.5	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
6/30/2019	1	Phosphorus, total (as P)	MO AVG	1.1	1	30
7/31/2019	1	Solids, total suspended	MO AVG	36	30	31
7/31/2019	1	Solids, total suspended	DAILY MX	47	45	1
7/31/2019	1	Phosphorus, total (as P)	DAILY MX	1.6	1.5	1
7/31/2019	1	Phosphorus, total (as P)	MO AVG	1.3	1	31
7/31/2019	1	E. coli, MTEC-MF	WK GEOMN	650	284	7
7/31/2019	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	60	40	1
7/31/2019	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	1700	1520	1
7/31/2019	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	34	25	31
8/31/2019	1	E. coli, MTEC-MF	WK GEOMN	537	284	7
8/31/2019	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	28	25	31
8/31/2019	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	61	40	1
8/31/2019	6	Phosphorus, total (as P)	MO AVG	1.1	1	31
8/31/2019	8	Oxygen, dissolved (DO)	DAILY MN	4.1	5	1
9/30/2019	1	Nitrogen, ammonia total (as N)	DAILY MX	130	90.9	1
9/30/2019	1	Nitrogen, ammonia total (as N)	DAILY MX	4.9	3.5	1
9/30/2019	1	Phosphorus, total (as P)	DAILY MX	1.8	1.5	1
9/30/2019	1	Phosphorus, total (as P)	MO AVG	1.28	1	30
9/30/2019	6	Oxygen, dissolved (DO)	DAILY MN	3.5	5	1
9/30/2019	7	pH, maximum	DAILY MX	10	9	1
9/30/2019	8	Application rate area sprayed	DAILY MX	0.8	0.75	1
9/30/2019	9	Application rate area sprayed	DAILY MX	0.9	0.75	1
10/31/2019	1	Solids, total suspended	DAILY MX	56	45	1
10/31/2019	1	Solids, total suspended	MO AVG	31	30	31
10/31/2019	1	Nitrogen, ammonia total (as N)	DAILY MX	3.9	3.5	1
10/31/2019	1	Nitrogen, ammonia total (as N)	MO AVG	2.2	1.6	31
10/31/2019	1	Phosphorus, total (as P)	MO AVG	1.4	1	31
10/31/2019	1	Phosphorus, total (as P)	DAILY MX	1.9	1.5	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
10/31/2019	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	58	40	1
10/31/2019	6	Oxygen, dissolved (DO)	DAILY MN	4.8	5	1
10/31/2019	7	Phosphorus, total (as P)	MO AVG	1.2	1	31
10/31/2019	99	Solids, total suspended	MO AVG	39.6	5	31
10/31/2019	99	Solids, total suspended	DAILY MX	40.5	10.51	1
10/31/2019	99	Oil and grease (soxhlet extr.) tot.	DAILY MX	17	5.13	1
10/31/2019	99	Oil and grease (soxhlet extr.) tot.	MO AVG	11	3.08	31
11/30/2019	9	Solids, total suspended	MO AVG	43	30	30
12/31/2019	1	Chlorine, total residual	DAILY MX	1.9	1.44	1
12/31/2019	1	Chlorine, total residual	DAILY MX	0.07	0.038	1
12/31/2019	1	pH, minimum	DAILY MN	6.3	6.5	1
5/31/2020	1	Nitrogen, ammonia total (as N)	DAILY MX	4.9	3.5	1
5/31/2020	1	Nitrogen, ammonia total (as N)	DAILY MX	140	90.9	1
5/31/2020	1	Nitrogen, ammonia total (as N)	MO AVG	2	1.6	31
5/31/2020	1	Phosphorus, total (as P)	DAILY MX	3.03	1.5	1
5/31/2020	1	Phosphorus, total (as P)	MO AVG	1.24	1	31
5/31/2020	1	Phosphorus, total (as P)	DAILY MX	82.6	56.8	1
5/31/2020	1	Chlorine, total residual	DAILY MX	0.4	0.038	1
5/31/2020	1	Chlorine, total residual	DAILY MX	11	1.44	1
6/30/2020	1	Solids, total suspended	DAILY MX	1800	1710	1
6/30/2020	1	Solids, total suspended	MO AVG	36	30	30
6/30/2020	1	Solids, total suspended	DAILY MX	63	45	1
6/30/2020	1	Phosphorus, total (as P)	MO AVG	43.9	37.9	30
6/30/2020	1	Phosphorus, total (as P)	DAILY MX	60.5	56.8	1
6/30/2020	1	Phosphorus, total (as P)	DAILY MX	1.88	1.5	1
6/30/2020	1	Phosphorus, total (as P)	MO AVG	1.45	1	30
6/30/2020	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2000	1520	1
6/30/2020	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	35	25	30

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
6/30/2020	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1100	947	30
