

**CWA NPDES COMPLIANCE EVALUATION INSPECTION REPORT**  
**U.S. ENVIRONMENTAL PROTECTION AGENCY, REGION 5**

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**Inspection Type:** Compliance Evaluation Inspection

**Facility:**

Hyponex Corporation  
3875 South Elyria Road  
Shreve, Ohio 44676

**NPDES Permit Number:** OH0107077 (effective March 1, 2017 and expires February 28, 2022)

**Dates of Inspection:** March 22 and 25, 2021

**EPA Representatives:**

Mark Conti, Lead Environmental Engineer, (440) 250-1706  
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**Report Date:** April 13, 2021

**Report Prepared by:**

**MARK CONTI** Digitally signed by MARK CONTI  
Date: 2021.04.13 14:11:32  
-04'00'

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Mark Conti, Lead Environmental Engineer, (440) 250-1706, conti.mark@epa.gov

**Report Approved by:**

**Furio, Brooke** Digitally signed by Furio, Brooke  
Date: 2021.04.14 08:25:17  
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Brooke Furio, Section Chief, Multimedia Section

## **I. INTRODUCTION**

I called Mr. Lewis on March 17, 2021, to propose a date for a virtual opening conference. EPA held a virtual opening conference with Hyponex on March 22, 2021. EPA was represented by Jake Berger, Megan Zale, and me. Hyponex was represented by Messrs. Kendra, Morris, Dozier, Winter, and Johantges. I explained the purpose of the inspection and stated that the company had the right to assert a business confidentiality claim. Hyponex provided a description of operations, description of the package wastewater treatment plant, and steps taken to address discharge limitation exceedances. After the meeting, Mr. Lewis emailed to me the safety rules for the facility. After the meeting, I emailed to Mr. Lewis the U.S. EPA Small Business Resources Information Sheet, and I requested several records. The requested records and documents were provided to me prior to the on-site inspection.

The on-site inspection was conducted on March 25, 2021. After introductions, I presented my credentials to Mr. Kendra and reiterated Hyponex's right to assert a business confidentiality claim. Each of the EPA inspectors and Hyponex/Scotts employees who attended the virtual conference participated in the inspection. The walk-through was led by Mr. Kendra. EPA inspected outdoor raw material staging areas, storm drain catch basins, oil and chemical storage areas, bagging plant, package wastewater treatment plant, and sampling locations. I concluded the inspection by citing some of the preliminary areas of concern. On March 30, I requested additional records, and Mr. Lewis provided those to me.

## **II. OBJECTIVE**

The overall objective of the inspection was to evaluate the facility's compliance with its NPDES permit. A specific objective was to investigate the cause and measures taken to resolve significant non-compliance with the total suspended solids limitation for Station 602.

## **III. BACKGROUND**

Hyponex Corporation (Hyponex), a subsidiary of The Scotts Miracle-Gro Company, bags soil and mulch. The facility is classified under Standard Industrial Classification Code 2875 - Fertilizers, Mixing Only. They purchase bulk soil, compost, and mulch from vendors and store them in outdoor piles and windrows. Soil is mixed with front-end loaders prior to being loaded into hoppers in the bagging plant. The bagging plant includes pulverizing, screening, separating ferrous metals by magnet, bagging, and palletizing. A surfactant is sprayed on some soil mixtures before it is bagged.

From December through June, bagging and shipping operations are 4-6 days per week from 6:00 a.m. – 9:30 p.m. From July through November, the hours are Monday through Thursday 6:00 a.m. – 4:00 p.m. The facility employs 35-40 people.

**IV. SUMMARY OF FINDINGS AND OBSERVATIONS**

**A. Permit**

The description and location of the sampling stations in Part II.B of the permit are incorrect for Outfall 002 and Station 602. The locations identified by the permit are about 4000 feet southeast of the sampling locations. Table 1 includes the latitudes and longitudes in the permit and the facility’s sampling locations.

