

John R. Kasich, Governor Mary Taylor, Lt. Governor Craig W. Butler, Director

December 21, 2018

Carbon Limestone Landfill, LLC **Re:** 8100 South Stateline Rd Lowellville, OH 44436 Carbon Limestone Landfill Director's Final Findings and Orders (DFFO) DFFO Municipal Solid Waste Landfills Mahoning County MSWL018781

Subject: Final Findings and Orders of the Director

Dear Sir or Madam:

Transmitted herewith are the Final Findings and Orders of the Director concerning the matter indicated for Summit C&D Diposal.

If you have any questions, please contact Teri Finfrock at (614) 644-3037.

Sincerely,

Greg Nichols, Administrative Processing Unit Division of Materials & Waste Management

Enclosure

ec:

BEFORE THE

OHIO ENVIRONMENTAL PROTECTION AGENCY

In the Matter of:

Carbon Limestone Landfill LLC	:	Director's Interim Findings
8100 South State Line Rd.	1	and Orders
Lowellville, Ohio 44436	:	

PREAMBLE

It is agreed by the parties hereto as follows:

Ohio EPA DEC 21/18 Entered Directors Journal

I. JURISDICTION

These Director's Interim Findings and Orders ("Orders") are issued to Carbon Limestone Landfill LLC ("Respondent") pursuant to the authority vested in the Director of the Ohio Environmental Protection Agency ("Ohio EPA") under Ohio Revised Code ("ORC") Sections 3704.03, 3734.13, 3745.01 and 6111.03. A set of Director's Final Findings and Orders may be issued later to require Respondent to take additional action.

II. PARTIES BOUND

These Orders shall apply to and be binding upon Respondent and successors in interest liable under Ohio law. No change in ownership of Respondent or of the facility shall in any way alter Respondent's obligations under these Orders.

III. DEFINITIONS

Unless otherwise stated, all terms used in these Orders shall have the same meaning as defined in ORC Chapters 3704, 3734 and 6111 and the rules promulgated thereunder.

IV. FINDINGS

The Director of Ohio EPA makes the following findings:

1. Respondent owns and operates a sanitary landfill facility (Facility ID 0250070850 and MSWL018781) located at 8100 South State Line Road, Lowellville, Mahoning County, Ohio 44436 ("Facility").

Division of Air Pollution Control Findings

2. ORC Section 3704.05(J) states, in part, that, "no person shall violate any applicable requirement of a Title V permit or any permit condition."

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3. On September 19, 2013, Ohio EPA issued a renewal Title V permit (P0085730), with an effective date of October 10, 2013, to Respondent for various emissions units (EU). The EUs listed in P0085730 are "air contaminant sources" as defined in OAC Rule 3745-15-01(B) and (W). Respondent is subject to the requirements of USEPA's Standards of Performance for New Stationary Sources ("NSPS"), 40 CFR, Part 60, Subpart WWW. The NSPS for municipal solid waste landfills 40 CFR §60.753(c) states in part: "Each owner or operator of a MSW [municipal solid waste] landfill with a gas collection and control system [GCCS] used to comply with [40 CFR, Part 60, Subpart WWW] shall operate each interior wellhead in the collection system with a landfill gas temperature less than 55°C [131°F] and with either a nitrogen level less than 20 percent or an oxygen level less than 5 percent. The owner or operator may establish a higher operating temperature, nitrogen, or oxygen value at a particular well. A higher operating value (HOV) demonstration shall show supporting data that the elevated parameter does not cause fires or significantly inhibit anaerobic decomposition by killing methanogens."

4. As temperatures inside the landfill at various wells increased, Respondent requested HOVs from Ohio EPA to operate at temperatures above 131°F, as outlined in P0085730 and 40 CFR, Part 60, Subpart WWW. On September 30, 2016, December 6, 2016, February 27, 2017, and September 18, 2017, Ohio EPA issued Respondent letters denying these HOV requests for seven wells.

5. On February 3, 2017, Ohio EPA issued a Notice of Violation ("NOV") letter to Respondent due to certain wells not operating within acceptable operating parameters of the NSPS and the denied HOV requests. In this NOV, Ohio EPA requested Respondent to submit a compliance plan and schedule detailing how the facility intends to return to compliance.

6. Respondent submitted to Ohio EPA a Draft Heat Management and Enhanced Monitoring Plan on August 31, 2017.

7. Respondent has not achieved compliance with the temperature parameters as specified in P0085730 for some of it wells. Respondent is in violation of the terms and conditions of P0085730, 40 CFR, Part 60, Subpart WWW, and ORC Sections 3704.05(A) and (J).

