

INSPECTION REPORT

Inspection Date:	03/01/2023	Announced: Yes
Time:	Entry: 08:54 AM (ET)	Exit: 12:49 PM (ET)
Media:	Water	
Statute(s)/Program(s):	Clean Water Act, NPDES, WWTP	
Type of inspection:	Focused Inspection – AO monitoring	
Access:	Granted	
Permittee Name:	CITY OF KENDALLVILLE	
Facility or Site Name:	CITY OF KENDALLVILLE WASTEWATER TREATMENT PLANT	
Facility/Site Physical Address:	501 WEST WAYNE STREET	
(City, state, zip code)	KENDALLVILLE, IN 46755	
County/Parish:	NOBLE	
Facility GPS Coordinates:	41.446444, -85.273806	
Facility/Site Identifier:	110005973900	
Permit Number:	IN0020656	

Persons Participating in Inspection:

Title	Name	Phone	Email	Present at Opening Conf.	Present at Closing Conf.
Lead Inspector	Dean Maraldo	3123532098	maraldo.dean@epa.gov	Yes	Yes
Inspector	Jake Berger	(312) 353-8024	berger.jake@epa.gov	Yes	Yes
Inspector	Lynn Raisor	(317) 691-0099	LRAISOR@idem.IN.gov	Yes	Yes
Inspector	Aaron Deeter	(317) 691-1915	ADEETER@idem.IN.gov	Yes	Yes
City Council Member	Jim Dazey			Yes	No
Superintendent	Mark Schultz	(260) 349-8598	mschultz@kendallville-in.org	Yes	Yes
Maint. and Collection Supervisor	Patrick Howell			Yes	Yes
Pretreatment Coordinator	Trevor Hampshire	(260) 347-1362	THampshire@kendallville-in.org	Yes	Yes
WET Env. Eng	Wade Hale	(260)410-4400	whale@wetenvironmental.com	Yes	Yes
WET Env. Eng	Karl Tanner		ktanner@wetenvironmental.com	Yes	Yes
WET Env. Eng	Kyle Walters		kwalters@wetenvironmental.com	Yes	Yes
WET Env. Eng	Dustin Wuis	(260) 222-1560	dwuis@wetenvironmental.com	Yes	Yes

Lead Inspector:			
Dean Maraldo	[Signature]	DINO MARALDO Digitally signed by DINO MARALDO Date: 2023.03.02 16:36:04 -06'00'	
	REGION 5	Maraldo.Dean@epa.gov	(312) 353-2098
Supervisor Review:			
Ryan Bahr	[Signature]	Ryan Bahr Digitally signed by Ryan Bahr Date: 2023.03.02 21:24:07 -06'00'	
	REGION 5	bahr.ryan@epa.gov	

SECTION I – INTRODUCTION**Site Entry and Inspection Objectives**

I, Region 5 Lead Inspector, Dean Maraldo, arrived at the KENDALLVILLE WWTP (the “Site” or “Facility”), located at 501 WEST WAYNE STREET, at 8:54 AM (all times in Eastern Time Zone) on 03/01/2023 for an announced inspection. REGION 5 inspector Jake Berger joined me for the inspection and we both presented our credentials to the Superintendent Mark Schultz and informed him 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, and the recently issued administrative order on consent (dated January 9, 2023). The inspection was conducted under the authority of the Federal CWA (Section 308). The table above identifies the attendees that participated in the inspection. This report is based on information supplied by Facility representatives, observations made by the Region 5 inspectors, and records and reports maintained by the permittee and the Region 5 inspectors, including: direct observations made by the Region 5 inspectors, photographs taken by Region 5 inspectors, physical evidence collected by the Region 5 inspectors, verbal or written statements made by or information supplied by Facility 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 Facility 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.

After opening introductions, we went over the inspection plan for the day, including review of recent compliance with permit limits and the City’s recently submitted Interim Compliance Plan. I asked if there were any questions. There were no questions.

SECTION II – OBSERVATIONS

Observations may not be in sequential order.

Unit: Review of Recent Effluent Data	Contains CBI: No
Observation #: DM1-OB-001	Date: 03/01/2023
I asked the Facility representatives about recent compliance with NPDES permit limits. Mr. Hampshire presented recent influent and effluent data (see Appendix 2 – Inspection Documents). The data showed the facility is still struggling to meet effluent limits for nitrogen-ammonia, total suspended solids (TSS), phosphorus and biochemical oxygen demand (BOD). Mr. Schultz said that the ongoing effluent limit exceedances are due to highly variable BOD loading from Kraft Heinz. I asked about recent copper effluent limit exceedances.	

Mr. Schultz said the copper issues are usually related to high TSS influent conditions. I asked if all treatment plant components were up and running at the time of inspection. Mr. Schultz confirmed all treatment plant components were up and running at the time of inspection.

Unit: Review of City's Draft Interim Compliance Plan

Contains CBI: No

Observation #: DM1-OB-002

Date: 03/01/2023

I asked the City to review the key elements of their recently submitted Draft Interim Compliance Plan required under EPA's Administrative Order on Consent ("AOC"), dated January 9, 2023. The City submitted the Draft Interim Compliance Plan on February 7, 2023, and within the timeframe required by the AOC (paragraph 112(a)(i)). The City representatives walked through the planned interim measures and implementation schedule. I asked for clarification regarding the process of thermal bulking of secondary clarifiers, and the length of time proposed for chemical addition and redirection of pressate to digesters. Mr. Walters explained that currently a third of the mounding around clarifiers is complete, with a goal of adding bulk material to within 12-18" of the top of the clarifiers. Mr. Schultz added that the schedule for installing equipment related to chemical addition and redirection of pressate to digesters was due in part to funding procedures under the American Rescue Plan and contracting and installation scheduling. Mr. Schultz provided the list of equipment to be installed over the next several months (see Appendix 2 – Inspection Documents). Following the overview of the Draft Interim Compliance Plan, the City agreed to address some minor comments, including missing tables and figures, by March 6.

Unit: Review of Kraft Heinz Draft Interim Compliance Plan

Contains CBI: No

Observation #: DM1-OB-003

Date: 03/01/2023

Representatives of Kraft Heinz arrived at 9:50 AM, including Scott Borger, Kenny Pankop, Eric Stanek (via phone), Rachel Burris (Ramboll, via phone), and Dan Wagner (Ramboll, via phone).

They joined the meeting to go over the company's Draft Interim Compliance Plan required under EPA's Administrative Order on Consent ("AOC"), dated January 18, 2023.

