

Cardinal Forge
Industrial User Inspection Report
March 3, 2021

**U.S. Environmental Protection Agency
Region 5**

Purpose: Industrial User Compliance Evaluation Inspection

Facility: Cardinal Forge
1040 South Main Street
Rochelle, Illinois 61068

Inspection Date: March 3, 2021

EPA Representatives:

Ted Flatebo, Environmental Engineer, 312-886-9402, Flatebo.Ted@epa.gov
Newton Ellens, Pretreatment Program Manager, 312-353-5562, Ellens.Newton@epa.gov

Facility Representatives:

Lucas Ray, Controller, LucasR@forgerg.com
Kent Paul, Chief Financial Officer, KentP@forgerg.com
Matt McMeekan, Plant Manager, 815-561-8172

Report Prepared by:

Ted Flatebo, Environmental Engineer
Water Enforcement and Compliance Assurance Branch, Section 2

Inspector Signature and Date: NEWTON ELLENS Digitally signed by NEWTON ELLENS
Date: 2021.04.21 09:56:20 -05'00'

Approver Name and Title: Ryan J. Bahr, Section 2 Chief, Water Enforcement and Compliance
Assurance Branch

Approver Signature and Date: RYAN BAHR Digitally signed by RYAN BAHR
Date: 2021.04.21 15:48:01 -05'00'

Approval Date: 04/21/2021

PURPOSE OF INSPECTION

The purpose of this announced inspection at the Forge Resources Group, LLC dba Cardinal Forge, (Cardinal Forge) Facility ILP000399, located at 1040 South Main Street, Rochelle, Illinois 61068 was to describe, evaluate, and document compliance with the Clean Water Act (CWA) and associated pretreatment regulations.

COVID-19 PRECAUTIONS

COVID-19 precautions included conducting the inspection opening conference on March 2, 2021 via Microsoft Teams conference call. On March 3, 2021 inspectors drove to and from the facility in separate vehicles. During the inspection, EPA inspectors and site representatives wore face masks and observed social distancing throughout the inspection.

BACKGROUND

Cardinal Forge is an indirect industrial discharger to the City of Rochelle's (City) wastewater treatment plant (NPDES No. IL0030741) located at 888 Treatment Plant Road, Rochelle, Illinois. EPA is the control authority for the industry as the City currently does not administer an approved pretreatment program. The City submitted an industrial user survey (IUS), as required by their national pollution discharge elimination system (NPDES) permit, to EPA on August 31, 2020. The IUS identified Cardinal Forge as being subject to two categorical pretreatment standards; 40 CFR 467.46 – Aluminum Forming, Subpart D; and 40 CFR 468.15 – Copper Forming, Subpart A (Attachment B).

The City of Rochelle does have a pretreatment department although this is not an EPA approved program. The City issued Discharge Permit No. 054 to Cardinal Forge which was effective December 1, 2019 and expires November 30, 2022 (Attachment C).

The Cardinal Forge facility contains one building which houses all operations including production, warehouse, and administrative office space (Attachment D). Cardinal Forge's North American Industry Classification System (NAICS) code is #332111, "Iron and Steel Forging". The facility operates Monday through Friday, typically 8 hours per day but can operate longer hours depending on production volumes. There are 16 employees at the facility.

The facility began operations at the site in 2001. The company began with two forges and has since undergone multiple expansions in building square footage and process capacity, but the primary business activity has remained consistent.

INSPECTION

Opening Conference

An opening conference for the inspection was conducted at 10:00 A.M. on March 2, 2021 via Microsoft Teams conference call. This opening conference was attended by EPA inspectors Ted Flatebo and Newton Ellens and Cardinal Forge representatives Lucas Ray, Controller, and Kent Paul, Chief Financial Officer.

After introductions were made, I stated that the purpose of the EPA's inspection at the Cardinal Forge facility was to conduct an announced inspection on March 3, 2021 to describe, evaluate, and document compliance with the Clean Water Act (CWA) and associated categorical pretreatment regulations. I stated that the inspection would include the opening conference meeting to discuss the facility's operations/to answer interview questions, to conduct a facility operations tour and inspection, and to conduct a closing conference. I also explained to the representatives that a final inspection report will be prepared after the inspection, and it they will be provided a copy summarizing the findings.

I stated that the opening conference will entail an interview to secure detailed information on the manufacturing process at the facility, a succinct discussion regarding pretreatment activities if any, and a records review of requested materials related to operations as an industrial user discharging to a publicly owned wastewater treatment works (POTW) located in the City of Rochelle and owned and operated by the City.

I stated that we would be finished with the on-site inspection by the afternoon. I asked if there were any confidential business information (CBI) restrictions or concerns (Attachment E). Mr. Paul responded that he would prefer that no final forged products were photographed due to customer privacy concerns, but otherwise there were no CBI concerns.

On-Site Inspection

EPA inspectors drove to the Cardinal Forge facility in separate vehicles and met at 9:15AM in the parking lot to jointly enter the facility lobby to meet with Lucas Ray, and Matt McMeekan, Plant Manager. Upon entering the lobby, we introduced ourselves and presented our credentials to Mr. Ray and Mr. McMeekan, and reiterated the intent of the visit. During the inspection, EPA inspectors and facility representatives wore face masks and observed social distancing.

The inspection began at the start of the forging process with delivery of materials to the facility. Cardinal Forge's primary raw materials are aluminum alloy and brass alloy billets. The facility typically uses three different alloys of aluminum depending on customer specifications: 7075, 2014, 6061 (Document I). The brass alloys used include 3770, UNS C63000, C14500 (Document II). All of the brass alloys used contain at least 50% copper by weight. Billets arrive at the facility pre-cut to the length required for a specific order. They are first weighed, and the quantity of billets is confirmed before being cleaned.

The pre-cut billets are cleaned in a large vibrating bowls (Pictures 1-3). Mr. McMeekan stated the facility has three such bowls on site and that all three are used to clean finished forged

products but only one bowl is used for raw billets. These vibrating bowls contain a cleaning media and operate on a closed-loop water system that contains a wastewater treatment system (WWTS).

Water that flows from the three separate vibrating bowls is pumped to a water filter housed under the elevated walking platform (picture 4). A filter is placed on top of this box and is replaced once or twice daily depending on production volume. From there, the water is pumped to a holding tank (picture 5). This tank collects the wastewater and stores it until sufficient volume is collected to activate the floats in the tank, at which point the water is pumped into the WWTS manufactured by Ringwood (picture 6-7).

According to Mr. McMeekan, the WWTS treats the water through pH adjustment and the addition of a clay product called RM10. This clay is stored in a large elevated tote adjacent to the treatment system and is mixed with the wastewater automatically to bind to pollutants and create a sludge. The sludge is removed through a filter paper which is located on a spool and continuously fed into the machine. The filter paper-sludge combination is collected in a bin (pictures 8, 11) and is hauled from the facility approximately quarterly. Cardinal Forge provided trash hauling records (Document V). They have a primary account with the trash company for their standard waste disposed of in dumpsters and a second account which is charged for this sludge waste. During the inspection, I observed pooled water at the base of the WWTS and there was evidence of a recent overflow. Mr. McMeekan stated that a small quantity of water spilled while the filter paper roll was replaced and that a staff member would soon clean up the water. No floor drains were observed in the facility.

Mr. McMeekan stated that the WWTS has an automatic pH adjustment system which uses concentrated sulfuric acid and sodium hydroxide. Both of these chemicals are stored in single walled 55-gallon barrels, within a chemical storage unit with a roll up door (pictures 12-14). Although the chemical storage unit does have built-in secondary containment, the sulfuric acid and sodium hydroxide are incompatible chemicals and should not be stored in close proximity to each other. In addition, the label on the sulfuric acid barrel states that the chemical "Reacts violently with water". This barrel is stored approximately three feet from the WWTS.

When questioned if any wastewater leaves this closed-loop system that feeds the vibrating cleaning bowls, Mr. McMeekan stated that no water is ever removed from the system and that it is only topped off with fresh water as necessary due to water loss through evaporation. Mr. McMeekan also said that no water samples have been collected from the WWTS.

After the billets are cleaned, they are ready to be forged. The aluminum or brass is first heated in an oven adjacent to the forging apparatus to bring it to the correct temperature, typically between 250°F to 500°F. The billet is then placed into a mold sprayed with an oil-water lubrication mixture. This lubrication evaporates in the forging process and does not create a wastestream. The molds used by Cardinal Forge are either owned by themselves or they belong to the customer depending on their contract agreement.

Once the billet has been forged into a product, one of two things happens. Either the product can have the excess material around the edge trimmed to reveal the final product shape or the rough

forged product can be sent to one of the six solution furnaces on site (pictures 16-17). According to Mr. McMeekan, all aluminum products are placed in the solution furnaces, either before or after the excess material is trimmed, but brass products are never put into the solution furnaces. These solution furnaces house water tanks holding 853 gallons of water. Depending on the product specifications, the water may be heated to 140°F or it may be room temperature water. Products are held in the water for 30-35 minutes.

Mr. McMeekan stated that the solution furnaces are drained as necessary, and the water flows through a piping system directly to the sanitary sewer without treatment. Products that require hot water (140°F) in the solution furnace are produced at the beginning of the day, and then any products that require room temperature water are produced later in the day. Mr. McMeekan said that it varies widely how often the tanks are drained and refilled. It is sometimes daily and sometimes it can be weeks between draining depending on the products that are being produced. Records are not kept for how often the tanks are drained and refilled. He also stated that the solution furnaces are all drained once per year for an annual servicing. During this time, solids are removed from the bottom of the tank and a cleaner is used to scrub the interior surfaces. He was unable to provide the name of the cleaning product used.

