INSPECTION REPORT

Inspection Date(s):	06/15/2021 - 06/16/2021	Inspection Announced: Yes
Time:	Entry: 08:15 AM (ET)	Exit: 11:20 AM (ET)
Media:	Water	
Statute(s)/Program(s):	Clean Water Act, NPDES, Industrial	
Type of inspection:	CEI - Compliance Evaluation Inspection	
Access:	Granted	
Permittee Name:	Campbell Soup Supply Corporation, LLC	
Facility or Site Name:	Campbell Soup Supply Corporation, LLC	
Facility/Site Physical Address:	12-773 State Route 110	
(city, state, zip code)	Napoleon, OH 43545	
County/Parish:	Henry	
Facility GPS Coordinates:	41.35606, -84.114479	
Facility/Site Identifier:	110006108942	
Permit Number:	OH0003298	
SIC or NAICS:	SIC 2032 and 2033	

Persons Participating in Inspection:

Title	Name	Phone	Email	Present at Opening Conference	Present at Closing Conference
Lead Inspector	Mark Conti	(440) 250-1706	conti.mark@epa.gov	Yes	Yes
Physical Scientist	Matthew Schulte	(312) 886-2405	schulte.matthew@epa.gov	Yes	Yes
Environmental, Health & Safety Manager	Cary Drewes	(419) 599-6723	cary_drewes@campbellsoup.com	Yes	Yes
Wastewater Treatment Plant Manager	Ernie Shafer	--	ernest.shafer@campbells.com	Yes	Yes
Manager, Water Treatment	Aaron McCoy	--	--	Yes	No

Persons Participating in Inspection:					
Environmental & Sustainability Analyst	Sue Cameron	--	--	No	Yes

Lead Inspector:			
Mark Conti	MARK CONTI Digitally signed by MARK CONTI Date: 2021.08.05 09:40:17 -04'00'		
	Region 5	conti.mark@epa.gov	(440) 250-1706
Additional Persons Participating in Inspection:			
Matthew Schulte	Region 5	schulte.matthew@epa.gov	(312) 886-2405
Supervisor Review:			
Brooke Furio	Furio, Brooke Digitally signed by Furio, Brooke Date: 2021.08.05 10:58:20 -04'00'		
	Region 5	furio.brooke@epa.gov	(440) 250-1705

SECTION I – INTRODUCTION

Site Entry and Inspection Objectives

Region 5 Lead Inspector, Mark Conti, arrived at Campbell Soup Supply Corporation (the "Site" or "Facility"), located at 12-773 State Route 110, at 08:15 AM (ET) on 06/15/2021 for an announced inspection. The Lead Inspector presented his credentials to Cary Drewes, Ernie Shafer, and Aaron McCoy and informed them that this was a Region 5 inspection to determine compliance with the Clean Water Act (CWA) and the National Pollutant Discharge Elimination System (NPDES) permit program. The inspection was conducted under the authority of the Region 5 NPDES permit program and Section 308 of the CWA. The table above identifies the attendees that participated in the inspection.

This report is based on information supplied by Campbell Soup Supply Corporation representatives, observations made by the Region 5 inspectors, and records and reports maintained by the permittee and Region 5 including the following: direct observations made by the Region 5 inspector(s), photographs taken by Region 5 inspectors, physical evidence collected by Region 5 inspectors, measurements taken by Region 5 inspectors, verbal or written statements made or supplied by Campbell Soup Supply Corporation representatives (the permittee) during or subsequent to the on-site Inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the Region 5 inspectors by Campbell Soup Supply Corporation representatives during or subsequent to the on-site inspection. In addition, information

gathered prior to or subsequent to the inspection from a review of U.S. EPA, State, and public records may be included in this report.

Facility/Site Description

Region 5 Lead Inspector confirmed the following facility information:

The Facility cans fruit and vegetable juices, sauces, and soups. Wastewater is generated from cleaning and peeling vegetables, evaporators, washdown in processing areas, boiler blowdown, chiller water, water treatment, laundry, and restrooms. Two-piece cans and PET injection blow-molded bottles are also manufactured on the Facility property. Metal cans are manufactured by Silgan Containers and PET bottles are manufactured by Amcor Rigid Plastics USA (Amcor). Rinse water from canmaking and miscellaneous water used by Amcor is treated and discharged by the Facility.

Wastewater is treated at the on-site wastewater treatment plant and/or by rotary screens and spray field overland flow treatment. The wastewater treatment plant includes grit removal, dissolved air flotation tanks, primary and secondary roughing towers, settling tanks, primary and secondary trickling filters, final settling tanks, post aeration tanks, and a chlorination basin. Sludge is anaerobically digested and stored in lagoons along with spent lime from water treatment. Sludge lagoon supernatant can be pumped to spray fields or returned to the wastewater treatment plant. Sludge is land-applied to Facility spray fields beginning in late summer.

Wastewater treatment plant effluent is discharged at Outfall 001. Spray fields discharge at Outfalls 006, 007, 008, and 009. There are two permitted stormwater outfalls and four internal monitoring stations.

SECTION II – OBSERVATIONS

Observations may not be in sequential order.

No.	Observation	Area of Concern?
MC3-OB-001	The Facility measures dissolved oxygen at Outfall 001 twice per shift. There was not a functioning continuous analyzer at the outfall.	Yes
MC3-OB-002	Composite samples at Outfall 001 are collected as flow-proportioned samples with a refrigerated Hach AS950 sampler. The sampler's storage temperature was 4 °C.	No
MC3-OB-003	Flow at Outfall 001 is measured with an 18-inch Parshall flume and Endress+Hauser Prosonic S FMU90 ultrasonic transducer and recorder. Flow through the flume was turbulent with waves and surface boils (see Photos 11 and 12). The flow rate was spot-checked against the staff gauge. The gauge measurement was about 1.7 feet, which corresponds to 6,090 gallons per minute. The meter readout was 5,700 gallons per minute.	Yes
MC3-OB-004	Samples at Internal Monitoring Station 605 are collected from the overflow of a holding pit. Wastewater is pumped out of one end of the overflow trough to	Yes