6/30/2020	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	63	40	1
7/31/2020	1	E. coli, MTEC-MF	WK GEOMN	960	284	7
7/31/2020	6	Phosphorus, total (as P)	MO AVG	1.17	1	31
7/31/2020	8	Phosphorus, total (as P)	MO AVG	1.02	1	31
8/31/2020	1	Nitrogen, ammonia total (as N)	MO AVG	1.9	1.6	31
8/31/2020	1	Nitrogen, ammonia total (as N)	DAILY MX	220	90.9	1
8/31/2020	1	Nitrogen, ammonia total (as N)	DAILY MX	8.8	3.5	1
8/31/2020	1	E. coli, MTEC-MF	WK GEOMN	2720	284	7
8/31/2020	7	Application rate area sprayed	DAILY MX	0.755	0.75	1
9/30/2020	1	Phosphorus, total (as P)	DAILY MX	1.85	1.5	1
9/30/2020	1	Phosphorus, total (as P)	MO AVG	1.4	1	30
9/30/2020	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	57	40	1
9/30/2020	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	26	25	30
9/30/2020	8	Phosphorus, total (as P)	MO AVG	1.06	1	30
10/31/2020	1	Phosphorus, total (as P)	MO AVG	1.26	1	31
10/31/2020	1	Phosphorus, total (as P)	DAILY MX	1.71	1.5	1
10/31/2020	1	E. coli, MTEC-MF	WK GEOMN	8160	284	7
10/31/2020	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	47	40	1
10/31/2020	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	31	25	31
10/31/2020	8	Phosphorus, total (as P)	MO AVG	1.47	1	31
10/31/2020	9	BOD, carbonaceous, 05 day, 20 C	DAILY MX	42	40	1
12/31/2020	1	Solids, total suspended	MO AVG	34	30	31
12/31/2020	1	Solids, total suspended	DAILY MX	68	45	1
12/31/2020	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	36	25	31
12/31/2020	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	1600	1520	1
12/31/2020	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	81	40	1
1/31/2021	1	Solids, total suspended	MO AVG	1200	1140	31

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
1/31/2021	1	Solids, total suspended	MO AVG	46	30	31
1/31/2021	1	Solids, total suspended	DAILY MX	2200	1710	1
1/31/2021	1	Solids, total suspended	DAILY MX	88	45	1
1/31/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	71	40	1
1/31/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	1900	1520	1
1/31/2021	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	35	25	31
2/28/2021	1	Solids, total suspended	MO AVG	2050	1140	28
2/28/2021	1	Solids, total suspended	DAILY MX	132	45	1
2/28/2021	1	Solids, total suspended	DAILY MX	2950	1710	1
2/28/2021	1	Solids, total suspended	MO AVG	82.9	30	28
2/28/2021	1	Phosphorus, total (as P)	DAILY MX	1.85	1.5	1
2/28/2021	1	Phosphorus, total (as P)	MO AVG	1.35	1	28
2/28/2021	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	90	25	28
2/28/2021	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	2240	947	28
2/28/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	120	40	1
2/28/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	3040	1520	1
2/28/2021	99	Solids, total suspended	MO AVG	5.093	5	28
3/31/2021	1	Solids, total suspended	MO AVG	62	30	31
3/31/2021	1	Solids, total suspended	DAILY MX	84	45	1
3/31/2021	1	Solids, total suspended	DAILY MX	2200	1710	1
3/31/2021	1	Solids, total suspended	MO AVG	1600	1140	31
3/31/2021	1	Phosphorus, total (as P)	MO AVG	1.1	1	31
3/31/2021	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	58	25	31
3/31/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	99	40	1
3/31/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2600	1520	1
3/31/2021	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1500	947	31
4/30/2021	1	Solids, total suspended	MO AVG	39	30	30
4/30/2021	1	Solids, total suspended	DAILY MX	52	45	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
4/30/2021	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	27	25	30
