

Malaga County Water District  
Wastewater Treatment Facility

# Pollution Prevention Plan

Malaga, CA  
May 2017



Date  
Signed 5/10/17



DATE SIGNED: 5/10/17

Prepared for:  
Malaga County Water District  
Malaga, CA

Prepared by:  
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# APPENDIX

Wastewater Treatment Data  
SIU Data  
Residential Data  
Well Data

# Abbreviations

|                       |  |
|-----------------------|--|
| CDO .....             | Cease and Desist Order R5-2014-0146                            |
| CN .....              | Cyanide  |
| Cu .....              | Copper   |
| DDW .....             | State Water Resources Control Board Division of Drinking Water |
| MCL .....             | Maximum Contaminant Level                                      |
| MCWD .....            | Malaga County Water District                                   |
| N .....               | Nitrogen   |
| NH <sub>3</sub> ..... | Ammonia  |
| PPP .....             | Pollution Prevention Plan                                      |
| RWQCB .....           | Regional Water Quality Control Board                           |
| SIU .....             | Significant Industrial User                                    |
| WDR .....             | Waste Discharge Requirements                                   |
| WWTF .....            | Wastewater Treatment Facility                                  |

# 1 Introduction

The Malaga County Water District owns and operates a community water system, wastewater collection, treatment, and disposal system for the community of Malaga, in Fresno County. The Wastewater Treatment Facility (WWTF) and effluent disposal ponds occupy assessor's parcel number 330-100-07T in the southern half of the northwest quarter of the southeast quarter of section 13, T16S, R19E, and MDB&M. The WWTF Waste Discharge Requirements Order No. R5-2014-0145 (WDRs) and Cease and Desist Order R5-2014-0146 (CDO) were issued by the Central Valley Regional Water Quality Control Board (RWQCB). The WDRs contain several Provisions to be completed by the District. This Pollution Prevention Plan (Plan) has been prepared to comply with WDR CDO Provision 5, Task 5A which states:

*Submit and implement a Pollution Prevention Plan (PPP) for copper, cyanide, and nitrate plus nitrite (as N) that meets the requirements specified in California Water Code Section 13263. (The pollution prevention plan shall describe pollution prevention activities the Discharger will implement in the short-term and long-term to reduce effluent concentrations for copper, cyanide, and nitrate plus nitrite (as N)).*

The California Water Code, Section 13263.3, describes the required elements for the Pollution Prevention Plan.

1. An estimate of all of the sources of a pollutant contributing, or potentially contributing, to the loadings of a pollutant in the treatment plant influent (Plan Section 3);
2. An analysis of the methods that could be used to prevent the discharge of the pollutants (Plan Section 4, 5, 6);
3. An estimate of the load reductions that may be attained through the methods identified in Item 2 (Plan Section 4, 5, 6);
4. A plan for monitoring the results of the pollution prevention program (Plan Section 7);
5. A description of the tasks, costs, and time required to investigate and implement elements in the pollution prevention plan (Plan Section 8);
6. A statement of the pollution prevention goals and strategies, including immediate, short and long term action (Plan Section 8);
7. A description of existing pollution prevention programs (Plan Section 9);
8. An analysis, to the extent feasible, of any adverse environmental impacts that may result from pollution prevention actions (Plan Section 10); and
9. An analysis, to the extent feasible, of the costs and benefits that may be incurred to implement the pollution prevention program (Plan Section 11).

## 2 Existing Conditions

### 2.1 General

The subject of this Pollution Prevention Plan includes:

- Nitrate plus Nitrite (as N) and Ammonia (NH<sub>3</sub><sup>+</sup>);
- Cyanide (CN);
- Copper (Cu).

Existing conditions must be evaluated in order to determine a baseline or background condition from which pollutant reduction goals can be measured. Existing conditions that have been evaluated include:

- Supply water Nitrate plus Nitrite, CN, Cu, and NH<sub>3</sub><sup>+</sup>.
- Residential waste discharge
- Significant Industrial Users discharge
- Commercial Users discharge
- Wastewater Treatment Facility influent Nitrate plus Nitrite, CN, Cu, and NH<sub>3</sub><sup>+</sup>.
- Wastewater Treatment Facility effluent Nitrate plus Nitrite, CN, Cu, and NH<sub>3</sub><sup>+</sup>.

The concentrations of the various pollutants were based upon existing monitoring data.

## 3 Sources of Pollution

Malaga CWD serves residential, commercial, and industrial customers. There are two main sewer lines that enter the WWTF. One line collects mainly residential and commercial dischargers. The other line collects wastewater from industrial users. Figure 3-1 shows the collection system for the residential and commercial dischargers (Collection System Line A). Figure 3-2 shows the collection system for the industrial users (Collection System Line B). Commercial businesses within the District consist of a school, restaurants, gas stations, and truck washes. The industrial complexes within the Malaga community consist of PPG Industries, Air Products and Chemical Inc., Rio Bravo, and Stratas Foods. Figure 3-3 depicts the locations of the commercial and industrial users. Industrial users contribute 40% to 50% of the total wastewater plant flow.

Possible sources of ammonia, nitrate plus nitrite, copper and cyanide are shown below:

- **Ammonia** – Intrinsic constituent of domestic wastewater. Discharge from industrial users.
- **Nitrate** – From the potable wells. Produced in the WWTF from the oxidation of ammonia.
- **Copper** – Potable water supply, potable water distribution system corrosion, dietary supplements, paint, pesticides. Certain from certain industrial users like truck washes.
- **Cyanide** – Rodent poison, possible false high concentration due to sample preservation procedures.

### 3.1 Ammonia and Nitrate

Untreated wastewater contains ammonia and organic nitrogen, which are considered intrinsic constituents of the raw influent wastewater. The nitrogen present in raw wastewater is primarily combined with urea. Organic nitrogen is decomposed readily by bacteria to ammonia in the treatment process. There is no practical source control of residential ammonia to the treatment plant but ammonia can be removed in the wastewater treatment plant by nitrification, where ammonia is oxidized to nitrate. Subsequently, nitrate can be converted to nitrogen gas, which escapes into the atmosphere by the denitrification process. The existing wastewater treatment plant is not designed for the nitrification/denitrification process. However, process changes made at the wastewater treatment plant have allowed the plant to fully nitrify. The District is examining options to upgrade the wastewater treatment plant to comply with the final nitrate effluent limits.

### 3.2 Copper

The Malaga CWD WWTF has a copper effluent limitation of 6.5 µg/L when discharging to the Fresno Irrigation District Central Canal. However, the District has not discharged to the canal since December 6, 2013. The District has been discharging to several disposal ponds. The discharge to the ponds does not have a copper limitation.

Copper contamination generally occurs from corrosion of household copper potable water supply pipes. EPA requires water systems to control the corrosiveness of their water if the concentration of copper at house faucets or hose bibs exceeds the action level of 1.3 mg/L in more than 10 percent of the water samples. The Malaga water system has not exceeded the action level for copper over the past six years.



Copper is present in commercially available products such as paint, pesticides, and dietary supplements but these sources are believed to have insignificant contributions.

### 3.3 Cyanide

The Malaga CWD WWTF has a cyanide effluent limitation of 4.2 µg/L when discharging to the Fresno Irrigation District Central Canal. However, the District has not discharged to the canal since December 6, 2013. The District has been discharging to several disposal ponds. The discharge to the ponds does not have a cyanide limitation.

Influent at municipal wastewater treatment plants typically contains cyanide at low or undetectable concentrations. Cyanide in municipal WWTF influent is generally derived from industrial sources such as electroplating, steel production, or photographic finishing facilities. There are no such industries in the service area.

### 3.4 Potable Water Quality

The DDW has established nitrate, copper, cyanide maximum contaminant level (MCL) drinking water standards for public water supplies. For nitrate plus nitrite (as N), the MCL is 10 mg/L. For cyanide, the MCL is 0.15 mg/L, with copper being 1.30 mg/L. Below is a table of MCL levels allowed in drinking water:

Table 3-1: Maximum Contaminant Level for Drinking Water

| <b>Maximum Contaminant Level DDW</b> |                   |
|--------------------------------------|-------------------|
|                                      | <i><b>MCL</b></i> |
| <b>Nitrate as Nitrogen (mg/L)</b>    | 10                |
| <b>Nitrate + Nitrite as N (mg/L)</b> | 10                |
| <b>Nitrite as N (mg/L)</b>           | 1                 |
| <b>Cyanide (mg/L)</b>                | 0.15              |
| <b>Copper (mg/L)</b>                 | 1.30              |

There are 3 operating potable water wells (6, 7 and 8) that provide water to the community. Figure 3-4 depicts the entire water system of Malaga CWD. Well 6, 7 and 8 have all values of the previous mentioned contaminants well below the MCL. Ammonia has not been tested for these three wells over the course of their lifetime. Nitrate, Copper, and Cyanide levels for the supply wells from 2011-2016 are presented in Table 3-2. The three wells rotate being the lead well throughout the day – Well 7 runs for 6am to 2 pm, Well 8 from 2 pm to 12 am, and Well 6 from 12am to 6am. A flow weighted average was calculated for each sampling period based on the supply volume produced by each well.