**Table 1. Sampling Station Locations<sup>1</sup>**

<b>Sampling Station</b>	<b>Latitude</b>	<b>Longitude</b>
Outfall 002 location in permit:	40° 45’ 07”	-82° 04’ 49”
Facility’s sampling location:	40° 44’ 38”	-82° 04’ 20”
Outfall 003 location in permit:	40° 45’ 00”	-82° 04’ 49”
Facility’s sampling location:	40° 45’ 00”	-82° 04’ 48”
Station 602 location in permit: (northeast of bagging plant)	40° 44’ 38”	-82° 04’ 15”
Facility’s sampling location: (northwest of bagging plant)	40° 45’ 07”	-82° 04’ 49”

**B. Records/Reports**

1. Part III.12.A of the NPDES permit requires 24-hour notification of any violation of a daily maximum discharge limitation. I requested non-compliance notification records for total residual chlorine violations that occurred in 2019 and 2020. The daily maximum concentration for Outfall 002 was exceeded on May 9, 2019, July 9, 2019, June 16, 2020, and August 20, 2020. The company did not notify the Ohio EPA within 24-hours of discovery of these events.
2. I reviewed lab reports (Alloway / Marion, Ohio / 800.635.3222) and discharge monitoring reports (DMRs) for 2020. There were inconsistencies between flow rates recorded on lab field data sheets and flow rates entered in Hyponex’s DMR submissions. Table 2 summarized the dates with inconsistencies.

**Table 2. Measured Versus Reported Flow**

<b>Date(s)</b>	<b>Measured and Reported Flow, gallons/day</b>
January 14, 2020	Station 602 measured flow rate: 183 Alloway report and DMR: < 100
November 17, 2020 November 17-30, 2020	Station 602 measured flow rate: 1080 Alloway report and DMR: 6,480
December 8, 2020	Station 602 measured flow rate: 1271 Alloway report and DMR: 6,671

<sup>1</sup> The location of Outfall 003 identified in the permit seems to be at a point downstream of where two storm water discharges combine, which would be representative of storm water from the southern half of the production area. The company has an outfall marker before the point where the two storm water discharges combine, so not all storm water is represented at that location. Figure 2 in Hyponex’s storm water pollution prevention plan shows the location of Outfall 003 as being downstream of where the two storm water ditches combine.

3. The measured total residual chlorine at Outfall 002 on June 16, 2020 was 0.05 mg/L (compared to the permit limit of 0.019 mg/L). The value reported in the DMR submittal was also 0.05 mg/L, but in the enforcement and compliance history online (ECHO) database, the value is recorded as “Not Quantifiable”.
4. Despite no monitoring being done at Outfall 003 in 2017, 2018, 2019 or 2020, and no benchmark monitoring at Outfall 002 in 2017, 2018, 2019 or 2020, ECHO shows “Conditional Monitoring – Not Required this Period” for all reporting periods.
5. The storm water pollution prevention plan (SWPPP) lists weekly visual inspections as a best management practice (BMP). Weekly inspection records were available.
6. Part IV.E of the NPDES permit requires routine (quarterly) facility inspections, quarterly visual assessments, and comprehensive site inspections. Each of these activities were documented in 2020. See paragraphs IV.F.5 and IV.F.6 of this report for potential deficiencies with *how* these were done.

#### C. Facility Site Review

1. The facility discharges sanitary wastewater, storm water and artesian well water. There is a 1,500 gallon per day package wastewater treatment plant for sanitary wastewater treatment. There are no drains in the bagging plant.

Sanitary wastewater is treated in an extended aeration package plant. The package plant includes a trash trap, aeration tank, settling tank, dosing tank, sand filter beds, and a chlorination/dechlorination chamber. Mr. Lewis said that flow through the plant is typically about 300 gallons per day.

The aeration tank is supplied with air by a pair of blowers that alternate on timers. Sludge is hauled rather than wasted. The dosing tank has high- and low-level floats and two pumps that pump clarified water to a distribution box ahead of the sand filter beds. The distribution box is used to manually select which filter bed receives flow. The chlorination portion of the contact chamber has 2 sections separated by an underflow weir. Chlorination and dechlorination are done with tablet dispensers during summer months (May – October).

2. According to Mr. Morris, the trash trap is cleaned out every few months by a septic hauler. Sludge is also removed from the settling tank every few months by the septic hauler. The aeration tank was well-mixed with no dead spots. It had a small amount of brown foam. The return sludge was tan in color. The settling tank was free of floating scum and sludge.
3. Mr. Lewis conducts a daily plant inspection to note the visual appearance of wastewater, trash trap condition, ensure blowers and pumps are functioning,

scrape settling tank walls, rake sand beds, and inspect the tablet dispenser (summer months). He does not perform any operational or control tests.