I asked the Kraft Heinz representatives to specifically describe items 17-24 (items initiated since November 2022) in the plan, summarized below:

- #17. Rented a 24-hour sampler to investigate elevated BOD discharges.
- #18. Daily Walk Through with Maintenance and Production Manager inspecting pumps or lines that for leaks.
- #19. End of production run remove excess product prior to sanitation.
- #20. Check pH every 4 hours and calibrate sensor every week.
- #21. When shutting down lines capture as much product as possible into Animal Feed totes to reduce wastewater loading.
- #22. Weekly Wednesday call with City and engineering group to discuss issues or actions.
- #23. Daily COD sampling to the City.
- #24. Continuous evaluation of process to identify additional measures to reduce BOD Loading.

Mr. Borger described each of the above items. For item #17, Mr. Borger noted BOD spikes occurred at night due to sanitation and cleaning and flushing lines. I asked for clarification for item #19. Mr. Borger said that crews remove excess product from tanks and then scrape into hoppers, and reuse excess in other processes.

For item #20, Mr. Borger said that they now check pH every 4 hours, and added that “pH doing well, no violations over last couple months.” Regarding item #21, Mr. Borger clarified that captured waste in marshmallow lines was used for animal feed. Lastly, for item#24, Mr. Borger provided a copy of his presentation describing continuous evaluation process to reduce BOD loading (see Kraft Heinz handout in Appendix 2 – Inspection Documents).

After the presentation, I asked if they had any other interim items to mention. Mr. Borger added that they expect to have corporate help with ideas soon, and they were looking into working with third parties for solutions. Mr. Stanek added that Kraft Heinz plans to use a phased approach for interim actions. We agreed to set up a call with Kraft Heinz and EPA to discuss interim measures in more detail.

Mr. Hampshire asked about BOD spikes in January. Mr. Pankop said January was bad month and weather caused a lot of problems in production and unplanned downtime (see Kraft Heinz handout in Appendix 2 – Inspection Documents).

Mr. Tanner asked Dan Wagner (Ramboll) if they could share design criteria for BOD inflows. They agreed to set up a meeting to discuss.

Mr. Schultz asked about Kraft Heinz plans to construct an equalization basin. Rachel Burris said Kraft is evaluating the option and will include it in the engineering report (due to EPA in April pursuant to the AOC). Mr. Schultz followed up with a question about developing an O&M manual. Kraft Heinz representatives confirmed that an O&M manual would be developed.

With no additional questions, we concluded the meeting with Kraft Heinz, and their representatives departed the facility at 10:35 AM. After a break we reconvened and began the physical plant inspection.

Unit: Physical Inspection

Contains CBI: No

Observation #: DM1-OB-004

Date: 03/01/2023

We began the physical plant inspection at 11:15 AM. The Superintendent led the tour. We started at headworks and grit basin where all flow enters the plant via gravity from the collection system, then followed the treatment train all the way to the final outfall. See the Photo Log for a summary of physical inspection observations.

We concluded the physical inspection at 12:30 PM and returned to the main office for the closeout conference.

SECTION III – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS

No sampling was conducted.

SECTION IV - 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.

Unit: Interview	
DM1-OB-001	
Ongoing chronic effluent limit exceedances for CBOD, copper, <i>E.coli</i> , nitrogen-ammonia, phosphorus, and TSS. See summary of effluent limit exceedances from August 1, 2022 to December 31, 2023 (see Appendix 2 – Inspection Documents).	Citations: Permit Part I.A
DM1-OB-002	
The City recently submitted a Draft Interim Compliance Plan required under EPA's AOC, dated January 9, 2023. Following the City's overview of the Draft Interim Compliance Plan, the City agreed to address some minor comments, including missing tables and figures, by March 6.	Citations: AOC, paragraph 112(a)(i).
Unit: Physical Inspection	
DM1-OB-004	
The City reported a CSO discharge of 628,885 gallons on February 22, 2023, due to 15" of rainfall (see Bypass/Overflow Report in Appendix 2 – Inspection Documents). CSO Outfall #002 is located just upstream from Outfall 003, on the unnamed tributary that flows to Henderson Lake.	Citations: Permit Attachment A.

SECTION V – CLOSING CONFERENCE AND FOLLOW UP

I began the inspection closing conference with facility personnel at 12:35 PM on 03/01/2023. During the closing conference, I discussed the preliminary observations and Areas of Concern identified during the inspection. Observations and Areas of Concern have not yet been evaluated for a formal compliance determination. We also discussed follow-up on a recent citizen complaint about an alleged surface discharge that occurs during rain events on Pennsylvania Ave. The City agreed to follow-up on the issue and the IDEM representatives agreed to contact the citizen.

I also reviewed the documents received from the City during the inspection, including:

1. Data Graphs (12/1/2022-2/28/2023)
2. Summary of American Rescue Plan-Fund Plan
3. Kraft Heinz Wastewater Presentation (received from Kraft Heinz representatives)

Before concluding, I asked if anyone had any questions. With no other questions, I discussed EPA's inspection report timeframes, and we departed the facility at 12:49 PM, on March 1, 2023.

Communication Log

Type	From	To	Date	Description	Attachment(s)
Email	Dustin Wuis	Dean Maraldo	3/2/2023	transmitting attachment	Electronic copy of data graphs

SECTION VII – LIST OF APPENDICES

1. Photo Log
2. Inspection Documents

APPENDIX 1. Photo Log

Headworks - Grit Basin	
KVLL0198.JPG	
03/01/2023 11:27 AM (ET)	
Dean Maraldo	
Physical Inspection/Headworks	
No CBI	
No PII	
Note influent pipe outlet.	
SCADA Display	
KVLL0199.JPG	
03/01/2023 11:35 AM (ET)	
Dean Maraldo	
Physical Inspection/Control Room	
No CBI	
No PII	
SCADA system display in the Operations Building.	

Primary Clarifier	
KVLL0200.JPG	
03/01/2023 11:49 AM (ET)	
Dean Maraldo	
Physical Inspection/Primary Clarification	
No CBI	
No PII	
Aeration Tank #1	
KVLL0201.JPG	
03/01/2023 11:54 AM (ET)	
Dean Maraldo	
Physical Inspection/Aeration Tank #1	
No CBI	
No PII	
Four aeration tanks in total and all operating.	
Aeration Tank #4	
KVLL0202.JPG	
03/01/2023 11:58 AM (ET)	
Dean Maraldo	
Physical Inspection/Aeration Tank #4	
No CBI	
No PII	
Noted palm oil blobs on surface, but difficult to discern in image.	