4/30/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	47	40	1
4/30/2021	99	Oil and grease (soxhlet extr.) tot.	MO AVG	3.7	3.08	30
5/31/2021	1	Solids, total suspended	MO AVG	32	30	31
5/31/2021	1	Solids, total suspended	DAILY MX	2200	1710	1
5/31/2021	1	Solids, total suspended	DAILY MX	68	45	1
5/31/2021	1	E. coli, MTEC-MF	MO GEOMN	1405	126	31
5/31/2021	1	E. coli, MTEC-MF	WK GEOMN	7700	284	7
5/31/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	52	40	1
5/31/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	1700	1520	1
6/30/2021	1	Solids, total suspended	DAILY MX	100	45	1
6/30/2021	1	Solids, total suspended	DAILY MX	3410	1710	1
6/30/2021	1	Solids, total suspended	MO AVG	1500	1140	30
6/30/2021	1	Solids, total suspended	MO AVG	48.5	30	30
6/30/2021	1	Phosphorus, total (as P)	DAILY MX	1.52	1.5	1
6/30/2021	1	E. coli, MTEC-MF	MO GEOMN	1426.9	126	30
6/30/2021	1	E. coli, MTEC-MF	WK GEOMN	19200	284	7
6/30/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	81	40	1
6/30/2021	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	36.9	25	30
6/30/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2390	1520	1
6/30/2021	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1130	947	30
6/30/2021	6	Oxygen, dissolved (DO)	DAILY MN	3.23	5	1
7/31/2021	1	Solids, total suspended	DAILY MX	62	45	1
7/31/2021	1	Solids, total suspended	MO AVG	32	30	31
7/31/2021	1	Solids, total suspended	DAILY MX	1800	1710	1
7/31/2021	1	Nitrogen, ammonia total (as N)	DAILY MX	3.9	3.5	1
7/31/2021	1	Nitrogen, ammonia total (as N)	DAILY MX	100	90.9	1
7/31/2021	1	Phosphorus, total (as P)	DAILY MX	1.59	1.5	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
7/31/2021	1	Phosphorus, total (as P)	MO AVG	1.05	1	31
7/31/2021	1	E. coli, MTEC-MF	WK GEOMN	12000	284	7
7/31/2021	1	E. coli, MTEC-MF	MO GEOMN	1331.3	126	31
7/31/2021	1	Chlorine, total residual	MO AVG	0.03	0.021	31
7/31/2021	1	Chlorine, total residual	DAILY MX	0.23	0.038	1
7/31/2021	1	Chlorine, total residual	DAILY MX	5.1	1.44	1
7/31/2021	6	Oxygen, dissolved (DO)	DAILY MN	2.62	5	1
8/31/2021	1	Oxygen, dissolved (DO)	DAILY MN	3	5	1
8/31/2021	1	E. coli, MTEC-MF	WK GEOMN	641.1	284	7
8/31/2021	1	E. coli, MTEC-MF	MO GEOMN	205.6	126	31
8/31/2021	1	Chlorine, total residual	DAILY MX	2.1	1.44	1
8/31/2021	1	Chlorine, total residual	DAILY MX	0.08	0.038	1
8/31/2021	6	Oxygen, dissolved (DO)	DAILY MN	4.77	5	1
8/31/2021	99	Solids, total suspended	MO AVG	5.12	5	31
9/30/2021	1	Phosphorus, total (as P)	MO AVG	1.06	1	30
9/30/2021	1	Phosphorus, total (as P)	DAILY MX	1.75	1.5	1
9/30/2021	1	E. coli, MTEC-MF	WK GEOMN	489	284	7
9/30/2021	1	E. coli, MTEC-MF	MO GEOMN	206	126	30
9/30/2021	1	Chlorine, total residual	DAILY MX	0.15	0.038	1
9/30/2021	1	Chlorine, total residual	DAILY MX	1.8	1.44	1
9/30/2021	6	Oxygen, dissolved (DO)	DAILY MN	3.1	5	1
9/30/2021	8	Oxygen, dissolved (DO)	DAILY MN	3.89	5	1
9/30/2021	8	Phosphorus, total (as P)	DAILY MX	5.17	3.84	1
9/30/2021	8	pH, minimum	DAILY MN	6	6.5	1
9/30/2021	8	BOD, carbonaceous, 05 day, 20 C	DAILY MX	170	102.3	1
9/30/2021	9	BOD, carbonaceous, 05 day, 20 C	DAILY MX	260	196.8	1
10/31/2021	6	Oxygen, dissolved (DO)	DAILY MN	4.6	5	1
10/31/2021	8	Oxygen, dissolved (DO)	DAILY MN	3.4	5	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
10/31/2021	8	pH, minimum	DAILY MN	6.4	6.5	1
10/31/2021	9	Solids, total suspended	DAILY MX	72	45	1
10/31/2021	99	Solids, total suspended	MO AVG	16.3	5	31
10/31/2021	99	Solids, total suspended	DAILY MX	22.7	10.51	1
11/30/2021	1	Oxygen, dissolved (DO)	DAILY MN	0.2	5	1
11/30/2021	99	Solids, total suspended	DAILY MX	24.71	10.51	1