No.	Observation	Area of Concern?
	the Facility's wastewater treatment plant. Canmaking return flow from two pipes discharges into the end of the trough that is pumped out (see Photo 19). The sampling location is at the end of the trough that is opposite of where it is pumped out. The set up may not allow for adequate mixing and a representative sample at the monitoring location.	
MC3-OB-005	Samples at Internal Monitoring Station 605 are collected as time-composite samples. An aliquot is collected every 15 minutes.	Yes
MC3-OB-006	Composite samples at Internal Monitoring Station 605 are not cooled during collection.	Yes
MC3-OB-007	The readout on the flow meter recording device at Internal Monitoring Station 605 was erratic. The instantaneous readout varied between 12 and 45 gallons per minute over a period of about a minute. Wastewater is pumped with a fixed speed pump (see Photo 15) through an inline, horizontally-mounted meter (see Photo 16). The meter appeared to be a magnetic flow meter. Magnetic flow meters are often mounted vertically to ensure the cross-section of the pipe is liquid-filled. Less than a full pipe at the measurement location may be affecting the reading of the flow meter.	Yes
MC3-OB-008	Outfalls 001, 002, 006, 007, 008, and 009 had markers on the stream banks. The markers for the spray field outfalls are installed in May and taken down before winter.	No
MC3-OB-009	Temperature, conductivity, and dissolved oxygen can be continuously recorded at Outfalls 006, 007, 008, and 009. Probes had not yet been installed for the season.	No
MC3-OB-010	Flow is measured and totalized with 36-inch rectangular weirs and Endress+Hauser Prosonic S FMU90 ultrasonic transducers and recorders at Outfalls 006, 007, 008, and 009. Ultrasonic transducers had not yet been installed and connect for the season at Outfalls 007, 008, and 009.	No
MC3-OB-011	Each spray field is hayed off and the grass is removed by a farmer prior to discharging to a field for the growing season. The first discharge to a field for the 2021 season was on May 29 to the field that discharges at Outfall 006. The Facility planned to have the remaining fields available for wastewater treatment by July 4.	No
MC3-OB-012	Primary dissolved air flotation tank #1 (DAF #1) had been out of service since October 2020. It was also out of service for some of the summer months in 2020.	Yes
MC3-OB-013	The plastic media in the secondary roughing tower is breaking down. The Facility has a tentative plan to rebuild it in 2022.	Yes
MC3-OB-014	Beverage plant wastewater discharge volume and solids concentration increase from August through mid-October when processing "V7" vegetables.	No

No.	Observation	Area of Concern?
	The Facility states that spray fields result in better wastewater treatment than the wastewater treatment plant, so it tries to maximize flow to sprays fields during that period.	
MC3-OB-015	The wastewater treatment plant is shut down for about 16 hours once each year around Memorial Day to perform electrical maintenance. This may have a temporary negative impact on biological media in treatment units.	No

SECTION III – RECORDS REVIEW

Records may not be in sequential order.

No.	Record	Area of Concern?
MC3-RR-001	The permit fact sheet describes how compliance with effluent guideline limitations (EGLs) at 40 CFR 465.43, Subpart D – Canmaking Subcategory are verified. The fact sheet does not describe how compliance is verified when some, or all, wastewater is treated in spray fields, though it implies it is the same. Compliance with the EGLs are verified by multiplying pollutant concentrations in untreated canmaking wastewater by one minus the removal efficiency for the pollutant by the wastewater treatment plant. Removal efficiencies were determined from wastewater treatment plant influent and effluent sampling. The removal efficiencies determined for zinc and aluminum were 27.5% and 14.9% respectively. The removal efficiency for chromium was determined to be 77.4%, which was based on two sample results above detection. Canmaking is the only source of chromium. Canmaking wastewater is diluted 50-fold entering the wastewater treatment plant. Most chromium samples taken for removal efficiency determination were below detection, which may be partially attributed to dilution. The wastewater treatment plant is a biological plant, so 77.4% removal for a metal may not be achieved. A chromium removal efficiency similar to the other metals (zinc and aluminum) may be more appropriate.	Yes
MC3-RR-002	Mr. Shafer is a Class IV wastewater treatment plant operator. The permit requires a Class IV wastewater treatment plant operator be in charge of the wastewater treatment works and sewerage system.	No
MC3-RR-003	The laboratory used by the Facility to analyze free cyanide uses method OIA 1677-09.	Yes
MC3-RR-004	The Lead Inspector requested calibration records and meter information for the flow meter at Internal Monitoring Station 605 during the records review and close-out. The Facility has not provided the information.	Yes

<table>
<tr><th>No.</th><th>Record</th><th>Area of Concern?</th></tr>
<tr><td>MC3-RR-005</td><td>The Facility could not recall having requested permission for the chiller and boiler treatment additives they use. They did not have a record(s) of written permission from the director of the Ohio EPA for additives prior to their use.</td><td>Yes</td></tr>
<tr><td>MC3-RR-006</td><td>There were several issues with chain of custody records. The 5/7/2020 upstream/downstream sample was marked as received at the lab before it was sampled by Industrial Fluid Management (IFM). Some nitrate + nitrite samples collected by IFM and sent to BoJhun Environmental Services (BoJhun) for analysis were not marked whether they were preserved with sulfuric acid. An IFM form for samples sent to BoJhun that was collected on 2/26/2021 was not marked whether samples were iced. Several forms for samples sent to MASI Environmental Laboratories were not marked whether samples were place on ice, and they lacked date and time the samples were relinquished. An IFM form for the upstream sample sent to BoJhun was marked as collected on 12/8/2021, but the correct date was 1/28/2021.</td><td>Yes</td></tr>
<tr><td>MC3-RR-007</td><td>Noncompliance reports for violations of daily maximum discharge limits were not submitted for violations that were discovered prior to October 2020.</td><td>Yes</td></tr>
<tr><td>MC3-RR-008</td><td>There were 2 times (September/October 2020 and March/April 2021) when samples were not measured at the required monitoring frequency of 2 times per week at Outfall 001. The Facility stated their contract lab only samples the first 4 weeks of the month. Some pairs of months have nine weeks, in which case there may be a week when monitoring is not done.</td><td>Yes</td></tr>
<tr><td>MC3-RR-009</td><td>Routine stormwater inspections and stormwater visual assessments were documented for the prior four quarters. One visual assessment was during snowmelt discharge. All visual assessments stated there was no color, oil sheen, or any other characteristic.

Stormwater discharges that never have color, solids or floatable material is not typical.</td><td>No</td></tr>
<tr><td>MC3-RR-010</td><td>Compliance with categorical limits at 40 CFR 465.43 is calculated from measured concentrations of untreated wastewater at Internal Monitoring Station 605 and then multiplying by one minus the removal efficiency of the pollutant at the wastewater treatment plant. Results are reported as Station 099 measurements. The permit includes removal efficiencies to use in the calculation. Calculation errors were found when making a random check of discharge monitoring report (DMR) records. Examples are shown below.
<table>
<tr><th>Date</th><th>DMR Value</th><th>Correct Value</th></tr>
<tr><td>5/13/2020</td><td>0.021 mg/L fluoride</td><td>0.2 mg/L</td></tr>
<tr><td>5/20/2020</td><td>11.07 ug/L aluminum</td><td>7.3 ug/L</td></tr>
<tr><td>6/04/2020</td><td>8.59 ug/L aluminum</td><td>5.67 ug/L</td></tr>
<tr><td>6/17/2020</td><td>26.82 ug/L zinc</td><td>54.2 ug/L</td></tr>
<tr><td>6/17/2020</td><td>37 ug/L aluminum</td><td>37.8 ug/L</td></tr>
</table></td><td>Yes</td></tr>
</table>

No.	Record			Area of Concern?
	7/08/2020	0.29 ug/L phosphorus	0.21 ug/L	
	7/08/2020	8.81 ug/L aluminum	5.81 ug/L	
	8/05/2020	8.81 ug/L aluminum	5.81 ug/L	
	8/19/2020	8.81 ug/L aluminum	5.81 ug/L	
	8/19/2020	7.4 mg/L total suspended solids	98.3 mg/L	
MC3-RR-011	Samples for fluoride, chromium, zinc and aluminum are collected on Mondays or Wednesdays at Outfall 001. Samples for fluoride, chromium, zinc and aluminum are collected on Tuesdays and Thursdays at Internal Monitoring Station 605.			Yes
MC3-RR-012	Bromine compounds are not used for disinfection. The permit does not require total residual oxidants monitoring when bromine compounds are not used.			No
MC3-RR-013	Based on the most recent quarter of data (01/01/2021 – 03/31/2021), the Facility was in significant non-compliance with carbonaceous biochemical oxygen demand ($CBOD_5$) and total suspended solids limitations at Outfall 001. An ECHO Effluent Exceedance Report for the five years through 05/31/2021 is included as Appendix 2.			Yes

SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION V - AREAS OF CONCERN

Areas of Concern may not be in sequential order.