After the parts have completed both the solution treatment and surplus material trimming stages, the parts are placed in an aging oven. The facility has four ovens, which are used to improve product quality. The length of time the parts spends in the oven and at what temperature vary but 350°F for 10 hours is common. Following this step, the parts are inspected for final quality. Depending on customer specifications, some final sanding to remove rough edges may be conducted. Additionally, some customers may require a product inspection immediately after forging. This process takes place in the hot inspection area. A quench tank is located in this area (picture 18-19) to rapidly cool parts after forging so that an employee can handle and inspect them. Water from the quench tank is discharged, without treatment, to the sanitary sewer. This concluded the facility walk through which ended at 10:47 A.M.

Water Usage

During the opening conference, I asked Mr. Ray and Mr. Paul how much water the Cardinal Forge facility used on an average daily/monthly basis. They were unable to provide an answer but indicated we should review the City of Rochelle water utility bills they had provided (Document IV). They stated that other than the City water meter, there were no other water metering devices within the facility. Mr. Paul stated that he did not believe there had been any significant, meaning more than 20%, changes in water usage at the facility in the past 3 years.

Next, I asked about specific areas of water usage at the facility. Mr. Ray and Mr. Paul indicated they believed the primary usage of water at the facility was for employee hygiene and sanitary waste. The facility does have an employee locker room space with showers; although, Mr. Ray stated he did not believe they were used on a regular basis. They described the water usage associated with the vibrating cleaning bowls and the solution furnaces, as being used for parts cleaning and treating forged products respectively.

The facility does not use a boiler or cooling tower. The solution furnaces contain their own water heating equipment to heat the tanks as necessary. All water entering the facility flows through a water filter (picture 15).

The facility production area floor appeared to be composed entirely of polished concrete and we did not observe any floor drains anywhere in the facility. According to Mr. McMeekan, the floors are cleaned weekly using a mechanical floor scrubber, this is a dry process and does not generate wastewater.

No production or storage of materials occurs outdoors. There is an uncovered, paved employee parking lot immediately north of the building.

Chemical Usage

The facility does have a parts cleaner onsite which is used as necessary and serviced by an outside contractor. The facility also has their oily rags laundered for them by a vendor.

The facility stores their chemicals in 55-gallon drums (picture 9-10). Chemicals used include trim press oil (Rockway 220-s), hydraulic fluid (Rock Valley Oil and Chemical Co. Trojan 32-aw), gear oil (Rock Valley Oil and Chemical Co. RV Ep Lube, S-460), and 142 solvent (VS-140). The facility places buckets under the faucet for each drum to catch drippings. At the base of the rack where the drums are stored, absorbent was sprinkled on the ground as a precaution. The absorbent was dry and clean at the time of inspection. I asked Mr. McMeekan if the facility had spill kits on site and he stated they did not. The facility also had one 55-gallon drum for used oil. Mr. Ray provided one hazardous waste hauling manifest from Rock Island Lubricants (Attachment F) for disposal of used mineral spirits and used oil.

Categorical Pretreatment Standards

During the opening conference I asked Mr. Ray and Mr. Paul if Cardinal Forge was subject to any categorical pretreatment standards. They responded that they did not believe the facility was subject to any of these standards. Next, I asked if they had conducted any wastewater sampling or if they had any designated sampling locations at the facility. They responded the company has neither designated any sample locations nor conducted any sampling. They also indicated that although the City of Rochelle discharge permit reserves the right for a City representative to sample the facility's wastewater, the City has not done so. According to EPA records, the facility has never submitted a baseline monitoring report or any other type of categorical pretreatment monitoring reports.

The facility was evaluated to determine if the aluminum forming (40 CFR 467) and copper forming (40 CFR 468) categorical pretreatment regulations were applicable. Upon completing the inspection, reviewing the regulations in the federal register, and the applicable guidance document, the facility appears to generate wastestreams from processes defined as categorical: water discharged from the quench tank in the hot inspection area and water discharged from the solution furnaces.

The aluminum forming category was promulgated in 1988 and the copper forming category was promulgated in 1986. Because the facility began operations in 2001, their wastestreams may be subject to the pretreatment standards for new sources for both regulations: 40 CFR 467.46 and 40 CFR 468.15.

Closing Conference

After completing the facility walk through, the EPA inspection team went to the facility's conference room to discuss their findings and to prepare for the closing conference. At 11:10 A.M. a closing conference with Mr. Ray and Mr. McMeekan was conducted.

During the closing conference, I briefly reviewed and discussed the information and documents we received and summarized our observations. I also discussed the preliminary areas of concern, noting that these would be finalized when we sent our inspection report. I gave the Cardinal Forge representatives the opportunity to ask questions regarding the inspection and our preliminary findings. I then ended the closing conference and the inspection team departed the facility at 11:30 A.M.

OBSERVATIONS AND AREAS OF CONCERN

EPA has the following areas of concern following the review of information gathered during the inspection.

- The categorical pretreatment regulations at 40 CFR 467.40 describes that the forging subcategory is applicable to “discharges of pollutants to waters of the United States and introductions of pollutants into publicly owned treatment works from the core of the forging subcategory and the ancillary operations”. In particular, 40 CFR 467.46– Aluminum Forming, Subpart D includes standards for new aluminum forming processes. Similarly, 40 CFR 468.10 – Copper Forming describes that the subpart applies to “discharges of pollutants to waters of the United States, and introduction of pollutants into publicly owned treatment works from the forming of copper and copper alloys except beryllium copper alloys”. The water bath cooling process at the solution furnaces was observed as an ancillary operation utilized at the forge and results in a discharge. The quench tank ancillary operation also resulted in a discharge.
- The facility has not submitted a baseline monitoring report to EPA, has not conducted effluent sampling, and has not maintained sufficient records to determine compliance with a production-based pretreatment standard.
- The team noted storage of incompatible concentrated sodium hydroxide and sulfuric acid immediately next to each other, and in the vicinity of water.

LIST OF ATTACHMENTS

- A.** Photo Log
- B.** City of Rochelle Industrial User Survey – Dated August 31, 2020.
- C.** City of Rochelle Discharge Permit No. 054
- D.** Cardinal Forge Floor Plan
- E.** Confidential Business Information (CBI) and Personal Privacy Information (PPI) Document.
- F.** Hazardous Waste Hauling Manifest – Dated August 10, 2018.
- G.** Cardinal Forge Response to City of Rochelle Industrial User Survey
- H.** Baxter Woodman Site Inspection – Dated May 14, 2019

LIST OF DOCUMENTS PROVIDED TO EPA -

NOT ATTACHED TO REPORT BUT ARE AVAILABLE FOR REVIEW UP REQUEST

- I.** Aluminum Delivery Receipts
- II.** Brass Deliver Receipts
- III.** Metal Recycling Receipts
- IV.** Rochelle Municipal Utilities, Water Bills
- V.** Northern Illinois Disposal Invoices

Attachment A

**Cardinal Forge
EPA Inspection March 3, 2021
All photos taken by Ted Flatebo, Environmental Engineer, U.S. EPA
Camera: Ricoh WG-4**



1: RIMG0032

Description: One of three vibrating washers used to clean raw billets and forged products.

Location: Northwest corner of building.

Camera Direction: North.

Date/Time: March 3, 2021 / 9:47 A.M.



2: RIMG0033

Description: Water nozzles used to spray water contained in a closed loop-system onto billets/parts as they exit the vibrating cleaning bowls.

Location: Northwest corner of building.

Camera Direction: North.

Date/Time: March 3, 2021 / 9:48 A.M.



3: RIMG0034

Description: Overview of vibrating cleaning bowls. Note forged parts in bowl being cleaned in media mixture.

Location: Northwest corner of building.

Camera Direction: Down.

Date/Time: March 3, 2021 / 9:49 A.M.



4: RIMG0035

Description: Water filter tank under elevated platform. Water from all vibrating bowl flows through the filter paper on top of tank before flowing to wastewater treatment system.

Location: Northwest corner of building.

Camera Direction: Northwest.

Date/Time: March 3, 2021 / 9:50 A.M.



5: RIMG0036

Description: Holding tank for wastewater between the water filter tank and the wastewater treatment system. Note floats within tank that activate wastewater treatment system when sufficient volume is collected.

Location: Northwest corner of building.

Camera Direction: Down.

Date/Time: March 3, 2021 / 9:51 A.M.



6: RIMG0037

Description: Wastewater treatment system. Note roll of continuous feed filter paper installed in machine and backup roll.

Location: Northwest corner of building.

Camera Direction: West.

Date/Time: March 3, 2021 / 9:52 A.M.



7: RIMG0038

Description: Wastewater treatment system manufacturer sign.

Location: Northwest corner of building.

Camera Direction: West.

Date/Time: March 3, 2021 / 9:53 A.M.



8: RIMG0039

Description: Sludge exiting wastewater treatment system.

Location: Northwest corner of building.

Camera Direction: East.

Date/Time: March 3, 2021 / 9:54 A.M.



9: RIMG0040

Description: Chemical storage area. Drip buckets are placed under spouts of barrels but no secondary containment is present.

Location: Northwest corner of building.

Camera Direction: Northwest.

Date/Time: March 3, 2021 / 9:57 A.M.



10: RIMG0041

Description: Used oil storage. Note secondary containment around barrel and filter media for wastewater treatment system.

Location: Northwest corner of building.

Camera Direction: Southeast.

Date/Time: March 3, 2021 / 10:01 A.M.



11: RIMG0042

Description: Overview of wastewater treatment system.

Location: Northwest corner of building.

Camera Direction: Northwest.