4. In the March 2020 DMR submission, it was noted that the sand in the filter beds needed to be excavated and replaced. On April 7, 2020, the package plant was emptied and cleaned. On July 31, 2020, the plant was taken off-line for maintenance to address solids carryover to the discharge. On August 17, the clarifier weir and a separation in the piping on the sludge return line were caulked. On August 21, a new chorine tablet applicator was installed. On August 25, the sand in the filter beds was replaced. While offline, Miller Septic pumped wastewater and sludge multiple times. The package plant was brought online on September 1. Mr. Lewis noted that total suspended solids continued to exceed the permit limitation for the package plant after completing the maintenance, and he suspected that dirty sand was the cause. The filter beds were flushed several times. The discharge concentration at Station 602 was within the permit limitation in December 2020 and January 2021. The discharge loading was within the permit limitation in January 2021.
5. Part II.I of the NPDES permit requires the permittee to maintain a permanent marker on the stream bank at each outfall. Hyponex has permanent markers at the sample locations for Outfalls 002 and 003. The markers are near their property line; they are not at the receiving stream's bank.

#### D. Effluent/Receiving Waters

There was no discharge at Station 602 during the inspection. The effluent from Outfalls 002 and 003 was clear and colorless. The two ditches in the immediate vicinity of the outfalls were free of sludge deposits and floating materials such as oil and foam.

#### E. Flow Measurement

1. 24-hour flow estimates for Station 602 and Outfall 002 are made by Alloway. Flow for station 602 is estimated by timing how long it takes the discharge from a 4" corrugated pipe to fill a quart jar. The flow estimate for Outfall 002 only includes a measurement of the discharge from the 16" corrugated pipe conveying storm water and artesian water, rather than the combined discharge of sanitary wastewater (Station 602), storm water, and artesian water. The flow rate from the 16" pipe is estimated by timing how long it takes for water to fill a quart jar.
2. Station 602 discharges intermittently. A pump in the dosing tank cycles on and off (high- and low-level floats) and pumps clarified wastewater to one of the filter beds. The filtered water flows to the chlorine contact tank and then to the discharge location. This cycling happens only a few times a day. On sampling days, Mr. Lewis manually activates a pump 30-60 minutes before Alloway performs its sampling so there will be a discharge at Station 602. The flow rate

that is measured for that brief period is not representative of the flow over a 24-hour period. Reported flow since July 2019 has ranged from 114 gallon per day to 6,671 gallons per day. Since flow is measured while pumping to the sand filter beds, I would not expect such a large variation in measured flow rates.

3. There was no storm water at Outfall 002 on the day of the inspection, but there was artesian water flowing from the 16" pipe. Even with no storm water, it would have been difficult to collect the entire flow stream in a quart jar. During a storm event, the jar method would not be possible. Mr. Kendra confirmed that water gushes from the pipe during a storm event.
4. Mr. Morris stated that he plans to install a flow meter on the pipe between the dosing tank and filter beds.

#### F. Self-Monitoring Program

1. The samples collected for Outfall 002 may not be representative of the combined sanitary, stormwater, and artesian well water under all sampling conditions. Two pipes (one for the package plant and one for storm water plus artesian well water) discharge to a ditch that ultimately enters Kiser Ditch. Samples are collected from a pool just below the end of the two pipes (see Photo No. 6). There may not always be adequate mixing in this area to represent the combined flow.
2. Part 1.A of the NPDES permit requires quarterly sampling (when discharging) at Outfall 003 for pH and TSS and a 24-hour total flow estimate. Neither sampling nor flow estimates were made in 2017, 2018, 2019 or 2020. The DMRs for the second quarter of 2020 (April 1 – June 30) cited COVID as the reason for lack of sampling during that period.
3. Outfalls 002 and 003 have storm water benchmark monitoring requirements. Part I.A of the NPDES permit requires quarterly monitoring (when discharging) for nitrite-nitrate, lead, zinc and phosphorous. Annual monitoring is allowed in lieu of quarterly sampling provided that a rotating schedule is followed that ensures a sample is collected in each quarter over the term of the permit. Hyponex did not conduct benchmark monitoring in 2017, 2018, 2019 or 2020. Flow was reported at Outfall 002 every month, so there were discharges. There was a discharge at Outfall 003 during each of the quarterly stormwater inspections in 2020, and the outfall was discharging on the day of the inspection.
4. Daily turbidity observations are made by Mr. Morris. Alloway collects and analyzes samples for pH, total suspended solids (TSS), ammonia-nitrogen (NH<sub>3</sub>-N), CBOD<sub>5</sub>, and E. coli (summer) at Station 602 and pH, TSS and total residual chlorine (summer) at Outfall 002. I reviewed the chains of custody and lab reports for January – December 2020. The records included the information required by permit condition Part III.6. The lab uses test procedures listed in 40 CFR 136 for