The presentation of areas of concern does not constitute a formal compliance determination or violation.

No.	Area of Concern
MC3-OB-001	The Facility measures dissolved oxygen at Outfall 001 twice per shift. There was not a functioning continuous analyzer at the outfall. **Permit Part I.A.:** continuously monitor dissolved oxygen at Outfall 001
MC3-OB-003	Flow at Outfall 001 is measured with an 18-inch Parshall flume and Endress+Hauser Prosonic S FMU90 ultrasonic transducer and recorder. Flow through the flume was turbulent with waves and surface boils (see Photos 11 and 12). The flow rate was spot-checked against the staff gauge. The gauge measurement was about 1.7 feet, which corresponds to 6,090 gallons per minute. The meter readout was 5,700 gallons per minute. **Permit Part I.A.:** continuously measure flow rate at Outfall 001

No.	Area of Concern
	Permit Part II.5.: the permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements
MC3-OB-004	Samples at Internal Monitoring Station 605 are collected from the overflow of a holding pit. Wastewater is pumped out of one end of the overflow trough to the wastewater treatment plant. Return flow from two pipes discharges into the end of the trough that is pumped (see Photo 19). The sampling location is at the end of the trough that is opposite of where it is pumped out. The set up may not allow for adequate mixing and a representative sample. **Permit Part II.I.:** samples shall be collected at such times and locations, and in such a fashion, as to be representative of the facility's overall performance
MC3-OB-005	Samples at Internal Monitoring Station 605 are collected as time-composite samples. An aliquot is collected every 15 minutes. **Permit Part II.I.:** composite samples shall be comprised of a series of grab samples collected over a 24-hour period and proportionate in volume to the wastewater flow rate at the time of sampling
MC3-OB-006	Composite samples at Internal Monitoring Station 605 are not cooled during collection. **40 CFR 136.3(e):** total suspended solids and phosphorus samples must be preserved at ≤6 °C
MC3-OB-007	The readout on the flow meter recording device at Internal Monitoring Station 605 was erratic. The instantaneous readout varied between 12 and 45 gallons per minute over a period of about a minute. Wastewater is pumped with a fixed speed pump (see Photo 15) through an inline, horizontally-mounted meter (see Photo 16). The meter appeared to be a magnetic flow meter. Magnetic flow meters are often mounted vertically to ensure the cross-section of the pipe is liquid-filled. Less than a full pipe at the measurement location may be affecting the reading of the flow meter. **Permit Part I.A.:** measure 24-hour total flow at Internal Monitoring Station 605 **Permit Part II.5.:** the permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements
MC3-OB-012	Primary dissolved air flotation tank #1 (DAF #1) had been out of service since October 2020. It was also out of service for some of the summer months in 2020. **Permit Part III.3.A.:** at all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit

No.	Area of Concern
MC3-OB-013	The plastic media in the secondary roughing tower is breaking down. The Facility has a tentative plan to rebuild it in 2022. **Permit Part III.3.A.:** at all times, the permittee shall maintain in good working order and operate as efficiently as possible all treatment or control facilities or systems installed or used by the permittee necessary to achieve compliance with the terms and conditions of this permit
MC3-RR-001	The permit fact sheet describes how compliance with effluent guideline limitations (EGLs) at 40 CFR 465.43, Subpart D – Canmaking Subcategory are verified. The fact sheet does not describe how compliance is verified when some, or all, wastewater is treated in spray fields, though it implies it is the same. Compliance with the EGLs are verified by multiplying pollutant concentrations in untreated canmaking wastewater by one minus the removal efficiency for the pollutant by the wastewater treatment plant. Removal efficiencies were determined from wastewater treatment plant influent and effluent sampling. The removal efficiencies determined for zinc and aluminum were 27.5% and 14.9% respectively. The removal efficiency for chromium was determined to be 77.4%, which was based on two sample results above detection. Canmaking is the only source of chromium. Canmaking wastewater is diluted 50-fold entering the wastewater treatment plant. Most chromium samples taken for removal efficiency determination were below detection, which may be partially attributed to dilution. The wastewater treatment plant is a biological plant, so 77.4% removal for a metal may not be achieved. A chromium removal efficiency similar to the other metals (zinc and aluminum) may be more appropriate. **40 CFR 465.43:** maximum for any 1 day and maximum for monthly average
MC3-RR-003	The laboratory used by the Facility to analyze free cyanide uses method OIA 1677-09. **Permit Part III.5.:** test procedures for the analysis of pollutants shall conform to regulation 40 CFR 136 unless procedures have been specified in this permit **Permit Part II.T.:** the permittee shall utilize method 4500-CN I for analysis of free cyanide **40 CFR 136.3:** Standard Methods 4500-CN I is not currently an approved test procedure. Method OIA 1677-09 is currently an approved test procedure.
MC3-RR-004	The Lead Inspector requested calibration records and meter information for the flow meter at Internal Monitoring Station 605 during the records review and close-out. The Facility has not provided the information. **Permit Part II.5.:** the permittee shall periodically calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements.