Section Three: Sources of Pollution  
 Pollution Prevention Plan

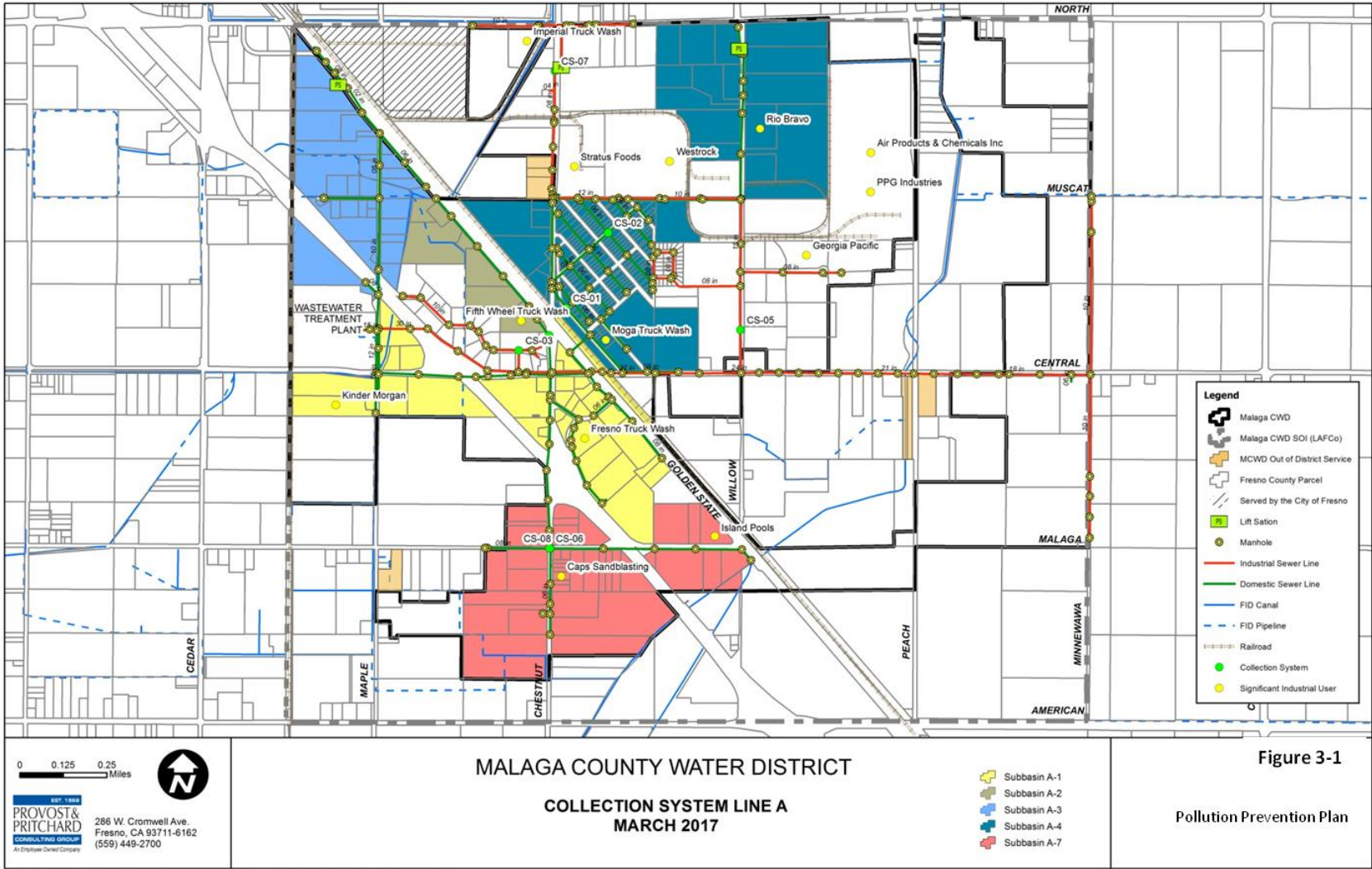


Figure 3-1: Collection System Line A

Section Three: Sources of Pollution  
Pollution Prevention Plan

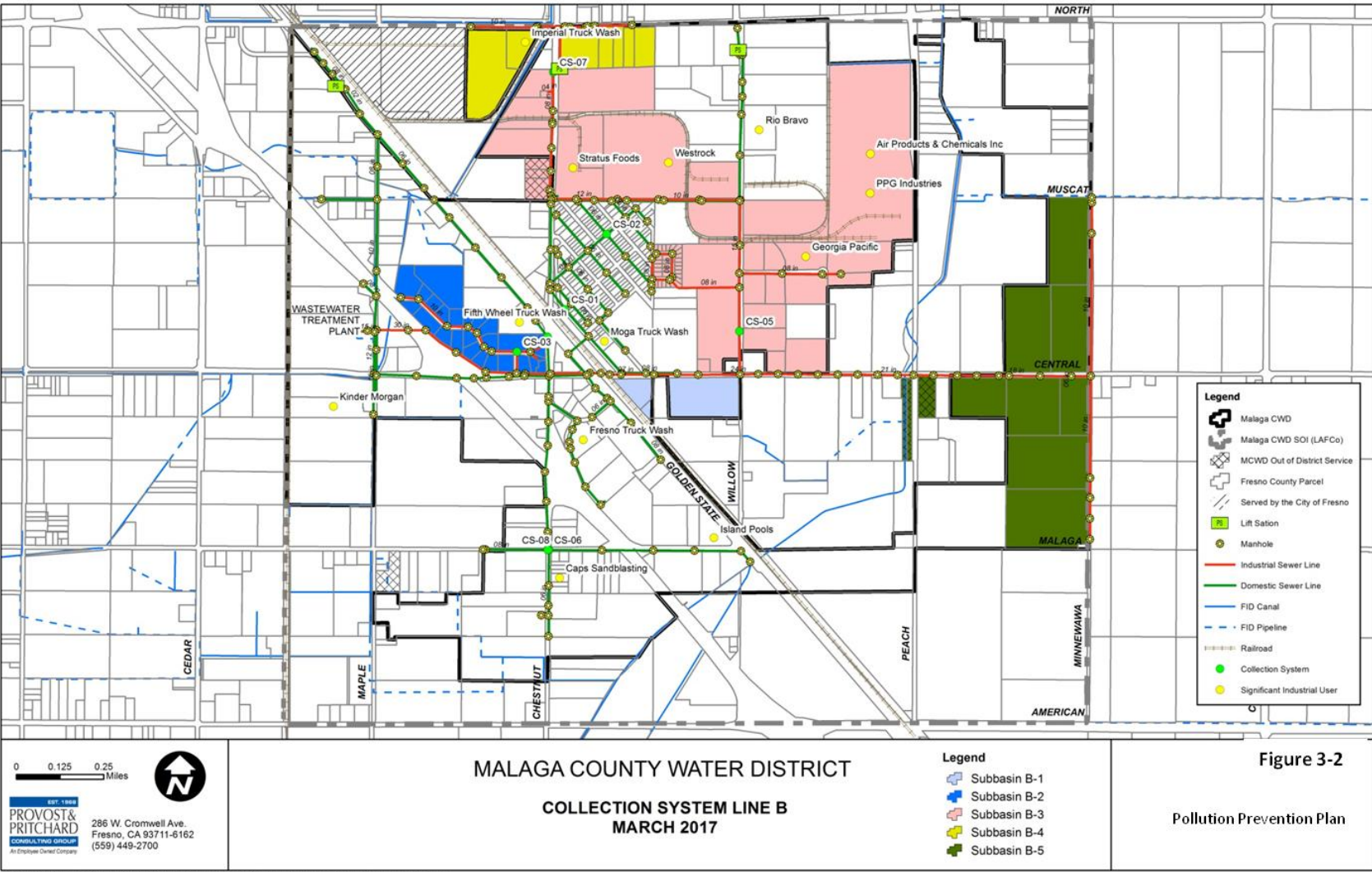


Figure 3-2: Collection System Line B

Section Three: Sources of Pollution  
 Pollution Prevention Plan

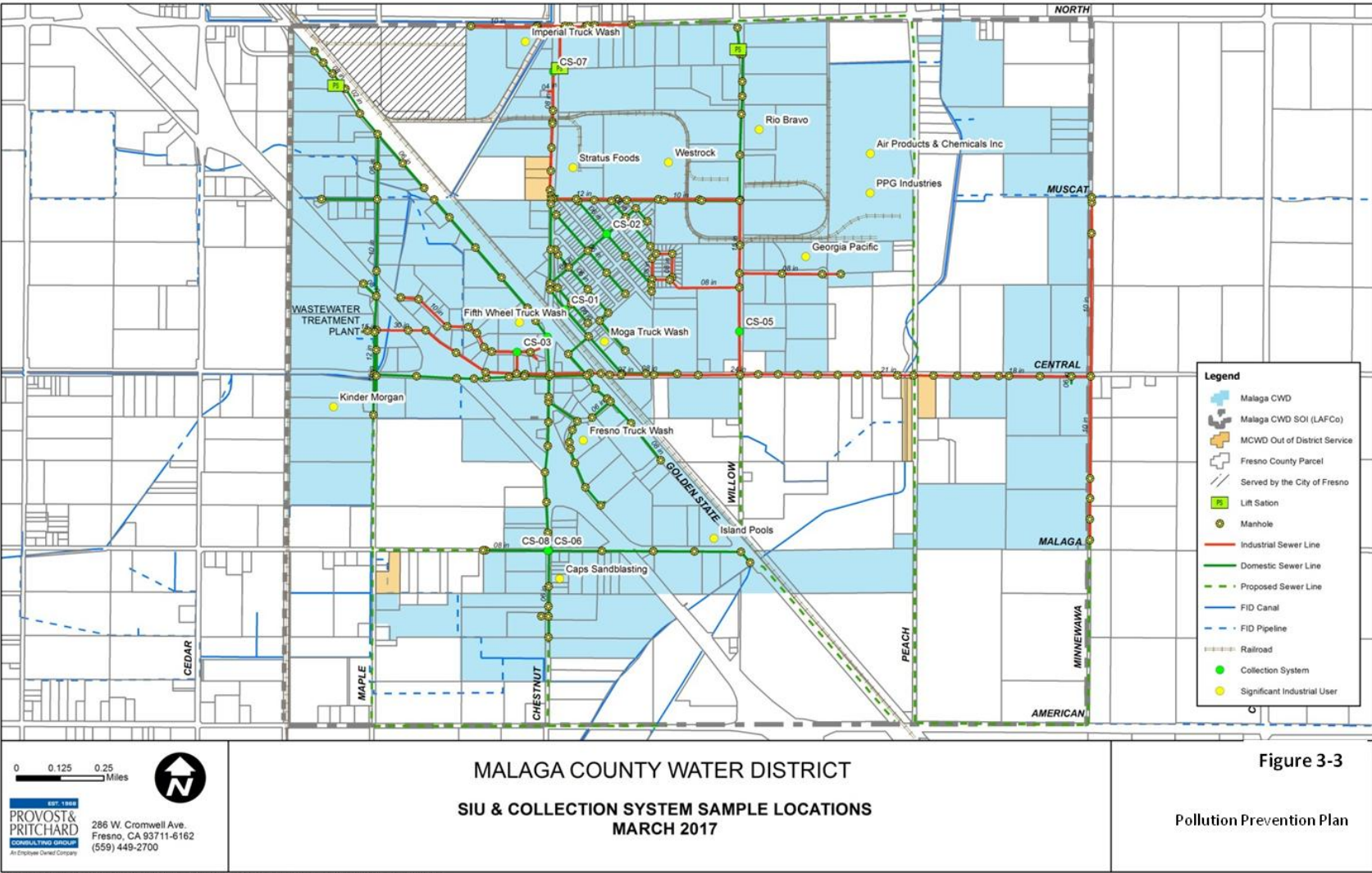


Figure 3-3: Significant Commercial and Industrial Users

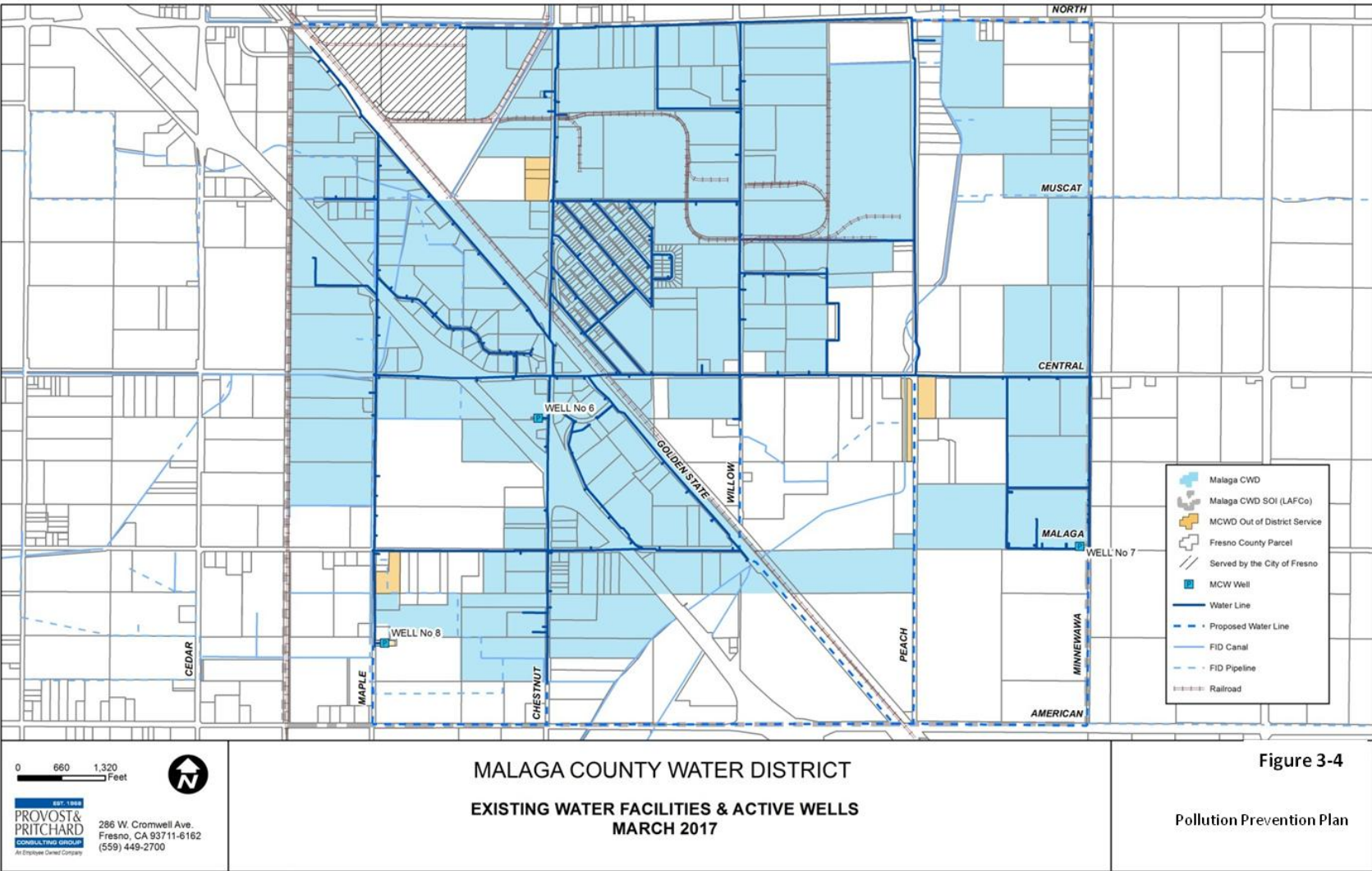


Figure 3-4: Water System

Table 3-2 Average Constituent Data for Supply Water

| Well Constituent Data          |                   |                   |                   |
|--------------------------------|-------------------|-------------------|-------------------|
|                                | <i>Well No. 6</i> | <i>Well No. 7</i> | <i>Well No. 8</i> |
| Average Ammonia (mg/L)         | Not Sampled       | Not Sampled       | Not Sampled       |
| Average Nitrate (mg/L)         | 3.85              | 3.11              | 2.46              |
| Nitrate <sup>1</sup> (lbs/day) | 19.83             | 26.82             | 12.30             |
| Cyanide (mg/L)                 | Non Detect        | Non Detect        | Non Detect        |
| Cyanide <sup>1</sup> (lbs/day) | 0                 | 0                 | 0                 |
| Copper (ug/L)                  | 0.31              | 1.53              | Non Detect        |
| Copper <sup>1</sup> (lbs/day)  | 0.01              | 0.09              | 0                 |
| Average Flow (MGD)             | 0.48              | 0.8               | 0.46              |
| Minimum Flow (MGD)             | 0.01              | 0.46              | 0.03              |
| Maximum Flow (MGD)             | 0.95              | 1.04              | 0.76              |

<sup>1</sup> Based upon average flow

### 3.5 WWTP Influent and Effluent Data Summary

The effluent limitations set forth in the WDRs state that the monthly average pollutants shall not exceed the set standard for that specific pollutant. The WWTF effluent must not exceed the maximum discharge limitation as shown in Table 3-3.