11/30/2021	99	Solids, total suspended	MO AVG	18.3	5	30
11/30/2021	99	Oil and grease (soxhlet extr.) tot.	DAILY MX	8.74	5.13	1
11/30/2021	99	Oil and grease (soxhlet extr.) tot.	MO AVG	5.55	3.08	30
12/31/2021	1	Oxygen, dissolved (DO)	DAILY MN	2.4	5	1
12/31/2021	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	30	25	31
12/31/2021	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	48	40	1
12/31/2021	99	Solids, total suspended	MO AVG	28.3	5	31
12/31/2021	99	Solids, total suspended	DAILY MX	36	10.51	1
12/31/2021	99	Oil and grease (soxhlet extr.) tot.	DAILY MX	13.3	5.13	1
12/31/2021	99	Oil and grease (soxhlet extr.) tot.	MO AVG	7.9	3.08	31
1/31/2022	1	Oxygen, dissolved (DO)	DAILY MN	4.7	5	1
1/31/2022	1	Solids, total suspended	MO AVG	41	30	31
1/31/2022	1	Solids, total suspended	DAILY MX	2100	1710	1
1/31/2022	1	Solids, total suspended	DAILY MX	74	45	1
1/31/2022	1	pH, minimum	DAILY MN	6.4	6.5	1
1/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	3150	1520	1
1/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	64	25	31
1/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1760	947	31
1/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	110	40	1
1/31/2022	99	Solids, total suspended	MO AVG	62.8	5	31
1/31/2022	99	Solids, total suspended	DAILY MX	102.9	10.51	1
2/28/2022	1	Oxygen, dissolved (DO)	DAILY MN	2.2	5	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
2/28/2022	1	Solids, total suspended	MO AVG	42	30	28
2/28/2022	1	Solids, total suspended	DAILY MX	1800	1710	1
2/28/2022	1	Solids, total suspended	MO AVG	1200	1140	28
2/28/2022	1	Solids, total suspended	DAILY MX	64	45	1
2/28/2022	1	pH, minimum	DAILY MN	6.2	6.5	1
2/28/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2000	1520	1
2/28/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1100	947	28
2/28/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	38	25	28
2/28/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	64	40	1
2/28/2022	99	Solids, total suspended	DAILY MX	41	10.51	1
2/28/2022	99	Solids, total suspended	MO AVG	36	5	28
2/28/2022	99	Oil and grease (soxhlet extr.) tot.	DAILY MX	7.9	5.13	1
2/28/2022	99	Oil and grease (soxhlet extr.) tot.	MO AVG	4.17	3.08	28
3/31/2022	1	Oxygen, dissolved (DO)	DAILY MN	3	5	1
3/31/2022	1	Solids, total suspended	DAILY MX	3580	1710	1
3/31/2022	1	Solids, total suspended	DAILY MX	124	45	1
3/31/2022	1	Solids, total suspended	MO AVG	32.9	30	31
3/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2100	1520	1
3/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	72	40	1
3/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	33	25	31
3/31/2022	99	Solids, total suspended	DAILY MX	40.02	10.51	1
3/31/2022	99	Solids, total suspended	MO AVG	34.76	5	31
3/31/2022	99	Oil and grease, hexane extr method	MO AVG	21.1	3.08	31
3/31/2022	99	Oil and grease, hexane extr method	DAILY MX	36.6	5.13	1
4/30/2022	1	Solids, total suspended	DAILY MX	46	45	1
4/30/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	56	40	1
4/30/2022	99	Solids, total suspended	MO AVG	5.47	5	30
5/31/2022	1	Oxygen, dissolved (DO)	DAILY MN	0.3	5	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
5/31/2022	1	Solids, total suspended	DAILY MX	1900	1710	1
5/31/2022	1	Solids, total suspended	DAILY MX	58	45	1
5/31/2022	1	Solids, total suspended	MO AVG	31	30	31
5/31/2022	1	Phosphorus, total (as P)	MO AVG	1.03	1	31
5/31/2022	1	E. coli, MTEC-MF	WK GEOMN	2420	284	7
5/31/2022	1	E. coli, MTEC-MF	MO GEOMN	1261	126	31
5/31/2022	1	pH, minimum	DAILY MN	6.1	6.5	1