Date/Time: March 3, 2021 / 10:06 A.M.



12: RIMG0043

Description: Chemical storage area. Note water on the ground surrounding wastewater treatment system.

Location: Northwest corner of building.

Camera Direction: Northwest.

Date/Time: March 3, 2021 / 10:07 A.M.



13: RIMG0044

Description: Sodium hydroxide and sulfuric acid storage area, chemicals are used for wastewater treatment pH adjustment. Note strong acid and base stored next to each other in single-hulled barrels.

Location: Northwest corner.

Camera Direction: Northwest.

Date/Time: March 3, 2021 / 10:11 A.M.



14: RIMG0045

Description: Close up of Sulfuric acid and sodium hydroxide labels. Note sulfuric acid label states “Reacts violently with water”.

Location: Within yellow plastic chemical storage container in northwest corner of building.

Camera Direction: North.

Date/Time: March 3, 2021 / 10:11 A.M.



15: RIMG0046

Description: Water filter for municipal water entering the building. This is the only water supply for the facility.

Location: South wall of building.

Camera Direction: South.

Date/Time: March 3, 2021 / 10:24 A.M.



16: RIMG0047

Description: Overview of solution furnace one, two, and three. There are six total solution furnaces at the facility.

Location: Along north wall of building.

Camera Direction: North.

Date/Time: March 3, 2021 / 10:32 A.M.



17: RIMG0048

Description: Water stored within solution furnace.

Location: Along north wall of building.

Camera Direction: Down.

Date/Time: March 3, 2021 / 10:32 A.M.



18: RIMG0049

Description: Quench tank within hot inspection area.

Location: North-center of building. Adjacent to a solution furnace.

Camera Direction: North.

Date/Time: March 3, 2021 / 10:45 A.M.



19: RIMG0050

Description: Water within quench tank in the hot inspection area.

Location: North-center of building. Adjacent to a solution furnace.

Camera Direction: Down.

Date/Time: March 3, 2021 / 10:45 A.M.

Attachment B

August 31, 2020

U.S. Environmental Protection Agency
Region 5
Water Enforcement and Compliance Assurance Branch
77 West Jackson Blvd.
Chicago, Illinois 60604

***Subject: City of Rochelle – Rochelle Water Reclamation Facility
NPDES Permit No. IL0030741
Status Update on Pretreatment Activities – Special Condition 11***

Dear Water Enforcement and Compliance Assurance Branch:

The City of Rochelle has retained Baxter & Woodman, Inc. to assist with NPDES compliance for the Rochelle Water Reclamation Facility (WRF) Permit No. IL0030741. This submittal describes the City's pretreatment activities and a listing of the significant industrial users in accordance with Special Condition 11.

The deadline for the report of pretreatment activities was 12-months after the effective date of the permit, September 1, 2019.

Major Work Efforts: Industrial User Survey

The City of Rochelle has an informal pretreatment program which was initiated in 1993. The City and Baxter & Woodman have completed an industrial user survey of both the permitted and unpermitted industries and businesses in the WRF service area. The City and Baxter & Woodman developed a list of 52 industrial users within the service area using local maps, the Illinois Manufacturing Directory, and general knowledge from City staff members, including existing permitted users in the program. Special consideration was given to include businesses that may be using phosphorus containing chemicals, to complete the requirements of Special Condition 18 for influent reduction of phosphorus.

A survey was sent to each business requesting a response to the industrial user survey. This survey gathered information from each industrial user on the type of business, raw materials, processes completed, discharge of process waste, and use of phosphorus containing chemicals. Industry surveys were collected from 44 industries. Eight locations were excluded as they were determined to be vacant, out of the WRF service area, on septic, or no longer hauling process wastewater to the WRF. Baxter & Woodman screened the surveys, contacted industries for follow up questions, and determined necessary site inspections. Site inspections were completed by the City or Baxter & Woodman at the following 11 businesses:

- Erie Foods International, Inc.
- Carbon Green Greenhouse LLC, DBA MightyVine
- BrightFarms CHI Greenhouse
- Blue Beacon Truck Wash
- Cardinal Forge
- Continuous Cast Alloys
- Hixson Lumber Sales
- Master Graphics
- News Media Corporation
- Rochelle Travel Plaza
- Silgan Containers Manufacturing

Baxter & Woodman worked with the City to collect information during the site inspections and classifications were determined based on the processes the industries implement. The City had process information on several industries who have industrial user discharge permits. The permits, permit applications, and other documentation of the existing industrial users in Rochelle's pretreatment program were reviewed to determine the classifications of industries. Due to the impacts of COVID-19, site inspections were not possible at all industries, however classifications were determined based on information available. Three categorical industrial users and five significant industrial users were identified during the survey. They are:

Continuous Cast Alloys – Horizontal continuous casting – metal foundry, using nickel, cobalt, chrome, molybdenum, silicon, carbon, beryllium, tungsten, and boron. Water is used to clean the parts and some parts go through a vibratory bowl.

Classification: Categorical Industrial User

40 CFR 471.35-Nonferrous Metals Forming and Metal Powders Point Source Category
Subpart C – Nickel-Cobalt Forming – New Source

40 CFR 471.55 – Nonferrous Metals Forming and Metal Powders Point Source Category
Subpart E - Refractory Metals Forming – New Source

Cardinal Forge – Closed die forging using aluminum, and brass (58-61% copper)

Classification: Categorical Industrial User

40 CFR 467.46 Aluminum Forming Point Source Category
Subpart D – Forging Subcategory - New Source

40 CFR 468.15 Copper Forming Point Source Category

Subpart A - Copper Forming Subcategory – New Source

CHS, Inc. – Manufacturing of ethanol used for fuel, corn oil, Distiller’s Dried Grains with Solubles (DDGS), and Wet Distiller’s Grains with Solubles (WDGS)

Classification: Categorical Industrial User

40 CFR 414.111 – Organic Chemicals, Plastics and Synthetic Fibers (OCPSF)

Subpart K – Indirect Discharge Point Sources – New Source

40 CFR 406.26 – Grain Mills Point Source Category

Subpart B Corn Dry Milling Subcategory – New Source

Allied Waste Industries of Illinois – Dixon Landfill – Non-hazardous waste landfill hauling leachate to the WRF, daily average flow 27,000 gallons per day

Classification: Significant Industrial User, based on landfill leachate (non-domestic wastewater) hauled greater than 25,000 gallons per day

Rochelle Foods LLC – Manufacturing meat products including bacon, ham, and microwaveable meals using meat products, meat smoking products, vegetables, starches and packaging materials; daily average flow of process wastewater 400,032 gallons per day

Classification: Significant Industrial User, based on process flow discharged of greater than 25,000 gallons per day and past occurrences of treatment plant upsets and slug loads the WRF

Rochelle Waste Disposal – Municipal solid waste landfill pumping leachate by forcemain to the WRF, daily average flow 86,500 gallons per day

Classification: Significant Industrial User, based on landfill leachate (non-domestic wastewater) discharged greater than 25,000 gallons per day

Waste Management – Dekalb County Landfill – Solid waste landfill hauling leachate to the WRF, daily average flow 40,000 gallons per day

Classification: Significant Industrial User, based on landfill leachate (non-domestic wastewater) discharged greater than 25,000 gallons per day

Waste Management – Prairie Hill Landfill – Solid waste landfill hauling leachate to the WRF, daily average flow 30,000 gallons per day

Classification: Significant Industrial User, based on landfill leachate (non-domestic wastewater) discharged greater than 25,000 gallons per day

Several industries will be evaluated further to confirm phosphorus containing waste. This information will be included in the Phosphorus Discharge Optimization Plan, to be submitted prior to the 36-month deadline of September 1, 2022.

Pretreatment Activity

As of the date of this report, there are three categorical industrial users and five significant industrial users within the WRF service area.

The WRF is not currently having any operational issues due to industries, however plant upset has occurred in the past. FBC Industries, an industrial user manufacturing additives and preservatives for the food and beverage industry, had a tank failure in 2017 resulting in 15,000 gallons of calcium chloride to be discharged to the WRF. Spill containment measures have been added to address this. Rochelle Foods, a significant industrial user, had violations in the past and as recently as June 2020 causing fats, oils and grease and surfactants at the treatment plant. The City is working with Rochelle Foods to maintain compliance with pretreatment standards.

Pretreatment permittees including Rochelle Foods, CHS, Rochelle Waste Disposal, and Rochelle Energy collect samples for analysis to meet the City's local limits and for the calculation of surcharge. Notices of violation are issued when necessary and site inspections are completed by City staff on an annual basis. No further pretreatment activities are planned or expected at this time, however the City will be evaluating industries as they move into the service area for any potential impacts to the WRF.

We trust that this response will provide an adequate update for compliance with Special Condition 11. Please contact Ms. Sharon Hawkins (815-561-2067) of Rochelle Municipal Utilities with any comments, questions or concerns.

Sincerely,

BAXTER & WOODMAN, INC.
CONSULTING ENGINEERS



Lisa G. Lucht, P.E.
LGL

- C: Adam Lanning, City of Rochelle (via email)
Jay Mulholland, City of Rochelle (via email)
Sharon Hawkins, City of Rochelle (via email)
Nichole Schaeffer, Baxter & Woodman, Inc. (via email)

ELECTRONIC SUBMITTAL ONLY

Attachment C



ROCHELLE MUNICIPAL UTILITIES
DISCHARGE PERMIT 054


In accordance with provisions of the City of Rochelle Municipal Code:

Cardinal Forge
1040 S. Main Street
Rochelle, IL 61068

hereafter in this document identified as Permittee, is hereby authorized to discharge process wastewater to the City of Rochelle's Water Reclamation Plant. Discharge shall be in accordance with the conditions set forth in Part 1 through Part 4 and Standard Conditions of this permit. Non-compliance with any term or condition of this permit shall constitute a violation of the Rochelle Municipal Code.