Table 3-3: WDR Discharge Limitations

| Maximum Discharge Limitation     |   |                               |
|----------------------------------|---|-------------------------------|
|                                  | <i>Discharge to<br/>Central<br/>Canal</i> | <i>Discharge to<br/>Ponds</i> |
| Ammonia, un-ionized as N (mg/L)  | 0.025                                     | No limitation                 |
| Nitrate plus Nitrite (mg/L)      | 10  | No limitation                 |
| Cyanide, Total (mg/L)            | 0.0042                                    | No limitation                 |
| Copper, Total Recoverable (mg/L) | 0.0065                                    | No limitation                 |

Section Three: Sources of Pollution  
Pollution Prevention Plan

Table 3-4 Effluent Pollutant Concentrations 2015-2017

|  |           | WWTF Influent |             |             |              | WWTF Effluent |             |             |             |
|--|-----------|---------------|-------------|-------------|--------------|---------------|-------------|-------------|-------------|
| Date   |           | Nitrate       | Cyanide     | Copper      | Ammonia      | Nitrate       | Cyanide     | Copper      | Ammonia     |
|  |           | mg/L          | mg/L        | mg/L        | mg/L         | mg/L          | mg/L        | mg/L        | mg/L        |
| 2015   | January   |               |             |             |              |               |             |             |             |
|  | February  |               |             |             |              |               |             |             |             |
|  | March     | 1.2           |             |             | 18.5         | 10.2          |             |             |             |
|  | April     | 1.2           |             |             |              | 15            |             |             |             |
|  | May       |               |             |             |              | 19            |             |             |             |
|  | June      |               |             |             |              | 17            |             |             |             |
|  | July      |               |             |             |              | 19            |             |             |             |
|  | August    |               |             |             |              | 15            |             |             |             |
|  | September |               |             |             |              | 15            |             |             |             |
|  | October   |               |             |             |              | 13            |             |             |             |
|  | November  |               |             |             |              | 14            |             |             |             |
|  | December  | 0.58          |             |             | 18           | 16.5          |             |             |             |
| 2016   | January   |               |             |             |              | 5             |             |             |             |
|  | February  |               |             |             |              | 19            |             |             | 0.38        |
|  | March     |               |             |             |              | 15            |             |             | 0.12        |
|  | April     |               |             |             |              | 12            |             |             | 0.14        |
|  | May       |               |             |             |              | 14            |             |             |             |
|  | June      |               |             |             |              | 13            |             |             | 0.25        |
|  | July      |               |             |             |              | 11            |             |             |             |
|  | August    |               |             | 0.052       |              | 11.5          |             |             | 0.09        |
|  | September |               | 0.003       | 0.048       |              |               |             | 0.016       |             |
|  | October   |               | 0.005       | 0.078       |              | 13            |             | 0.015       | 0.06        |
|  | November  |               | 0.002       | 0.099       |              | 15            | 0.004       | 0.015       |             |
|  | December  |               | 0.006       | 0.022       |              | 14            |             | 0.011       | 0.10        |
| 2017   | January   |               |             |             |              | 11.5          |             |             | 0.04        |
|  | March     |               | 0.013       | 0.300       |              | 16            | 0.000       | 0.032       | 0.00        |
| <b>Average</b>                                       |           | 0.99          | 0.006       | 0.100       | 18.3         | 14.1          | 0.002       | 0.018       | 0.13        |
| <b>Lbs/day</b>                                       |           | <b>4.72</b>   | <b>0.03</b> | <b>0.47</b> | <b>86.65</b> | <b>62.45</b>  | <b>0.01</b> | <b>0.08</b> | <b>0.58</b> |
| <b>WDR Limitation for Discharge to Central Canal</b> |           |               |             |             |              | 10 mg/L       | 0.0042 mg/L | 0.0065 mg/L | 0.025 mg/L  |

\* Blanks indicate samples not analyzed for the pollutant.

### 3.6 Residential Sources

The residential community within the CWD service area is approximately 62 square acres located just east of the intersection of Golden State Blvd and Chestnut Avenue. As part of the 2016 Local Limit Study, the District collected samples throughout the residential area in 2015 and 2016. Figure 3-3 identifies the testing locations in the residential community, which are labeled CS-XX. The local limit monitoring locations assisted in measuring constituents that represent the residential community as a whole. Residential flow was calculated by subtracting the SIU and commercial flow from the WWTP influent flow. Table 3-4 is a breakdown of the monitoring results from the residential section of Malaga during the years of 2015 and 2016.

Table 3-5: Residential Constituent Data for 2015-2016

| 2015-2016 Residential Report Data |         |         |
|-----------------------------------|---------|---------|
|                                   | Average | lbs/day |
| Ammonia (mg/L)                    | 23.96   | 15.19   |
| Nitrate (mg/L)                    | 0.41    | 0.26    |
| Cyanide (ug/L)                    | 6.55    | 0.004   |
| Copper (mg/L)                     | 0.02    | 0.01    |
| Total Average Flow (MGD)          | 0.08    | -       |

After analyzing the residential data, there is elevated ammonia concentrations coming from the homes located in Malaga. Nitrate, cyanide, and copper from residential sources appear to contribute minimally to the WWTF influent concentrations.

### 3.7 SIU Sources

Water quality data was obtained by the District sampling of the local SIUs and reviewing self monitoring reports as part of its local limit study. Malaga CWD water service meters for the SIUs indicate a total of 0.724 mgd of water is delivered to the SIUs. Effluent meters on all the SIUs show a total of 0.224 mgd is discharged to the sewer system. Approximately, 0.50 mgd of water to the SIUs is not discharged to the sewer system. Over 0.4 mgd of this non-sewered water is attributable to Rio Bravo and evaporative losses in its cooling towers. Figure 3-3 shows the locations used during the recent local limit study.

Table 3-6: Industrial Waste Users 2011-2016 Constituent Data

| 2011-2016 SIU's Report Data   |                |                   |                |                   |                |                   |               |                  |                    |
|-------------------------------|----------------|-------------------|----------------|-------------------|----------------|-------------------|---------------|------------------|--------------------|
| SIU Name                      | Ammonia (mg/L) | Ammonia (lbs/day) | Nitrate (mg/L) | Nitrate (lbs/day) | Cyanide (mg/L) | Cyanide (lbs/day) | Copper (mg/L) | Copper (lbs/day) | Average Flow (mgd) |
| PPG                           | 0.08           | 0.04              | 7.05           | 3.83              | ND             | 0                 | 0.03          | 0.01             | .065               |
| Air Products                  | 0.19           | 0.05              | 6.45           | 1.74              | 0.01           | 0.002             | 0.02          | 0.005            | .032               |
| Rio Bravo                     | 0.23           | 0.21              | 7.50           | 6.91              | ND             | 0                 | 0.02          | 0.02             | 0.11               |
| ADM Stratas                   | 0.21           | 0.02              | 5.08           | 0.37              | 0.01           | 0.01              | 0.02          | 0.002            | .009               |
| RockTenn                      | 0.17           | 0.01              | 6.60           | 0.43              | ND             | 0                 | 0.03          | 0.002            | .008               |
| <b>Total SIU Loading</b>      |                | <b>0.33</b>       |                | <b>13.28</b>      |                | <b>0.01</b>       |               | <b>0.034</b>     |                    |
| <b>Total Average SIU Flow</b> |                |                   |                |                   |                |                   |               |                  | <b>0.224</b>       |



### 3.8 Commercial Sources

Commercial users in the Malaga CWD include Island Pools, Fresno Truck Wash, Speedy Oil Change, Imperial Truck Wash, Georgia Pacific, 5<sup>th</sup> Wheel Truck Wash, Kinder Morgan, and many other restaurants, distribution facilities, and offices. The some commercial units were monitored during the local limits study by sampling conducted by the District. Table 3-7 provides the average constituent levels as well as daily flows for the commercial users.

Table 3-7: Sampled Commercial User Flow and Loading Data (2015-2016)

| 2015-2016 Commercial User Data                    |       |
|---|-------|
| Ammonia (lbs/day)                                 | 6.79  |
| Nitrate (lbs/day)                                 | 0.30  |
| Cyanide (lbs/day)                                 | 0.001 |
| Copper (lbs/day)                                  | 0.012 |
| Average Flow (MGD)                                | 0.022 |
| Average Flow (MGD) – Non sampled commercial users | 0.27  |

### 3.9 Mass Summary

The source water average mass flow rate is tabulated in Table 3-8 as well as the mass flow coming from the residential area, SIUs, and the commercial businesses. The WWTF influent and effluent mass flow rates are also tabulated in the table. The table shows the mass pollutant loading from the major contributing sources to help identify where pollution prevention plan efforts should be focused.

Table 3-8: Mass Summary for Malaga CWD

|                           | <i>Source Water</i> | <i>Residential</i> | <i>Commercial</i> | <i>Non Sampled Commercial</i> | <i>SIU</i> | <i>Non-Sewered SIU</i> | <i>WWTF Influent</i> | <i>WWTF Effluent</i> |
|---------------------------|---------------------|--------------------|-------------------|-------------------------------|------------|------------------------|----------------------|----------------------|
| <b>Nitrate (lbs/day)</b>  | 59                  | 15.19              | 0.3               | -                             | 13.28      | -                      | 4.72                 | 65.4                 |
| <b>Cyanide (lbs/day)</b>  | 0                   | 0.004              | 0.001             | -                             | 0.01       | -                      | 0.023                | 0.013                |
| <b>Copper (lbs/day)</b>   | 0                   | 0.01               | 0.012             | -                             | 0.03       | -                      | 0.39                 | 0.077                |
| <b>Ammonia (lbs/day)</b>  | Not Sampled         | 15.19              | 6.79              | -                             | 0.33       | -                      | 86.7                 | 0.62                 |
| <b>Average Flow (MGD)</b> | <b>1.7</b>          | 0.076              | 0.022             | 0.27                          | 0.220      | 0.50                   | 0.569                | <b>0.53</b>          |

## 4 Ammonia and Nitrate Minimization Options and Load Reductions

### 4.1 Minimization Option 1 – Nitrification/Denitrification at the WWTF

The District is in the process of evaluating options to modify the existing aeration process to allow for aerobic and anaerobic zones. The goal will be to nitrify and denitrify in the existing aeration basins to convert the nitrates to nitrogen gas. The plant current fully nitrifies but has minimal de-nitrification. The current modifications involved installing variable frequency drives (VFDs) on the existing blowers along with dissolved oxygen (DO) probes in the existing basins. The District is next connecting the aeration basing piping to the digester air piping to allow the blowers to operate more efficiently. The estimated completion date for the air piping is by the end of 2017. Based upon the results after the changes, additional modifications may be needed.

The average nitrate effluent from the WWTF during the period included in this plan was 14 mg/L or 64.4 lb/day. After the modifications to the WWTF are operational, the effluent nitrate as nitrogen value would be less than 10 mg/L. Assuming 10 mg/L of nitrate in the effluent would result in 47.5 lb/day at the existing flow rate. This would result in a nitrate load reduction of 17.9 lbs/day.

### 4.2 Minimization Option 2 – Local Limits

A Local Limits Study was submitted to the Regional Board in July 2016. The study recommended an ammonia limit of 15.6 mg/L. There was previously no local limit for ammonia. Upon approval by the Regional Board of the local limit study, the ammonia limit will be implemented. The existing SIUs do not exhibit elevated levels of ammonia or nitrates. However, some of the commercial industries showed high ammonia concentrations. Specifically, Kinder Morgan accounted for 6.39 lb/day (91 mg/L) of ammonia. If Kinder Morgan complied with the ammonia local limit, the loading would drop to 1.09 lb/day. This would result in an ammonia load reduction of 5.3 lb/day. The District will notify SIUs of the updated local limits ahead of issuing the updated SIU permits. The permits will contain a compliance schedule stating when the SIU must be in full compliance with the revised local limits.

The identification of other potentially elevated sources of ammonia from commercial users may result in a larger load reduction.

### 4.3 Minimization Option 3 – Residential Discharges

The monitoring data indicates nitrates in the well water of 59 lbs/day, yet very little nitrates (0.26 lbs/day) were measured in the discharge of residential users. Only 4.72 lbs/day of nitrates are seen at the WWTF influent. However, residential dischargers showed 15.2 lb/day of ammonia and commercial users showed 16 lb/day. This seems to indicate that reduction of nitrate to ammonia may be taking place somewhere between the well head and the sample location for residential dischargers.

The District is undertaking a sampling program to identify the potential reasons for the nitrate and ammonia concentrations seen between the wells and the residential dischargers. It is difficult to determine what, if any, nitrate or ammonia load reduction will occur after analysis of this sampling program is completed.

### 4.4 Ammonia and Nitrate Minimization Implementation Schedule

A description of tasks to investigate and implement the ammonia and nitrate minimization options is in Table 4-1.

Table 4-1: Ammonia and Nitrate Minimization Task and Time Summary

| Task  | Approx. Completion Date                                  |
|---|--|
| Implement Initial Two Month Monitoring Program                        | Currently ongoing.<br>Estimated completion by July 2017. |
| Evaluate Residential Discharge Pollutant Loadings                     | Four months after Initial Two Month Monitoring Program   |
| Ongoing WWTF Monitoring   | Ongoing  |
| Implement changes to connect air piping between basins and digesters. | December 2017  |
| Evaluate impact of air piping changes on de-nitrification             | June 2018  |
| Implement Local Limits  | One year after local limits study approval               |
| Updated Recommended Actions and Findings                              | September 2017   |
| Updated Sampling Program  | Ongoing until compliance is achieved                     |

# 5 Cyanide Minimization Options and Load Reductions

The District is only subject to the cyanide effluent limit if it discharges to the Central Canal. There has not been a discharge to the canal since December 6, 2013. The District has disconnected the discharge to the canal and is awaiting a new WDR that would not contain NPDES limitations. However, it is not sure when the updated WDR may be issued.