Secondary Clarifier	
KVLL0203.JPG	
03/01/2023 12:11 PM (ET)	
Dean Maraldo	
Physical Inspection/Secondary Clarification	
No CBI	
No PII	
Post-aeration Basin	
KVLL0204.JPG	
03/01/2023 12:16 PM (ET)	
Dean Maraldo	
Physical Inspection/Disinfection & post-aeration	
No CBI	
The UV system was out of service until recreation season begins April 1. Noted improvement in duckweed and growth since August 2022 inspection.	
No PII	
Final Outfall #003	
KVLL0205.JPG	
03/01/2023 12:24 PM (ET)	
Dean Maraldo	
Physical Inspection/Final Outfall	
No CBI	
No PII	
Outfall #003 discharges to an unnamed tributary just upstream of Henderson Lake. Discharge appeared clear.	

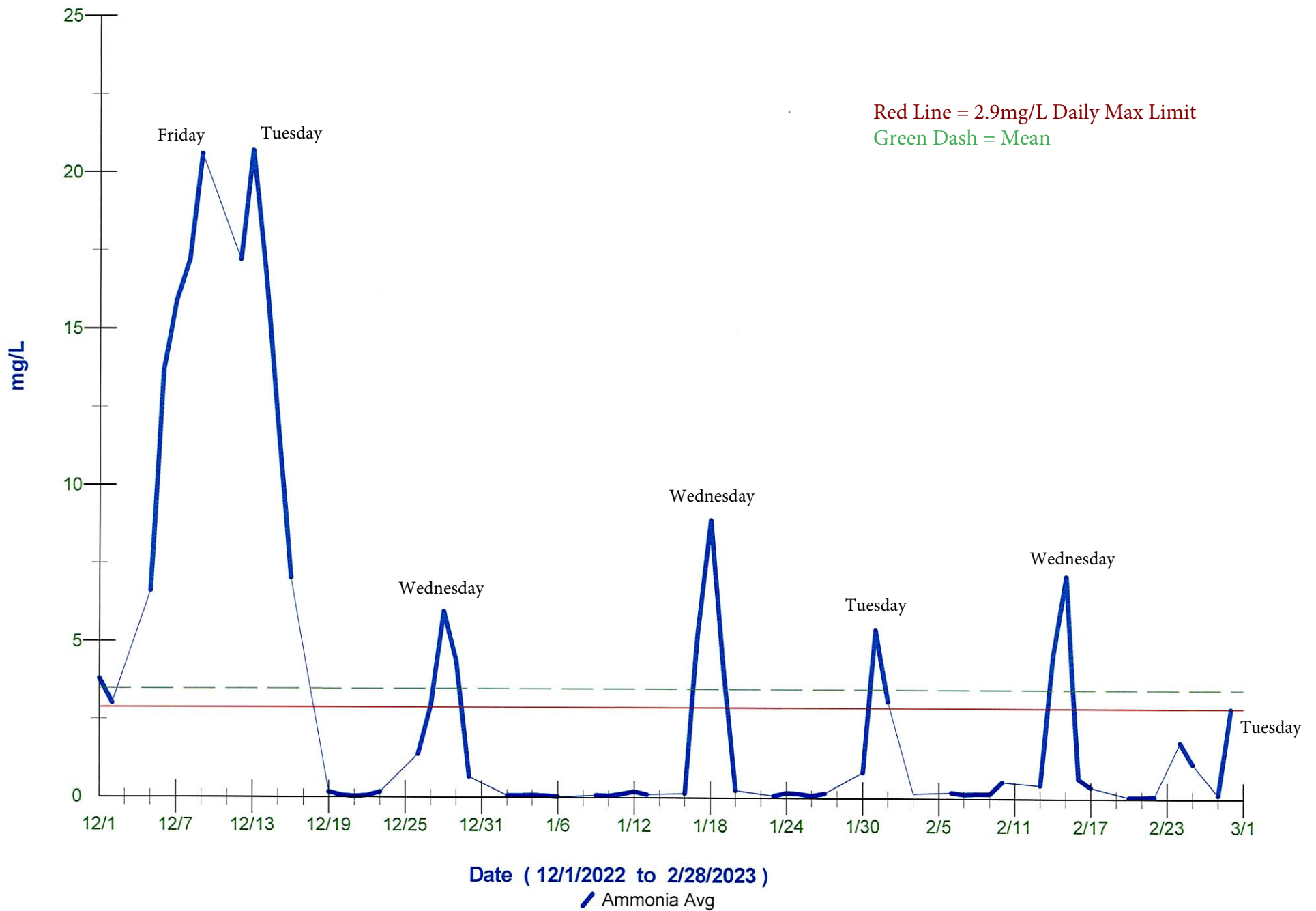
CSO Outfall #002	
KVLL0206.JPG	
03/01/2023 12:25 PM (ET)	
Dean Maraldo	
Physical Inspection/CSO Outfall	
No CBI	
No PII	
CSO Outfall #002 is located just upstream from Outfall 003, on the unnamed tributary that flows to Henderson Lake. The CSO discharged 628,885 gallons on February 22, 2023, due to 15" of rainfall (see Bypass/Overflow Report in Appendix 2 – Inspection Documents)	