Division of Materials and Waste Management Findings

8. Respondent is the "owner" and the "operator" of the Facility as those terms are defined in Ohio Administrative Code ("OAC") Rules 3745-27-01(O)(5) & (7), and is also the license holder for the Facility.

9. The Facility is a "sanitary landfill facility" as that term is defined under OAC Rule 3745-27-01(S)(4) and is authorized to accept "solid waste" as that term is defined under ORC Section 3734.01(E) and OAC Rule 3745-27-01(S)(23).

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10. OAC Rule 3745-27-19(B)(2) provides that the owner or operator shall conduct all operations at the Facility in strict compliance with its authorizing documents. As set forth in Finding number 7 above, Respondent is in violation of Title V Permit P0085730, which is also a violation of OAC Rule 3745-27-19(B)(2).

11. ORC Section 3734.13(A) states that the Director may issue Orders to any person in order to abate a violation or prevent a threatened violation of ORC 3734 and the rules adopted thereunder.

Division of Surface Water Findings

12. Respondent discharges landfill leachate and gas well leachate through a dedicated discharge line from the landfill to the Village of Lowellville sanitary sewer system to the Lowellville Wastewater Treatment Plant (Lowellville WWTP). Respondent is authorized to discharge to the Village system with an Ohio Indirect Discharge Permit (IDP) (3DP00004 *FP) effective August 1, 2012 with an expiration date of July 31, 2017. This permit is authorized under the Federal Water Pollution Control Act, as amended (33 U.S.C. 1251 et. seq., hereinafter referred to as "the Act"), and the Ohio Water Pollution Control Act (Ohio Revised Code 6111). Respondent submitted on February 7, 2017 a complete application for renewal of its IDP (which included a request for new discharge limits) ("IDP Renewal Application") which is more than one hundred and eighty days prior to the expiration of its IDP.

13. The Lowellville WWTP is authorized to discharge pollutants to the Mahoning River, a water of the state, in accordance with the terms and conditions of Ohio National Pollutant Discharge Elimination System ("NPDES") permit No. 3PC00007*KD, modification effective August 1, 2014 and expiring December 31, 2018.

14. Respondent has violated effluent limits of its IDP as cited in Attachment I. Each effluent violation cited in Attachment I constitutes a separate violation of ORC Section 6111.07. Carbon Limestone is in Significant Noncompliance for ammonia daily maximum and monthly average permit loading violations. Based on conditions in the landfill, a greater volume of landfill leachate and gas well leachate is being produced and is contributing to the exceedances of limits in Respondent's IDP.

15. Some of these permit exceedances are a contributing factor to the Village of Lowellville WWTP violating the effluent limits of its NPDES permit No.3PC00007.

16. On October 5, 2017, Ohio EPA personnel witnessed a discharge from the Lowellville WWTP which was causing discoloration and foam of the Mahoning River.

17. Based on a review of the Lowellville WWTP eDMR, since at least October 20,

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2017 the Lowellville WWTP has been meeting effluent limits in its NPDES permit despite discharges from Respondent that are in violation of its IDP.

18. ORC Section 6111.07(A) prohibits any person from violating, or failing to perform, any duty imposed by O.R.C. 6111.01 to 6111.08, or violating any order, rule, or term or condition of a permit issued or adopted by the Director. Each day of violation is a separate offense.

19. The following Orders do not constitute authorization or approval of the construction of any physical structure or facilities, or the modification of any disposal system. Any such construction or modification is subject to O.R.C. 6111.44 and 6111.45 and OAC Chapter 3745-42.

20. The Director has considered and based his determination on, evidence relating to the technical feasibility and economic reasonableness of complying with these Orders and to evidence relating to conditions calculated to result from compliance with these Orders, and their relation to the benefits to the people of the state to be derived from such compliance in accomplishing the purposes of O.R.C. Chapters 3704, 3734, and 6111.