This permit will become effective December 1, 2019 and will expire on November 30, 2022.

If Permittee wishes to continue to discharge after November 30, 2022, an application must be filed a minimum of ninety days prior to that date. This application must be in accordance with the requirements of Rochelle Municipal Code 98-159.

By:  _____
Superintendent: Adam Lanning

Date Issued:  _____

333 Lincoln Highway
Rochelle, IL 61068
www.rmu.net

PART 1: EFFLUENT LIMITATIONS

A. During the period of December 1, 2019 through November 30, 2022, the Permittee is authorized to discharge domestic wastewater to Rochelle Municipal Utilities (RMU) sewerage system from the outfall listed below:

001 – Mini-System MH 1.39 Downstream, as designated by the City of Rochelle which flows to the Caron Road Liftstation to the WWTP.

B. During the time period of December 1, 2019 through November 30, 2022, the discharge from this outfall shall not exceed the following effluent limitations:

| Parameter | Local Limit Guidelines |
|------------------------|-------------------------------|
| pH | 5.0 - 9.0 Standard Units |
| Ammonia-nitrogen | 35.0 mg/L |
| Arsenic | 0.25 mg/L |
| Barium | 2.0 mg/L |
| BOD 5 | 250.0 mg/L |
| COD | 600.0 mg/L |
| Cadmium | 0.5 mg/L |
| Chromium (total) | 1.0 mg/L |
| Copper | 1.0 mg/L |
| Cyanide | 0.025 mg/L |
| Iron | 4.0 Mg/L |
| Lead | 0.30 mg/L |
| Manganese | 1.0 mg/L |
| Mercury | 0.0005 mg/L |
| Nickel (total) | 1.0 mg/L |
| Phenols (total) | 0.5 mg/L |
| Nonpolar fats | 125.0 mg/L |
| Polar oils | 20.0 mg/L |
| Phosphorus | 10.0 mg/L |
| Selenium | 1.0 mg/L |
| Silver | 0.1 mg/L |
| Total Suspended Solids | 300.0 mg/L |
| Zinc | 2.0 mg/L |

STATE OF TEXAS

County of ... State of Texas, do hereby certify that the following is a true and correct copy of the ... as the same appears from the records of said County.

Witness my hand and seal of office this ... day of ... 19... at ... Texas.

By ... County Clerk

| Section | Area | Acres |
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C. The Permittee shall not discharge wastewater containing any of the following substances from outfall 001:

1. Any pollutant, including oxygen demanding pollutants at a flow rate and/or concentration which will cause the pollutant to pass through to the receiving waters or interfere with the POTW's operation. For the purpose of this section, the terms "pass through" and "interference" have the same definitions as appear in the Rochelle Municipal Code 98-151(d).

2. Products containing quaternary ammonia compounds (QAC's) and biocides which inhibit or are toxic to the nitrifiers necessary for the treatment process.

3. A discharge that imparts color which cannot be removed by the treatment process, and/or consequently imparts color to the treatment plant's effluent, and thereby causes a violation of the POTW's NPDES permit.

4. Should there be a pass through to the treatment plant's effluent that can be attributed to the Permittee, the Permittee will be liable for acute biotoxicity testing of *Ceriodaphnia dubia* according to USEPA testing procedures. Wastewater personnel will be responsible for the collection and handling of samples, and the Permittee will be responsible for the cost of testing and handling charges.

D. All discharges shall comply with all other applicable laws, regulations, standards, and requirements contained in Rochelle Municipal Code and any applicable State and Federal pretreatment laws, regulations, standards and requirements, including any such laws, regulations, standards, or requirements that may become effective during the term of this permit.

PART 2: MONITORING REQUIREMENTS

A. Random yearly sampling may be performed by RMU. A composite sampler will be placed in a discharge manhole. The sample will be tested for pH, COD, BOD, TSS and Ammonia. Should the testing exceed any of the Local Limits, Part 2- B will apply.

B. From December 1, 2019 through November 30, 2022, the Permittee shall monitor the effluent for the parameters listed in Part 1 B as requested by RMU personnel. All samples and testing are to be collected and performed at Permittee's expense.

PART 3: REPORTING REQUIREMENTS

- A. If Permittee monitors any pollutant more frequently than required by this permit, using test procedures prescribed in 40 CFR Part 136 or amendments thereto, or otherwise approved by EPA, or as specified in the permit, the results of such monitoring shall be included in any calculations of actual daily maximum or monthly average pollutant discharge and results shall be reported in the monthly report submitted to RMU.
- B. **Monitoring Reports:** Monitoring results obtained shall be reported on an Industrial User Monitoring Report form as requested. The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analyses were performed during the six months preceding the submission of each report.
- C. If the results of any analysis indicate that a violation of this permit has occurred, the Permittee must:
1. Inform the Water Reclamation Department of the violation within 24 hours; and,
 2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 30 days of the first violation.
- D. **Accidental Discharge Report:**
1. Permittee shall notify the Water Reclamation Division at 815-562-4155, immediately upon the occurrence of an accidental discharge of substances prohibited by Rochelle Municipal Code or any slug loads or spills that may enter the public sewer. During normal business hours RMU should be notified by telephone at 815-562-2761. At all other times, RMU should be notified by telephone at 815-562-4155. The notification shall include location of discharge, date and time thereof, type of waste, including concentration and volume, and corrective actions taken. The Permittee's notification of accidental releases in accordance with this section does not relieve it of other reporting requirements that arise under local, State, or Federal laws.
 2. Within five days following an accidental discharge, the Permittee shall submit to RMU a detailed written report. The report shall specify:
 - a. Description and cause of the upset, slug load or accidental discharge; the cause, and the possible impact upon the Water Reclamation Department compliance status. The description should also include location of discharge, type, concentration and volume of waste.
 - b. Duration of non-compliance, including exact dates and time of non-compliance and, if the noncompliance is continuing, the time by which compliance is reasonably expected to occur.
 - c. All steps taken or to be taken to reduce, eliminate, and/or prevent recurrence of such an upset, slug load, accidental discharge, or other conditions of non-compliance.

E. All reports required by this permit shall be submitted to RMU at the following address:

Rochelle Municipal Utilities – Water/Water Reclamation Division
Attn: Sharon A. Hawkins
P.O. Box 456
Rochelle, IL 61068
Email: shawkins@rmu.net

PART 4 - SPECIAL CONDITIONS

- A. Permittee will notify RMU, the USEPA, and the State hazardous waste authorities of any discharge to the system, which, if otherwise disposed of would be a hazardous waste under 40 CFR part 261. This provision is required by 40 CFR 403.12 (p).
- B. An annual site visit will be conducted by RMU personnel.

All agents registered by the Bureau shall be subject to the following conditions:

1. Agents shall be subject to the supervision and control of the Bureau and the State in which they are registered.
2. Agents shall be subject to the laws and regulations of the State in which they are registered.
3. Agents shall be subject to the laws and regulations of the United States.

ARTICLE IV - SPECIAL AGENTS

Special Agents shall be appointed by the Bureau and the State in which they are registered. They shall be subject to the laws and regulations of the State in which they are registered and the laws and regulations of the United States. They shall be subject to the supervision and control of the Bureau and the State in which they are registered.

All special agents shall be subject to the following conditions:

STANDARD CONDITIONS

A. Permittee shall provide wastewater treatment as necessary to comply with the Rochelle Municipal Code and shall achieve compliance with all categorical pretreatment standards, local limits, and the prohibitions set forth in the Rochelle Municipal Code.

B. All applications, user reports and information submitted by Permittee must be signed by an authorized representative of the user and contain the following certification statement.

"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."

1. For the purpose of the above paragraph, a responsible corporate officer means: (1) the president, secretary, treasurer, or a vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation, or (2) the manager of one or more manufacturing, production, or operation facilities employing more than two hundred fifty (250) persons or having gross annual sales or expenditures exceeding twenty-five million dollars (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures. The individuals described above may designate another authorized representative if the authorization is in writing, the authorization specifies the individual or position responsible for the overall operation of the facility from which the discharge originates or having overall responsibility for environmental matters for the company, and the written authorization is submitted to the Director of Utilities of RMU.

C. Permittee may petition the Director of Utilities to appeal the terms of this permit within 15 working days of notice of its issuance. This petition must be in writing, and failure to submit a timely petition for review shall be deemed to be a waiver of the administrative appeal. In its petition, the appealing party must indicate the provisions objected to, the reasons for the objection, and the alternative condition, if any, it seeks to place in the wastewater discharge permit. The effectiveness of the permit shall not be stayed pending the appeal. If the Director of Utilities fails to act within thirty (30) days, a request for reconsideration shall be deemed to be denied. Decisions to reconsider a wastewater discharge permit, not to issue a wastewater discharge permit, or not to modify a wastewater discharge permit shall be considered final administrative actions for purposes of judicial review. Aggrieved parties seeking judicial review of the final administrative wastewater discharge permit decision must do so by filing a complaint with the Circuit Court for Ogle County within thirty (30) days after receipt of the final decisions from the administrative review.

D. This permit may be modified for good cause, including, but not limited to:

1. Incorporation of any new or revised Federal, State, or local pretreatment standards or requirements.

2. Addressing significant alterations or additions to the user's operation, processes, or wastewater volume or character since the time of the wastewater discharge permit issuance.

3. A change in the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge.

4. Information indicating that the permitted discharge poses a threat to the POTW, RMU personnel, or the receiving waters.