the analyses conducted. pH and total residual chlorine are measured in the field by Alloway's technician. Sample holding times were met.

5. Part IV.E.2 of the NPDES permit requires a quarterly visual assessment of storm water discharges. The sample for the visual assessment is to be collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample shall be collected as soon as practicable after the first 30 minutes, along with documentation as to why it was not possible to take samples within the first 30 minutes. Based on precipitation data from a nearby weather station<sup>2</sup>, the visual assessment samples may be collected beyond the 30-minute timeframe. The 2020 quarterly assessments did not include any notations that sample collection was delayed. Storm event data is summarized below. In the table, the first column is the date and time that a cumulative 0.25-inches of precipitation was recorded, which I assumed would result in an actual discharge. The amount of rainfall triggering a storm water discharge from the facility may vary significantly from this assumption.

**Table 3. Storm Event Data and Visual Observation Times**

<b>Date and Time of Cumulative 0.25-in. of Rain</b>	<b>Date and Time of Storm Event Visual Observation</b>
3/18/2020, 5:00 PM	3/19/2020, 2:30 PM
4/13/2020, 8:00 AM	4/13/2020, 4:15 PM
7/28/2020, 12:00 AM	7/28/2020, 9:30 AM
10/28/2020, 6:00 AM	10/28/2020, 11:30 AM

6. Part IV.E.2 of the NPDES permit requires at least one quarterly visual assessment during snowmelt discharge in areas subject to snow. None of the quarterly visual assessment records indicate they were made during a snowmelt discharge.
7. Permit limit exceedances for March 2017 – January 2021 are summarized in Attachment C.

**G. Storm Water**

1. Storm water control measures are included in the NPDES permit. The permit includes benchmark standards for nitrite-nitrate, lead, zinc and phosphorous. The company's current SWPPP was updated in December 2017, and it is signed and dated.
2. Hyponex has a self-certified spill prevention control and countermeasure (SPCC) plan for diesel and gasoline tanks, drums of motor and hydraulic oils, and a

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<sup>2</sup> Weather Underground personal weather station KOHWOOST35 (40.749° N, 82.009° W) about 3.7 miles east of the Hyponex facility.

container of used oil. All bulk storage containers have secondary containment. Hyponex no longer harvests peat and no longer has the associated 1,000-gallon diesel tank onsite. 40 CFR 112.5(a) requires amendment of a plan when a change in the facility operation affects its potential for a discharge (e.g. change in storage capacity).

3. At least three storm water catch basins are not shown in Figure 2 of the SWPPP. There is a catch basin in the truck loading dock and there are two catch basins between buildings (see Photo No. 13), which are not shown in the figure.
4. One of the BMPs included in the SWPPP is keeping areas adjacent to storm water catch basins clean of soil. According to Mr. Kendra, the facility has an outdoor sweeper and water truck for cleaning paved areas and suppressing dust. There was a moderate amount of mud and dust adjacent to some storm water catch basins (see Photo Nos. 2, 13 and 15). Catch basins are fitted with geotextile fabric inserts (Eagle StormNEST™ Model No. T8702B). According to Mr. Kendra, these are replaced or cleaned as needed. Since it was dry during the inspection, the effectiveness of the catch basin filters could not be evaluated.