No.	Area of Concern
MC3-RR-005	The Facility could not recall having requested permission for the chiller and boiler treatment additives they use. They did not have a record(s) of written permission from the director of the Ohio EPA for additives prior to their use. **Permit Part II.BB.:** in the event that the permittee's operation requires the use of cooling or boiler water treatment additives that are discharged to surface waters of the state, written permission must be obtained from the director of the Ohio EPA prior to use
MC3-RR-006	There were several issues with chain of custody records. The 5/7/2020 upstream/downstream sample was marked as received at the lab before it was sampled by Industrial Fluid Management (IFM). Some nitrate + nitrite samples collected by IFM and sent to BoJhun Environmental Services (BoJhun) for analysis were not marked whether they were preserved with sulfuric acid. An IFM form for samples sent to BoJhun that was collected on 2/26/2021 was not marked whether samples were iced. Several forms for samples sent to MASI Environmental Laboratories were not marked whether samples were place on ice, and they lacked date and time the samples were relinquished. An IFM form for the upstream sample sent to BoJhun was marked as collected on 12/8/2021, but the correct date was 1/28/2021. **40 CFR 136.3(e):** total suspended solids, ammonia, nitrate + nitrate, CBOD 5-day, phosphorus, oil and grease, dissolved hexavalent chromium, cyanide, and total dissolved solids samples must be preserved at ≤6 °C. E. coli samples must be preserved at ≤10 °C. Nitrate + nitrite samples must be preserved with sulfuric acid to pH <2
MC3-RR-007	Noncompliance reports for violations of daily maximum discharge limits were not submitted for violations that were discovered prior to October 2020. **Part III.12.A.:** the permittee shall report noncompliance that is the result of any violation of a daily maximum discharge limit for any of the pollutants listed by the Director in the permit by e-mail or telephone within twenty-four (24) hours of discovery
MC3-RR-008	There were 2 times (September/October 2020 and March/April 2021) when samples were not measured at the required monitoring frequency of 2 times per week at Outfall 001. The Facility stated their contract lab only samples the first 4 weeks of the month. Some pairs of months have nine weeks, in which case there may be a week when monitoring is not done. **Permit Part I.A.1.:** monitoring frequency for total suspended solids, ammonia-nitrogen, and total phosphorus is two times per week
MC3-RR-010	Compliance with categorical limits at 40 CFR 465.43 is calculated from measured concentrations of untreated wastewater at Internal Monitoring Station 605 and then multiplying by one minus the removal efficiency of the pollutant at the wastewater treatment plant. Results are reported as Station 099 measurements. The permit includes removal efficiencies to use in the calculation. Calculation errors were found when making a random check of discharge monitoring report (DMR) records. Examples are shown below.

No.	Area of Concern
	<table><tr><th>Date</th><th>DMR Value</th><th>Correct Value</th></tr><tr><td>5/13/2020</td><td>0.021 mg/L fluoride</td><td>0.2 mg/L</td></tr><tr><td>5/20/2020</td><td>11.07 ug/L aluminum</td><td>7.3 ug/L</td></tr><tr><td>6/04/2020</td><td>8.59 ug/L aluminum</td><td>5.67 ug/L</td></tr><tr><td>6/17/2020</td><td>26.82 ug/L zinc</td><td>54.2 ug/L</td></tr><tr><td>6/17/2020</td><td>37 ug/L aluminum</td><td>37.8 ug/L</td></tr><tr><td>7/08/2020</td><td>0.29 ug/L phosphorus</td><td>0.21 ug/L</td></tr><tr><td>7/08/2020</td><td>8.81 ug/L aluminum</td><td>5.81 ug/L</td></tr><tr><td>8/05/2020</td><td>8.81 ug/L aluminum</td><td>5.81 ug/L</td></tr><tr><td>8/19/2020</td><td>8.81 ug/L aluminum</td><td>5.81 ug/L</td></tr><tr><td>8/19/2020</td><td>7.4 mg/L total suspended solids</td><td>98.3 mg/L</td></tr></table> **Permit Part I.A.1.:** final effluent limitations and monitoring requirements for Station 099
MC3-RR-011	Samples for fluoride, chromium, zinc and aluminum are collected on Mondays or Wednesdays at Outfall 001. Samples for fluoride, chromium, zinc and aluminum are collected on Tuesdays and Thursdays at Internal Monitoring Station 605. **Permit Part I.A. and Part II.II.:** sampling for fluoride, chromium, zinc and aluminum at stations 2IH00021001, 2IH00021601, 2IH00021604 and 2IH00021605 shall occur the same day
MC3-RR-013	Based on the most recent quarter of data (01/01/2021 – 03/31/2021), the Facility was in significant non-compliance with carbonaceous biochemical oxygen demand ($CBOD_5$) and total suspended solids limitations at Outfall 001. An ECHO Effluent Exceedance Report for the five years through 05/31/2021 is included as Appendix 2. **40 CFR 123.45** and **Permit Part I.A**.

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The Lead Inspector held a closing conference with Facility personnel on 06/16/2021 for the inspection. During the closing conference, the Lead Inspector discussed the observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination

Follow Up

The following items were requested by the inspector at the time of the inspection.

No.	Follow Up Item
MC3-RR-004	The Lead Inspector requested calibration records and meter information for the flow meter at Internal Monitoring Station 605 during the records review and closing conference.

Communication Log

No additional information received by the Lead inspector after exiting the Facility on 06/16/2021.

SECTION VII – LIST OF APPENDICES

Appendix 1 – Photo Log
Appendix 2 – ECHO Effluent Exceedance Report

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 1	**Time:** 8:57 AM

Direction Photo Taken: down

Photo Description: This is the 36-inch rectangular weir and ultrasonic transducer for measuring flow rate at Outfall 006.

File: Campbell IMG_0001

Facility Name & Location:	Photographer:	Camera:
Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	Mark Conti	Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.:	Time:
2	8:59 AM

Direction Photo Taken: --

Photo Description: This is the Endress+Hauser Prosonic S FMU90 flow recorder at Outfall 006.

File: Campbell IMG_0002

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 4	**Time:** 9:13 AM

Direction Photo Taken: north

Photo Description: This is the 36-inch rectangular weir and ultrasonic transducer for measuring flow rate at Outfall 007.

File: Campbell IMG_0004

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 6	**Time:** 9:26 AM

Direction Photo Taken: down

Photo Description: This is the 36-inch rectangular weir and ultrasonic transducer for measuring flow rate at Outfall 009.

File: Campbell IMG_0006

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 8	**Time:** 9:36 AM

Direction Photo Taken: southeast

Photo Description: This is the 36-inch rectangular weir and ultrasonic transducer for measuring flow rate at Outfall 008.

File: Campbell IMG_0008

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 9	**Time:** 10:34 AM

Direction Photo Taken: --

Photo Description: A Hach AS950 sampler is used to collect 24-hour flow-proportional composite samples at Outfall 001. Samples are collected in a 2.5-gallon polyethylene bottle. The bottle thermometer in the refrigerator indicated samples were cooled to 4 °C.

File: Campbell IMG_0009

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	Photographer: Mark Conti	Camera: Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 10	Time: 10:35 AM

Direction Photo Taken: --

Photo Description: This is the controller for the Hach AS950 sampler used to collect 24-hour flow-proportional composite samples at Outfall 001. The display showed the program was running, 7 aliquots had been collected, aliquot collection was flow-based, and the cabinet was at 3.4 °C.

File: Campbell IMG_0010

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 11	**Time:** 10:36 AM

Direction Photo Taken: southeast

Photo Description: This is the 18-inch Parshall flume and Endress+Hauser Prosonic S FMU90 ultrasonic transducer for measuring final discharge flow rate at Outfall 001.

File: Campbell IMG_0011

Facility Name & Location:	Photographer:	Camera: Canon PowerShot SD1400 IS (S/N 212065043406)
Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	Mark Conti	

Date Photograph Was Taken: 6/15/2021

Photo No.: 12	Time: 10:37 AM

Direction Photo Taken: down

Photo Description:
This is the 18-inch Parshall flume and Endress+Hauser Prosonic S FMU90 ultrasonic transducer for measuring final discharge flow rate at Outfall 001. There is also a staff gauge at the measurement location, which was mostly obscured with algae.