5. Violation of any terms or conditions of the wastewater discharge permit.

6. Misrepresentations or failure to fully disclose all relevant facts in the wastewater discharge permit or application or in any required reporting.

7. Revisions of or a grant of variance from categorical pretreatment standards pursuant to 40 CFR 403.13.

8. Correct typographical or other errors in the wastewater discharge permit.

9. Reflect a transfer of the facility ownership to a new owner or operator.

The filing of a request by Permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.

E. Wastewater discharge permits may be transferred to a new owner or operator only if the permittee gives at least ninety (90) days advance written notice to the Director of Utilities, and the Director of Utilities approves the wastewater discharge permit transfer. The notice to the Director of Utilities must include a written certification by the new owner or operator which:

1. States that the new owner and/or operator has no immediate intent to change the facility's operations and processes.

2. Identifies the specific date on which the transfer is to occur.

3. Acknowledges full responsibility for complying with the existing wastewater discharge permit. Failure to provide advance notice of a transfer renders the wastewater discharge permit void as of the date of facility transfer.

F. This permit may be terminated for the following reasons.

1. Failure to notify the Director of Utilities of significant changes to the wastewater prior to the changed discharge.

2. Failure to provide prior notifications to the Director of Utilities of changed conditions pursuant 98-161(e) of the Rochelle Municipal Code(Reports of Changed Conditions).

3. Misrepresentation or failure to fully disclose all relevant facts in the wastewater discharge permit application.

4. Falsifying self-monitoring reports.

5. Tampering with monitoring equipment.

6. Refusing to allow the Director of Utilities timely access to the facility premises and records.

7. Failure to meet effluent limitations.

8. Failure to pay fines.

9. Failure to pay sewer charges.

10. Failure to meet compliance schedules.

11. Failure to complete a wastewater survey or the wastewater discharge permit application.

12. Failure to provide advance notice of the transfer of the transfer of business ownership of a permitted facility.

13. Violation of any pretreatment standard or requirement, or any terms of the wastewater discharge permit or Rochelle Municipal Code.

This wastewater discharge permit shall be voidable upon cessation of operations or transfer of business ownership. This wastewater discharge permit is void upon the issuance of a new wastewater discharge permit to the Permittee.

G. The Permittee shall apply for a wastewater discharge permit reissuance by submitting a completed permit application, in accordance with 98-159 (c) of Rochelle Municipal Code a minimum of ninety (90) days prior to the expiration of this wastewater discharge permit.

H. All wastewater samples must be representative of the user's discharge. Wastewater monitoring and flow measurement facilities shall be properly operated, kept clean, and maintained in good working order at all times. The failure to keep a monitoring facility in good working order shall not be grounds for the user to claim that sample results are unrepresentative of its discharge.

I. Permittee must notify the Director of Utilities of any planned significant changes to operations or system which might alter the nature, quality, or volume of its wastewater at least forty-five (45) days before the change. For purposes of this requirement, significant changes include, but are not limited to:

1. Flow increases or decreases of twenty percent (20%) or greater.
2. The discharge of any previously unreported pollutants.

J. A notice shall be permanently posted on the appropriate facility bulletin board or other prominent place advising employees whom to call in the event of an accidental discharge. Permittee shall ensure that all employees who may cause or suffer such an accidental discharge to occur are advised of the emergency notification procedure.

K. Permittees subject to the reporting requirements of the Rochelle Municipal Code shall retain and make available for inspection and copying, all records of information obtained pursuant to any monitoring activities required by the Rochelle Municipal Code and any additional records of information obtained pursuant to monitoring activities undertaken by the user independent of such requirements. Records shall include the date, exact place, method, and time of sampling, and the name of the person(s) taking the samples, the dates analyses were performed, who performed the analyses, the analytical techniques or methods used, and the results of such analyses. These records shall remain available for a period of at least three (3) years. This period shall automatically be extended for the duration of any litigation concerning the user or the City, or where the user has been specifically notified of a longer retention period by the Director of Utilities.

L. The Director of Utilities shall have the right to enter the premises of the Permittee to determine whether the user is complying with all requirements of Rochelle Municipal Code and any wastewater discharge permit or order issued hereunder. Permittees shall allow the Director of Utilities ready access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties.

1. Where a user has security measures in force which require

proper identification and clearance before entry into its premises, the user shall make necessary arrangements with its security guards, so that, upon presentation of suitable identification, the Director of Utilities will be permitted to enter without delay for the purposes of performing specific responsibilities.

2. The Director of Utilities shall have the right to set up on the user's property or require installation of, such devices as are necessary to conduct sampling and/or metering of the user's operations.

3. The Director of Utilities may require the user to install monitoring equipment as necessary. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the user at its own expense. All devices used to measure wastewater flow and quality shall be calibrated at six month intervals to ensure their accuracy.

4. Any temporary or permanent obstruction to safe and easy access to the facility to be inspected and/or sampled shall be promptly removed by the user at the written or verbal request of the Director of Utilities and shall not be replaced. The costs of clearing such access shall be born by the user.

5. Unreasonable delays in allowing the Director of Utilities access to the Permittee's premises shall be a violation of the Rochelle Municipal Code.

M. RMU is required to publish a list of POTW users, including the Permittee, which, during the previous twelve (12) months were in significant noncompliance with applicable pretreatment standards and requirements. "Significant Noncompliance" shall mean that a industrial user's violation(s) meets one or more of the following criteria:

1. Chronic violations of wastewater discharge limits, defined here as those in which sixty-six percent (66%) or more of wastewater measurement taken during a six (6) month period exceed the daily maximum limit or average limit for the same pollutant parameter by any amount.

2. Technical Review Criteria (TRC) violations, defined here as those in which thirty-three percent (33%) or more of wastewater measurements taken for each pollutant parameter during a six (6) month period equals or exceeds the product of the daily maximum limit or the average limit multiplied by the applicable criteria (1.4 for BOD, TSS, fats oils and grease, and 1.2 for all other pollutants except pH.)

3. Any other discharge violation that the Director of Utilities believes has caused alone, or in combination with other discharge, interference or pass through, including endangering the health of POTW personnel or the general public.

4. Any discharge of pollutants that has caused imminent endangerment to the public or to the environment, or has resulted in RMU's exercise of its emergency authority to halt or prevent such a discharge.

5. Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone contained in a wastewater discharge permit or enforcement order for starting construction, completing construction, or attaining final compliance.

6. Failure to provide within thirty (30) days after the due date, any required reports, including baseline monitoring reports, reports on compliance with categorical pretreatment standard deadlines, periodic self monitoring reports, and reports on compliance with compliance schedules.

- 7 Failure to accurately report noncompliance.
- 8 Any other violation which the Director of Utilities determines will adversely affect the operation or implementation of the local pretreatment program.

N. If the Permittee violates, or continues to violate any provision of the Rochelle Municipal Code, a wastewater discharge permit, or order issued hereunder, or any other pretreatment standard or requirement, the Permittee shall be liable to the City for a maximum civil penalty of \$1,000 per violation, per day. In the case of a monthly or other long-term average discharge limit, penalties shall accrue for each day during the period of violation. If the Permittee willfully or negligently violates any provision of Rochelle Municipal Code, a discharge permit or any other pretreatment standard or requirement, the Permittee shall, upon conviction, be guilty of a misdemeanor, punishable by a fine, up to the maximum allowed under State law, per violation, per day or imprisonment for not more than six (6) months or both.

O. If any provisions of this permit are invalidated by any court of competent jurisdiction, the remaining provisions shall not be effected and shall continue in full force and effect.

P. Permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be ground for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements.

Q. If the Permittee knowingly makes any false statements, representations, or certifications in any application, record, report, plan, or other documentation filed, or required to be maintained, pursuant to Rochelle Municipal Code, a discharge permit, or who falsifies, tampers with, or knowingly render inaccurate any monitoring device or method required under Rochelle Municipal Code shall, upon conviction, be punished by a fine, up to the maximum fine allowable under State law, per violation, per day, or imprisonment for not more than six (6) months, or both.