V. ORDERS

The Director hereby issues the following Orders:

Division of Surface Water

1. Until such time as the discharge limits in Respondent's IDP are modified or its IDP is renewed with modified discharge limits, Respondent shall be subject to the following requirements:

- a. Upon the effective date of these Orders, Respondent shall be allowed to discharge to the Lowellville WWTP 450 lbs./day of ammonia. Respondent shall reduce the ammonia load if the Village notifies Respondent that the discharge is causing interference at the Lowellville WWTP. The ammonia loading may be increased when the interference is resolved.
- b. Upon the effective date of these Orders, and only after obtaining approval from the Lowellville WWTP, Respondent shall be allowed to discharge 0.624lbs/day of arsenic to the Lowellville WWTP provided the following conditions are met: Respondent shall increase the loading over a minimum of six weeks in order to allow the WWTP biomass to acclimate to the increased loading. Respondent shall collect and

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> analyze (using an on-site spectrophotometer, test kit, or equivalent means of obtaining results) a composite sample for arsenic five days per week for six weeks in order to ensure the increase in load is being controlled. The test method is for process control and is not intended to be used for compliance monitoring required by the Indirect Discharge Permit (which must employ a method approved under 40 CFR 136 approved). Respondent shall stop increasing the arsenic load if notified by the Lowellville WWTP that the discharge is causing interference at the WWTP. The arsenic loading may be increased when the interference is resolved. Until the Respondent is subject to a modified or renewed IDP, Respondent shall thereafter collect and analyze (using an on-site spectrophotometer or equivalent) weekly a composite arsenic sample of the discharge and provide the results to an Ohio EPA designated representative. Although the Village of Lowellville may not have amended its ordinance to discharge these levels into the Lowellville WWTP, it is understood that the Village of Lowellville's written approval for same may be relied upon until its Ordinance is amended.

c. During the pendency of this Order 1, Respondent shall conduct sampling three times per week of total dissolved solids (TDS) and ammonia (ammonia sampling may be performed using a field instrument), with sampling results for both to be reported on a weekly basis via email to an Ohio EPA designated representative.

2. If the Village of Lowellville adopts local limits that are in addition to or more stringent than those listed in the table below, or if Respondent's IDP is modified or its IDP is renewed such that the IDP limits are more stringent than those listed in the table below, Respondent may seek modifications to these Orders to address timeframes necessary to meet those limits or seek additional time to develop alternative disposal alternatives.

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Parameter	Daily Maximum (lbs./day)	Monthly Average (lbs./day)		
Ammonia	450	450		
Arsenic	0.624	0.624		
Cadmium	0.674	0.01		
Chromium	1.013	0.449		
Chromium, hexavalent	0.614	0.530		
Copper	0.116	0.09		
Free cyanide	Monitor only			
Lead	0.749	0.1		
Mercury	0.002	0.002		
Nickel	0.978	0.978		
Zinc	0.615	0.615		
TFR (TDS)	None	12,102		

3. Respondent shall make necessary upgrades to its leachate pretreatment system that are necessary to meet revised local limits from the Village of Lowellville in accordance with the following schedule:

- a. Within 60 days of the Village of Lowellville finalizing its local limits, Respondent shall submit an alteration request for its Permit to Install for its leachate pretreatment system for any upgrades needed to meet applicable limits.
- After receiving approval of the alteration request, Respondent shall timely initiate construction of the upgrades into the existing construction schedule for the pretreatment system; and
- c. Within 365 days of receiving the approval specified in order 3.b. above, Respondent shall complete construction of any upgrades to meet applicable local limits.

4. Within 45 days of the effective date of these Orders, Respondent shall submit a Standard Operating Procedure that includes a Slug Control Plan.

5. Within 45 days of the effective date of these Orders, Respondent shall submit a communications plan that will outline communication procedures to notify Ohio EPA, and/or Village of Lowellville of noncompliance with Respondent's IDP, upsets and emergency response actions. Such plan shall include information regarding contacts, including phone numbers for Respondent's officials, Ohio EPA, and Village of Lowellville.

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6. Upon the effective date of these Orders, Respondent shall submit to Ohio EPA the semi-monthly sampling and analytical results collected pursuant to the IDP by the 30th of each following month.

Divisions of Materials and Waste Management and Air Pollution Control

7. Within 60 days of the effective date of these Orders, Respondent shall submit a report documenting that it has sufficient on-site storage to accommodate landfill leachate and gas well leachate collected from within the landfill. Respondent shall monitor and report to Ohio EPA monthly its compliance with this paragraph of the Order.

Phase 2 and 3 Gas Wells

8. Upon the effective date of these Orders, Respondent shall monitor and adjust all gas wells within Phases 2 and 3 of the landfill twice per month utilizing a field monitoring device for methane, carbon dioxide, oxygen, balance gas, flow, temperature, and pressure. All gas analysis shall be performed with instrumental methods of sufficient resolution to determine gas composition at the levels present in all samples.