File: Campbell IMG_0012

Facility Name & Location:	Photographer:	Camera: Canon PowerShot SD1400 IS (S/N 212065043406)
Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	Mark Conti	

Date Photograph Was Taken: 6/15/2021

Photo No.: 13	Time: 10:37 AM

Direction Photo Taken: --

Photo Description: An Endress+Hauser Prosonic S FMU90 ultrasonic transducer and recorder measures flow rate at Outfall 001.

File: Campbell IMG_0013

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021	
Photo No.: 14	**Time:** 10:37 AM
Direction Photo Taken: --	
Photo Description: The Endress+Hauser Prosonic S FMU90 flow recorder at Outfall 001 was calibrated on 10/6/2020.	

File: Campbell IMG_0014

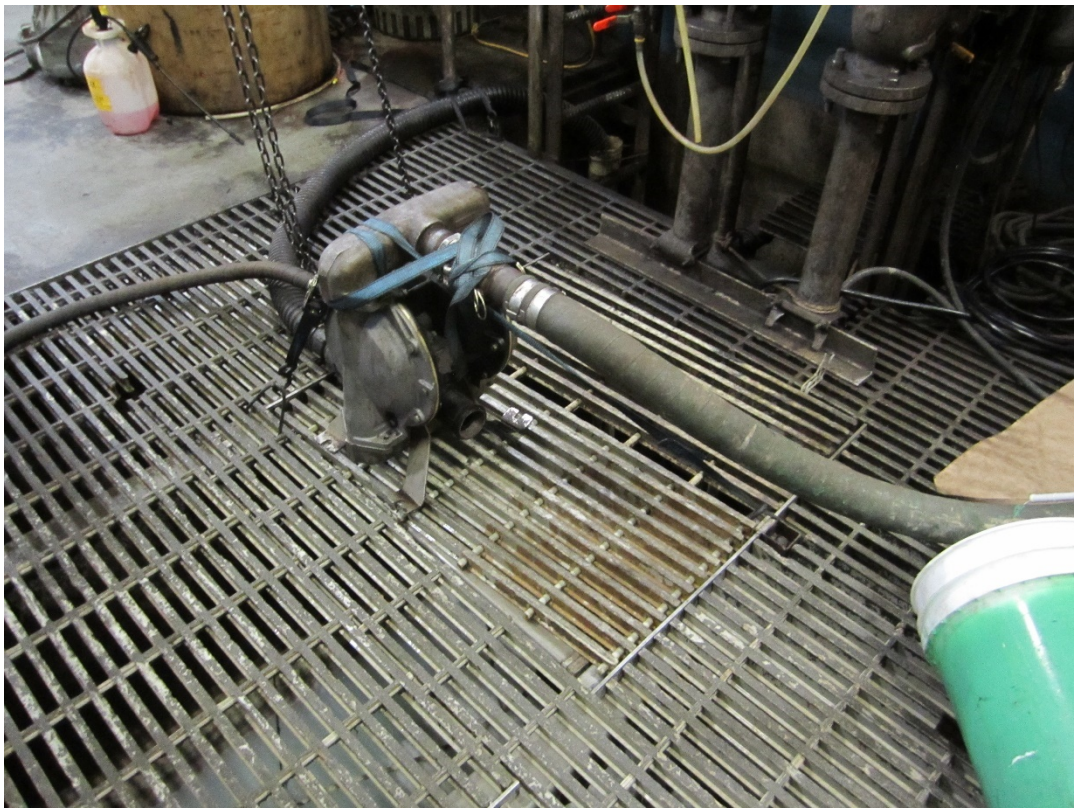
Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 15	**Time:** 1:55 PM

Direction Photo Taken: indoors

Photo Description: Samples for Internal Monitoring Station 605 are collected from the trough under this grate. Silgan Containers pumps their canmaking wastewater to Campbell's wastewater treatment plant.



File: Campbell IMG_0015

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken:
6/15/2021

Photo No.: 16	**Time:** 1:55 PM

Direction Photo Taken: up

Photo Description:
This is the device for measuring the flow rate of wastewater pumped from Silgan Containers to Campbell's wastewater treatment plant.

File: Campbell IMG_0016

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 17	**Time:** 1:56 PM

Direction Photo Taken: indoors

Photo Description: This is the flow recorder for recording flow rate and totalizing 24-hour flow of wastewater pumped from Silgan Containers to Campbell's wastewater treatment plant.

File: Campbell IMG_0017

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken:
6/15/2021

Photo No.: 18	**Time:** 1:56 PM

Direction Photo Taken: indoors

Photo Description:
This is the ISCO automatic sampler used by Silgan Containers for collecting composite samples at Internal Monitoring Station 605.

File: Campbell IMG_0018

Facility Name & Location: Campbell Soup Supply Corporation, LLC 12-773 State Route 110, Napoleon, Ohio	**Photographer:** Mark Conti	**Camera:** Canon PowerShot SD1400 IS (S/N 212065043406)

Date Photograph Was Taken: 6/15/2021

Photo No.: 19	**Time:** 1:58 PM

Direction Photo Taken: down

Photo Description: This is looking down into a trough that receives rinse water from canmaking. Silgan Containers pumps the wastewater to Campbell's wastewater treatment plant through the black corrugated plastic pipe behind the ladder.

File: Campbell IMG_0019

ECHO Effluent Exceedances Report
Monitoring Period Date Range: 06/01/2016 to 05/31/2021