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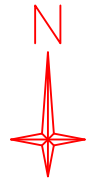
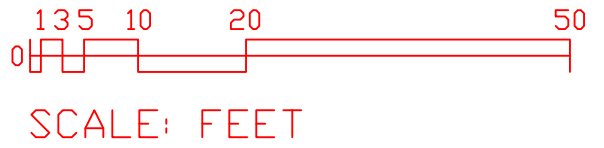
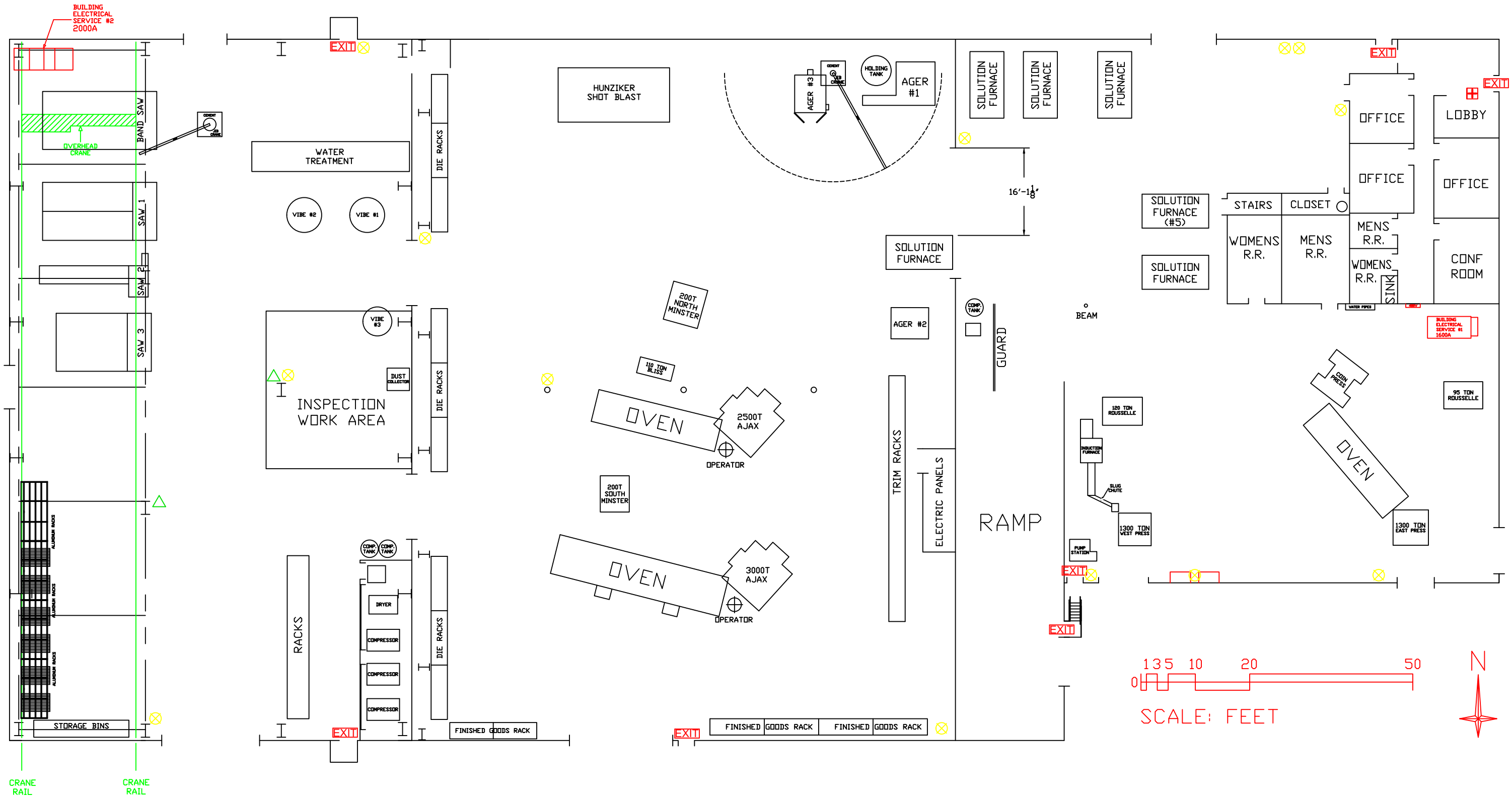
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Attachment D

CARDINAL FORGE

LEGEND

- EXIT = OUTSIDE EXIT
- ⊗ = FIRE EXTINGUISHER
- + = FIRST AID KIT
- △ = EYEWASH STATION



Attachment E

Confidential Business and Personal Privacy Information

Assertion Requirements

You may assert a business confidentiality claim covering any parts of the information requested in the attached Appendix B, as provided in 40 C.F.R. § 2.203(b).

To make a confidentiality claim, submit the requested information and indicate that you are making a claim of confidentiality. Any document for which you make a claim of confidentiality should be marked by attaching a cover sheet stamped or typed with a caption or other suitable form of notice to indicate the intent to claim confidentiality. The stamped or typed caption or other suitable form of notice should employ language such as “trade secret” or “proprietary” or “company confidential” and indicate a date, if any, when the information should no longer be treated as confidential.

Information covered by such a claim will be disclosed by EPA only to the extent permitted and by means of the procedures set forth in 40 C.F.R. Part 2. Under 40 C.F.R. § 144.5, the following information is not entitled to confidential treatment and claims of confidentiality will be denied: name and address of any permit applicant or permittee, and information which deals with the existence, absence, or level of contaminants in drinking water.

Allegedly confidential portions of otherwise non-confidential documents should be clearly identified. EPA will construe the failure to furnish a confidentiality claim with your response to the information request as a waiver of that claim, and the information may be made available to the public without further notice to you.

Determining Whether the Information Is Entitled to Confidential Treatment

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a letter asking that you support your confidential business information (CBI) claim. If you receive such a letter, you must respond within the number of days specified by EPA. Failure to submit your comments within that time would be regarded as a waiver of your confidentiality claim or claims, and EPA may release the information. If you receive such a letter, EPA will ask you to specify which portions of the information you consider confidential by page, paragraph and sentence. Any information not specifically identified as subject to a confidentiality claim may be disclosed to the requestor without further notice to you. For each item or class of information that you identify as being CBI, EPA will ask that you answer the following questions, giving as much detail as possible:

1. For what period of time do you request that the information be maintained as confidential, e.g., until a certain date, until the occurrence of a special event or permanently? If the occurrence of a specific event will eliminate the need for confidentiality, specify that event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to question number 1?

3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by an agreement not to disclose the information further? If so, why should the information still be considered confidential?
4. Is the information contained in any publicly available databases, promotional publications, annual reports or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to confidentiality of the information? If so, attach a copy of the determination.
6. Do you assert that the information is submitted on a voluntary or a mandatory basis? Explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
7. Is there any other information you deem relevant to EPA's determination regarding your claim of business confidentiality?

If you receive a request for a substantiation letter from the EPA, you bear the burden of substantiating your confidentiality claim. Conclusory allegations will be given little or no weight in the determination. In substantiating your CBI claim(s), you must bracket all text so claimed and mark it "CBI." Information so designated will be disclosed by EPA only to the extent allowed by and by means of the procedures set forth in 40 C.F.R. Part 2, Subpart B. If you fail to claim the information as confidential, it may be made available to the public without further notice to you.

Please also note that pursuant to 40 C.F.R. § 2.204, EPA may determine that the information you claimed as CBI is clearly not entitled to confidential treatment and issue a final determination without providing you an opportunity to substantiate your claim. Examples of information clearly not entitled to confidential treatment include effluent data, as defined in 40 C.F.R. § 2.302(A)(2), and information in National Pollution Discharge Elimination System permit applications are not entitled to confidential treatment. See 40 C.F.R. § 122.7.

Personal Privacy Information

Please segregate any personnel, medical and similar files from your responses and include that information on a separate sheet(s) marked as "Personal Privacy Information." Disclosure of such information to the general public may constitute an invasion of privacy.

Attachment F

INVOICE

Invoice Number: 0025451-IN

Invoice Date: 8/10/2018

Page: 1



Fluid

1320 1st Street
 Rock Island, IL 61201
 Phone: (800) 522-1150
 Phone: (309) 788-1854
 Fax: (309) 786-3946

SOLD TO:

SHIP TO:

CARDINAL FORGE
 P.O. BOX 567
 Dekalb, IL 60115

CARDIANL FORGE
 1040 S MAIN ST
 Rochelle, IL 61068

ROCKIS

| Terms | | Salesperson: | | Customer P.O. Number | | Customer Number: | |
|--|------------|--------------|----------|----------------------|--------------|------------------|--------|
| Net 30 Days | | Thomas Mason | | | | CARDIN | |
| Order NO: | Order Date | Ship Date | Ship VIA | | F.O.B. | | |
| 0027960 | 8/3/2018 | 8/3/2018 | | | DEST | | |
| Item Number | U/M | Whse: | Ordered | Shipped | Back Ordered | Price | Amount |
| USEDMS | GL | 000 | 0.00 | 55.000- | 55.000 | 0.0000 | 0.00 |
| USED MINERAL SPIRITS | | | | | | | |
| PICKED UP (1) FULL DRUM OF USED MINERAL SPIRITS | | | | | | | |
| PICKED UP (1) FULL DRUM OF USED OIL | | | | | | | |
| /DD | EACH | | 0.00 | 2.000 | 0.000 | 25.0000 | 50.00 |
| Drum Deposit | | | | | | | |
| TOOK (2) EMPTY CLOSED TOP DRUMS FOR REPLACEMENT | | | | | | | |
| CREDIT WILL BE ISSUED WHEN DRUMS ARE RETURNED FULL | | | | | | | |
| REF: SO# 27960 MANIFEST# 25535 | | | | | | | |

kwiktag® 239 045 569



Thank you for your order

A 1% per month service charge can be added to all invoices unpaid for more than 30 days from invoice date

| | |
|-----------------------|--------------|
| Net Invoice: | 50.00 |
| Less Discount: | 0.00 |
| Freight: | 0.00 |
| Sales Tax: | 0.00 |
| Invoice Total: | 50.00 |



Cardinal Forge Company

1040 South Main St
Rochelle, Illinois 61068
Phone: 815-561-8172

Fax: 815-561-0613

Purchase Order - Completed

PO Number: 1699
PO Reference:
Ordered: 8/23/2018
Customer ID: ROCKIS

Status: Completed
Required: 9/6/2018 8:18:13 AM
Completed: 8/23/2018
WO Reference:

Supplier: Rock Island Lubricants
Thomas Mason
1320 First Street. PO Box 5015
Rock Island IL 61204-5015
Phone 309-788-5631
Toll Free 800-522-1150
Fax 309-786-3946
Email thomas@rilcoinc.com
Shipping Method: Best Way
Terms:

Ship To: Cardinal Forge Company
1040 South Main St
Rochelle
Illinois 61068
Phone 815-561-8172 Fax 815-561-0613