Wells of Interest

9. For the purposes of these orders a gas well shall be designated a well of interest ("WOI") if:

- a. A monitoring event indicates that a gas well has a well head temperature above 131°F; and
- b. The gas well is re-monitored within fifteen (15) days and has a well head temperature above 131° F

10. For the purpose of these orders, a gas well shall continue to be designated WOI until the gas wellhead temperature drops below 131°F for three consecutive months, at which point the gas well will no longer be classified as a WOI. A WOI may only be abandoned with Ohio EPA's prior approval.

11. By January 4, 2019, Respondent shall submit to Ohio EPA the September, October, November and December 2018 temperature readings for all the facility's gas wells. Within 30 days of the effective date of the orders, Respondent shall submit to Ohio EPA for concurrence a proposed list of WOIs that meet the criteria established in paragraph 9. After obtaining Ohio EPA concurrence, gas wells shall be added and removed from this list in accordance with the criteria set forth in paragraph 8 and 9.

12. Upon the effective date of these orders, Respondent shall monitor all WOI quarterly using either Tedlar bags or SUMMA canisters or "mini" gas chromatograph for

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percent or concentration of carbon monoxide, hydrogen and nitrogen. All gas analysis shall be performed with instrumental methods of sufficient resolution to determine gas composition at the levels present in all samples. Ohio EPA reserves the right to request Respondent to conduct monthly monitoring of specific WOI.

13. Upon the effective date of these Orders, liquid level measurements shall be collected monthly from each WOI. If liquid levels cover at least 50% of the available perforation length for a WOI for more than two (2) continuous months, Respondent shall install a pump and pump cycle counter within such WOI within thirty (30) days from the date of the second month's measurement unless conditions in the WOI prevent such installation. For pump cycle counters installed within any WOI, the number of pump cycles shall be recorded twice per month to ensure each pump is operating properly. If pump cycle counts indicate a significant reduction in quantity of pump cycles or that the counter has stopped advancing, the pump shall be evaluated and corrective measures taken. All WOI pumps shall be pulled, cleaned and inspected at a frequency of no less than once per year.

14. Upon the effective date of these Orders, Respondent shall take corrective action pursuant to NSPS timeline requirements to address any WOI exceeding NSPS standards with the exception of temperature. All corrective action taken shall be reported monthly to Ohio EPA. Respondent shall remove as much landfill gas as reasonably possible. Respondent shall also balance the applied pressure on any WOI to minimize air intrusion.

15. Once designated a WOI pursuant to Orders 9, 10 and 11, a gas well shall be monitored and operated in compliance with these Orders and Respondent will not need to request a temperature HOV for that gas well. Compliance with these Orders shall resolve the need for temperature HOV requests under 40 C.F.R. Part 60, Subpart WWW and ORC Sections 3704.05 (A) and (J).

16. Upon the effective date of these Orders, Respondent shall notify the Ohio EPA air and solid waste inspectors within fifteen (15) days of the initial occurrence of a gas well temperature at 150° F or above.

17. Upon the effective date of these Orders, Respondent shall notify the Ohio EPA air and solid waste inspectors within fifteen (15) days of the initial occurrence of a gas well exceeding 100 ppmv carbon monoxide.

Heat Management/Landfill Gas Collection Well Compliance/ Contingency Plan

18. Within 30 days from the effective date of these Orders, Respondent shall submit to Ohio EPA a draft schedule for the wells it plans to install within Phases 2 and 3 of the landfill during 2019. The schedule will include the proximate location for the proposed wells. Wells may be added or removed from the schedule based on the

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Respondent's on-going evaluation of the wellfield. Any alterations to this schedule will be identified in Respondent's monthly report. Upon completion of a construction event, Respondent will provide updated "as-built" documents within the monthly report.

19. Within 60 days of the effective date of these Orders, Respondent shall submit a first draft of a Heat Management/Landfill Gas Collection Well Compliance/Contingency Plan ("Plan"). This Plan will address (i) enhanced monitoring for early detection of elevated gas well temperatures, landfill gas with the ratio of the percent methane to percent carbon dioxide of less than 1, subsidence, subsurface oxidation events (SSO) and fires, and (ii) provide corrective action and/or contingency plans to address elevated gas wellhead temperatures, methane to carbon dioxide ratio less than 1, subsidence, odors, SSO events and fires. The WOI criteria set forth in Orders 9 and 10 may be modified in this Plan by agreement of the parties. Once approved, this Plan is meant to be a "living document" that can be modified and adjusted to reflect changes at the landfill. Once approved, the Plan can be modified by mutual agreement of the parties without the need for a Director's action unless such action is required by law.