Monitoring Period	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Qualifier	Limit Value Unit	% Exceedance
6/30/2016	001	BOD, carbonaceous, 5-day	DAILY MX	45	mg/L	40	<=	mg/L	13
7/31/2016	001	Nitrogen, ammonia total (as N)	DAILY MX	10	mg/L	3.5	<=	mg/L	171
7/31/2016	001	Nitrogen, ammonia total (as N)	MO AVG	3	mg/L	1.6	<=	mg/L	63
7/31/2016	001	Nitrogen, ammonia total (as N)	DAILY MX	190	kg/d	90.9	<=	kg/d	109
7/31/2016	001	Phosphorus, total (as P)	MO AVG	3	mg/L	1	<=	mg/L	168
7/31/2016	001	Phosphorus, total (as P)	MO AVG	54	kg/d	37.9	<=	kg/d	43
7/31/2016	001	Phosphorus, total (as P)	DAILY MX	203	kg/d	56.8	<=	kg/d	257
7/31/2016	001	Phosphorus, total (as P)	DAILY MX	10	mg/L	1.5	<=	mg/L	562
7/31/2016	001	E. coli, MTEC-MF	WK GEOMN	3,450	MPN/100mL	284	<=	MPN/100mL	1,115
7/31/2016	001	BOD, carbonaceous, 5-day	MO AVG	34	mg/L	25	<=	mg/L	36
7/31/2016	001	BOD, carbonaceous, 5-day	DAILY MX	67	mg/L	40	<=	mg/L	68
8/31/2016	001	BOD, carbonaceous, 5-day	DAILY MX	59	mg/L	40	<=	mg/L	48
9/30/2016	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	17
9/30/2016	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	24
3/31/2017	001	BOD, carbonaceous, 5-day	DAILY MX	55	mg/L	40	<=	mg/L	38
3/31/2017	001	BOD, carbonaceous, 5-day	MO AVG	30	mg/L	25	<=	mg/L	20
4/30/2017	001	Oxygen, dissolved (DO)	DAILY MN	4	mg/L	5	>=	mg/L	18
6/30/2017	001	E. coli, MTEC-MF	WK GEOMN	24,200	MPN/100mL	284	<=	MPN/100mL	8,421
7/31/2017	001	Solids, total suspended	DAILY MX	50	mg/L	45	<=	mg/L	11
7/31/2017	001	Nitrogen, ammonia total (as N)	DAILY MX	4	mg/L	3.5	<=	mg/L	11
7/31/2017	001	Nitrogen, ammonia total (as N)	DAILY MX	120	kg/d	90.9	<=	kg/d	32
7/31/2017	001	BOD, carbonaceous, 5-day	DAILY MX	2,300	kg/d	1520	<=	kg/d	51
7/31/2017	001	BOD, carbonaceous, 5-day	MO AVG	45	mg/L	25	<=	mg/L	80
7/31/2017	001	BOD, carbonaceous, 5-day	MO AVG	1,300	kg/d	947	<=	kg/d	37
7/31/2017	001	BOD, carbonaceous, 5-day	DAILY MX	83	mg/L	40	<=	mg/L	108
8/31/2017	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	30
8/31/2017	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	25
8/31/2017	001	BOD, carbonaceous, 5-day	DAILY MX	1,800	kg/d	1520	<=	kg/d	18
8/31/2017	001	BOD, carbonaceous, 5-day	MO AVG	1,100	kg/d	947	<=	kg/d	16
8/31/2017	001	BOD, carbonaceous, 5-day	MO AVG	37	mg/L	25	<=	mg/L	48
8/31/2017	001	BOD, carbonaceous, 5-day	DAILY MX	64	mg/L	40	<=	mg/L	60

ECHO Effluent Exceedances Report
Monitoring Period Date Range: 06/01/2016 to 05/31/2021

Monitoring Period	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Qualifier	Limit Value Unit	% Exceedance
9/30/2017	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	11
9/30/2017	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	16
9/30/2017	001	BOD, carbonaceous, 5-day	DAILY MX	46	mg/L	40	<=	mg/L	15
10/31/2017	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	15
10/31/2017	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	22
10/31/2017	001	BOD, carbonaceous, 5-day	DAILY MX	50	mg/L	40	<=	mg/L	25
10/31/2017	001	BOD, carbonaceous, 5-day	MO AVG	32	mg/L	25	<=	mg/L	28
10/31/2017	099	Oil and grease (soxhlet extr.) tot.	MO AVG	4	kg/d	3.08	<=	kg/d	17
10/31/2017	099	Oil and grease (soxhlet extr.) tot.	DAILY MX	6	kg/d	5.13	<=	kg/d	18
11/30/2017	001	BOD, carbonaceous, 5-day	DAILY MX	50	mg/L	40	<=	mg/L	25
12/31/2017	001	BOD, carbonaceous, 5-day	DAILY MX	42	mg/L	40	<=	mg/L	5
12/31/2017	001	BOD, carbonaceous, 5-day	MO AVG	27	mg/L	25	<=	mg/L	8
2/28/2018	001	BOD, carbonaceous, 5-day	MO AVG	29	mg/L	25	<=	mg/L	16
3/31/2018	001	BOD, carbonaceous, 5-day	DAILY MX	47	mg/L	40	<=	mg/L	18
3/31/2018	001	BOD, carbonaceous, 5-day	MO AVG	26	mg/L	25	<=	mg/L	4
6/30/2018	001	E. coli, MTEC-MF	WK GEOMN	910	MPN/100mL	284	<=	MPN/100mL	220
6/30/2018	099	Oil and grease (soxhlet extr.) tot.	MO AVG	3	kg/d	3.08	<=	kg/d	10
7/31/2018	001	E. coli, MTEC-MF	WK GEOMN	5,470	MPN/100mL	284	<=	MPN/100mL	1,826
7/31/2018	006	Oxygen, dissolved (DO)	DAILY MN	3	mg/L	5	>=	mg/L	48
7/31/2018	006	pH, minimum	DAILY MN	5	SU	6.5	>=	SU	
8/31/2018	001	Solids, total suspended	DAILY MX	50	mg/L	45	<=	mg/L	11
8/31/2018	001	BOD, carbonaceous, 5-day	DAILY MX	57	mg/L	40	<=	mg/L	43
8/31/2018	001	BOD, carbonaceous, 5-day	DAILY MX	1,900	kg/d	1520	<=	kg/d	25
8/31/2018	006	pH, maximum	DAILY MX	11	SU	9	<=	SU	
8/31/2018	008	Oxygen, dissolved (DO)	DAILY MN	3	mg/L	5	>=	mg/L	46
8/31/2018	008	pH, minimum	DAILY MN	6	SU	6.5	>=	SU	
8/31/2018	009	Oxygen, dissolved (DO)	DAILY MN	5	mg/L	5	>=	mg/L	6
8/31/2018	009	pH, minimum	DAILY MN	4	SU	6.5	>=	SU	
9/30/2018	001	Nitrogen, ammonia total (as N)	DAILY MX	12	mg/L	3.5	<=	mg/L	254
9/30/2018	001	Nitrogen, ammonia total (as N)	DAILY MX	343	kg/d	90.9	<=	kg/d	277
9/30/2018	001	Nitrogen, ammonia total (as N)	MO AVG	3	mg/L	1.6	<=	mg/L	76

ECHO Effluent Exceedances Report
Monitoring Period Date Range: 06/01/2016 to 05/31/2021