Cyanide was not detected in the potable water system and at minimal concentrations from the SIUs. The largest source of cyanide loading was from commercial sources. Since December 6, 2013, the effluent from the WWTF has not discharged to the Central Canal. Therefore, there is no cyanide WDR limitation.

## 5.1 Minimization Option 1 – Local Limits

A Local Limits Study was submitted to the Regional Board in July 2016. The Local Limits Study recommended a cyanide limit of 0.02 mg/L. There was previously no local limit for cyanide. Upon approval by the Regional Board of the local limit study, the cyanide limit will be implemented. The existing SIUs and commercial industries do not exhibit elevated levels of cyanide. The cyanide influent loading to the WWTF is minimal at 0.02 lb/day. The implementation of the local limits should prevent any additional cyanide loading to the WWTF. The District will notify SIUs of the updated local limits ahead of issuing the updated SIU permits. The permits will contain a compliance schedule stating when the SIU must be in full compliance with the revised local limits.

As part of the pretreatment program, the District is continually investigating possible sources of pollutants – including cyanide. Any sources of cyanide would be evaluated for possible permitting as an SIU.

## 5.2 Cyanide Minimization Implementation Schedule

A description of tasks to investigate and implement the ammonia and nitrate minimization options is in Table 5-1.

Table 5-1: Cyanide Minimization Task and Time Summary

| Task                                     | Approx. Completion Date                    |
|--|--|
| Ongoing WWTF Monitoring                  | Ongoing                                    |
| Implement Local Limits                   | One year after local limits study approval |
| Updated Recommended Actions and Findings | September 2017                             |

## 6 Copper Minimization Options and Load Reductions

The District is only subject to the copper effluent limit if it discharges to the Central Canal. There has not been a discharge to the canal since December 6, 2013. . The District has disconnected the discharge to the canal and is awaiting a new WDR that would not contain NPDES limitations. However, it is not sure when the updated WDR may be issued.

Copper was not detected in the potable water system and at minimal concentrations from the SIUs. The largest source of copper loading was from residential sources. The copper loading to the WWTF was 0.39 lbs/day (0.02 mg/L) with the effluent at 0.08 lbs/day. If the WWTF would have discharged to the Central Canal, the effluent from the WWTF would not have exceeded the copper WDR limitation of 4.2 µg/L. The WWTF is removing 0.31 lbs/day of copper from the liquid waste stream. This amount of copper is mainly ending up in the bio-solids.

### 6.1 Minimization Option 1 – Local Limits

A Local Limits Study was submitted to the Regional Board in July 2016. The Local Limits Study recommended a copper limit of 0.07 mg/L. The previous copper local limit was 5 mg/L. Upon approval by the Regional Board of the local limit study, the copper limit will be implemented. The existing SIUs do not exhibit elevated levels of copper. However, some of the commercial industries (specifically, truck washes) showed elevated copper concentrations. The truck washes accounted for 0.012 lb/day of copper. If the truck washes complied with the copper local limit, the loading would drop to 0.007 lb/day. This would account for a 5.4% reduction in the combined loading from the current combined loading from the residential, commercial and industrial users. Pretreatment for copper at the truck washes may consist of a clarifier and/or a filter to remove copper from the discharge. The District will notify SIUs of the updated local limits ahead of issuing the updated SIU permits. The permits will contain a compliance schedule stating when the SIU must be in full compliance with the revised local limits.

The identification of other potentially elevated sources of copper from commercial users would result in a larger load reduction.

### 6.2 Copper Minimization Implementation Schedule

A description of tasks to investigate and implement the ammonia and nitrate minimization options is in Table 6-1.

Table 6-1: Copper Minimization Task and Time Summary

| Task   | Approx. Completion Date                    |
|--|--|
| Ongoing WWTF Monitoring                            | Ongoing                                    |
| Implement Local Limits (particularly truck washes) | One year after local limits study approval |
| Updated Recommended Actions and Findings           | September 2017                             |

## 7 Monitoring Plan

The monitoring plan outlined in this section will be initiated upon the approval of this plan. Periodically during the implementation of this monitoring plan, sample collection procedures and analytical laboratories will be evaluated and changed as necessary to ensure that the goals of the monitoring plan are consistently met.

It is recommended that the following samples and tests are performed once every two weeks for the next two months. Upon review of the information, follow up sampling and testing may be recommended.

| <u>Location</u>   | <u>Sample Type</u> | <u>Testing</u>                    |
|---|--------------------|-----------------------------------|
| <u>Sewer</u>  |                    |                                   |
| CS-01   | Grab               | Ammonia, Nitrate                  |
| CS-02   | Grab               | Ammonia, Nitrate                  |
| CS-05   | Grab               | Ammonia, Nitrate                  |
| MH at Grand and the alley<br>Between Calvin and Ward            | Grab               | Ammonia, Nitrate, Copper, Cyanide |
| MH at Grand and the alley<br>Between Victoria and Frank         | Grab               | Ammonia, Nitrate, Copper, Cyanide |
| MH in domestic sewer (southerly line)<br>In Muscat e/o Chestnut | Grab               | Ammonia, Nitrate, Copper, Cyanide |
| Lift Station near<br>Inland Star (Chestnut)                     | Grab               | Ammonia, Nitrate, Copper, Cyanide |
| MH at Chestnut and Malaga<br>(south line contribution)          | Grab               | Ammonia, Nitrate, Copper, Cyanide |
| WWTP Influent   | Grab               | Ammonia, Nitrate, Copper, Cyanide |
| WWTP Effluent   | Grab               | Ammonia, Nitrate, Copper, Cyanide |
| <u>Water</u>  |                    |                                   |
| Well 6  | Grab               | Ammonia, Nitrate                  |
| Well 7  | Grab               | Ammonia, Nitrate                  |
| Well 8  | Grab               | Ammonia, Nitrate                  |
| Hydrant near Frank and<br>Grand                                 | Grab               | Ammonia, Nitrate                  |
| Hydrant along Willow<br>South of North Ave.                     | Grab               | Ammonia, Nitrate                  |

As specified in the WDR, the District is required to monitor for ammonia, nitrate, copper and cyanide on a monthly basis. After the above initial two month sampling, the WDR required monitoring should provide

adequate data for the characterization of effluent water quality and to assess the effectiveness of any pollution prevention strategies implemented by the District.

# 8 Tasks, Costs, and Time for Plan Implementation

A description of tasks to investigate and implement the plan elements is provided in Table 8-1. Also included are estimated costs, including labor and expenses, to implement the individual tasks.

**Table 8-1: Task, Costs, and Time Summary**

| Task  | Approx. Cost  | Approx. Completion Date                                |
|---|---------------|--|
| Implement Initial Two Month Monitoring Program                        | \$ 9,000      | Currently ongoing. Estimated completion by July 2017.  |
| Evaluate Residential Discharge Pollutant Loadings                     | \$ 5,000      | Four months after Initial Two Month Monitoring Program |
| Ongoing WWTF Monitoring   | \$ 15,000 /yr | Ongoing  |
| Implement changes to connect air piping between basins and digesters. | \$ 50,000     | December 2017  |
| Evaluate impact of air piping changes on de-nitrification             | \$10,000      | June 2018  |
| Implement Local Limits  | \$ 3,000      | One year after local limits study approval             |
| Updated Recommended Actions and Findings                              |               | September 2017   |
| Updated Sampling Program  |               | Ongoing until compliance is achieved                   |

## 8.1 Pollution Prevention Goals and Strategies

The goal of this plan is to gather water quality data and to control the concentrations of nitrate, copper and cyanide to the WWTF and to achieve compliance with the WDR.

Short-term and immediate actions include the implementation of a monitoring program to further characterize water quality and to assess the success of any potentially implemented pollution prevention actions.

Long-term actions include using the ongoing WWTF monitoring program results to track effluent water quality trends and to determine if and where targeted pollution prevention efforts are appropriate. Other long-term actions include the WWTF improvements to nitrify and de-nitrify, permit appropriate commercial/industrial dischargers, and implement options to minimize ammonia from residential users.



## 9 Existing PPP

The District is not currently implementing any formal pollution prevention efforts.

## 10 Adverse Environmental Impacts

The Water Code specifies that a pollution prevention plan should include an analysis, to the extent feasible, of any adverse environmental impacts that may result from the implementation of the pollution prevention plan. At this time, there is no indication that the implementation of any of the pollution prevention measures identified in this plan will cause, or contribute to, any adverse environmental impacts. The potential implementation of nitrification/denitrification at the WWTF would require the submittal of California Environmental Quality Act (CEQA) documents which would determine environmental impacts.

# 11 Cost and Benefits to Implement PPP

Estimated costs, including labor and expenses, were presented in Table 8-1. At this time there is not enough data available to conclusively identify all sources of pollutants of concern, and an analysis of the costs and benefits of all potential pollution prevention measures cannot be conducted. The implementation of the monitoring program in conjunction with the source reduction strategies outlined in this plan is a necessary element that will allow the identification of sources to target that will provide the greatest benefit in load reductions.

# Appendix

Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT |                             |                     |         |        | SECONDARY EFFLUENT CONSTITUENT |                     |         |         |        |         |  |
|-----------|----------------------|-----------------------------|---------------------|---------|--------|--------------------------------|---------------------|---------|---------|--------|---------|--|
|           | Daily                |                             |                     |         |        | Daily                          | Quarterly           |         |         |        |         |  |
|           | TOTAL FLOW (calc.)   | Ammonia (Total (as N) mg/L) | NITRATE (as N) mg/L | Cyanide | Copper | FLOW MGD (Q)                   | NITRATE (as N) mg/L | Nitrite | Cyanide | Copper | Ammonia |  |
| 1/1/2015  | 0.487                |                             |                     |         |        | 0.49                           |                     |         |         |        |         |  |
| 1/2/2015  | 0.475                |                             |                     |         |        | 0.475                          |                     |         |         |        |         |  |
| 1/3/2015  | 0.476                |                             |                     |         |        | 0.476                          |                     |         |         |        |         |  |
| 1/4/2015  | 0.35                 |                             |                     |         |        | 0.35                           |                     |         |         |        |         |  |
| 1/5/2015  | 0.558                |                             |                     |         |        | 0.558                          |                     |         |         |        |         |  |
| 1/6/2015  | 0.535                |                             |                     |         |        | 0.535                          |                     |         |         |        |         |  |
| 1/7/2015  | 0.552                |                             |                     |         |        | 0.552                          |                     |         |         |        |         |  |
| 1/8/2015  | 0.543                |                             |                     |         |        | 0.543                          |                     |         |         |        |         |  |
| 1/9/2015  | 0.574                |                             |                     |         |        | 0.574                          |                     |         |         |        |         |  |
| 1/10/2015 | 0.447                |                             |                     |         |        | 0.447                          |                     |         |         |        |         |  |
| 1/11/2015 | 0.432                |                             |                     |         |        | 0.432                          |                     |         |         |        |         |  |
| 1/12/2015 | 0.556                |                             |                     |         |        | 0.556                          |                     |         |         |        |         |  |
| 1/13/2015 | 0.533                |                             |                     |         |        | 0.533                          |                     |         |         |        |         |  |
| 1/14/2015 | 0.51                 |                             |                     |         |        | 0.51                           |                     |         |         |        |         |  |
| 1/15/2015 | 0.534                |                             |                     |         |        | 0.534                          |                     |         |         |        |         |  |
| 1/16/2015 | 0.506                |                             |                     |         |        | 0.506                          |                     |         |         |        |         |  |
| 1/17/2015 | 0.471                |                             |                     |         |        | 0.471                          |                     |         |         |        |         |  |
| 1/18/2015 | 0.448                |                             |                     |         |        | 0.448                          |                     |         |         |        |         |  |
| 1/19/2015 | 0.567                |                             |                     |         |        | 0.567                          |                     |         |         |        |         |  |
| 1/20/2015 | 0.553                |                             |                     |         |        | 0.553                          |                     |         |         |        |         |  |
| 1/21/2015 | 0.511                |                             |                     |         |        | 0.511                          |                     |         |         |        |         |  |
| 1/22/2015 | 0.531                |                             |                     |         |        | 0.531                          |                     |         |         |        |         |  |
| 1/23/2015 | 0.541                |                             |                     |         |        | 0.541                          |                     |         |         |        |         |  |
| 1/24/2015 | 0.506                |                             |                     |         |        | 0.506                          |                     |         |         |        |         |  |
| 1/25/2015 | 0.417                |                             |                     |         |        | 0.417                          |                     |         |         |        |         |  |
| 1/26/2015 | 0.593                |                             |                     |         |        | 0.593                          |                     |         |         |        |         |  |
| 1/27/2015 | 0.558                |                             |                     |         |        | 0.558                          |                     |         |         |        |         |  |
| 1/28/2015 | 0.513                |                             |                     |         |        | 0.513                          |                     |         |         |        |         |  |
| 1/29/2015 | 0.433                |                             |                     |         |        | 0.433                          |                     |         |         |        |         |  |
| 1/30/2015 | 0.481                |                             |                     |         |        | 0.481                          |                     |         |         |        |         |  |
| 1/31/2015 | 0.45                 |                             |                     |         |        | 0.45                           |                     |         |         |        |         |  |
| 2/1/2015  | 0.456                |                             |                     |         |        | 0.3                            |                     |         |         |        |         |  |
| 2/2/2015  | 0.499                |                             |                     |         |        | 0.34                           |                     |         |         |        |         |  |
| 2/3/2015  | 0.491                |                             |                     |         |        | 0.061                          |                     |         |         |        |         |  |
| 2/4/2015  | 0.428                |                             |                     |         |        | 0.407                          |                     |         |         |        |         |  |
| 2/5/2015  | 0.532                |                             |                     |         |        | 0.371                          |                     |         |         |        |         |  |
| 2/6/2015  | 0.405                |                             |                     |         |        | 0.395                          |                     |         |         |        |         |  |
| 2/7/2015  | 0.454                |                             |                     |         |        | 0.306                          |                     |         |         |        |         |  |
| 2/8/2015  | 0.368                |                             |                     |         |        | 0.277                          |                     |         |         |        |         |  |
| 2/9/2015  | 0.312                |                             |                     |         |        | 0.3                            |                     |         |         |        |         |  |
| 2/10/2015 | 0.386                |                             |                     |         |        | 0.263                          |                     |         |         |        |         |  |
| 2/11/2015 | 0.369                |                             |                     |         |        | 0.283                          |                     |         |         |        |         |  |
| 2/12/2015 | 0.381                |                             |                     |         |        | 0.377                          |                     |         |         |        |         |  |
| 2/13/2015 | 0.444                |                             |                     |         |        | 0.444                          |                     |         |         |        |         |  |
| 2/14/2015 | 0.581                |                             |                     |         |        | 0.284                          |                     |         |         |        |         |  |
| 2/15/2015 | 0.427                |                             |                     |         |        | 0.358                          |                     |         |         |        |         |  |
| 2/16/2015 | 0.486                |                             |                     |         |        | 0.438                          |                     |         |         |        |         |  |
| 2/17/2015 | 0.543                |                             |                     |         |        | 0.323                          |                     |         |         |        |         |  |
| 2/18/2015 | 0.545                |                             |                     |         |        | 0.2                            |                     |         |         |        |         |  |
| 2/19/2015 | 0.542                |                             |                     |         |        | 0.064                          |                     |         |         |        |         |  |
| 2/20/2015 | 0.542                |                             |                     |         |        | 0.109                          |                     |         |         |        |         |  |
| 2/21/2015 | 0.435                |                             |                     |         |        | 0.256                          |                     |         |         |        |         |  |
| 2/22/2015 | 0.635                |                             |                     |         |        | 0.418                          |                     |         |         |        |         |  |
| 2/23/2015 | 0.564                |                             |                     |         |        | 0.446                          |                     |         |         |        |         |  |

Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT |                             |                     |         |        | SECONDARY EFFLUENT CONSTITUENT |                     |         |         |        |         |
|-----------|----------------------|-----------------------------|---------------------|---------|--------|--------------------------------|---------------------|---------|---------|--------|---------|
|           | Daily                |                             |                     |         |        | Daily                          | Quarterly           |         |         |        |         |
|           | TOTAL FLOW (calc.)   | Ammonia (Total (as N) mg/L) | NITRATE (as N) mg/L | Cyanide | Copper | FLOW MGD (Q)                   | NITRATE (as N) mg/L | Nitrite | Cyanide | Copper | Ammonia |
| 2/24/2015 | 0.631                |                             |                     |         |        | 0.325                          |                     |         |         |        |         |
| 2/25/2015 | 0.556                |                             |                     |         |        | 0.325                          |                     |         |         |        |         |
| 2/26/2015 | 0.546                |                             |                     |         |        | 0.25                           |                     |         |         |        |         |
| 2/27/2015 | 0.535                |                             |                     |         |        | 0.153                          |                     |         |         |        |         |
| 2/28/2015 | 0.539                |                             |                     |         |        | 0.277                          |                     |         |         |        |         |
| 3/1/2015  | 0.526                |                             |                     |         |        | 0.278                          |                     |         |         |        |         |
| 3/2/2015  | 0.567                |                             |                     |         |        | 0.37                           |                     |         |         |        |         |
| 3/3/2015  | 0.533                | 21                          | 0.1                 |         |        | 0.372                          | 13                  |         |         |        |         |
| 3/4/2015  | 0.496                |                             |                     |         |        | 0.368                          |                     |         |         |        |         |
| 3/5/2015  | 0.538                |                             |                     |         |        | 0.448                          |                     |         |         |        |         |
| 3/6/2015  | 0.538                |                             |                     |         |        | 0.477                          |                     |         |         |        |         |
| 3/7/2015  | 0.535                |                             |                     |         |        | 0.39                           |                     |         |         |        |         |
| 3/8/2015  | 0.459                |                             |                     |         |        | 0.407                          |                     |         |         |        |         |
| 3/9/2015  | 0.488                |                             |                     |         |        | 0.427                          |                     |         |         |        |         |
| 3/10/2015 | 0.574                | 16                          | 2.3                 |         |        | 0.424                          | 15                  |         |         |        |         |
| 3/11/2015 | 0.568                |                             |                     |         |        | 0.492                          |                     |         |         |        |         |
| 3/12/2015 | 0.57                 |                             |                     |         |        | 0.49                           | 2.6                 |         |         |        |         |
| 3/13/2015 | 0.522                |                             |                     |         |        | 0.503                          |                     |         |         |        |         |
| 3/14/2015 | 0.544                |                             |                     |         |        | 0.499                          |                     |         |         |        |         |
| 3/15/2015 | 0.514                |                             |                     |         |        | 0.506                          |                     |         |         |        |         |
| 3/16/2015 | 0.515                |                             |                     |         |        | 0.508                          |                     |         |         |        |         |
| 3/17/2015 | 0.608                |                             |                     |         |        | 0.557                          |                     |         |         |        |         |
| 3/18/2015 | 0.593                |                             |                     |         |        | 0.537                          |                     |         |         |        |         |
| 3/19/2015 | 0.541                |                             |                     |         |        | 0.519                          |                     |         |         |        |         |
| 3/20/2015 | 0.575                |                             |                     |         |        | 0.528                          |                     |         |         |        |         |
| 3/21/2015 | 0.657                |                             |                     |         |        | 0.566                          |                     |         |         |        |         |
| 3/22/2015 | 0.521                |                             |                     |         |        | 0.501                          |                     |         |         |        |         |
| 3/23/2015 | 0.477                |                             |                     |         |        | 0.481                          |                     |         |         |        |         |
| 3/24/2015 | 0.548                |                             |                     |         |        | 0.535                          |                     |         |         |        |         |
| 3/25/2015 | 0.559                |                             |                     |         |        | 0.534                          |                     |         |         |        |         |
| 3/26/2015 | 0.57                 |                             |                     |         |        | 0.551                          |                     |         |         |        |         |
| 3/27/2015 | 0.57                 |                             |                     |         |        | 0.548                          |                     |         |         |        |         |
| 3/28/2015 | 0.593                |                             |                     |         |        | 0.518                          |                     |         |         |        |         |
| 3/29/2015 | 0.505                |                             |                     |         |        | 0.304                          |                     |         |         |        |         |
| 3/30/2015 | 0.509                |                             |                     |         |        | 0.334                          |                     |         |         |        |         |
| 3/31/2015 | 0.565                |                             |                     |         |        | 0.374                          |                     |         |         |        |         |
| 4/1/2015  | 0.575                |                             |                     |         |        | 0.425                          |                     |         |         |        |         |
| 4/2/2015  | 0.559                |                             |                     |         |        | 0.268                          |                     |         |         |        |         |
| 4/3/2015  | 0.543                |                             |                     |         |        | 0.429                          |                     |         |         |        |         |
| 4/4/2015  | 0.542                |                             |                     |         |        | 0.202                          |                     |         |         |        |         |
| 4/5/2015  | 0.481                |                             |                     |         |        | 0.105                          |                     |         |         |        |         |
| 4/6/2015  | 0.474                |                             |                     |         |        | 0.295                          |                     |         |         |        |         |
| 4/7/2015  | 0.553                |                             |                     |         |        | 0.317                          |                     |         |         |        |         |
| 4/8/2015  | 0.602                |                             |                     |         |        | 0.343                          | 15                  |         |         |        |         |
| 4/9/2015  | 0.561                |                             |                     |         |        | 0.237                          |                     |         |         |        |         |
| 4/10/2015 | 0.562                |                             |                     |         |        | 0.207                          |                     |         |         |        |         |
| 4/11/2015 | 0.512                |                             |                     |         |        | 0.232                          |                     |         |         |        |         |
| 4/12/2015 | 0.508                |                             |                     |         |        | 0.361                          |                     |         |         |        |         |
| 4/13/2015 | 0.488                |                             |                     |         |        | 0.256                          |                     |         |         |        |         |
| 4/14/2015 | 0.592                |                             |                     |         |        | 0.426                          |                     |         |         |        |         |
| 4/15/2015 | 0.576                |                             |                     |         |        | 0.429                          |                     |         |         |        |         |
| 4/16/2015 | 0.586                |                             |                     |         |        | 0.313                          |                     |         |         |        |         |
| 4/17/2015 | 0.581                |                             |                     |         |        | 0.298                          |                     |         |         |        |         |

Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT |                             |                     |         |        | SECONDARY EFFLUENT CONSTITUENT |                     |         |         |        |         |
|-----------|----------------------|-----------------------------|---------------------|---------|--------|--------------------------------|---------------------|---------|---------|--------|---------|
|           | Daily                |                             |                     |         |        | Daily                          | Quarterly           |         |         |        |         |
|           | TOTAL FLOW (calc.)   | Ammonia (Total) (as N) mg/L | NITRATE (as N) mg/L | Cyanide | Copper | FLOW MGD (Q)                   | NITRATE (as N) mg/L | Nitrite | Cyanide | Copper | Ammonia |
| 4/18/2015 | 0.565                |                             |                     |         |        | 0.261                          |                     |         |         |        |         |
| 4/19/2015 | 0.51                 |                             |                     |         |        | 0.164                          |                     |         |         |        |         |
| 4/20/2015 | 0.543                |                             |                     |         |        | 0.236                          |                     |         |         |        |         |
| 4/21/2015 | 0.577                |                             |                     |         |        | 0.426                          |                     |         |         |        |         |
| 4/22/2015 | 0.462                |                             |                     |         |        | 0.189                          |                     |         |         |        |         |
| 4/23/2015 | 0.499                |                             |                     |         |        | 0.225                          |                     |         |         |        |         |
| 4/24/2015 | 0.526                |                             |                     |         |        | 0.418                          |                     |         |         |        |         |
| 4/25/2015 | 0.59                 |                             |                     |         |        | 0.489                          |                     |         |         |        |         |
| 4/26/2015 | 0.555                |                             |                     |         |        | 0.422                          |                     |         |         |        |         |
| 4/27/2015 | 0.521                |                             |                     |         |        | 0.44                           |                     |         |         |        |         |
| 4/28/2015 | 0.571                |                             |                     |         |        | 0.501                          |                     |         |         |        |         |
| 4/29/2015 | 0.607                |                             |                     |         |        | 0.499                          |                     |         |         |        |         |
| 4/30/2015 | 0.599                |                             |                     |         |        | 0.529                          |                     |         |         |        |         |
| 5/1/2015  | 0.579                |                             |                     |         |        | 0.615                          |                     |         |         |        |         |
| 5/2/2015  | 0.56                 |                             |                     |         |        | 0.476                          |                     |         |         |        |         |
| 5/3/2015  | 0.505                |                             |                     |         |        | 0.431                          |                     |         |         |        |         |
| 5/4/2015  | 0.572                |                             |                     |         |        | 0.507                          |                     |         |         |        |         |
| 5/5/2015  | 0.567                |                             |                     |         |        | 0.481                          |                     |         |         |        |         |
| 5/6/2015  | 0.569                |                             |                     |         |        | 0.474                          |                     |         |         |        |         |
| 5/7/2015  | 0.518                |                             |                     |         |        | 0.414                          |                     |         |         |        |         |
| 5/8/2015  | 0.565                |                             |                     |         |        | 0.428                          |                     |         |         |        |         |
| 5/9/2015  | 0.5                  |                             |                     |         |        | 0.402                          |                     |         |         |        |         |
| 5/10/2015 | 0.427                |                             |                     |         |        | 0.261                          |                     |         |         |        |         |
| 5/11/2015 | 0.522                |                             |                     |         |        | 0.427                          |                     |         |         |        |         |
| 5/12/2015 | 0.393                |                             |                     |         |        | 0.193                          |                     |         |         |        |         |
| 5/13/2015 | 0.365                |                             |                     |         |        | 0.252                          |                     |         |         |        |         |
| 5/14/2015 | 0.384                |                             |                     |         |        | 0.24                           |                     |         |         |        |         |
| 5/15/2015 | 0.359                |                             |                     |         |        | 0.168                          |                     |         |         |        |         |
| 5/16/2015 | 0.361                |                             |                     |         |        | 0.144                          |                     |         |         |        |         |
| 5/17/2015 | 0.343                |                             |                     |         |        | 0.144                          |                     |         |         |        |         |
| 5/18/2015 | 0.402                |                             |                     |         |        | 0.288                          |                     |         |         |        |         |
| 5/19/2015 | 0.388                |                             |                     |         |        | 0.314                          |                     |         |         |        |         |
| 5/20/2015 | 0.366                |                             |                     |         |        | 0.335                          |                     |         |         |        |         |
| 5/21/2015 | 0.442                |                             |                     |         |        | 0.413                          |                     |         |         |        |         |
| 5/22/2015 | 0.508                |                             |                     |         |        | 0.421                          |                     |         |         |        |         |
| 5/23/2015 | 0.428                |                             |                     |         |        | 0.382                          |                     |         |         |        |         |
| 5/24/2015 | 0.471                |                             |                     |         |        | 0.444                          |                     |         |         |        |         |
| 5/25/2015 | 0.541                |                             |                     |         |        | 0.5                            |                     |         |         |        |         |
| 5/26/2015 | 0.555                |                             |                     |         |        | 0.526                          |                     |         |         |        |         |
| 5/27/2015 | 0.58                 |                             |                     |         |        | 0.563                          |                     |         |         |        |         |
| 5/28/2015 | 0.614                |                             |                     |         |        | 0.553                          |                     |         |         |        |         |
| 5/29/2015 | 0.576                |                             |                     |         |        | 0.527                          |                     |         |         |        |         |
| 5/30/2015 | 0.551                |                             |                     |         |        | 0.515                          |                     |         |         |        |         |
| 5/31/2015 | 0.494                |                             |                     |         |        | 0.477                          |                     |         |         |        |         |
| 6/1/2015  | 0.531                |                             |                     |         |        | 0.5                            |                     |         |         |        |         |
| 6/2/2015  | 0.529                |                             |                     |         |        | 0.456                          |                     |         |         |        |         |
| 6/3/2015  | 0.548                |                             |                     |         |        | 0.465                          |                     |         |         |        |         |
| 6/4/2015  | 0.539                |                             |                     |         |        | 0.478                          |                     |         |         |        |         |
| 6/5/2015  | 0.618                |                             |                     |         |        | 0.529                          |                     |         |         |        |         |
| 6/6/2015  | 0.557                |                             |                     |         |        | 0.393                          |                     |         |         |        |         |
| 6/7/2015  | 0.582                |                             |                     |         |        | 0.414                          |                     |         |         |        |         |
| 6/8/2015  | 0.646                |                             |                     |         |        | 0.562                          |                     |         |         |        |         |
| 6/9/2015  | 0.688                |                             |                     |         |        | 0.53                           |                     |         |         |        |         |

Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT  |                                  |                           |         |        | SECONDARY EFFLUENT CONSTITUENT |                           |         |         |        |         |
|-----------|-----------------------|----------------------------------|---------------------------|---------|--------|--------------------------------|---------------------------|---------|---------|--------|---------|
|           | Daily                 | Ammonia (Total<br>(as N)<br>mg/L | NITRATE<br>(as N)<br>mg/L | Cyanide | Copper | Daily                          | Quarterly                 | Nitrite | Cyanide | Copper | Ammonia |
|           | TOTAL FLOW<br>(calc.) |                                  |                           |         |        | FLOW<br>MGD (Q)                | NITRATE<br>(as N)<br>mg/L |         |         |        |         |
| 6/10/2015 | 0.596                 |                                  |                           |         |        | 0.428                          |                           |         |         |        |         |
| 6/11/2015 | 0.594                 |                                  |                           |         |        | 0.49                           |                           |         |         |        |         |
| 6/12/2015 | 0.62                  |                                  |                           |         |        | 0.47                           |                           |         |         |        |         |
| 6/13/2015 | 0.554                 |                                  |                           |         |        | 0.344                          |                           |         |         |        |         |
| 6/14/2015 | 0.515                 |                                  |                           |         |        | 0.222                          |                           |         |         |        |         |
| 6/15/2015 | 0.541                 |                                  |                           |         |        | 0.473                          |                           |         |         |        |         |
| 6/16/2015 | 0.521                 |                                  |                           |         |        | 0.336                          |                           |         |         |        |         |
| 6/17/2015 | 0.575                 |                                  |                           |         |        | 0.437                          |                           |         |         |        |         |
| 6/18/2015 | 0.556                 |                                  |                           |         |        | 0.409                          |                           |         |         |        |         |
| 6/19/2015 | 0.515                 |                                  |                           |         |        | 0.348                          |                           |         |         |        |         |
| 6/20/2015 | 0.535                 |                                  |                           |         |        | 0.286                          |                           |         |         |        |         |
| 6/21/2015 | 0.483                 |                                  |                           |         |        | 0.262                          |                           |         |         |        |         |
| 6/22/2015 | 0.559                 |                                  |                           |         |        | 0.5                            |                           |         |         |        |         |
| 6/23/2015 | 0.528                 |                                  |                           |         |        | 0.486                          |                           |         |         |        |         |
| 6/24/2015 | 0.577                 |                                  |                           |         |        | 0.482                          |                           |         |         |        |         |
| 6/25/2015 | 0.572                 |                                  |                           |         |        | 0.543                          |                           |         |         |        |         |
| 6/26/2015 | 0.524                 |                                  |                           |         |        | 0.59                           |                           |         |         |        |         |
| 6/27/2015 | 0.58                  |                                  |                           |         |        | 0.444                          |                           |         |         |        |         |
| 6/28/2015 | 0.524                 |                                  |                           |         |        | 0.486                          |                           |         |         |        |         |
| 6/29/2015 | 0.586                 |                                  |                           |         |        | 0.56                           |                           |         |         |        |         |
| 6/30/2015 | 0.634                 |                                  |                           |         |        | 0.621                          |                           |         |         |        |         |
| 7/1/2015  | 0.575                 |                                  |                           |         |        | 0.523                          |                           |         |         |        |         |
| 7/2/2015  | 0.597                 |                                  |                           |         |        | 0.549                          | 19                        |         |         |        |         |
| 7/3/2015  | 0.546                 |                                  |                           |         |        | 0.345                          |                           |         |         |        |         |
| 7/4/2015  | 0.618                 |                                  |                           |         |        | 0.458                          |                           |         |         |        |         |
| 7/5/2015  | 0.536                 |                                  |                           |         |        | 0.389                          |                           |         |         |        |         |
| 7/6/2015  | 0.557                 |                                  |                           |         |        | 0.53                           |                           |         |         |        |         |
| 7/7/2015  | 0.576                 |                                  |                           |         |        | 0.504                          |                           |         |         |        |         |
| 7/8/2015  | 0.574                 |                                  |                           |         |        | 0.499                          |                           |         |         |        |         |
| 7/9/2015  | 0.582                 |                                  |                           |         |        | 0.521                          |                           |         |         |        |         |
| 7/10/2015 | 0.618                 |                                  |                           |         |        | 0.532                          |                           |         |         |        |         |
| 7/11/2015 | 0.525                 |                                  |                           |         |        | 0.458                          |                           |         |         |        |         |
| 7/12/2015 | 0.514                 |                                  |                           |         |        | 0.404                          |                           |         |         |        |         |
| 7/13/2015 | 0.498                 |                                  |                           |         |        | 0.43                           |                           |         |         |        |         |
| 7/14/2015 | 0.554                 |                                  |                           |         |        | 0.534                          |                           |         |         |        |         |
| 7/15/2015 | 0.569                 |                                  |                           |         |        | 0.534                          |                           |         |         |        |         |
| 7/16/2015 | 0.602                 |                                  |                           |         |        | 0.443                          |                           |         |         |        |         |
| 7/17/2015 | 0.586                 |                                  |                           |         |        | 0.545                          |                           |         |         |        |         |
| 7/18/2015 | 0.381                 |                                  |                           |         |        | 0.33                           |                           |         |         |        |         |
| 7/19/2015 | 0.487                 |                                  |                           |         |        | 0.439                          |                           |         |         |        |         |
| 7/20/2015 | 0.615                 |                                  |                           |         |        | 0.574                          |                           |         |         |        |         |
| 7/21/2015 | 0.632                 |                                  |                           |         |        | 0.583                          |                           |         |         |        |         |
| 7/22/2015 | 0.607                 |                                  |                           |         |        | 0.538                          |                           |         |         |        |         |
| 7/23/2015 | 0.597                 |                                  |                           |         |        | 0.538                          |                           |         |         |        |         |
| 7/24/2015 | 0.58                  |                                  |                           |         |        | 0.519                          |                           |         |         |        |         |
| 7/25/2015 | 0.558                 |                                  |                           |         |        | 0.48                           |                           |         |         |        |         |
| 7/26/2015 | 0.507                 |                                  |                           |         |        | 0.438                          |                           |         |         |        |         |
| 7/27/2015 | 0.604                 |                                  |                           |         |        | 0.6                            |                           |         |         |        |         |
| 7/28/2015 | 0.632                 |                                  |                           |         |        | 0.593                          |                           |         |         |        |         |
| 7/29/2015 | 0.613                 |                                  |                           |         |        | 0.606                          |                           |         |         |        |         |
| 7/30/2015 | 0.615                 |                                  |                           |         |        | 0.634                          |                           |         |         |        |         |
| 7/31/2015 | 0.615                 |                                  |                           |         |        | 0.55                           |                           |         |         |        |         |
| 8/1/2015  | 0.564                 |                                  |                           |         |        | 0.521                          |                           |         |         |        |         |



Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT  |                                  |                           |         |        | SECONDARY EFFLUENT CONSTITUENT |                           |         |         |        |         |  |
|-----------|-----------------------|----------------------------------|---------------------------|---------|--------|--------------------------------|---------------------------|---------|---------|--------|---------|--|
|           | Daily                 | Ammonia (Total<br>(as N)<br>mg/L | NITRATE<br>(as N)<br>mg/L | Cyanide | Copper | Daily                          | Quarterly                 | Nitrite | Cyanide | Copper | Ammonia |  |
|           | TOTAL FLOW<br>(calc.) |                                  |                           |         |        | FLOW<br>MGD (Q)                | NITRATE<br>(as N)<br>mg/L |         |         |        |         |  |
| 8/2/2015  | 0.55                  |                                  |                           |         |        | 0.488                          |                           |         |         |        |         |  |
| 8/3/2015  | 0.613                 |                                  |                           |         |        | 0.566                          |                           |         |         |        |         |  |
| 8/4/2015  | 0.567                 |                                  |                           |         |        | 0.496                          |                           |         |         |        |         |  |
| 8/5/2015  | 0.586                 |                                  |                           |         |        | 0.52                           | 15                        |         |         |        |         |  |
| 8/6/2015  | 0.587                 |                                  |                           |         |        | 0.532                          |                           |         |         |        |         |  |
| 8/7/2015  | 0.575                 |                                  |                           |         |        | 0.524                          |                           |         |         |        |         |  |
| 8/8/2015  | 0.552                 |                                  |                           |         |        | 0.504                          |                           |         |         |        |         |  |
| 8/9/2015  | 0.49                  |                                  |                           |         |        | 0.483                          |                           |         |         |        |         |  |
| 8/10/2015 | 0.568                 |                                  |                           |         |        | 0.553                          |                           |         |         |        |         |  |
| 8/11/2015 | 0.578                 |                                  |                           |         |        | 0.555                          |                           |         |         |        |         |  |
| 8/12/2015 | 0.572                 |                                  |                           |         |        | 0.536                          |                           |         |         |        |         |  |
| 8/13/2015 | 0.572                 |                                  |                           |         |        | 0.593                          |                           |         |         |        |         |  |
| 8/14/2015 | 0.584                 |                                  |                           |         |        | 0.586                          |                           |         |         |        |         |  |
| 8/15/2015 | 0.633                 |                                  |                           |         |        | 0.573                          |                           |         |         |        |         |  |
| 8/16/2015 | 0.534                 |                                  |                           |         |        | 0.541                          |                           |         |         |        |         |  |
| 8/17/2015 | 0.547                 |                                  |                           |         |        | 0.517                          |                           |         |         |        |         |  |
| 8/18/2015 | 0.691                 |                                  |                           |         |        | 0.739                          |                           |         |         |        |         |  |
| 8/19/2015 | 0.625                 |                                  |                           |         |        | 0.605                          |                           |         |         |        |         |  |
| 8/20/2015 | 0.605                 |                                  |                           |         |        | 0.565                          |                           |         |         |        |         |  |
| 8/21/2015 | 0.593                 |                                  |                           |         |        | 0.525                          |                           |         |         |        |         |  |
| 8/22/2015 | 0.553                 |                                  |                           |         |        | 0.473                          |                           |         |         |        |         |  |
| 8/23/2015 | 0.633                 |                                  |                           |         |        | 0.478                          |                           |         |         |        |         |  |
| 8/24/2015 | 0.551                 |                                  |                           |         |        | 0.581                          |                           |         |         |        |         |  |
| 8/25/2015 | 0.623                 |                                  |                           |         |        | 0.521                          |                           |         |         |        |         |  |
| 8/26/2015 | 0.731                 |                                  |                           |         |        | 0.619                          |                           |         |         |        |         |  |
| 8/27/2015 | 0.733                 |                                  |                           |         |        | 0.676                          |                           |         |         |        |         |  |
| 8/28/2015 | 0.629                 |                                  |                           |         |        | 0.594                          |                           |         |         |        |         |  |
| 8/29/2015 | 0.559                 |                                  |                           |         |        | 0.436                          |                           |         |         |        |         |  |
| 8/30/2015 | 0.541                 |                                  |                           |         |        | 0.432                          |                           |         |         |        |         |  |
| 8/31/2015 | 0.539                 |                                  |                           |         |        | 0.729                          |                           |         |         |        |         |  |
| 9/1/2015  | 0.614                 |                                  |                           |         |        | 0.544                          |                           |         |         |        |         |  |
| 9/2/2015  | 0.598                 |                                  |                           |         |        | 0.539                          | 15                        |         |         |        |         |  |
| 9/3/2015  | 0.576                 |                                  |                           |         |        | 0.495                          |                           |         |         |        |         |  |
| 9/4/2015  | 0.567                 |                                  |                           |         |        | 0.494                          |                           |         |         |        |         |  |
| 9/5/2015  | 0.521                 |                                  |                           |         |        | 0.447                          |                           |         |         |        |         |  |
| 9/6/2015  | 0.536                 |                                  |                           |         |        | 0.464                          |                           |         |         |        |         |  |
| 9/7/2015  | 0.526                 |                                  |                           |         |        | 0.468                          |                           |         |         |        |         |  |
| 9/8/2015  | 0.618                 |                                  |                           |         |        | 0.552                          |                           |         |         |        |         |  |
| 9/9/2015  | 0.593                 |                                  |                           |         |        | 0.536                          |                           |         |         |        |         |  |
| 9/10/2015 | 0.602                 |                                  |                           |         |        | 0.558                          |                           |         |         |        |         |  |
| 9/11/2015 | 0.603                 |                                  |                           |         |        | 0.547                          |                           |         |         |        |         |  |
| 9/12/2015 | 0.581                 |                                  |                           |         |        | 0.487                          |                           |         |         |        |         |  |
| 9/13/2015 | 0.324                 |                                  |                           |         |        | 0.27                           |                           |         |         |        |         |  |
| 9/14/2015 | 0.462                 |                                  |                           |         |        | 0.368                          |                           |         |         |        |         |  |
| 9/15/2015 | 0.534                 |                                  |                           |         |        | 0.462                          |                           |         |         |        |         |  |
| 9/16/2015 | 0.585                 |                                  |                           |         |        | 0.67                           |                           |         |         |        |         |  |
| 9/17/2015 | 0.52                  |                                  |                           |         |        | 0.314                          |                           |         |         |        |         |  |
| 9/18/2015 | 0.622                 |                                  |                           |         |        | 0.478                          |                           |         |         |        |         |  |
| 9/19/2015 | 0.492                 |                                  |                           |         |        | 0.461                          |                           |         |         |        |         |  |
| 9/20/2015 | 0.39                  |                                  |                           |         |        | 0.32                           |                           |         |         |        |         |  |
| 9/21/2015 | 0.414                 |                                  |                           |         |        | 0.36                           |                           |         |         |        |         |  |
| 9/22/2015 | 0.433                 |                                  |                           |         |        | 0.363                          |                           |         |         |        |         |  |
| 9/23/2015 | 0.413                 |                                  |                           |         |        | 0.326                          |                           |         |         |        |         |  |
| 9/24/2015 | 0.421                 |                                  |                           |         |        | 0.358                          |                           |         |         |        |         |  |