Odor Monitoring and Mitigation Plan

20. Within 60 days of the effective date of these Orders, Respondent shall submit an Odor Monitoring and Mitigation Plan that contains at a minimum:

- a. Odor surveillance route with frequency;
- b. Standards of measure to determine/evaluate odors,
- c. Staff training and a process to implement the plan;
- d. Communication protocols with complainants, government officials, and Ohio EPA;
- e. A plan to evaluate other odor control measures and to determine when they may become necessary to implement.

Monthly Report

21. Upon the effective date of these Orders, Respondent shall submit all data collected pursuant to Orders 8, 12, 13, 14, and 18 in a monthly report to Ohio EPA by the 15th of each following month. Data shall be submitted in Excel format. As part of the monthly reports, Respondent shall provide a plan view showing the location of all wells (current and newly installed), the boring logs for all newly installed wells including waste temperatures and identification of the top and bottom elevations of the perforations in the wells and a profile view of all wells with respect to top of the landfill and the bottom liner of the landfill. When reporting the data for Order 8, Respondent will also include in its monthly report the methane to carbon dioxide ratio.

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VI. REVIEW OF SUBMITTALS

Ohio EPA may review any work plan, report, or other item required to be submitted pursuant to these Orders in accordance with this Section. Upon review, Ohio EPA may in its sole discretion: (a) approve the submission in whole or in part; (b) approve the submission upon specified conditions; (c) modify the submission; (d) disapprove the submission in whole or in part, notifying Respondent of deficiencies; or (e) any combination of the above. The results of Ohio EPA's review shall be provided in writing to Respondent.

In the event that Ohio EPA initially disapproves a submission, in whole or in part, approves the submission with specified conditions, or suggests modifications and notifies Respondent in writing of such, Respondent shall within thirty (30) days, or such longer period of time as specified by Ohio EPA in writing, address Ohio EPA's comments and remit the revised submission to Ohio EPA for approval. Revised submissions shall be accompanied by a letter indicating how and where each Ohio EPA comment was incorporated into the submission and identify any other changes made to the submission by Respondent.

VII. TERMINATION

Respondent's obligations under these Orders shall terminate upon the issuance of a Director's Final Findings and Orders or by the mutual written agreement of Respondent and the Chiefs of Ohio EPA's Division of Air Pollution Control, Division of Materials and Waste Management and Division of Surface Water as relevant.

VIII. OTHER CLAIMS

Nothing in these Orders shall constitute or be construed as a release from any claim, cause of action or demand in law or equity against any person, firm, partnership or corporation, not a party to these Orders, for any liability arising from, or related to, operations by Respondent.

IX. OTHER APPLICABLE LAWS

All actions required to be taken pursuant to these Orders shall be undertaken in accordance with the requirements of all applicable local, state and federal laws and regulations. These Orders do not waive or compromise the applicability and enforcement of any other statutes or regulations applicable to Respondent.

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X. MODIFICATIONS

These Orders may be modified by agreement of the parties hereto. Modifications shall be in writing and shall be effective on the date entered in the journal of the Director of Ohio EPA.

XI. NOTICE

All documents required to be submitted by Respondent pursuant to these Orders shall be addressed to:

Ohio EPA, Northeast District Office Division of Surface Water 2110 East Aurora Road Twinsburg, Ohio 44087-1924 Attn: Rich Blasick

and to:

Ohio Environmental Protection Agency Division of Material and Waste Management 2110 East Aurora Road Twinsburg, Ohio 44087-1924 Attn: Lynn Sowers (and electronically to: NEDODMWM.Submittals@epa.ohio.gov)

and to:

Ohio Environmental Protection Agency Division of Air Pollution Control P.O. Box 1049 Columbus, Ohio 43216-1049 Attn: James Kavalec (and electronically to the Air Services Portal)

or to such persons and addresses as may hereafter be otherwise specified in writing by Ohio EPA.

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XII. RESERVATION OF RIGHTS

Ohio EPA and Respondent each reserve all rights, privileges and causes of action, except as specifically waived in Section XIII of these Orders. Ohio EPA reserves the right to require Respondent to undertake additional actions in future orders concerning this facility. Ohio EPA reserves its rights to seek civil penalties for violations cited in these Orders.