APPENDIX 2: INSPECTION DOCUMENTS

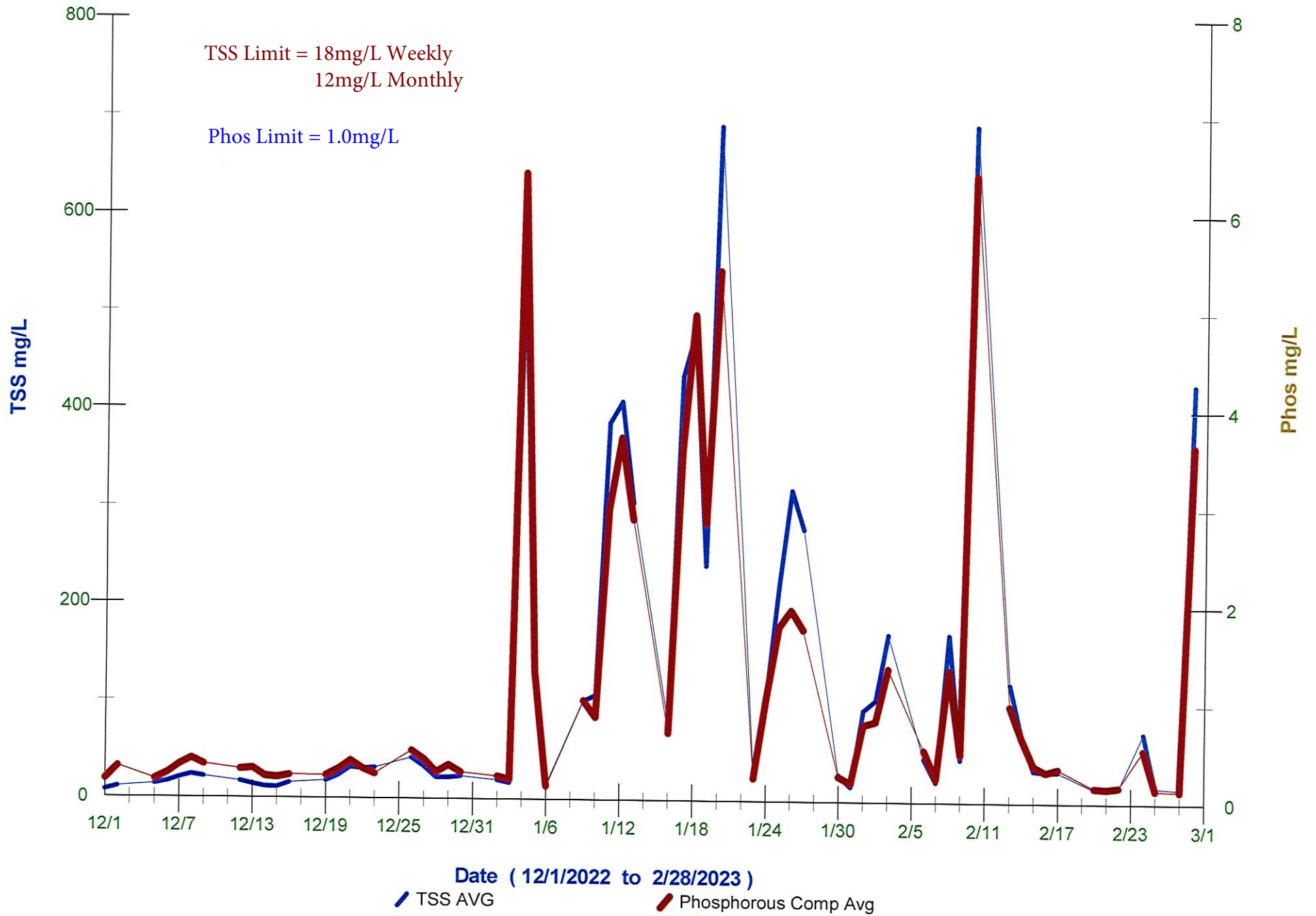
Document Received Name	Date Received	Pages	Attached to report below?
Data Graphs (12/1/2022-2/28/2023)	03/03/2023	6	Yes
Summary of American Rescue Plan-Fund Plan	03/01/2023	1	Yes
Kraft Heinz Wastewater Presentation (received from Kraft Heinz representatives)	03/01/2023	4	Yes
CSO Notification Report	02/24/2023	1	Yes

Reference Document Name	Page(s)	Attached to report below?
Summary of effluent limit exceedances (August 1, 2022 to December 31, 2023)	1	Yes