5/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	43	40	1
5/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	28	25	31
5/31/2022	6	pH, maximum	DAILY MX	10.49	9	1
5/31/2022	8	Oxygen, dissolved (DO)	DAILY MN	4.67	5	1
5/31/2022	99	Solids, total suspended	DAILY MX	24.1	10.51	1
5/31/2022	99	Solids, total suspended	MO AVG	23.9	5	31
5/31/2022	99	Oil and grease, hexane extr method	MO AVG	51.1	3.08	31
5/31/2022	99	Oil and grease, hexane extr method	DAILY MX	102	5.13	1
6/30/2022	1	Oxygen, dissolved (DO)	DAILY MN	2.7	5	1
6/30/2022	1	Solids, total suspended	DAILY MX	48	45	1
6/30/2022	1	Solids, total suspended	MO AVG	32	30	30
6/30/2022	1	Phosphorus, total (as P)	DAILY MX	82.2	56.8	1
6/30/2022	1	Phosphorus, total (as P)	MO AVG	1.5	1	30
6/30/2022	1	Phosphorus, total (as P)	DAILY MX	2.79	1.5	1
6/30/2022	1	Phosphorus, total (as P)	MO AVG	40.6	37.9	30
6/30/2022	1	E. coli, MTEC-MF	WK GEOMN	3537	284	7
6/30/2022	1	E. coli, MTEC-MF	MO GEOMN	1830	126	30
6/30/2022	1	pH, minimum	DAILY MN	6.4	6.5	1
6/30/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1100	947	30
6/30/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	68	40	1
6/30/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2000	1520	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
6/30/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	41	25	30
6/30/2022	8	Oxygen, dissolved (DO)	DAILY MN	4.03	5	1
6/30/2022	9	pH, minimum	DAILY MN	6.4	6.5	1
6/30/2022	99	Solids, total suspended	MO AVG	10.03	5	30
6/30/2022	99	Solids, total suspended	DAILY MX	16.1	10.51	1
7/31/2022	1	Oxygen, dissolved (DO)	DAILY MN	3.6	5	1
7/31/2022	1	Solids, total suspended	MO AVG	40	30	31
7/31/2022	1	Solids, total suspended	DAILY MX	58	45	1
7/31/2022	1	Nitrogen, ammonia total (as N)	DAILY MX	3.6	3.5	1
7/31/2022	1	Phosphorus, total (as P)	DAILY MX	2.22	1.5	1
7/31/2022	1	Phosphorus, total (as P)	MO AVG	1.54	1	31
7/31/2022	1	E. coli, MTEC-MF	WK GEOMN	2420	284	7
7/31/2022	1	E. coli, MTEC-MF	MO GEOMN	1259	126	31
7/31/2022	1	pH, maximum	DAILY MX	9.1	9	1
7/31/2022	1	pH, minimum	DAILY MN	6.2	6.5	1
7/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	80	40	1
7/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2000	1520	1
7/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	48	25	31
7/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1200	947	31
7/31/2022	6	Oxygen, dissolved (DO)	DAILY MN	4.3	5	1
7/31/2022	6	pH, minimum	DAILY MN	6.3	6.5	1
7/31/2022	8	Oxygen, dissolved (DO)	DAILY MN	2.8	5	1
7/31/2022	8	pH, minimum	DAILY MN	6.4	6.5	1
7/31/2022	9	Oxygen, dissolved (DO)	DAILY MN	4.7	5	1
7/31/2022	99	Solids, total suspended	DAILY MX	26	10.51	1
7/31/2022	99	Solids, total suspended	MO AVG	17	5	31
7/31/2022	99	Oil and grease, hexane extr method	MO AVG	5.7	3.08	31
7/31/2022	99	Oil and grease, hexane extr method	DAILY MX	9.8	5.13	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
8/31/2022	1	Oxygen, dissolved (DO)	DAILY MN	0.3	5	1
8/31/2022	1	Solids, total suspended	DAILY MX	62	45	1
8/31/2022	1	Solids, total suspended	MO AVG	44	30	31
8/31/2022	1	Phosphorus, total (as P)	DAILY MX	1.95	1.5	1
8/31/2022	1	Phosphorus, total (as P)	MO AVG	1.35	1	31
8/31/2022	1	E. coli, MTEC-MF	MO GEOMN	217.52	126	31
8/31/2022	1	E. coli, MTEC-MF	WK GEOMN	7652.7	284	7
8/31/2022	1	Chlorine, total residual	DAILY MX	2.2	0.038	1
8/31/2022	1	Chlorine, total residual	DAILY MX	64	1.44	1
8/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	110	40	1
8/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2960	1520	1
8/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1400	947	31