XIII. WAIVER

Without admission of fact, violation or liability, Respondent consents to the issuance of these Orders and agrees to comply with these Orders.

Respondent hereby waives the right to appeal the issuance, terms and conditions, and service of these Orders, and Respondent hereby waives any and all rights Respondent may have to seek administrative or judicial review of the issuance, terms and conditions of these Orders either in law or equity.

Notwithstanding the preceding, Ohio EPA and Respondent agree that if these Orders are appealed by any other party to the Environmental Review Appeals Commission, or any court, Respondent retains the right to intervene and participate in such appeal. In such an event, Respondent shall continue to comply with these Orders notwithstanding such appeal and intervention unless these Orders are stayed, vacated or modified.

XIV. EFFECTIVE DATE

The effective date of these Orders is the date these Orders are entered into the Ohio EPA Director's journal.

XV. SIGNATORY AUTHORITY

Each undersigned representative of a party to these Orders certifies that he or she is fully authorized to enter into these Orders and to legally bind such party to these Orders.

IT IS SO ORDERED AND AGREED:

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Ohio Environmental Protection Agency

Craig W. Butle Director

12/21/18 Date

IT IS SO AGREED:

Carbon Limestone LandfillLLC

Signature

12-19-18

Date

Goodsell Printed or Typed Name

Presi Title

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ATTACHMENT 1

Carbon Limestone Landfill 3DP00004*FP Limit Violations 01/01/2014 - 07/01/2017

Attachment I

Permit No	Reporting Period Si	Reportin ation Code	9 Parameter	Limit Type	Limit	Reported Value	Violation Date	Comments
P00004*FP	00:		Arsenic, Total Recover	30D Conc	17	138.	1/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
P00004*FP	00:	00978	Arsenic, Total Recover	30D Conc	17	99.7	2/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
P00004*FP	00:	00978	Arsenic, Total Recover	30D Conc	17	105.85	3/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
P00004*FP	00:		Arsenic, Total Recover	30D Conc	17	137.1	4/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
P00004*FP	00:		Arsenic, Total Recover	30D Conc	17	127.85	5/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
P00004*FP	00:		Arsenic, Total Recover	30D Conc	17	135.25	6/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
P00004*FP	00:		Nitrogen, Ammonia (NH3	1D Qty	113.4	113.913	6/4/2014	
P00004*FP	003		Arsenic, Total Recover	30D Conc	17	110.8	7/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	148.3	8/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	191.1	9/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
P00004*FP	001		Arsenic, Total Recover	30D Conc	17	165.35	10/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	138.95	11/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	149.45	12/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	127.25	1/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	130.475	2/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover Arsenic, Total Recover	30D Conc	17	132.55	3/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP DP00004*FP	001			30D Conc	17 17	106.6 113.725	4/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/ Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover Nitrogen, Ammonia (NH3	30D Conc 1D Qty	113.4	128.629	5/1/2015 5/5/2015	invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	151.05	6/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	118.375	7/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Nitrogen, Ammonia (NH3	1D Qty	113.4	138.803	7/21/2015	intoine monenty infine concerce by minor more issued syzing
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	165.	8/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Nitrogen, Ammonia (NH3	30D Qty	113.4	125.139	8/1/2015	
DP00004*FP	001		Nitrogen, Ammonia (NH3	1D Qty	113.4	149,409	8/4/2015	
DP00004*FP	001		Arsenic, Total Recover	30D Conc	17	255.	9/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/
0P00004*FP	001		Nitrogen, Ammonia (NH3	1D Qty	113.4	132.758	9/1/2015	
DP00004*FP	001		Nitrogen, Ammonia (NH3	30D Qty	113.4	144.076	9/1/2015	
0P00004*FP	001		Nitrogen, Ammonia (NH3	1D Qty	113.4	155.393	9/15/2015	
0P00004*FP	001		Arsenic, Total Recover	30D Conc	17	205.	10/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001		Nitrogen, Ammonia (NH3	1D Qty	113.4	134.806	10/6/2015	