Bill To: Forge Resources Group
PO Box 369
Dekaib
Illinois 60115
Phone 815-758-6400 Fax 815-787-8588

| Service | Comments | Quantity | Price | Discount | Line Total |
|---|-----------------------------|------------|-------|-----------------|------------|
| | WO Reference Account | | | | |
| Pick up used oil and solvent and drop off two empties | <none> | 1.00 hours | 50.00 | 0.00% | 50.00 |
| | | | | Subtotal | 50.00 |
| | | | | Freight | 0.00 |
| | | | | Tax | 0.00 |
| | | | | Total | 50.00 |
| | | | | Amt Paid | 0.00 |

RILCO Fluid Care

25535

1320 1st Street • Rock Island, IL 61201

RECYCLING MANIFEST

MANIFEST

Generator's Name and Address:

Phone #:

P.O. #

Transporter 1 Company Name

RILCO Fluid Care

Phone #: 309/788-1854

EPA ID # ILD025811704

Designated Facility and Site Address

RILCO Fluid Care

1320 1st Street

Rock Island, IL 61201

Phone #: 309/788/1854

Fax #: 309/786-3946

EPA ID #: ILD025811704

**THIS MANIFEST IS YOUR CERTIFICATION OF FULLY RECYCLED MATERIALS.
COMPLETE DOCUMENTATION REMAINS ON FILE AT RILCO FLUID CARE
AND IS AVAILABLE UPON REQUEST.**

SHIPPING NAME, DESCRIPTION, AND IDENTIFICATION

| DATE REQUESTED | QUANTITY | C | UC | DESCRIPTION |
|----------------|----------|----|----|----------------------------|
| 8-9-18 | 1 | Dr | 55 | Barrel(s) Used Oil Filters |
| 8-9-18 | 1 | Dr | 55 | Gallons Used Oil |
| | | | | Antifreeze |
| | | | | Barrel(s) Used Absorbents |
| | | | | Gallons of Oily Water Mix |
| 8-9-18 | 1 | Dr | 55 | Empty Drums |

SPECIAL INSTRUCTIONS AND ADDITIONAL INFORMATION:

ON SPEC BURNER FUEL COPIES OF USED OIL ANALYSIS ARE AVAILABLE AT THE RILCO FLUID CARE OFFICE LOCATED AT: 1320 1ST STREET, ROCK ISLAND, IL 61201 309/788-1854

Company's Certification: I certify the above described materials are not subject to Federal/State regulations for reporting proper disposal of non-hazardous materials.

NAME:

SIGNATURE:

DATE:

Transporter 1:

Acknowledge receipt of materials

NAME:

SIGNATURE:

DATE:

Processing Facility:

Acknowledge receipt of materials. Assure all materials will be recycled in accordance with contracted guideline, no portion will be landfilled.

NAME:

SIGNATURE:

DATE:

EPA ID# ILD025811704

DOT# 367096

UPM#0367096-IL

White - Pick Up Copy

Yellow - Accounting

Pink - Generators

Sales Order



1370 1st Street
 Rock Island, IL 61201
 Phone (800) 522-1150
 Phone (309) 786-1854
 Fax (309) 786-3946

Order Number: 0027960

Order Date: 8/3/2018

Expiration Date: 8/3/2018

Page: 1

SOLD TO:

SHIP TO:

CARDINAL FORGE
 P.O. BOX 567
 Dekalb, IL 60115

CARDIANL FORGE
 1040 S MAIN ST
 Rochelle, IL 61068

| | | | | | | | |
|------------------|-------------------------|---------------------|------------------|----------------------------|--|-----------------------------|--|
| Terms | | Salesperson: | | Salesperson E-mail: | | Customer P.O. Number | |
| Net 30 Days | | Thomas Mason | | | | | |
| Order NO: | Customer Number: | Order Date | Ship Date | Ship VIA | | F.O.B. | |
| 0027960 | CARDIN | 8/3/2018 | 8/3/2018 | | | DEST | |

| Item Number | U/M | Whse: | Ordered | Shipped | Back Order | Price | Amount |
|--|------|-------|---------|---------|------------|---------|--------|
| USEDMS | GL | 000 | 0.000 | 0.000 | 0.000 | 0.0000 | 0.00 |
| USED MINERAL SPIRITS | | | | | | | |
| PICK UP (1) FULL DRUM OF USED MINERAL SPIRITS | | | | | | | |
| PICK UP (1) FULL DRUM OF USED OIL | | | | | | | |
| /DD | EACH | | 0.000 | 0.000 | 0.000 | 25.0000 | 0.00 |
| Drum Deposit | | | | | | | |
| TAKE (2) EMPTY CLOSED TOP DRUMS IN CASE THEY NEED REPLACEMENTS | | | | | | | |

| | |
|---------------------|-------------|
| Net Order: | 0.00 |
| Less Discount: | 0.00 |
| Freight: | 0.00 |
| Sales Tax: | 0.00 |
| Order Total: | 0.00 |

RILCO Fluid Care

1320 1st Street • Rock Island, IL 61201

25535

RECYCLING MANIFEST

MANIFEST

Generator's Name and Address:

CADILLAC TRUCK
1000 S MAIN ST ROCK ISLAND, IL

Phone #:

309-361-2112 x-47

P.O. #

Transporter 1 Company Name

RILCO Fluid Care

Phone #: 309/788-1854

EPA ID # ILD025811704

Designated Facility and Site Address

RILCO Fluid Care
1320 1st Street
Rock Island, IL 61201

Phone #: 309/788/1854

Fax #: 309/786-3946

EPA ID #: ILD025811704

**THIS MANIFEST IS YOUR CERTIFICATION OF FULLY RECYCLED MATERIALS.
COMPLETE DOCUMENTATION REMAINS ON FILE AT RILCO FLUID CARE
AND IS AVAILABLE UPON REQUEST.**

SHIPPING NAME, DESCRIPTION, AND IDENTIFICATION

| DATE REQUESTED | QUANTITY | C | UC | DESCRIPTION |
|----------------|----------|----|----|----------------------------|
| 8-9-18 | 1 | OK | 55 | Barrel(s) Used Oil Filters |
| 8-9-18 | 1 | OK | 55 | Gallons Used Oil |
| | | | | Antifreeze |
| | | | | Barrel(s) Used Absorbents |
| | | | | Gallons of Oily Water Mix |
| 8-9-18 | 1 | OK | 55 | Empty Drums |

SPECIAL INSTRUCTIONS AND ADDITIONAL INFORMATION:

ON SPEC BURNER FUEL COPIES OF USED OIL ANALYSIS ARE AVAILABLE AT THE RILCO FLUID CARE OFFICE LOCATED AT: 1320 1ST STREET, ROCK ISLAND, IL 61201 309/788-1854

Company's Certification: I certify the above described materials are not subject to Federal/State regulations for reporting proper disposal of non-hazardous materials.

NAME:

Justin Carr

SIGNATURE:

Justin Carr

DATE:

8-9-18

Transporter 1:

Acknowledge receipt of materials

NAME:

Austin Minson

SIGNATURE:

Austin Minson

DATE:

8-9-18

Processing Facility:

Acknowledge receipt of materials. Assure all materials will be recycled in accordance with contracted guideline, no portion will be landfilled.

NAME:

PEG DAWSON

SIGNATURE:

PEG DAWSON

DATE:

8-9-18

EPA ID# ILD025811704

DOT# 367096

UPM#0367096-IL

White - Pick Up Copy

Yellow - Accounting

Pink - Generators

Attachment G



June 13, 2018

Subject: City of Rochelle - Industrial Wastewater Survey

Dear Business Owner:

The United States Environmental Protection Agency (USEPA) requires the City of Rochelle to complete a mandatory survey of all industrial firms that contribute non-domestic wastewater to the City's Water Reclamation Facility as a requirement of their wastewater discharge permit. You are receiving a one-page Industrial Wastewater Survey because your firm has been identified as operating within an area that has been zoned for commercial or manufacturing use that discharges to Rochelle's Water Reclamation Facility. Please take a few minutes to complete this short form on the internet using the enclosed instructions. Your login information follows:

User ID: 1014

If you do not have access to the internet, please fill out and return the attached paper copy of the survey to the City of Rochelle at:

City of Rochelle
Attn: Adam Lanning
333 Lincoln Highway
Rochelle, IL 61068

The information that you provide will assist the City of Rochelle in correctly identifying if your firm is required to be permitted to discharge process wastewater. If you are a property management firm rather than a business entity, please supply the name(s) and address(es) of your tenant(s) including a contact name.

Upon receipt of the survey information and its review, the City of Rochelle and its representatives may confirm the information provided through a telephone call or site visit. If you have any questions concerning the survey completion, please contact Nichole Schaeffer at 815-444-3372. The City prefers that the survey be filled out and submitted on-line. We would like to thank you in advance for your cooperation.

Please return the survey either postmarked or on-line no later than June 30, 2018.

Sincerely,
City of Rochelle Municipal Utilities

Adam Lanning
Superintendent Water & Water Reclamation

333 Lincoln Highway
Rochelle, IL 61068
www.rmu.net

**City of Rochelle
Industrial Wastewater Survey**



Cardinal Forge Co.
1040 S. Main Street
Rochelle, IL 61068

If Business Name or Address is incorrect on this letter, please provide correct information below:

We encourage you to use the following link and user ID to complete your survey online:

Type the following link in your web browser: www.bwgis.com/RochelleSurvey

User ID: 1015

Site Representative: Justin Evans
Title: Plant Manager
Site Phone: 815-561-8172
Email: justme@forgeig.com

Number of units in building occupied by this company: Stand-alone building Multiple Units: # of Units: _____

Number of Employees: 15 1st Shift - 2nd Shift - 3rd Shift

Operating Days: Mon Tues Wed Thurs Fri Sat Sun

Operating Hours per Day (Mon-Fri): 6-2:30pm (Sat-Sun): -

Date That Service / Production Began at this site: Month Jan Year 2001

What services are performed or products produced at this site?