## V. ATTACHMENTS


- A. Approximate Photo Locations and Direction Photos were Taken
- B. Photo Log
- C. Permit Limit Exceedance for March 2017 – January 2021





Approximate Photo Locations and Direction Photos were Taken


<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 1	<b>Time:</b> 9:18 AM		
<b>Direction Photo Taken:</b> Inside bagging plant			
<b>Photo Description:</b> Surfactant is sprayed on some soil mixtures prior to bagging it. Surfactant is stored in these totes in the bagging plant.		<b>File:</b> Hyponex IMG_0366	


<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 2	<b>Time:</b> 9:22 AM		
<b>Direction Photo Taken:</b> West			
<b>Photo Description:</b> This is a storm drain about 50 feet east of the fuel pumps. The drain had a catch basin insert, which is shown in Photo No. 3.		<b>File:</b> Hyponex IMG_0367	


<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 3	<b>Time:</b> 9:23 AM		
<b>Direction Photo Taken:</b> down			
<b>Photo Description:</b> This is the catch basin insert in the storm drain shown in Photo No. 2. It is an Eagle Manufacturing Company Model No. T8702B.			
		<b>File:</b> Hyponex IMG_0368	


<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 4	<b>Time:</b> 9:27 AM		
<b>Direction Photo Taken:</b> northeast			
<b>Photo Description:</b> This is one of the two sand filter beds in the package wastewater treatment plant. This filter bed was not in use at the time of the inspection. One filter bed is used at a time, and they are alternated.		<b>File:</b> Hyponex IMG_0369	


<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 5	<b>Time:</b> 9:39 AM		
<b>Direction Photo Taken:</b> Down			
<b>Photo Description:</b> This is the distribution box for the filter beds. Clarified water from the dosing tank is pumped to one sand filter by sealing a drainpipe in the distribution box.		<b>File:</b> Hyponex IMG_0370	


<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 6	<b>Time:</b> 9:49 AM		
<b>Direction Photo Taken:</b> north			
<b>Photo Description:</b> The smaller pipe is the discharge from the package wastewater treatment plant. The larger pipe discharges storm water and artesian well water. Samples for Outfall 002 are collected from the pool of water shown here.		<b>File:</b> Hyponex IMG_0371	

<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 7	<b>Time:</b> 9:57 AM		
<b>Direction Photo Taken:</b> East			
<b>Photo Description:</b> In the middle of this photo is an artesian spring that flows into a storm water ditch along the far western edge of the bulk material storage area.		<b>File:</b> Hyponex IMG_0372	

<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 8	<b>Time:</b> 9:57 AM		
<b>Direction Photo Taken:</b> East			
<b>Photo Description:</b> In the middle of this photo is an artesian spring that flows into a storm water ditch along the far western edge of the bulk material storage area. Bulk material storage piles and the bagging plant are in the background.		<b>File:</b> Hyponex IMG_0373	