Monitoring Period	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Qualifier	Limit Value Unit	% Exceedance
9/30/2018	001	Nitrogen, ammonia total (as N)	MO AVG	80	kg/d	60.6	<=	kg/d	32
9/30/2018	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	10
9/30/2018	001	E. coli, MTEC-MF	WK GEOMN	285	MPN/100mL	284	<=	MPN/100mL	-
9/30/2018	006	pH, maximum	DAILY MX	10	SU	9	<=	SU	
9/30/2018	006	pH, minimum	DAILY MN	6	SU	6.5	>=	SU	
9/30/2018	009	Oxygen, dissolved (DO)	DAILY MN	4	mg/L	5	>=	mg/L	14
10/31/2018	001	Nitrogen, ammonia total (as N)	MO AVG	2	mg/L	1.6	<=	mg/L	19
10/31/2018	001	Nitrogen, ammonia total (as N)	DAILY MX	93	kg/d	90.9	<=	kg/d	2
10/31/2018	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	10
10/31/2018	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	7
10/31/2018	006	pH, maximum	DAILY MX	9	SU	9	<=	SU	
11/30/2018	001	pH, maximum	DAILY MX	10	SU	9	<=	SU	
1/31/2019	001	pH, minimum	DAILY MN	6	SU	6.5	>=	SU	
4/30/2019	001	Solids, total suspended	DAILY MX	52	mg/L	45	<=	mg/L	16
5/31/2019	001	Nitrogen, ammonia total (as N)	DAILY MX	10	mg/L	3.5	<=	mg/L	174
5/31/2019	001	Nitrogen, ammonia total (as N)	DAILY MX	240	kg/d	90.9	<=	kg/d	164
6/30/2019	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	10
6/30/2019	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	20
7/31/2019	001	Solids, total suspended	MO AVG	36	mg/L	30	<=	mg/L	20
7/31/2019	001	Solids, total suspended	DAILY MX	47	mg/L	45	<=	mg/L	4
7/31/2019	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	30
7/31/2019	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	7
7/31/2019	001	E. coli, MTEC-MF	WK GEOMN	650	MPN/100mL	284	<=	MPN/100mL	129
7/31/2019	001	BOD, carbonaceous, 5-day	DAILY MX	60	mg/L	40	<=	mg/L	50
7/31/2019	001	BOD, carbonaceous, 5-day	MO AVG	34	mg/L	25	<=	mg/L	36
7/31/2019	001	BOD, carbonaceous, 5-day	DAILY MX	1,700	kg/d	1520	<=	kg/d	12
8/31/2019	001	E. coli, MTEC-MF	WK GEOMN	537	MPN/100mL	284	<=	MPN/100mL	89
8/31/2019	001	BOD, carbonaceous, 5-day	MO AVG	28	mg/L	25	<=	mg/L	12
8/31/2019	001	BOD, carbonaceous, 5-day	DAILY MX	61	mg/L	40	<=	mg/L	53
8/31/2019	006	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	10
8/31/2019	008	Oxygen, dissolved (DO)	DAILY MN	4	mg/L	5	>=	mg/L	18

ECHO Effluent Exceedances Report
Monitoring Period Date Range: 06/01/2016 to 05/31/2021

Monitoring Period	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Qualifier	Limit Value Unit	% Exceedance
9/30/2019	001	Nitrogen, ammonia total (as N)	DAILY MX	5	mg/L	3.5	<=	mg/L	40
9/30/2019	001	Nitrogen, ammonia total (as N)	DAILY MX	130	kg/d	90.9	<=	kg/d	43
9/30/2019	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	28
9/30/2019	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	20
9/30/2019	006	Oxygen, dissolved (DO)	DAILY MN	4	mg/L	5	>=	mg/L	30
9/30/2019	007	pH, maximum	DAILY MX	10	SU	9	<=	SU	
9/30/2019	008	Application rate area sprayed	DAILY MX	1	in/d	0.75	<=	in/d	7
9/30/2019	009	Application rate area sprayed	DAILY MX	1	in/d	0.75	<=	in/d	20
10/31/2019	001	Solids, total suspended	MO AVG	31	mg/L	30	<=	mg/L	3
10/31/2019	001	Solids, total suspended	DAILY MX	56	mg/L	45	<=	mg/L	24
10/31/2019	001	Nitrogen, ammonia total (as N)	DAILY MX	4	mg/L	3.5	<=	mg/L	11
10/31/2019	001	Nitrogen, ammonia total (as N)	MO AVG	2	mg/L	1.6	<=	mg/L	38
10/31/2019	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	27
10/31/2019	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	40
10/31/2019	001	BOD, carbonaceous, 5-day	DAILY MX	58	mg/L	40	<=	mg/L	45
10/31/2019	006	Oxygen, dissolved (DO)	DAILY MN	5	mg/L	5	>=	mg/L	4
10/31/2019	007	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	20
10/31/2019	099	Solids, total suspended	DAILY MX	41	kg/d	10.51	<=	kg/d	285
10/31/2019	099	Solids, total suspended	MO AVG	40	kg/d	5	<=	kg/d	692
10/31/2019	099	Oil and grease (soxhlet extr.) tot.	DAILY MX	17	kg/d	5.13	<=	kg/d	231
10/31/2019	099	Oil and grease (soxhlet extr.) tot.	MO AVG	11	kg/d	3.08	<=	kg/d	257
11/30/2019	009	Solids, total suspended	MO AVG	43	mg/L	30	<=	mg/L	43
12/31/2019	001	Chlorine, total residual	DAILY MX	0	mg/L	0.038	<=	mg/L	84
12/31/2019	001	Chlorine, total residual	DAILY MX	2	kg/d	1.44	<=	kg/d	32
12/31/2019	001	pH, minimum	DAILY MN	6	SU	6.5	>=	SU	
5/31/2020	001	Nitrogen, ammonia total (as N)	MO AVG	2	mg/L	1.6	<=	mg/L	25
5/31/2020	001	Nitrogen, ammonia total (as N)	DAILY MX	140	kg/d	90.9	<=	kg/d	54
5/31/2020	001	Nitrogen, ammonia total (as N)	DAILY MX	5	mg/L	3.5	<=	mg/L	40
5/31/2020	001	Phosphorus, total (as P)	DAILY MX	3	mg/L	1.5	<=	mg/L	102
5/31/2020	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	24
5/31/2020	001	Phosphorus, total (as P)	DAILY MX	83	kg/d	56.8	<=	kg/d	45

ECHO Effluent Exceedances Report
Monitoring Period Date Range: 06/01/2016 to 05/31/2021

Monitoring Period	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Qualifier	Limit Value Unit	% Exceedance
5/31/2020	001	Chlorine, total residual	DAILY MX	0	mg/L	0.038	<=	mg/L	953
5/31/2020	001	Chlorine, total residual	DAILY MX	11	kg/d	1.44	<=	kg/d	664
6/30/2020	001	Solids, total suspended	DAILY MX	1,800	kg/d	1710	<=	kg/d	5
6/30/2020	001	Solids, total suspended	DAILY MX	63	mg/L	45	<=	mg/L	40
6/30/2020	001	Solids, total suspended	MO AVG	36	mg/L	30	<=	mg/L	20
6/30/2020	001	Phosphorus, total (as P)	DAILY MX	61	kg/d	56.8	<=	kg/d	7
6/30/2020	001	Phosphorus, total (as P)	MO AVG	44	kg/d	37.9	<=	kg/d	16
6/30/2020	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	45
6/30/2020	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	25
6/30/2020	001	BOD, carbonaceous, 5-day	DAILY MX	2,000	kg/d	1520	<=	kg/d	32
6/30/2020	001	BOD, carbonaceous, 5-day	MO AVG	1,100	kg/d	947	<=	kg/d	16
6/30/2020	001	BOD, carbonaceous, 5-day	DAILY MX	63	mg/L	40	<=	mg/L	58
6/30/2020	001	BOD, carbonaceous, 5-day	MO AVG	35	mg/L	25	<=	mg/L	40
7/31/2020	001	E. coli, MTEC-MF	WK GEOMN	960	MPN/100mL	284	<=	MPN/100mL	238
7/31/2020	006	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	17
7/31/2020	008	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	2
8/31/2020	001	Nitrogen, ammonia total (as N)	DAILY MX	9	mg/L	3.5	<=	mg/L	151
8/31/2020	001	Nitrogen, ammonia total (as N)	MO AVG	2	mg/L	1.6	<=	mg/L	19
8/31/2020	001	Nitrogen, ammonia total (as N)	DAILY MX	220	kg/d	90.9	<=	kg/d	142
8/31/2020	001	E. coli, MTEC-MF	WK GEOMN	2,720	MPN/100mL	284	<=	MPN/100mL	858
8/31/2020	007	Application rate area sprayed	DAILY MX	1	in/d	0.75	<=	in/d	1
9/30/2020	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	23
9/30/2020	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	40
9/30/2020	001	BOD, carbonaceous, 5-day	MO AVG	26	mg/L	25	<=	mg/L	4
9/30/2020	001	BOD, carbonaceous, 5-day	DAILY MX	57	mg/L	40	<=	mg/L	43
9/30/2020	008	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	6
10/31/2020	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	14
10/31/2020	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	26
10/31/2020	001	E. coli, MTEC-MF	WK GEOMN	8,160	MPN/100mL	284	<=	MPN/100mL	2,773
10/31/2020	001	BOD, carbonaceous, 5-day	MO AVG	31	mg/L	25	<=	mg/L	24
10/31/2020	001	BOD, carbonaceous, 5-day	DAILY MX	47	mg/L	40	<=	mg/L	18