Pollution Prevention Plan

| DATE       | INFLUENT CONSTITUENT |                             |                     |         |        | SECONDARY EFFLUENT CONSTITUENT |                     |         |         |        |         |
|------------|----------------------|-----------------------------|---------------------|---------|--------|--------------------------------|---------------------|---------|---------|--------|---------|
|            | Daily                |                             |                     |         |        | Daily                          | Quarterly           |         |         |        |         |
|            | TOTAL FLOW (calc.)   | Ammonia (Total (as N) mg/L) | NITRATE (as N) mg/L | Cyanide | Copper | FLOW MGD (Q)                   | NITRATE (as N) mg/L | Nitrite | Cyanide | Copper | Ammonia |
| 9/25/2015  | 0.504                |                             |                     |         |        | 0.483                          |                     |         |         |        |         |
| 9/26/2015  | 0.622                |                             |                     |         |        | 0.549                          |                     |         |         |        |         |
| 9/27/2015  | 0.521                |                             |                     |         |        | 0.496                          |                     |         |         |        |         |
| 9/28/2015  | 0.568                |                             |                     |         |        | 0.538                          |                     |         |         |        |         |
| 9/29/2015  | 0.594                |                             |                     |         |        | 0.491                          |                     |         |         |        |         |
| 9/30/2015  | 0.611                |                             |                     |         |        | 0.523                          |                     |         |         |        |         |
| 10/1/2015  | 0.538                |                             |                     |         |        | 0.481                          |                     |         |         |        |         |
| 10/2/2015  | 0.595                |                             |                     |         |        | 0.517                          |                     |         |         |        |         |
| 10/3/2015  | 0.574                |                             |                     |         |        | 0.497                          |                     |         |         |        |         |
| 10/4/2015  | 0.507                |                             |                     |         |        | 0.436                          |                     |         |         |        |         |
| 10/5/2015  | 0.569                |                             |                     |         |        | 0.522                          |                     |         |         |        |         |
| 10/6/2015  | 0.566                |                             |                     |         |        | 0.522                          | 13                  |         |         |        |         |
| 10/7/2015  | 0.533                |                             |                     |         |        | 0.522                          |                     |         |         |        |         |
| 10/8/2015  | 0.621                |                             |                     |         |        | 0.517                          |                     |         |         |        |         |
| 10/9/2015  | 0.62                 |                             |                     |         |        | 0.548                          |                     |         |         |        |         |
| 10/10/2015 | 0.595                |                             |                     |         |        | 0.551                          |                     |         |         |        |         |
| 10/11/2015 | 0.55                 |                             |                     |         |        | 0.52                           |                     |         |         |        |         |
| 10/12/2015 | 0.634                |                             |                     |         |        | 0.589                          |                     |         |         |        |         |
| 10/13/2015 | 0.589                |                             |                     |         |        | 0.579                          |                     |         |         |        |         |
| 10/14/2015 | 0.628                |                             |                     |         |        | 0.57                           |                     |         |         |        |         |
| 10/15/2015 | 0.628                |                             |                     |         |        | 0.522                          |                     |         |         |        |         |
| 10/16/2015 | 0.585                |                             |                     |         |        | 0.484                          |                     |         |         |        |         |
| 10/17/2015 | 0.581                |                             |                     |         |        | 0.484                          |                     |         |         |        |         |
| 10/18/2015 | 0.523                |                             |                     |         |        | 0.484                          |                     |         |         |        |         |
| 10/19/2015 | 0.542                |                             |                     |         |        | 0.448                          |                     |         |         |        |         |
| 10/20/2015 | 0.571                |                             |                     |         |        | 0.467                          |                     |         |         |        |         |
| 10/21/2015 | 0.575                |                             |                     |         |        | 0.517                          |                     |         |         |        |         |
| 10/22/2015 | 0.58                 |                             |                     |         |        | 0.515                          |                     |         |         |        |         |
| 10/23/2015 | 0.556                |                             |                     |         |        | 0.505                          |                     |         |         |        |         |
| 10/24/2015 | 0.564                |                             |                     |         |        | 0.456                          |                     |         |         |        |         |
| 10/25/2015 | 0.555                |                             |                     |         |        | 0.464                          |                     |         |         |        |         |
| 10/26/2015 | 0.59                 |                             |                     |         |        | 0.507                          |                     |         |         |        |         |
| 10/27/2015 | 0.601                |                             |                     |         |        | 0.515                          |                     |         |         |        |         |
| 10/28/2015 | 0.588                |                             |                     |         |        | 0.504                          |                     |         |         |        |         |
| 10/29/2015 | 0.575                |                             |                     |         |        | 0.493                          |                     |         |         |        |         |
| 10/30/2015 | 0.566                |                             |                     |         |        | 0.478                          |                     |         |         |        |         |
| 10/31/2015 | 0.44                 |                             |                     |         |        | 0.432                          |                     |         |         |        |         |
| 11/1/2015  | 0.44                 |                             |                     |         |        | 0.432                          |                     |         |         |        |         |
| 11/2/2015  | 0.557                |                             |                     |         |        | 0.422                          |                     |         |         |        |         |
| 11/3/2015  | 0.668                |                             |                     |         |        | 0.544                          |                     |         |         |        |         |
| 11/4/2015  | 0.603                |                             |                     |         |        | 0.49                           | 14                  |         |         |        |         |
| 11/5/2015  | 0.545                |                             |                     |         |        | 0.453                          |                     |         |         |        |         |
| 11/6/2015  | 0.573                |                             |                     |         |        | 0.449                          |                     |         |         |        |         |
| 11/7/2015  | 0.544                |                             |                     |         |        | 0.445                          |                     |         |         |        |         |
| 11/8/2015  | 0.514                |                             |                     |         |        | 0.391                          |                     |         |         |        |         |
| 11/9/2015  | 0.572                |                             |                     |         |        | 0.427                          |                     |         |         |        |         |
| 11/10/2015 | 0.542                |                             |                     |         |        | 0.451                          |                     |         |         |        |         |
| 11/11/2015 | 0.525                |                             |                     |         |        | 0.441                          |                     |         |         |        |         |
| 11/12/2015 | 0.531                |                             |                     |         |        | 0.407                          |                     |         |         |        |         |
| 11/13/2015 | 0.566                |                             |                     |         |        | 0.453                          |                     |         |         |        |         |
| 11/14/2015 | 0.495                |                             |                     |         |        | 0.397                          |                     |         |         |        |         |
| 11/15/2015 | 0.51                 |                             |                     |         |        | 0.396                          |                     |         |         |        |         |
| 11/16/2015 | 0.513                |                             |                     |         |        | 0.381                          |                     |         |         |        |         |