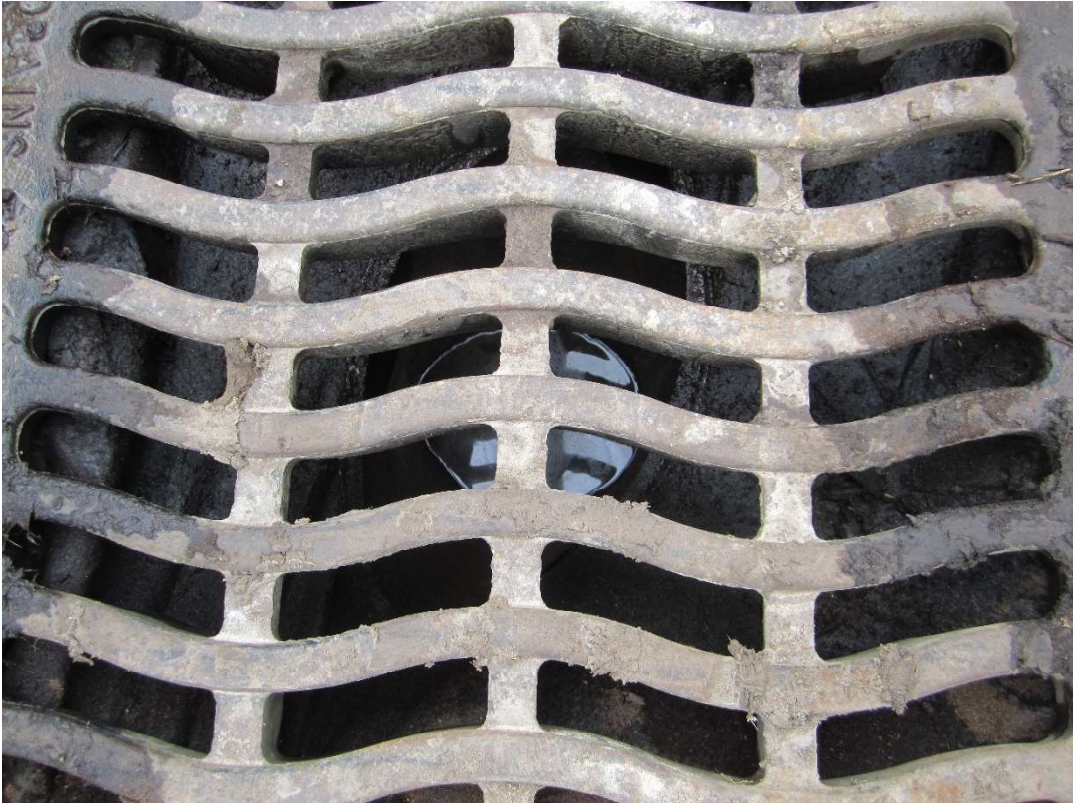
<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 9	<b>Time:</b> 10:00 AM		
<b>Direction Photo Taken:</b>			
<b>Photo Description:</b> The sign for Outfall 003 is on the tree in the center of the photo. The photo was taken from the approximate location where storm water visual assessments are usually made. There is another storm ditch that combines with this storm water downstream of this location.		<b>File:</b> Hyponex IMG_0374	


<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 10	<b>Time:</b> 10:00 AM		
<b>Direction Photo Taken:</b> east			
<b>Photo Description:</b> This is storm water runoff near Outfall 003. It includes storm water from several facility storm drains and a storm water swale. It does not include storm water from the ditch that runs parallel to the far western edge of the bulk material storage area.		<b>File:</b> Hyponex IMG_0375	

<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 11	<b>Time:</b> 10:01 AM		
<b>Direction Photo Taken:</b> west			
<b>Photo Description:</b> This is where the storm water shown in Photo No. 10 and storm water from the ditch that runs parallel to the far western edge of the bulk material storage area combine.		<b>File:</b> Hyponex IMG_0376	

<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 12	<b>Time:</b> 10:11 AM		
<b>Direction Photo Taken:</b> facing south			
<b>Photo Description:</b> The ground slopes left to right. To the left is the bulk material storage area. To the right of the vegetated strip is a storm water ditch.		<b>File:</b> Hyponex IMG_0377	

<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 13	<b>Time:</b> 10:27 AM		
<b>Direction Photo Taken:</b>			
<b>Photo Description:</b> There are two storm water catch basins in this alleyway that discharge via Outfall 003.			
		<b>File:</b> Hyponex IMG_0378	

<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 14	<b>Time:</b> 10:32 AM		
<b>Direction Photo Taken:</b>			
<b>Photo Description:</b> This is a storm water catch basin close to the north side of the bagging plant.			
		<b>File:</b> Hyponex IMG_0379	

<b>Facility Name &amp; Location:</b> Hyponex Corporation 3875 South Elyria Road, Shreve, Ohio		<b>Photographer:</b> Mark Conti	<b>Camera:</b> Canon PowerShot SD1400 IS (S/N 212065043406)
<b>Date Photograph Was Taken:</b> 3/25/2021			
<b>Photo No.:</b> 15	<b>Time:</b> 10:32 AM		
<b>Direction Photo Taken:</b>			
<b>Photo Description:</b> This is the area around the storm water catch basin shown in Photo No. 15. The catch basin was fitted with a filter insert.		<b>File:</b> Hyponex IMG_0380	