ECHO Effluent Exceedances Report
Monitoring Period Date Range: 06/01/2016 to 05/31/2021

Monitoring Period	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Qualifier	Limit Value Unit	% Exceedance
10/31/2020	008	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	47
10/31/2020	009	BOD, carbonaceous, 5-day	DAILY MX	42	mg/L	40	<=	mg/L	5
12/31/2020	001	Solids, total suspended	DAILY MX	68	mg/L	45	<=	mg/L	51
12/31/2020	001	Solids, total suspended	MO AVG	34	mg/L	30	<=	mg/L	13
12/31/2020	001	BOD, carbonaceous, 5-day	DAILY MX	81	mg/L	40	<=	mg/L	103
12/31/2020	001	BOD, carbonaceous, 5-day	MO AVG	36	mg/L	25	<=	mg/L	44
12/31/2020	001	BOD, carbonaceous, 5-day	DAILY MX	1,600	kg/d	1520	<=	kg/d	5
1/31/2021	001	Solids, total suspended	MO AVG	1,200	kg/d	1140	<=	kg/d	5
1/31/2021	001	Solids, total suspended	DAILY MX	88	mg/L	45	<=	mg/L	96
1/31/2021	001	Solids, total suspended	MO AVG	46	mg/L	30	<=	mg/L	53
1/31/2021	001	Solids, total suspended	DAILY MX	2,200	kg/d	1710	<=	kg/d	29
1/31/2021	001	BOD, carbonaceous, 5-day	MO AVG	35	mg/L	25	<=	mg/L	40
1/31/2021	001	BOD, carbonaceous, 5-day	DAILY MX	1,900	kg/d	1520	<=	kg/d	25
1/31/2021	001	BOD, carbonaceous, 5-day	DAILY MX	71	mg/L	40	<=	mg/L	78
2/28/2021	001	Solids, total suspended	DAILY MX	132	mg/L	45	<=	mg/L	193
2/28/2021	001	Solids, total suspended	MO AVG	2,050	kg/d	1140	<=	kg/d	80
2/28/2021	001	Solids, total suspended	MO AVG	83	mg/L	30	<=	mg/L	176
2/28/2021	001	Solids, total suspended	DAILY MX	2,950	kg/d	1710	<=	kg/d	73
2/28/2021	001	Phosphorus, total (as P)	DAILY MX	2	mg/L	1.5	<=	mg/L	23
2/28/2021	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	35
2/28/2021	001	BOD, carbonaceous, 5-day	MO AVG	2,240	kg/d	947	<=	kg/d	137
2/28/2021	001	BOD, carbonaceous, 5-day	DAILY MX	3,040	kg/d	1520	<=	kg/d	100
2/28/2021	001	BOD, carbonaceous, 5-day	MO AVG	90	mg/L	25	<=	mg/L	260
2/28/2021	001	BOD, carbonaceous, 5-day	DAILY MX	120	mg/L	40	<=	mg/L	200
2/28/2021	099	Solids, total suspended	MO AVG	5	kg/d	5	<=	kg/d	2
3/31/2021	001	Solids, total suspended	MO AVG	62	mg/L	30	<=	mg/L	107
3/31/2021	001	Solids, total suspended	DAILY MX	84	mg/L	45	<=	mg/L	87
3/31/2021	001	Solids, total suspended	MO AVG	1,600	kg/d	1140	<=	kg/d	40
3/31/2021	001	Solids, total suspended	DAILY MX	2,200	kg/d	1710	<=	kg/d	29
3/31/2021	001	Phosphorus, total (as P)	MO AVG	1	mg/L	1	<=	mg/L	10
3/31/2021	001	BOD, carbonaceous, 5-day	MO AVG	1,500	kg/d	947	<=	kg/d	58

ECHO Effluent Exceedances Report
Monitoring Period Date Range: 06/01/2016 to 05/31/2021

Monitoring Period	Outfall	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Limit Value	Limit Value Qualifier	Limit Value Unit	% Exceedance
3/31/2021	001	BOD, carbonaceous, 5-day	DAILY MX	2,600	kg/d	1520	<=	kg/d	71
3/31/2021	001	BOD, carbonaceous, 5-day	DAILY MX	99	mg/L	40	<=	mg/L	148
3/31/2021	001	BOD, carbonaceous, 5-day	MO AVG	58	mg/L	25	<=	mg/L	132
4/30/2021	001	Solids, total suspended	MO AVG	39	mg/L	30	<=	mg/L	30
4/30/2021	001	Solids, total suspended	DAILY MX	52	mg/L	45	<=	mg/L	16
4/30/2021	001	BOD, carbonaceous, 5-day	MO AVG	27	mg/L	25	<=	mg/L	8
4/30/2021	001	BOD, carbonaceous, 5-day	DAILY MX	47	mg/L	40	<=	mg/L	18
4/30/2021	099	Oil and grease (soxhlet extr.) tot.	MO AVG	4	kg/d	3.08	<=	kg/d	20
5/31/2021	001	Solids, total suspended	DAILY MX	68	mg/L	45	<=	mg/L	51
5/31/2021	001	Solids, total suspended	DAILY MX	2,200	kg/d	1710	<=	kg/d	29
5/31/2021	001	Solids, total suspended	MO AVG	32	mg/L	30	<=	mg/L	7
5/31/2021	001	E. coli, MTEC-MF	WK GEOMN	7,700	MPN/100mL	284	<=	MPN/100mL	2,611
5/31/2021	001	E. coli, MTEC-MF	MO GEOMN	1,405	MPN/100mL	126	<=	MPN/100mL	1,015
5/31/2021	001	BOD, carbonaceous, 5-day	DAILY MX	1,700	kg/d	1520	<=	kg/d	12
5/31/2021	001	BOD, carbonaceous, 5-day	DAILY MX	52	mg/L	40	<=	mg/L	30