8/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	64.4	25	31
8/31/2022	6	Phosphorus, total (as P)	DAILY MX	1.53	1.5	1
8/31/2022	7	Oxygen, dissolved (DO)	DAILY MN	4.6	5	1
8/31/2022	8	Oxygen, dissolved (DO)	DAILY MN	3.02	5	1
8/31/2022	8	Phosphorus, total (as P)	DAILY MX	1.84	1.5	1
8/31/2022	8	Phosphorus, total (as P)	MO AVG	1.25	1	31
8/31/2022	9	Oxygen, dissolved (DO)	DAILY MN	4.2	5	1
8/31/2022	9	Phosphorus, total (as P)	MO AVG	1.03	1	31
8/31/2022	9	Phosphorus, total (as P)	DAILY MX	1.76	1.5	1
9/30/2022	1	Oxygen, dissolved (DO)	DAILY MN	0.3	5	1
9/30/2022	1	Solids, total suspended	DAILY MX	53	45	1
9/30/2022	1	Solids, total suspended	MO AVG	35	30	30
9/30/2022	1	Phosphorus, total (as P)	MO AVG	1.5	1	30
9/30/2022	1	Phosphorus, total (as P)	DAILY MX	1.8	1.5	1
9/30/2022	1	E. coli, MTEC-MF	WK GEOMN	2420	284	7
9/30/2022	1	E. coli, MTEC-MF	MO GEOMN	1250	126	30

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
9/30/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	61	40	1
9/30/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	34	25	30
9/30/2022	6	pH, minimum	DAILY MN	5.73	6.5	1
9/30/2022	7	pH, minimum	DAILY MN	6.22	6.5	1
9/30/2022	8	Phosphorus, total (as P)	DAILY MX	2.2	1.5	1
9/30/2022	8	Phosphorus, total (as P)	DAILY MX	4.7	3.84	1
9/30/2022	8	Phosphorus, total (as P)	MO AVG	3.2	2.56	30
9/30/2022	8	Phosphorus, total (as P)	MO AVG	1.6	1	30
9/30/2022	9	pH, minimum	DAILY MN	6.17	6.5	1
9/30/2022	99	Solids, total suspended	MO AVG	6.08	5	30
10/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	44	40	1
10/31/2022	6	pH, minimum	DAILY MN	6.3	6.5	1
10/31/2022	7	Application rate area sprayed	DAILY MX	1.71	1.5	1
10/31/2022	7	pH, minimum	DAILY MN	5.56	6.5	1
10/31/2022	8	pH, minimum	DAILY MN	6	6.5	1
10/31/2022	9	pH, maximum	DAILY MX	10	9	1
10/31/2022	9	pH, minimum	DAILY MN	6.1	6.5	1
10/31/2022	99	Solids, total suspended	MO AVG	22	5	31
10/31/2022	99	Solids, total suspended	DAILY MX	28	10.51	1
11/30/2022	1	Oxygen, dissolved (DO)	DAILY MN	1.2	5	1
11/30/2022	1	Solids, total suspended	DAILY MX	54	45	1
11/30/2022	1	Solids, total suspended	MO AVG	31	30	30
11/30/2022	1	pH, minimum	DAILY MN	6.3	6.5	1
11/30/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2000	1520	1
11/30/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	39	25	30
11/30/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	64	40	1
11/30/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1100	947	30
11/30/2022	2	pH, maximum	DAILY MX	9.3	9	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
11/30/2022	99	Solids, total suspended	MO AVG	5.9	5	30
12/31/2022	1	Solids, total suspended	DAILY MX	3920	1710	1
12/31/2022	1	Solids, total suspended	MO AVG	1460	1140	31
12/31/2022	1	Solids, total suspended	MO AVG	53.8	30	31
12/31/2022	1	Solids, total suspended	DAILY MX	172	45	1
12/31/2022	1	Phosphorus, total (as P)	DAILY MX	1.6	1.5	1
12/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1500	947	31
12/31/2022	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	50	25	31
12/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2300	1520	1
12/31/2022	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	77	40	1
12/31/2022	2	pH, maximum	DAILY MX	9.3	9	1
12/31/2022	99	Solids, total suspended	DAILY MX	14.3	10.51	1
12/31/2022	99	Solids, total suspended	MO AVG	11.8	5	31
12/31/2022	99	Oil and grease, hexane extr method	MO AVG	4.96	3.08	31
12/31/2022	99	Oil and grease, hexane extr method	DAILY MX	5.54	5.13	1
1/31/2023	1	Solids, total suspended	MO AVG	30.1	30	31
1/31/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1368	947	31