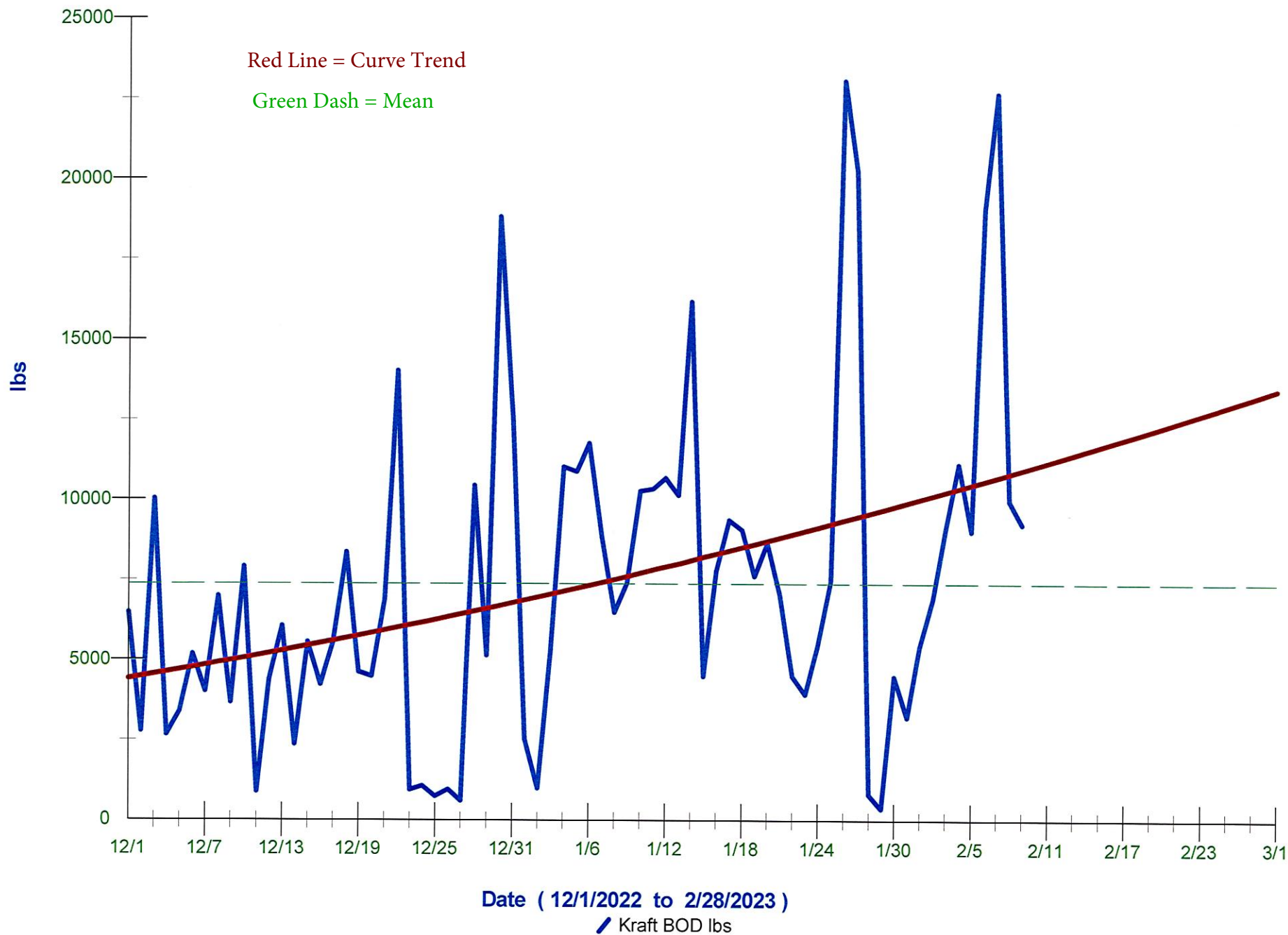
Final Effluent Ammonia



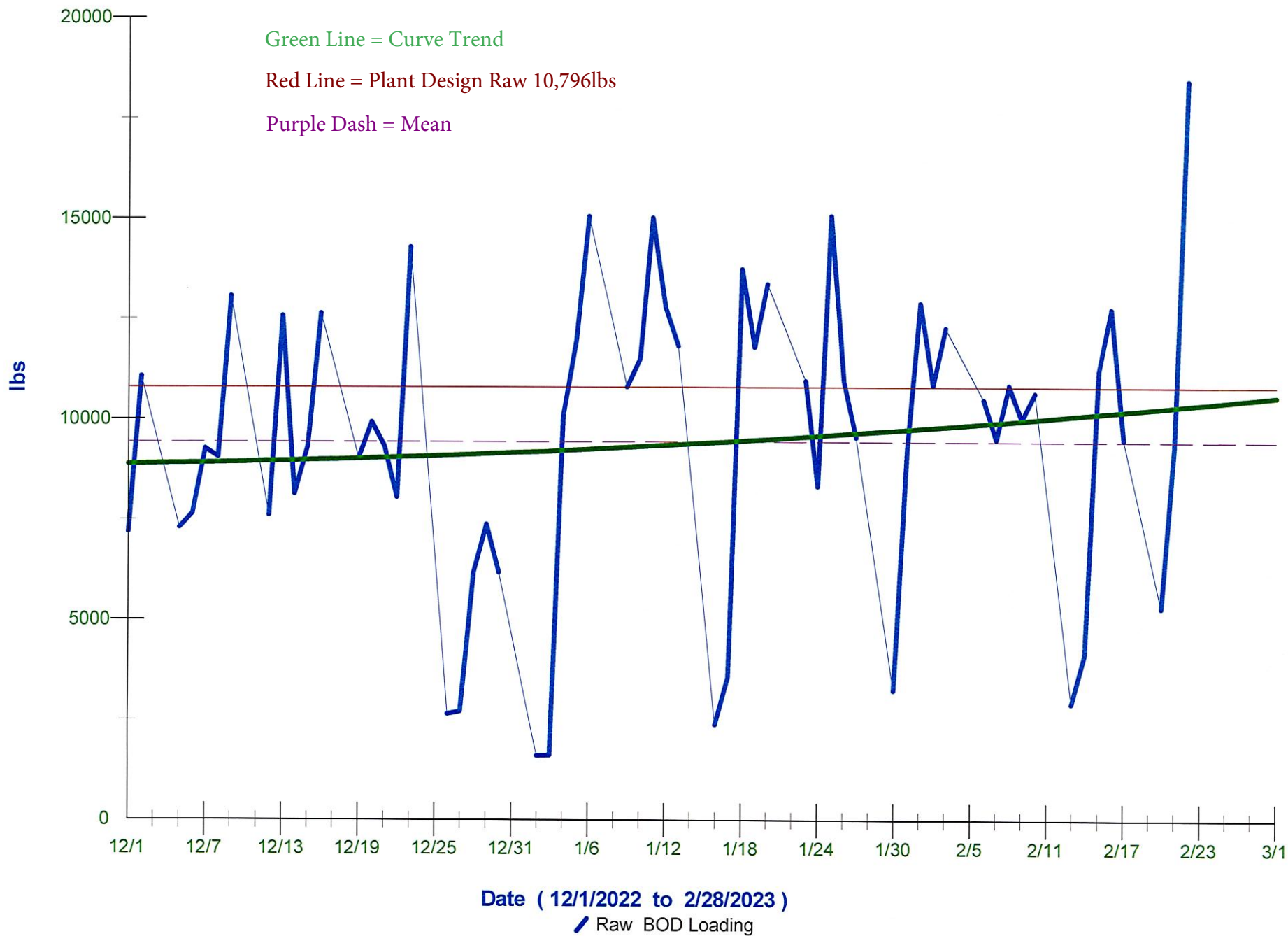
Final Effluent TSS/Phos



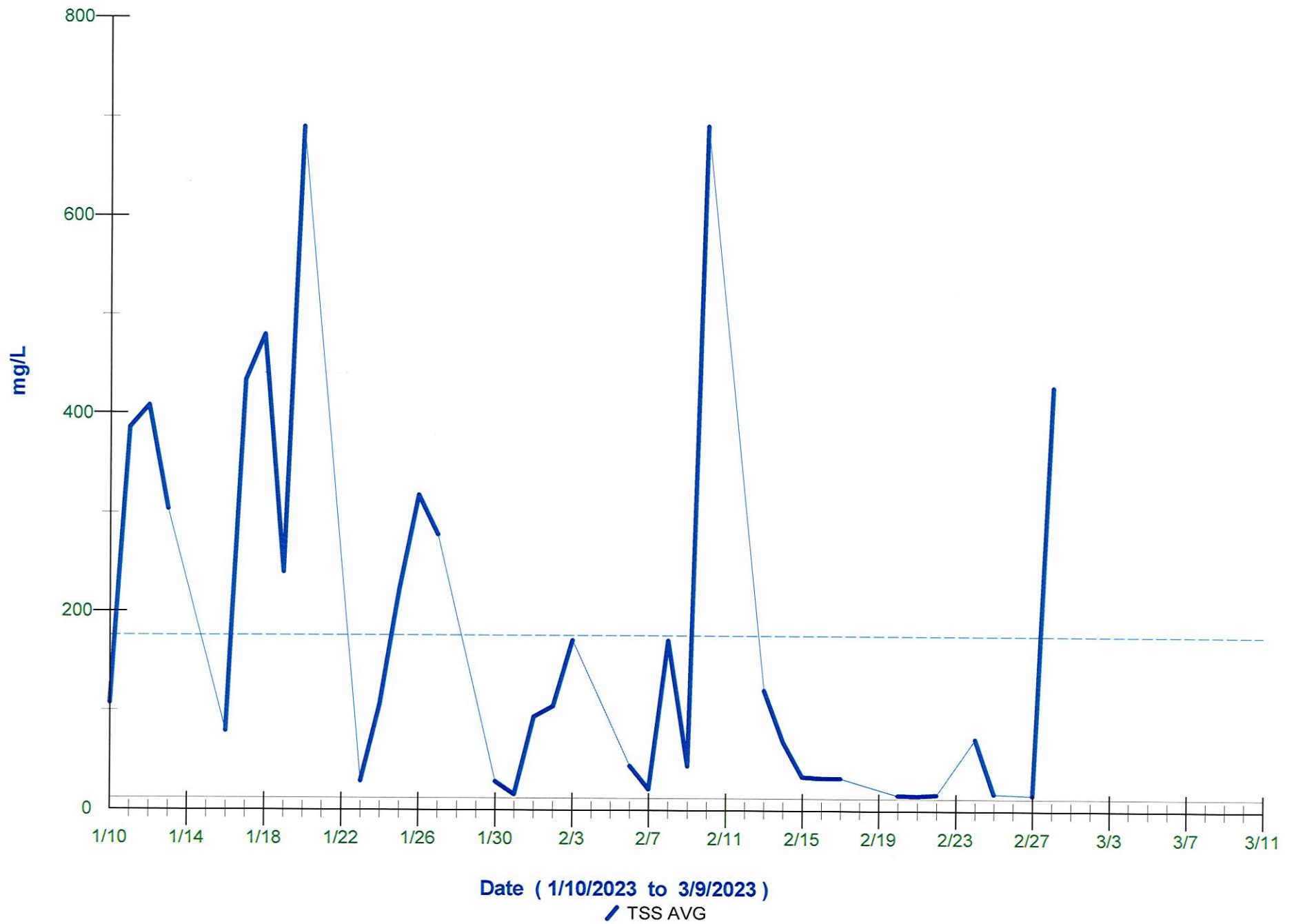
Kraft BOD lbs



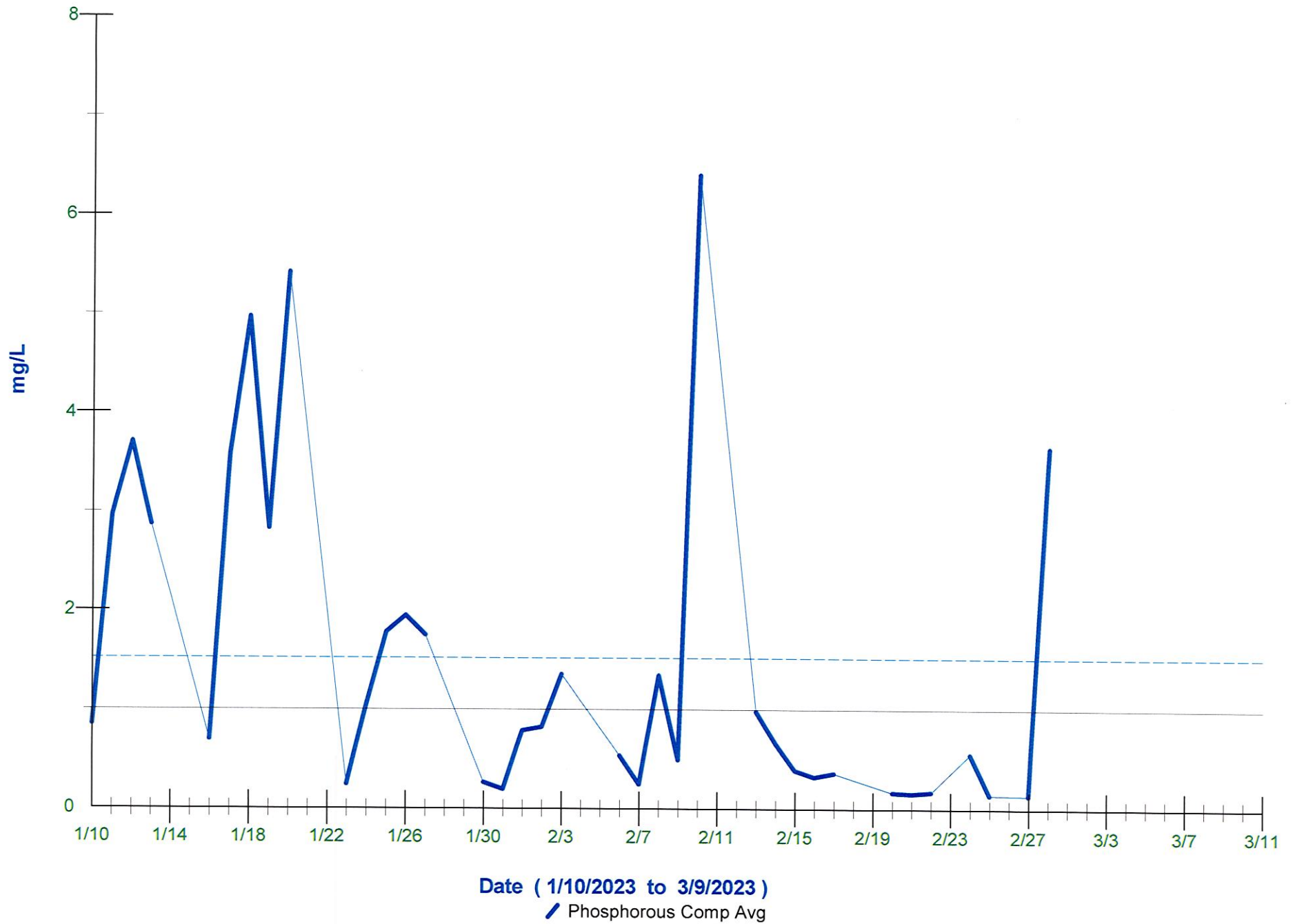
Plant Raw BOD lbs



Data Over Time



Data Over Time



ARP- American Rescue Plan 2021, Fiscal Recovery Fund Plan:

1. Enhance pump feed system skid \$25,000
2. Caustic feed pumps, containment equipment and Scada interface \$10,000
3. 7104 Pump Scada interface, chemical tank \$5,000
4. 1853 pump feed skid and Scada interface \$27,000
5. 4- Raw sewage pumps Scada \$25,000
6. Total suspend solids effluent meter & Scada interface \$7,699
7. Eliminating feeding anaerobic ammonia supernatant from the anaerobic digester to the head of the plant by repiping and pumping it to the aerobic digester for treatment.
\$25,000
8. Add on 10/18/22 -Sanitary Sewer Relining Project for 700 S Block of Main Street
\$40,000.00