Closed Die Forging

What raw materials are used on site?

Aluminum

Does your business do manufacturing at this facility? Yes No

Does your business do assembly or fabrication at this facility? Yes No

Does your business have an office at this facility? Yes No

Does your business have a warehouse at this facility? Yes No

Does your business have a cafeteria that prepares meals at this facility? Yes No

Does your business discharge process wastewater (non-domestic) to the sewer? Yes No

Description of process waste discharged: Water discharged from heat treat tanks + vibratory bowl cleaning equipment

Does your business have any process waste hauled offsite? Yes No

Description of process waste hauled: Cardboard, wastewater sludge, wood

Does your business treat your discharge at any point within your process? Yes No

Does your business store liquids in drums (typically 55 gal.)? Yes No

If yes, how many drums: Less Than 5: 5 or more:

Drum general substance: oils

Does the firm store liquids in totes or bulk tanks? Yes No

If yes, how many totes: 1 How many bulk tanks: -

Tote or bulk tank general substance and number of gallons: 100

Does your facility use any materials which include, but are not limited to, cleaning products, raw materials or chemicals in a process which contain PHOSPHORUS in the ingredients? Yes No

Are any inks or dyes used? Yes No

If yes, are any inks or dyes washed down the drain? Yes No

Does your firm precondition your water? Yes No

If yes, check how: Water Softener Reverse Osmosis Ion Exchange Distilled Chlorine Removal

Do you have a backflow preventer on the domestic service (not fire suppression system)? Yes No

Do you have a separate fire service? Yes No



**ROCHELLE MUNICIPAL UTILITIES
INDUSTRY SURVEY**

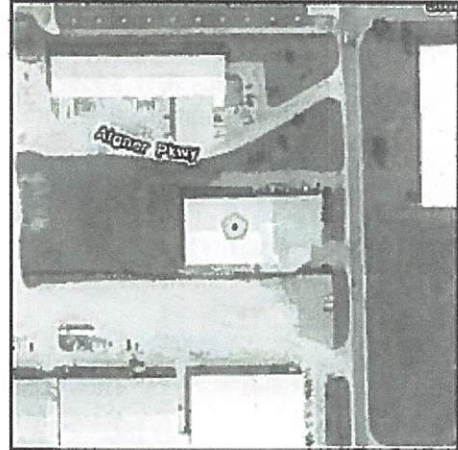
5/2/19 Matt Hitchcock
815-375-5423

Survey Year 2018

User ID: 1015
Business name: Cardinal Forge Co.

Site address: 1040 S. Main Street

Site representative: Justin Evans
Title: Plant Manager
Site Phone: 815-561-8172
Email: justine@forgerg.com



Number of employees: 11
First shift: 15
Second shift: 0
Third shift: 0
Number of units: 11
Hours of operation: Monday-Friday: 8
Saturday/Sunday:

Date that service/production began at this site (MM/YYYY): 01/2001
Services performed or products produced at this site: closed die forging

Raw materials used on site: aluminum

At this facility, this business does manufacturing? Yes
Does assembly? No
Has an office? Yes
Has a warehouse? Yes
Has a cafeteria? No

Process wastewater (non-domestic) discharged to sewer? Yes
Description: water discharged from heat treat tanks, and vibratory bowl cleaning equipment

Does the firm haul any process waste? Yes
Description: cardboard, wastewater sludge, wood

Does the business precondition their water? No, we do not precondition water

Does the business treat their discharge at any point within their process? Yes

Does the firm store liquids in drums? Yes, we have less than 5 drums

Name(s) of substance(s) contained in oils drums, and number of gallons:

Does the firm store liquids in totes or bulk tanks? Yes, we have less than 5 totes or tanks

Name of substance and number of 100 gallons:

Does the facility use any materials which include, but are not limited to cleaning products, raw materials or chemicals in a process which contain phosphorus in the ingredients? No

Inks or dyes used? Yes
If yes, inks or dyes washed down the drain? No

Does the business have a backflow preventer? YD

Additional Notes:

Submitted by: BW
Survey entry status: Survey completed by mail
Survey screening status: Site Inspection needed
Classification:
Classification Notes:

Attachment H

2.2 Cardinal Forge

Cardinal Forge
1040 S. Main Street
Rochelle, IL

Date of Site inspection: May 14, 2019
Time of site inspection: 12:54 PM

Lisa Lucht and Sharon Hawkins met with Matt Hitchcock, Maintenance Technician, of Cardinal Forge to conduct the site inspection. Cardinal Forge operates Monday through Friday with 15 employees. They began operation in January 2001.

Cardinal Forge uses aluminum and brass in closed die forging to make car and airplane parts. The composition of brass is 58-60% Copper, 0.3% Iron, 1.5-2.5% Lead, and 36% Zinc. Aluminum bars are cut to size, placed in a vibratory bowl, heated in the oven, then pressed to shape in steel molds/dies. The parts are then placed in a heat treating solution oven for heating, quenched, trimmed, and placed in the ager oven. The parts are air cooled and then cleaned with shot blasting or vibratory bowl before packing and shipping. Brass parts are only heated, forged, and cleaned.

Department of Justice

Attorney General

Washington, D.C.

February 1, 1952

Dear Mr. [Name]:

Reference is made to your letter of January 28, 1952.

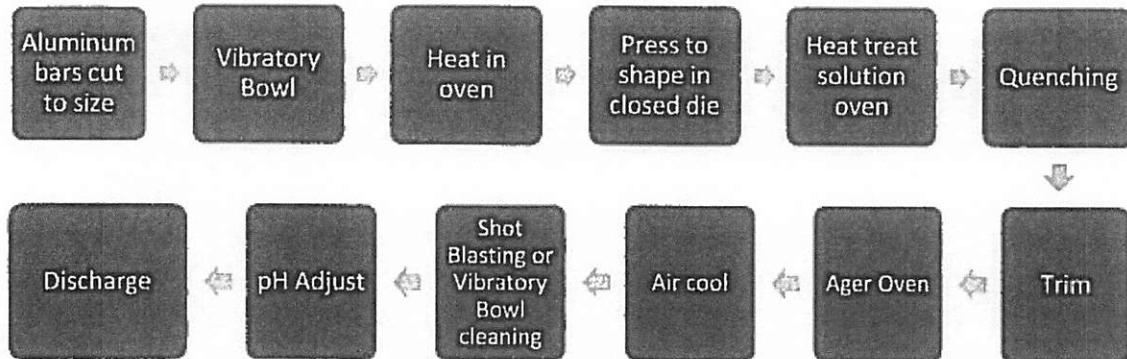
The Department is currently reviewing the information provided in your letter regarding the activities of the [Organization Name] in the United States. It is noted that the [Organization Name] has been active in various parts of the country, and it is being determined whether or not these activities constitute a threat to the national security.

It is requested that you continue to provide any additional information that may be available to you regarding the activities of the [Organization Name]. This information should be provided as soon as possible, and it should be clearly identified as such. The Department will appreciate your cooperation in this matter.

Sincerely,
[Signature]

Very truly yours,
[Signature]

FIGURE 3

Cardinal Forge Manufacturing and Finishing Process

Liquid Penetrant inspections are also completed on some parts using ZL-60D Magnaflux. The green penetrant is rinsed with water which is discharged to the wastewater treatment system. Parts are developed with a black light to check for cracks.

Process wastewater is discharged from the heat treat tanks and vibratory bowl cleaning equipment. All process wastewater is pH adjusted and RM-10 Clay powder is added for settling. The discharge goes through filter paper before each batch is discharged. Settled solids and filter paper solids are disposed of in the solid waste dumpster. Ringwood Wastewater Treatment calibrates the pH adjustment equipment once per year. Waste oil from equipment is hauled annually by Rock Valley Chemical. There are no floor drains in the facility.

Classification

Cardinal Forge is regulated under 40 CFR 467 Aluminum Forming – Subpart D Forging and 40 CFR 468 Copper Forming – Subpart A Copper Forming due to the composition of the brass used in their facility. Brass with a concentration of copper greater than 50% is included in the regulation for Copper Forming.

Recommendations

This industry should be permitted as a Categorical Industrial User – 40 CFR 467 – Aluminum Forming under Subpart D – Forging. Cardinal Forge should also be permitted as a Categorical Industrial User – 40 CFR 468 – Copper Forming – Subpart A – Copper Forming. Based on the difficult nature of permitting production based industries, we would further recommend that the industry become a zero discharge industry and be permitted as such.

1950

MEMORANDUM FOR THE RECORD

On 10/10/50, the following information was received from the [redacted] regarding the [redacted] of the [redacted] in the [redacted] area.

The [redacted] of the [redacted] in the [redacted] area is [redacted] and is [redacted] to the [redacted] of the [redacted] in the [redacted] area.

It is noted that the [redacted] of the [redacted] in the [redacted] area is [redacted] and is [redacted] to the [redacted] of the [redacted] in the [redacted] area.

The [redacted] of the [redacted] in the [redacted] area is [redacted] and is [redacted] to the [redacted] of the [redacted] in the [redacted] area.

It is noted that the [redacted] of the [redacted] in the [redacted] area is [redacted] and is [redacted] to the [redacted] of the [redacted] in the [redacted] area.

The [redacted] of the [redacted] in the [redacted] area is [redacted] and is [redacted] to the [redacted] of the [redacted] in the [redacted] area.

It is noted that the [redacted] of the [redacted] in the [redacted] area is [redacted] and is [redacted] to the [redacted] of the [redacted] in the [redacted] area.