1/31/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	110.5	40	1
1/31/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	3826	1520	1
1/31/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	41.56	25	31
1/31/2023	2	pH, maximum	DAILY MX	9.9	9	1
1/31/2023	99	Solids, total suspended	DAILY MX	29.66	10.51	1
1/31/2023	99	Solids, total suspended	MO AVG	20.83	5	31
1/31/2023	99	Oil and grease, hexane extr method	MO AVG	13	3.08	31
1/31/2023	99	Oil and grease, hexane extr method	DAILY MX	16.3	5.13	1
2/28/2023	1	Oxygen, dissolved (DO)	DAILY MN	3.7	5	1
2/28/2023	1	Solids, total suspended	MO AVG	1200	1140	28
2/28/2023	1	Solids, total suspended	MO AVG	38	30	28

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
2/28/2023	1	Solids, total suspended	DAILY MX	50	45	1
2/28/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1200	947	28
2/28/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	60	40	1
2/28/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	1800	1520	1
2/28/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	39	25	28
2/28/2023	2	pH, maximum	DAILY MX	10.4	9	1
2/28/2023	99	Solids, total suspended	MO AVG	7.1	5	28
3/31/2023	1	Solids, total suspended	MO AVG	36	30	31
3/31/2023	1	Solids, total suspended	DAILY MX	2700	1710	1
3/31/2023	1	Solids, total suspended	DAILY MX	80	45	1
3/31/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	31	25	31
3/31/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	72	40	1
3/31/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	960	947	31
3/31/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2400	1520	1
4/30/2023	1	Oxygen, dissolved (DO)	DAILY MN	3.7	5	1
4/30/2023	1	Solids, total suspended	DAILY MX	80	45	1
4/30/2023	1	Solids, total suspended	MO AVG	47	30	30
4/30/2023	1	Solids, total suspended	DAILY MX	2400	1710	1
4/30/2023	1	Phosphorus, total (as P)	DAILY MX	1.66	1.5	1
4/30/2023	1	Phosphorus, total (as P)	MO AVG	1.09	1	30
4/30/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2600	1520	1
4/30/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	42	25	30
4/30/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	88	40	1
4/30/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	1100	947	30
4/30/2023	99	Solids, total suspended	MO AVG	7.05	5	30
4/30/2023	99	Solids, total suspended	DAILY MX	10.8	10.51	1
5/31/2023	1	Oxygen, dissolved (DO)	DAILY MN	4.2	5	1
5/31/2023	1	Solids, total suspended	MO AVG	34	30	31

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
5/31/2023	1	Solids, total suspended	DAILY MX	56	45	1
5/31/2023	1	Phosphorus, total (as P)	MO AVG	1.15	1	31
5/31/2023	1	Phosphorus, total (as P)	DAILY MX	1.71	1.5	1
5/31/2023	1	E. coli, MTEC-MF	WK GEOMN	1733	284	7
5/31/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	26	25	31
5/31/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	44	40	1
5/31/2023	2	pH, maximum	DAILY MX	9.2	9	1
6/30/2023	1	Oxygen, dissolved (DO)	DAILY MN	0.8	5	1
6/30/2023	1	Phosphorus, total (as P)	DAILY MX	1.77	1.5	1
6/30/2023	1	Phosphorus, total (as P)	MO AVG	1.19	1	30
6/30/2023	99	Oil and grease, hexane extr method	MO AVG	4.78	3.08	30
6/30/2023	99	Oil and grease, hexane extr method	DAILY MX	9.23	5.13	1
7/31/2023	1	Nitrogen, ammonia total (as N)	DAILY MX	110	90.9	1
7/31/2023	1	Nitrogen, ammonia total (as N)	MO AVG	2	1.6	31
7/31/2023	1	Nitrogen, ammonia total (as N)	DAILY MX	8.1	3.5	1
7/31/2023	1	Phosphorus, total (as P)	MO AVG	1.31	1	31
7/31/2023	1	Phosphorus, total (as P)	DAILY MX	3.63	1.5	1
7/31/2023	1	pH, minimum	DAILY MN	5.7	6.5	1
7/31/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	42	40	1