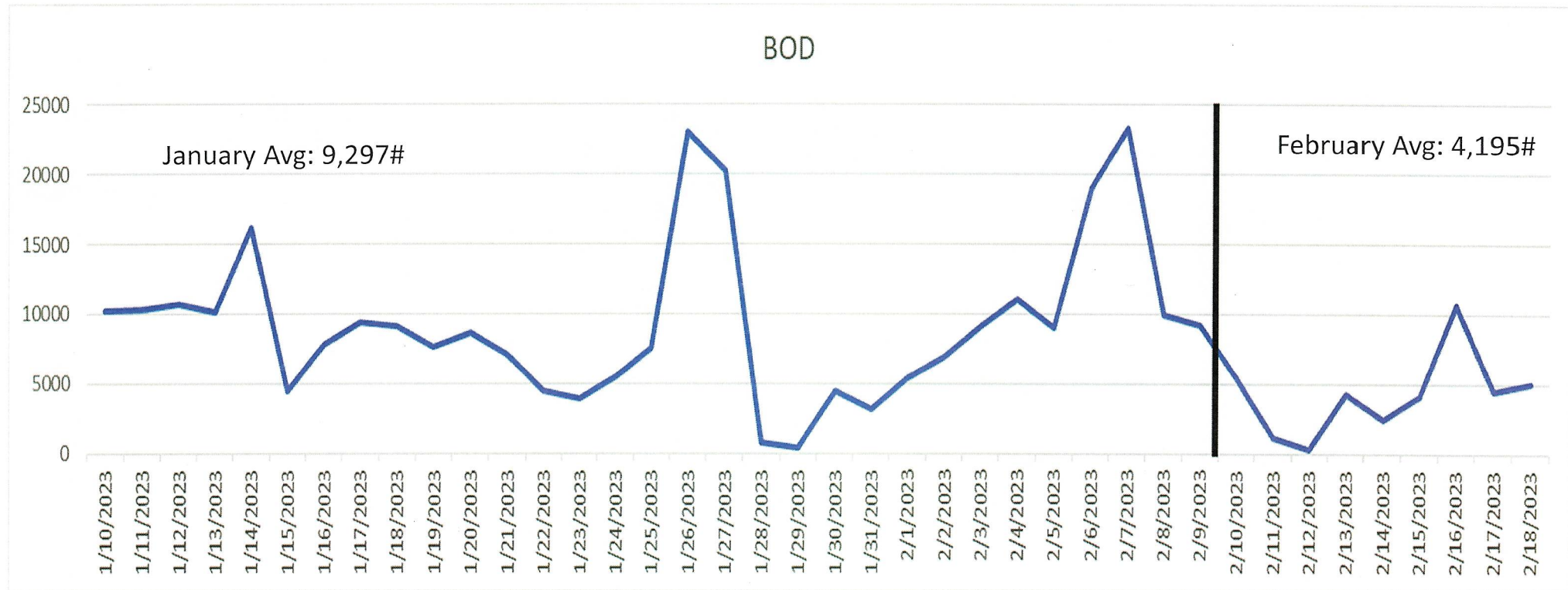
Total \$123,799



THE KRAFT HEINZ COMPANY

WasteWater

February Trend



KraftHeinz

Caramel BOD Reduction

- Caramel Kitchen
 - Met with cooks and learned that we could take our hot water in the caramelizing kettle and pump into baker to agitate then dump into animal feed tote.
 - This is a task that can be done before sanitation comes in to do their nightly clean
 - Have samples out to Element to understand how much BOD we are capturing by doing this



KraftHeinz

Unplanned Downtime in January/Next Steps

- Snowstorm in January caused a lot of call offs and we shut lines down for a shift
- Mechanical Failures on our lines causes us to shut lines downs throughout the shifts
 - Currently developing a maintenance reliability process and plan
 - Working toward hiring a maintenance reliability manager
 - Corporate maintenance support coming down to help



BYPASS / OVERFLOW INCIDENT REPORT

State Form 48373 (R9 / 7-22)
Indiana Department of Environmental Management
Office of Water Quality

☐ Follow-up to Bypass report
previously sent on: _____

INSTRUCTIONS: Complete all parts of this form and e-mail signed copies to wwreports@idem.IN.gov. Submittal of this report will satisfy the Office of Water Quality (OWQ) telephone and written bypass/overflow reporting requirements of your NPDES permit. Please use and the second page of this form as necessary to identify **separate locations caused by the same event**. If you have any questions while filling out this form, please call (317) 232-7150.

To report a spill or if the release is resulting in a fish kill or other severe environmental damage, immediately report the release to the Emergency Response Section spill response line at: (317) 233-7745 or toll free within Indiana at (888) 233-7745.

GENERAL INFORMATION					
(1) Facility Name (Organization) City of Kendallville, In WWTP		(2) Mailing Address (reporting organization) 234 South Main Street		(3) County Noble	(4) NPDES Permit IN00202656
RELEASE INFORMATION (Location 1)					
(5) Outfall Number 002	(6) Date (mm/dd/yy) and Time Release Began 2/22/23 6:20 ☐ AM ☒ PM	(7) Date (mm/dd/yy) and Time Release Stopped 2/23/23 1:40 ☐ AM ☒ PM	(8) Location of Release (streets address or Manhole, Lift Station, Force Main etc.) Henderson Ditch	(9) Latitude (Deg Min Sec) 41.27.56 N	(9) Longitude (Deg Min Sec) 85.19.12 W
(10) Amount of Flow Released (Always provide a volume.) Check one: ☐ Estimated ☒ Actual 628,885 Gallons			(11) WWTP Flow During Release 10 MGD	(12) WWTP Peak Design Flow Rate 6.48 MGD	
(13) Overflow Type (Select one.) ☐ Sanitary Sewer Overflow ☒ Treatment Bypass (at wastewater plant) ☐ Prohibited Combined Sewer Overflow ☐ Dry Weather Combined Sewer Overflow ☐ Combined Sewer System Release		(14) Describe any damage to aquatic life or receiving stream: N/A			
(15) Reason for Bypass / Overflow (Select one or more.) ☐ Construction Related ☐ Power Failure ☐ Equipment Failure ☐ Unknown ☐ Exceeded Max Capacity ☒ Precipitation 15 Inches					
(16) System Component(s) (Select one or more.) ☐ Manhole ☐ House Lateral ☐ Pipe Failure ☐ Pump Station Failure ☐ Treatment Bypassed ☐ Other ☐ Influent Structure ☐ Air Relief Valve ☐ Sewer Clean Out Describe Other: (in the box below)		(17) Additional Description of the Bypass / Overflow Event: Exceed Plant Design flow caused by 15 inches of rain and snow melt		(18) Description of the Area Impacted (Check all that apply.) ☐ Affected Private Property ☐ Basement Backup ☒ Occurred at Treatment Plant ☐ Reached Public Land ☐ Reached Receiving Water Name of Receiving Water Impacted:	
(19) Additional organizations notified by facility, if necessary (Select one or more.) ☐ IDEM Emergency Response ☐ Health Department ☐ DNR Fish and Wildlife ☐ Local Emergency Management ☐ Other: N/A					
(20) Actions Taken to Prevent, Minimize, or Mitigate Damage including Clean-up and Treatment of Affected Area (Select one or more of the following, then add a written description.) ☐ Removed Blockage ☐ Repaired Pipe ☐ Repaired Pump Station ☐ Other ☐ Lime ☐ Clean-Up Debris					
(21) Resolution: Actions Taken or Planned to Prevent Recurrence Plant Engineer to review and establish long term corrective action					
(22)					