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	235.	11/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	118.126	11/17/2015	
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	185.	12/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27,
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	124.988	12/1/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	125.767	12/2/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	124.208	12/16/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	156.010	1/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	125.777	1/5/2016	
DP00004*FP	001		Nitrogen, Ammonia (NH3	1D Qty	113.4	186.244	1/19/2016	
0P00004*FP	001		Nitrogen, Ammonia (NH3	30D Qty	113.4	136.398	2/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	145.696	2/3/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	127.100	2/17/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	117.734	3/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	118.794	3/2/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	116.673	3/16/2016	
DP00004"FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	127.445	4/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	127.376	4/5/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	127.514	4/19/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	129.174	5/1/2016	
0P00004*FP	001	00510	Nitrogen, Ammonia (NH3	1D Qty	113.4	125.165	5/4/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	133.182	5/18/2016	
0P00004*FP 0P00004*FP	001	00978	Arsenic, Total Recover Nitrogen, Ammonia (NH3	1D Conc 1D Qty	287 113.4	300. 124.269	5/1/2016	
0P00004*FP	001	00610		30D Qty	113.4	114.356	6/1/2016 6/1/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3 Nitrogen, Ammonia (NH3	30D Qty	113.4	147.480	7/1/2016	
000004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	148.912	7/6/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	146.048	7/20/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	157.734	8/1/2016	
DP00004*FP	001	00978	Arsenic, Total Recover	1D Conc	287	290.	8/2/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	135.711	8/2/2016	
P00004*FP	001	00978	Arsenic, Total Recover	1D Conc	287	300.	8/16/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	179.757	8/16/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	154.654	9/1/2016	
P00004*FP	001	00978	Arsenic, Total Recover	1D Conc	287	300.	9/7/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	179.193	9/7/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	130.115	9/21/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	122.065	10/1/2016	
PD0004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	149.074	10/4/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	138.471	11/1/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	118.677	11/2/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	158.265	11/16/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	126.111	12/1/2016	
000004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	160.605	12/7/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	166.837	1/1/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	157.438	1/10/2017	
P00004*FP	001	00978	Arsenic, Total Recover	1D Qty	0.045	.05163	1/24/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	176.237	1/24/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	177.442	2/1/2017	
P00004*FP	001	00978	Arsenic, Total Recover	1D Qty	0.045	.05481	2/7/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	238.231	2/7/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	116.653	2/21/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	212.569	3/1/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	229.552	3/7/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	195.585	3/21/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	141.413	4/1/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	152.372	4/4/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	130.453	4/18/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	119.076	5/17/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	227.251	6/1/2017	
P00004*FP	001	34694	Phenol	30D Conc	16362	24000.	6/1/2017	
P00004*FP	001	34694	Phenol	30D Qty	2.48	5.08477	6/1/2017	
P00004*FP	001	00978	Arsenic, Total Recover	1D Conc	287	290.	6/7/2017	
P00004*FP	001	00978	Arsenic, Total Recover	1D Qty	0.045	.04786	6/7/2017	
	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	171.792	6/7/2017	
0P00004*FP 0P00004*FP 0P00004*FP	001	00978	Arsenic, Total Recover Nitrogen, Ammonia (NH3	1D Qty 1D Qty	0.045 113.4	.07213 282.711	6/21/2017 6/21/2017	