7/31/2023	6	pH, minimum	DAILY MN	6.13	6.5	1
7/31/2023	7	Oxygen, dissolved (DO)	DAILY MN	3.9	5	1
7/31/2023	7	Application rate area sprayed	DAILY MX	1.82	1.5	1
7/31/2023	7	pH, minimum	DAILY MN	6.03	6.5	1
7/31/2023	9	pH, minimum	DAILY MN	6.34	6.5	1
8/31/2023	1	Oxygen, dissolved (DO)	DAILY MN	1.8	5	1
8/31/2023	1	Solids, total suspended	DAILY MX	49	45	1
8/31/2023	1	Phosphorus, total (as P)	MO AVG	1.01	1	31
8/31/2023	1	Phosphorus, total (as P)	DAILY MX	1.76	1.5	1

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
8/31/2023	1	E. coli, MTEC-MF	WK GEOMN	1414	284	7
8/31/2023	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	34.9	25	31
8/31/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	110	40	1
8/31/2023	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	2590	1520	1
8/31/2023	6	Application rate area sprayed	DAILY MX	1.67	1.5	1
8/31/2023	6	pH, minimum	DAILY MN	6.4	6.5	1
8/31/2023	7	Oxygen, dissolved (DO)	DAILY MN	4.6	5	1
8/31/2023	7	Application rate area sprayed	DAILY MX	2.19	1.5	1
8/31/2023	7	pH, minimum	DAILY MN	6.3	6.5	1
8/31/2023	8	Oxygen, dissolved (DO)	DAILY MN	4.3	5	1
8/31/2023	9	Oxygen, dissolved (DO)	DAILY MN	4.7	5	1
8/31/2023	9	pH, minimum	DAILY MN	6.1	6.5	1
9/30/2023	1	Nitrogen, ammonia total (as N)	DAILY MX	120	90.9	1
9/30/2023	1	Nitrogen, ammonia total (as N)	DAILY MX	5.7	3.5	1
9/30/2023	1	Phosphorus, total (as P)	DAILY MX	1.54	1.5	1
9/30/2023	1	Phosphorus, total (as P)	MO AVG	1.17	1	30
9/30/2023	1	E. coli, MTEC-MF	WK GEOMN	370	284	7
9/30/2023	1	pH, minimum	DAILY MN	6.2	6.5	1
9/30/2023	6	pH, minimum	DAILY MN	6.1	6.5	1
9/30/2023	7	Application rate area sprayed	DAILY MX	1.82	1.5	1
9/30/2023	7	pH, minimum	DAILY MN	6.2	6.5	1
9/30/2023	8	pH, minimum	DAILY MN	6.4	6.5	1
9/30/2023	9	pH, minimum	DAILY MN	5.7	6.5	1
10/31/2023	1	Oxygen, dissolved (DO)	DAILY MN	2.6	5	1
10/31/2023	1	Nitrogen, ammonia total (as N)	DAILY MX	4.2	3.5	1
10/31/2023	1	Phosphorus, total (as P)	DAILY MX	1.78	1.5	1
10/31/2023	1	Phosphorus, total (as P)	MO AVG	1.27	1	31
10/31/2023	1	E. coli, MTEC-MF	WK GEOMN	2420	284	7

Monitoring Period	Outfall	Parameter	Limit Type	DMR Reported Value	Limit Value	Exceedance Days
10/31/2023	1	pH, minimum	DAILY MN	5.9	6.5	1
10/31/2023	6	Application rate area sprayed	DAILY MX	6	1.5	1
10/31/2023	6	pH, minimum	DAILY MN	5.6	6.5	1
10/31/2023	7	Application rate area sprayed	DAILY MX	2.55	1.5	1
10/31/2023	7	pH, minimum	DAILY MN	5.6	6.5	1
10/31/2023	8	pH, minimum	DAILY MN	5.8	6.5	1
10/31/2023	9	Oxygen, dissolved (DO)	DAILY MN	4	5	1
10/31/2023	9	Phosphorus, total (as P)	DAILY MX	1.98	1.5	1
10/31/2023	9	pH, minimum	DAILY MN	5.8	6.5	1
11/30/2023	1	Solids, total suspended	DAILY MX	57	45	1
11/30/2023	1	pH, minimum	DAILY MN	6.3	6.5	1
12/31/2023	1	Oxygen, dissolved (DO)	DAILY MN	2.9	5	1
12/31/2023	99	Solids, total suspended	MO AVG	12.17	5	31
12/31/2023	99	Solids, total suspended	DAILY MX	16.77	10.51	1
1/31/2024	1	pH, minimum	DAILY MN	6.1	6.5	1
1/31/2024	1	pH, minimum	DAILY MN	6.3	6.5	1
1/31/2024	1	pH, minimum	DAILY MN	6.1	6.5	1
1/31/2024	1	pH, minimum	DAILY MN	6.2	6.5	1
1/31/2024	1	pH, maximum	DAILY MX	9.1	9	1
1/31/2024	1	Solids, total suspended	DAILY MX	48	45	1
1/31/2024	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	53	40	1
1/31/2024	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	41	40	1
1/31/2024	1	BOD, carbonaceous, 05 day, 20 C	DAILY MX	53	40	1
1/31/2024	1	BOD, carbonaceous, 05 day, 20 C	MO AVG	32.6	25	1
1/31/2024	2	pH, minimum	DAILY MX	9.1	9	1
1/31/2024	99	Solids, total suspended	MO AVG	6.86	5	1
Total Days of Violations						5468