## Attachment C

Station	Monitoring Period Date	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Exceedance [%]
602	4/30/2018	BOD, carbonaceous, 5-day	MO AVG	15	mg/L	50
602	4/30/2018	BOD, carbonaceous, 5-day	WKLY MAX	0.15	kg/d	76
602	4/30/2018	BOD, carbonaceous, 5-day	MO AVG	0.15	kg/d	163
<b>602</b>	<b>2/29/2020</b>	<b>BOD, carbonaceous, 5-day</b>	<b>MO AVG</b>	<b>15</b>	<b>mg/L</b>	<b>50</b>
602	3/31/2020	BOD, carbonaceous, 5-day	WKLY MAX	25	mg/L	67
<b>602</b>	<b>3/31/2020</b>	<b>BOD, carbonaceous, 5-day</b>	<b>MO AVG</b>	<b>25</b>	<b>mg/L</b>	<b>150</b>
<b>602</b>	<b>4/30/2020</b>	<b>BOD, carbonaceous, 5-day</b>	<b>MO AVG</b>	<b>15</b>	<b>mg/L</b>	<b>50</b>
<b>602</b>	<b>7/31/2020</b>	<b>BOD, carbonaceous, 5-day</b>	<b>MO AVG</b>	<b>33</b>	<b>mg/L</b>	<b>230</b>
602	7/31/2020	BOD, carbonaceous, 5-day	WKLY MAX	33	mg/L	120
602	7/31/2020	BOD, carbonaceous, 5-day	MO AVG	0.06	kg/d	5
602	6/30/2017	E. coli, MTEC-MF	MO GEOMN	210	MPN/100mL	67
602	10/31/2018	E. coli, MTEC-MF	MO GEOMN	308	MPN/100mL	144
602	10/31/2018	E. coli, MTEC-MF	WK GEOMN	308	MPN/100mL	8
602	5/31/2019	E. coli, MTEC-MF	WK GEOMN	771	MPN/100mL	171
602	5/31/2019	E. coli, MTEC-MF	MO GEOMN	771	MPN/100mL	512
602	6/30/2019	E. coli, MTEC-MF	MO GEOMN	243	MPN/100mL	93
602	9/30/2019	E. coli, MTEC-MF	WK GEOMN	2420	MPN/100mL	752
602	9/30/2019	E. coli, MTEC-MF	MO GEOMN	2420	MPN/100mL	1821
602	5/31/2020	E. coli, MTEC-MF	WK GEOMN	1733	MPN/100mL	510
602	5/31/2020	E. coli, MTEC-MF	MO GEOMN	1733	MPN/100mL	1275
602	6/30/2020	E. coli, MTEC-MF	WK GEOMN	2420	MPN/100mL	752
602	6/30/2020	E. coli, MTEC-MF	MO GEOMN	2420	MPN/100mL	1821
602	7/31/2020	E. coli, MTEC-MF	MO GEOMN	1842	MPN/100mL	1362
602	7/31/2020	E. coli, MTEC-MF	WK GEOMN	1842	MPN/100mL	549
<b>602</b>	<b>5/31/2019</b>	<b>Nitrogen, ammonia total (as N)</b>	<b>MO AVG</b>	<b>26.4</b>	<b>mg/L</b>	<b>1220</b>
602	5/31/2019	Nitrogen, ammonia total (as N)	WKLY MAX	26.4	mg/L	780
602	5/31/2019	Nitrogen, ammonia total (as N)	WKLY MAX	0.036	kg/d	112
<b>602</b>	<b>5/31/2019</b>	<b>Nitrogen, ammonia total (as N)</b>	<b>MO AVG</b>	<b>0.036</b>	<b>kg/d</b>	<b>227</b>
602	6/30/2019	Nitrogen, ammonia total (as N)	WKLY MAX	27.3	mg/L	810
602	6/30/2019	Nitrogen, ammonia total (as N)	WKLY MAX	0.223	kg/d	1212
<b>602</b>	<b>6/30/2019</b>	<b>Nitrogen, ammonia total (as N)</b>	<b>MO AVG</b>	<b>27.3</b>	<b>mg/L</b>	<b>1265</b>
<b>602</b>	<b>6/30/2019</b>	<b>Nitrogen, ammonia total (as N)</b>	<b>MO AVG</b>	<b>0.223</b>	<b>kg/d</b>	<b>1927</b>
602	7/31/2019	Nitrogen, ammonia total (as N)	WKLY MAX	4.38	mg/L	46
<b>602</b>	<b>7/31/2019</b>	<b>Nitrogen, ammonia total (as N)</b>	<b>MO AVG</b>	<b>4.38</b>	<b>mg/L</b>	<b>119</b>
602	9/30/2019	Nitrogen, ammonia total (as N)	WKLY MAX	0.0244	kg/d	44
<b>602</b>	<b>9/30/2019</b>	<b>Nitrogen, ammonia total (as N)</b>	<b>MO AVG</b>	<b>0.0244</b>	<b>kg/d</b>	<b>122</b>
602	5/31/2020	Nitrogen, ammonia total (as N)	MO AVG	4.65	mg/L	133
602	5/31/2020	Nitrogen, ammonia total (as N)	WKLY MAX	4.65	mg/L	55
602	3/31/2018	Solids, total suspended	WKLY MAX	70	mg/L	289
<b>602</b>	<b>3/31/2018</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>0.095</b>	<b>kg/d</b>	<b>40</b>
<b>602</b>	<b>3/31/2018</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>70</b>	<b>mg/L</b>	<b>483</b>