CERTIFICATION AND SIGNATURE			
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations. (The area below is for a handwritten signature or an electronic substitute. Scan the completed form to PDF and e-mail to wwreports@idem.IN.gov)			
SIGNATURE: Individual Making Report (printed) Mark Schultz		Telephone Number 260-347-1362	DATE (month, day, year): Date (month, day, year) / Time IDEM Notified 2/23/2023 ☐ AM ☒ PM

Effluent Limit Exceedances Report
 IN0020656: KENDALLVILLE WWTP, KENDALLVILLE, IN 46755
 Monitoring Period Date Range: 08/01/2022 to 12/31/2022

Exceedance Details

Monitoring Period Date	Parameter Description	Limit Type	DMR Value	dmr_valu e_qualifie r	DMR Value Unit	Limit Value	Limit Value Qualifier	% Exceedance
8/31/2022	Nitrogen, ammonia total (as N)	DAILY MX	8.68	=	mg/L	2.9	<=	199
8/31/2022	Nitrogen, ammonia total (as N)	MO AVG	1.9	=	mg/L	1.3	<=	46
8/31/2022	E. coli, colony forming units (CFU)	DAILY MX	533.5	=	CFU/100mL	235	<=	127
9/30/2022	Oxygen, dissolved (DO)	DLYAVMIN	5.68	=	mg/L	6	>=	5
9/30/2022	Solids, total suspended	MO AVG	14.9	=	mg/L	12	<=	24
9/30/2022	Solids, total suspended	MX WK AV	26	=	mg/L	18	<=	44
9/30/2022	Nitrogen, ammonia total (as N)	DAILY MX	13	=	mg/L	2.9	<=	348
9/30/2022	Nitrogen, ammonia total (as N)	MO AVG	1.86	=	mg/L	1.3	<=	43
9/30/2022	E. coli, colony forming units (CFU)	DAILY MX	960.6	=	CFU/100mL	235	<=	309
10/31/2022	Oxygen, dissolved (DO)	DLYAVMIN	5.45	=	mg/L	6	>=	9
10/31/2022	Solids, total suspended	MO AVG	420.27	=	kg/d	294.3311	<=	43
10/31/2022	Solids, total suspended	MX WK AV	36.4	=	mg/L	18	<=	102
10/31/2022	Solids, total suspended	MO AVG	112.4	=	mg/L	12	<=	837
10/31/2022	Nitrogen, ammonia total (as N)	DAILY MX	7.58	=	mg/L	2.9	<=	161
10/31/2022	Nitrogen, ammonia total (as N)	MO AVG	1.54	=	mg/L	1.3	<=	18
11/30/2022	Oxygen, dissolved (DO)	DLYAVMIN	1.42	=	mg/L	6	>=	76
11/30/2022	Solids, total suspended	MX WK AV	4979.37	=	kg/d	441.2698	<=	1028
11/30/2022	Solids, total suspended	MX WK AV	1179.4	=	mg/L	18	<=	6452
11/30/2022	Solids, total suspended	MO AVG	2779.91	=	kg/d	294.3311	<=	844
11/30/2022	Solids, total suspended	MO AVG	615.2	=	mg/L	12	<=	5027
11/30/2022	Nitrogen, ammonia total (as N)	MO AVG	7.51	=	mg/L	1.3	<=	478
11/30/2022	Nitrogen, ammonia total (as N)	DAILY MX	31.5	=	mg/L	2.9	<=	986
11/30/2022	Nitrogen, ammonia total (as N)	MO AVG	43.54	=	kg/d	31.88209	<=	37
11/30/2022	Nitrogen, ammonia total (as N)	DAILY MX	289.66	=	kg/d	71.11111	<=	307
11/30/2022	Phosphorus, total (as P)	MO AVG	4.54	=	mg/L	1	<=	354
11/30/2022	Copper, total recoverable	DAILY MX	0.33	=	mg/L	0.047	<=	604
11/30/2022	Copper, total recoverable	MO AVG	0.14	=	mg/L	0.023	<=	496
11/30/2022	Copper, total recoverable	MO AVG	0.66	=	kg/d	0.231293	<=	186
11/30/2022	Copper, total recoverable	DAILY MX	1.56	=	kg/d	0.498866	<=	212
11/30/2022	BOD, carbonaceous, 05 day, 20 C	MX WK AV	1331.70	=	kg/d	367.8005	<=	262
11/30/2022	BOD, carbonaceous, 05 day, 20 C	MX WK AV	299.4	=	mg/L	15	<=	1896
11/30/2022	BOD, carbonaceous, 05 day, 20 C	MO AVG	394.10	=	kg/d	245.3515	<=	61
11/30/2022	BOD, carbonaceous, 05 day, 20 C	MO AVG	87.2	=	mg/L	10	<=	772
11/30/2022	Phosphorus, total percent removal	MO AV MN	10.06	=	%	70	>=	200
12/31/2022	Solids, total suspended	MX WK AV	28.8	=	mg/L	18	<=	60
12/31/2022	Solids, total suspended	MO AVG	21.8	=	mg/L	12	<=	82
12/31/2022	Nitrogen, ammonia total (as N)	MO AVG	36.54	=	kg/d	31.88209	<=	15
12/31/2022	Nitrogen, ammonia total (as N)	MO AVG	7.73	=	mg/L	1.3	<=	495
12/31/2022	Nitrogen, ammonia total (as N)	DAILY MX	93.20	=	kg/d	71.11111	<=	31
12/31/2022	Nitrogen, ammonia total (as N)	DAILY MX	20.7	=	mg/L	2.9	<=	614
12/31/2022	Copper, total recoverable	MO AVG	0.032	=	mg/L	0.023	<=	39