Carbon Limestone Landfill 3DP00004*FP Limit Violations 01/01/2014 - 07/01/2017

Parmit No	Reporting Period Stat	Reporting on Code	Parameter	Limit Type	Limit	Reported Value	Violation Date	Comments
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	138.	1/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	99.7	2/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/2
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	105.85	3/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	137.1	4/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/2
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	127.85	5/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/:
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	135.25	6/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/2
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	110.8	7/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/2
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	148.3	8/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17 17	191.1 165.35	9/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/:
DP00004*FP	001	00978	Arsenic, Total Recover Arsenic, Total Recover	30D Conc 30D Conc	17	138.95	10/1/2014 11/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/ Invalid Monthly limit corrected by minor mod issued 5/27/
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	149.45	12/1/2014	Invalid Monthly limit corrected by minor mod issued 5/27/2
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	127.25	1/1/2015	invalid Monthly limit corrected by minor mod issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	130.475	2/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	132.55	3/1/2015	Invaild Monthly limit corrected by minor mod issued 5/27/3
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	106.6	4/1/2015	Invalid Monthly limit corrected by minor mod Issued 5/27/3
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	113.725	5/1/2015	Invalid Monthly limit corrected by minor mod Issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	151.05	6/1/2015	Invalid Monthly limit corrected by minor mod Issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	118.375	7/1/2015	invalid Monthly limit corrected by minor mod issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	165.	8/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/1
DP00004*FP DP00004*FP	001	00978	Arsenic, Total Recover Arsenic, Total Recover	30D Conc 30D Conc	17 17	255. 205.	9/1/2015 10/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/1 Invalid Monthly limit corrected by minor mod issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	235.	11/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/1 Invalid Monthly limit corrected by minor mod issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	30D Conc	17	185.	12/1/2015	Invalid Monthly limit corrected by minor mod issued 5/27/1
DP00004*FP	001	00978	Arsenic, Total Recover	1D Conc	287	300.	6/1/2016	
DP00004*FP	001	00978	Arsenic, Total Recover	1D Conc	287	290.	8/2/2016	
DP00004*FP	001	00978	Arsenic, Total Recover	1D Conc	287	300.	8/16/2016	
DP00004*FP	001	00978	Arsenic, Total Recover	1D Conc	287	300.	9/7/2016	
DP00004*FP	001	00978	Arsenic, Total Recover	1D Qty	0.045	.05163	1/24/2017	
DP00004*FP	001	00978	Arsenic, Total Recover	1D Qty	0.045	.05481	2/7/2017	
DP00004*FP	001	00978	Arsenic, Total Recover	1D Conc	287	290.	5/7/2017	
DP00004*FP	001	00978	Arsenic, Total Recover Arsenic, Total Recover	1D Qty	0.045	.04786	6/7/2017	
DP00004*FP DP00004*FP	001	00978	Arsenic, Total Recover Nitrogen, Ammonia (NH3	1D Qty 1D Qty	0.045	.07213 113.913	6/21/2017 6/4/2014	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	128.629	5/5/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	138.803	7/21/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	125.139	8/1/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	149.409	8/4/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	132.758	9/1/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	144.076	9/1/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	155.393	9/15/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	134.806	10/6/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	118.126	11/17/2015	
DP00004*FP DP00004*FP	001	00610	Nitrogen, Ammonia (NH3 Nitrogen, Ammonia (NH3	30D Qty 1D Qty	113.4 113.4	124.988 125.767	12/1/2015 12/2/2015	
DP00004 FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	124.208	12/16/2015	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	156.010	1/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	125.777	1/5/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	186.244	1/19/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	136.398	2/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	145.696	2/3/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	127.100	2/17/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	117.734	3/1/2016	
DP00004*FP DP00004*FP	001 001	00610 00610	Nitrogen, Ammonia (NH3 Nitrogen, Ammonia (NH3	1D Qty 1D Qty	113.4 113.4	118.794 116.673	3/2/2016 3/16/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	127.445	4/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	127.376	4/5/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	127.514	4/19/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	129.174	5/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	125.166	5/4/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	133.182	5/18/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	124.269	6/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	114.356	6/1/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	147.480	7/1/2016	
0P00004*FP	001	00510	Nitrogen, Ammonia (NH3	1D Qty	113.4	148.912	7/6/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3 Nitrogen, Ammonia (NH3	30D Qty	113.4 113.4	146.048	8/1/2016	
0P00004*FP	001	00510	Nitrogen, Ammonia (NH3	1D Qty	113.4	137.734	8/2/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	179.757	8/16/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	154.654	9/1/2016	
0P00004*FP	001	00510	Nitrogen, Ammonia (NH3	1D Qty	113.4	179.193	9/7/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	130.115	9/21/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	122.065	10/1/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	149.074	10/4/2016	
DP00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	138.471	11/1/2016	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	118.677	11/2/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3 Nitrogen, Ammonia (NH3	1D Qty	113.4	158.265 126.111	11/16/2016 12/1/2016	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty 1D Qty	113.4 113.4	126.111	12/7/2016	
P00004 FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	166.837	1/1/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	157.438	1/10/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	176.237	1/24/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	177.442	2/1/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	238.231	2/7/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	116.653	2/21/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	212.569	3/1/2017	
000004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	229.552	3/7/2017	
0P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	195.585	3/21/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	141.413	4/1/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	152.372	4/4/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	1D Qty	113.4	130.453	4/18/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3 Nitrogen, Ammonia (NH3	1D Qty	113.4	119.076	5/17/2017	
P00004*FP	001	00610	Nitrogen, Ammonia (NH3	30D Qty	113.4	227.251	6/1/2017	
P00004*FP P00004*FP	001	00610	Nitrogen, Ammonia (NH3 Nitrogen, Ammonia (NH3	1D Qty 1D Qty	113.4 113.4	171.792 282.711	6/7/2017 6/21/2017	
		00010						