## Attachment C

Station	Monitoring Period Date	Parameter Description	Limit Type	DMR Value	DMR Value Unit	Exceedance [%]
<b>602</b>	<b>4/30/2018</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>40</b>	<b>mg/L</b>	<b>233</b>
602	4/30/2018	Solids, total suspended	WKLY MAX	0.41	kg/d	302
602	4/30/2018	Solids, total suspended	WKLY MAX	40	mg/L	122
<b>602</b>	<b>4/30/2018</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>0.41</b>	<b>kg/d</b>	<b>503</b>
<b>602</b>	<b>3/31/2020</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>17</b>	<b>mg/L</b>	<b>42</b>
602	4/30/2020	Solids, total suspended	WKLY MAX	22	mg/L	22
<b>602</b>	<b>4/30/2020</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>22</b>	<b>mg/L</b>	<b>83</b>
602	9/30/2020	Solids, total suspended	WKLY MAX	0.23	kg/d	125
602	9/30/2020	Solids, total suspended	WKLY MAX	39	mg/L	117
<b>602</b>	<b>9/30/2020</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>39</b>	<b>mg/L</b>	<b>225</b>
<b>602</b>	<b>9/30/2020</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>0.23</b>	<b>kg/d</b>	<b>238</b>
602	10/31/2020	Solids, total suspended	WKLY MAX	0.32	kg/d	214
<b>602</b>	<b>10/31/2020</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>0.083</b>	<b>kg/d</b>	<b>22</b>
<b>602</b>	<b>10/31/2020</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>18</b>	<b>mg/L</b>	<b>50</b>
602	10/31/2020	Solids, total suspended	WKLY MAX	66	mg/L	267
602	11/30/2020	Solids, total suspended	WKLY MAX	23	mg/L	28
<b>602</b>	<b>12/31/2020</b>	<b>Solids, total suspended</b>	<b>MO AVG</b>	<b>0.19</b>	<b>kg/d</b>	<b>179</b>
602	12/31/2020	Solids, total suspended	WKLY MAX	0.19	kg/d	86
002	8/31/2017	Chlorine, total residual	DAILY MX	0.06	mg/L	216
<b>002</b>	<b>5/31/2019</b>	<b>Chlorine, total residual</b>	<b>DAILY MX</b>	<b>0.16</b>	<b>mg/L</b>	<b>742</b>
<b>002</b>	<b>7/31/2019</b>	<b>Chlorine, total residual</b>	<b>DAILY MX</b>	<b>0.06</b>	<b>mg/L</b>	<b>216</b>
<b>002</b>	<b>8/31/2020</b>	<b>Chlorine, total residual</b>	<b>DAILY MX</b>	<b>0.06</b>	<b>mg/L</b>	<b>216</b>
002	2/28/2019	Solids, total suspended	WKLY MAX	55	mg/L	22
002	2/28/2019	Solids, total suspended	MO AVG	55	mg/L	83
002	5/31/2019	Solids, total suspended	MO AVG	31	mg/L	3
002	2/29/2020	Solids, total suspended	MO AVG	36	mg/L	20

Note – The DMR values in bold text resulted in significant noncompliance (SNC) with NPDES pollutant limits.