Pollution Prevention Plan

| DATE       | INFLUENT CONSTITUENT  |                                  |                           |         |        | SECONDARY EFFLUENT CONSTITUENT |                           |         |         |        |         |  |
|------------|-----------------------|----------------------------------|---------------------------|---------|--------|--------------------------------|---------------------------|---------|---------|--------|---------|--|
|            | Daily                 | Ammonia (Total<br>(as N)<br>mg/L | NITRATE<br>(as N)<br>mg/L | Cyanide | Copper | Daily                          | Quarterly                 | Nitrite | Cyanide | Copper | Ammonia |  |
|            | TOTAL FLOW<br>(calc.) |                                  |                           |         |        | FLOW<br>MGD (Q)                | NITRATE<br>(as N)<br>mg/L |         |         |        |         |  |
| 11/17/2015 | 0.535                 |                                  |                           |         |        | 0.439                          |                           |         |         |        |         |  |
| 11/18/2015 | 0.534                 |                                  |                           |         |        | 0.437                          |                           |         |         |        |         |  |
| 11/19/2015 | 0.512                 |                                  |                           |         |        | 0.403                          |                           |         |         |        |         |  |
| 11/20/2015 | 0.527                 |                                  |                           |         |        | 0.436                          |                           |         |         |        |         |  |
| 11/21/2015 | 0.514                 |                                  |                           |         |        | 0.423                          |                           |         |         |        |         |  |
| 11/22/2015 | 0.499                 |                                  |                           |         |        | 0.402                          |                           |         |         |        |         |  |
| 11/23/2015 | 0.285                 |                                  |                           |         |        | 0.197                          |                           |         |         |        |         |  |
| 11/24/2015 | 0.688                 |                                  |                           |         |        | 0.633                          |                           |         |         |        |         |  |
| 11/25/2015 | 0.551                 |                                  |                           |         |        | 0.441                          |                           |         |         |        |         |  |
| 11/26/2015 | 0.53                  |                                  |                           |         |        | 0.405                          |                           |         |         |        |         |  |
| 11/27/2015 | 0.469                 |                                  |                           |         |        | 0.341                          |                           |         |         |        |         |  |
| 11/28/2015 | 0.473                 |                                  |                           |         |        | 0.366                          |                           |         |         |        |         |  |
| 11/29/2015 | 0.47                  |                                  |                           |         |        | 0.36                           |                           |         |         |        |         |  |
| 11/30/2015 | 0.454                 |                                  |                           |         |        | 0.353                          |                           |         |         |        |         |  |
| 12/1/2015  | 0.504                 |                                  |                           |         |        | 0.449                          |                           |         |         |        |         |  |
| 12/2/2015  | 0.519                 |                                  |                           |         |        | 0.403                          | 16                        |         |         |        |         |  |
| 12/2/2015  |                       | 18                               | 0.58                      |         |        |                                |                           |         |         |        |         |  |
| 12/3/2015  |                       |                                  |                           |         |        |                                | 17                        |         |         |        |         |  |
| 12/3/2015  | 0.552                 |                                  |                           |         |        | 0.398                          |                           |         |         |        |         |  |
| 12/4/2015  | 0.514                 |                                  |                           |         |        | 0.445                          |                           |         |         |        |         |  |
| 12/5/2015  | 0.494                 |                                  |                           |         |        | 0.427                          |                           |         |         |        |         |  |
| 12/6/2015  | 0.44                  |                                  |                           |         |        | 0.399                          |                           |         |         |        |         |  |
| 12/7/2015  | 0.498                 |                                  |                           |         |        | 0.352                          |                           |         |         |        |         |  |
| 12/8/2015  | 0.496                 |                                  |                           |         |        | 0.445                          |                           |         |         |        |         |  |
| 12/9/2015  | 0.498                 |                                  |                           |         |        | 0.433                          |                           |         |         |        |         |  |
| 12/10/2015 | 0.58                  |                                  |                           |         |        | 0.43                           |                           |         |         |        |         |  |
| 12/11/2015 | 0.618                 |                                  |                           |         |        | 0.485                          |                           |         |         |        |         |  |
| 12/12/2015 | 0.374                 |                                  |                           |         |        | 0.431                          |                           |         |         |        |         |  |
| 12/13/2015 | 0.494                 |                                  |                           |         |        | 0.364                          |                           |         |         |        |         |  |
| 12/14/2015 | 0.506                 |                                  |                           |         |        | 0.387                          |                           |         |         |        |         |  |
| 12/15/2015 | 0.48                  |                                  |                           |         |        | 0.387                          |                           |         |         |        |         |  |
| 12/16/2015 | 0.459                 |                                  |                           |         |        | 0.393                          |                           |         |         |        |         |  |
| 12/17/2015 | 0.469                 |                                  |                           |         |        | 0.351                          |                           |         |         |        |         |  |
| 12/18/2015 | 0.464                 |                                  |                           |         |        | 0.441                          |                           |         |         |        |         |  |
| 12/19/2015 | 0.483                 |                                  |                           |         |        | 0.454                          |                           |         |         |        |         |  |
| 12/20/2015 | 0.394                 |                                  |                           |         |        | 0.42                           |                           |         |         |        |         |  |
| 12/21/2015 | 0.656                 |                                  |                           |         |        | 0.329                          |                           |         |         |        |         |  |
| 12/22/2015 | 0.587                 |                                  |                           |         |        | 0.606                          |                           |         |         |        |         |  |
| 12/23/2015 | 0.538                 |                                  |                           |         |        | 0.492                          |                           |         |         |        |         |  |
| 12/24/2015 | 0.504                 |                                  |                           |         |        | 0.428                          |                           |         |         |        |         |  |
| 12/25/2015 | 0.441                 |                                  |                           |         |        | 0.351                          |                           |         |         |        |         |  |
| 12/26/2015 | 0.422                 |                                  |                           |         |        | 0.264                          |                           |         |         |        |         |  |
| 12/27/2015 | 0.454                 |                                  |                           |         |        | 0.254                          |                           |         |         |        |         |  |
| 12/28/2015 | 0.507                 |                                  |                           |         |        | 0.281                          |                           |         |         |        |         |  |
| 12/29/2015 | 0.503                 |                                  |                           |         |        | 0.402                          |                           |         |         |        |         |  |
| 12/30/2015 | 0.442                 |                                  |                           |         |        | 0.389                          |                           |         |         |        |         |  |
| 12/31/2015 | 0.46                  |                                  |                           |         |        | 0.357                          |                           |         |         |        |         |  |
| 1/1/2016   | 0.47                  |                                  |                           |         |        | 0.314                          |                           |         |         |        |         |  |
| 1/2/2016   | 0.467                 |                                  |                           |         |        | 0.361                          |                           |         |         |        |         |  |
| 1/3/2016   | 0.464                 |                                  |                           |         |        | 0.361                          |                           |         |         |        |         |  |
| 1/4/2016   | 0.521                 |                                  |                           |         |        | 0.419                          |                           |         |         |        |         |  |
| 1/5/2016   | 0.572                 |                                  |                           |         |        | 0.483                          |                           |         |         |        |         |  |
| 1/6/2016   | 0.556                 |                                  |                           |         |        | 0.473                          |                           |         |         |        |         |  |

Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT  |                                  |                           |         |        | SECONDARY EFFLUENT CONSTITUENT |                           |         |         |        |         |      |
|-----------|-----------------------|----------------------------------|---------------------------|---------|--------|--------------------------------|---------------------------|---------|---------|--------|---------|------|
|           | Daily                 | Ammonia (Total<br>(as N)<br>mg/L | NITRATE<br>(as N)<br>mg/L | Cyanide | Copper | Daily                          | Quarterly                 | Nitrite | Cyanide | Copper | Ammonia |      |
|           | TOTAL FLOW<br>(calc.) |                                  |                           |         |        | FLOW<br>MGD (Q)                | NITRATE<br>(as N)<br>mg/L |         |         |        |         |      |
| 1/7/2016  | 0.504                 |                                  |                           |         |        | 0.397                          |                           |         |         |        |         |      |
| 1/8/2016  | 0.501                 |                                  |                           |         |        | 0.376                          |                           |         |         |        |         |      |
| 1/9/2016  | 0.501                 |                                  |                           |         |        | 0.326                          |                           |         |         |        |         |      |
| 1/10/2016 | 0.524                 |                                  |                           |         |        | 0.321                          |                           |         |         |        |         |      |
| 1/11/2016 | 0.496                 |                                  |                           |         |        | 0.401                          |                           |         |         |        |         |      |
| 1/12/2016 | 0.521                 |                                  |                           |         |        | 0.407                          | 5                         |         |         |        |         |      |
| 1/13/2016 | 0.628                 |                                  |                           |         |        | 0.389                          |                           |         |         |        |         |      |
| 1/14/2016 | 0.409                 |                                  |                           |         |        | 0.335                          |                           |         |         |        |         |      |
| 1/15/2016 | 0.501                 |                                  |                           |         |        | 0.384                          |                           |         |         |        |         |      |
| 1/16/2016 | 0.502                 |                                  |                           |         |        | 0.355                          |                           |         |         |        |         |      |
| 1/17/2016 | 0.528                 |                                  |                           |         |        | 0.391                          |                           |         |         |        |         |      |
| 1/18/2016 | 0.583                 |                                  |                           |         |        | 0.488                          |                           |         |         |        |         |      |
| 1/19/2016 | 0.736                 |                                  |                           |         |        | 0.671                          |                           |         |         |        |         |      |
| 1/20/2016 | 0.511                 |                                  |                           |         |        | 0.421                          |                           |         |         |        |         |      |
| 1/21/2016 | 0.502                 |                                  |                           |         |        | 0.359                          |                           |         |         |        |         |      |
| 1/22/2016 | 0.48                  |                                  |                           |         |        | 0.483                          |                           |         |         |        |         |      |
| 1/23/2016 | 0.48                  |                                  |                           |         |        | 0.24                           |                           |         |         |        |         |      |
| 1/24/2016 | 0.303                 |                                  |                           |         |        | 0.134                          |                           |         |         |        |         |      |
| 1/25/2016 | 0.323                 |                                  |                           |         |        | 0.158                          |                           |         |         |        |         |      |
| 1/26/2016 | 0.337                 |                                  |                           |         |        | 0.19                           |                           |         |         |        |         |      |
| 1/27/2016 | 0.306                 |                                  |                           |         |        | 0.206                          |                           |         |         |        |         |      |
| 1/28/2016 | 0.312                 |                                  |                           |         |        | 0.203                          |                           |         |         |        |         |      |
| 1/29/2016 | 0.336                 |                                  |                           |         |        | 0.248                          |                           |         |         |        |         |      |
| 1/30/2016 | 0.5                   |                                  |                           |         |        | 0.216                          |                           |         |         |        |         |      |
| 1/31/2016 | 0.345                 |                                  |                           |         |        | 0.425                          |                           |         |         |        |         |      |
| 2/1/2016  | 0.431                 |                                  |                           |         |        | 0.425                          |                           |         |         |        |         |      |
| 2/2/2016  | 0.413                 |                                  |                           |         |        | 0.336                          |                           |         |         |        |         |      |
| 2/3/2016  | 0.484                 |                                  |                           |         |        | 0.345                          |                           |         |         |        |         |      |
| 2/4/2016  | 0.528                 |                                  |                           |         |        | 0.426                          |                           |         |         |        |         |      |
| 2/5/2016  | 0.496                 |                                  |                           |         |        | 0.472                          |                           |         |         |        |         |      |
| 2/6/2016  | 0.464                 |                                  |                           |         |        | 0.447                          |                           |         |         |        |         |      |
| 2/7/2016  | 0.446                 |                                  |                           |         |        | 0.384                          |                           |         |         |        |         |      |
| 2/8/2016  | 0.506                 |                                  |                           |         |        | 0.372                          |                           |         |         |        |         |      |
| 2/9/2016  | 0.531                 |                                  |                           |         |        | 0.445                          |                           |         |         |        |         |      |
| 2/10/2016 | 0.523                 |                                  |                           |         |        | 0.508                          |                           |         |         |        |         |      |
| 2/11/2016 | 0.504                 |                                  |                           |         |        | 0.505                          |                           |         |         |        |         | 0.38 |
| 2/12/2016 | 0.485                 |                                  |                           |         |        | 0.502                          |                           |         |         |        |         |      |
| 2/13/2016 | 0.46                  |                                  |                           |         |        | 0.462                          |                           |         |         |        |         |      |
| 2/14/2016 | 0.449                 |                                  |                           |         |        | 0.453                          |                           |         |         |        |         |      |
| 2/15/2016 | 0.543                 |                                  |                           |         |        | 0.409                          |                           |         |         |        |         |      |
| 2/16/2016 | 0.577                 |                                  |                           |         |        | 0.521                          |                           |         |         |        |         |      |
| 2/17/2016 | 0.555                 |                                  |                           |         |        | 0.567                          |                           |         |         |        |         |      |
| 2/18/2016 | 0.436                 |                                  |                           |         |        | 0.514                          |                           |         |         |        |         |      |
| 2/19/2016 | 0.38                  |                                  |                           |         |        | 0.383                          |                           |         |         |        |         |      |
| 2/20/2016 | 0.392                 |                                  |                           |         |        | 0.333                          |                           |         |         |        |         |      |
| 2/21/2016 | 0.464                 |                                  |                           |         |        | 0.355                          |                           |         |         |        |         |      |
| 2/22/2016 | 0.513                 |                                  |                           |         |        | 0.398                          |                           |         |         |        |         |      |
| 2/23/2016 | 0.527                 |                                  |                           |         |        | 0.493                          |                           |         |         |        |         |      |
| 2/24/2016 | 0.518                 |                                  |                           |         |        | 0.497                          |                           |         |         |        |         |      |
| 2/25/2016 | 0.607                 |                                  |                           |         |        | 0.456                          |                           |         |         |        |         |      |
| 2/26/2016 | 0.474                 |                                  |                           |         |        | 0.517                          |                           |         |         |        |         |      |
| 2/27/2016 | 0.5                   |                                  |                           |         |        | 0.532                          |                           |         |         |        |         |      |
| 2/28/2016 | 0.482                 |                                  |                           |         |        | 0.459                          |                           |         |         |        |         |      |
| 2/29/2016 | 0.491                 |                                  |                           |         |        | 0.437                          |                           |         |         |        |         |      |

Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT |                             |                     |         |        | SECONDARY EFFLUENT CONSTITUENT |                     |         |         |        |         |
|-----------|----------------------|-----------------------------|---------------------|---------|--------|--------------------------------|---------------------|---------|---------|--------|---------|
|           | Daily                |                             |                     |         |        | Daily                          | Quarterly           |         |         |        |         |
|           | TOTAL FLOW (calc.)   | Ammonia (Total (as N) mg/L) | NITRATE (as N) mg/L | Cyanide | Copper | FLOW MGD (Q)                   | NITRATE (as N) mg/L | Nitrite | Cyanide | Copper | Ammonia |
| 3/1/2016  | 0.536                |                             |                     |         |        | 0.524                          |                     |         |         |        |         |
| 3/2/2016  | 0.56                 |                             |                     |         |        | 0.551                          |                     |         |         |        |         |
| 3/3/2016  | 0.607                |                             |                     |         |        | 0.554                          |                     |         |         |        |         |
| 3/4/2016  | 0.643                |                             |                     |         |        | 0.559                          |                     |         |         |        |         |
| 3/5/2016  | 0.636                |                             |                     |         |        | 0.606                          |                     |         |         |        |         |
| 3/6/2016  | 0.666                |                             |                     |         |        | 0.586                          |                     |         |         |        |         |
| 3/7/2016  | 0.672                |                             |                     |         |        | 0.596                          |                     |         |         |        |         |
| 3/8/2016  | 0.568                |                             |                     |         |        | 0.62                           |                     |         |         |        |         |
| 3/9/2016  | 0.538                |                             |                     |         |        | 0.495                          |                     |         |         |        |         |
| 3/10/2016 | 0.55                 |                             |                     |         |        | 0.458                          |                     |         |         |        |         |
| 3/11/2016 | 0.674                |                             |                     |         |        | 0.497                          |                     |         |         |        |         |
| 3/12/2016 | 0.542                |                             |                     |         |        | 0.566                          |                     |         |         |        |         |
| 3/13/2016 | 0.557                |                             |                     |         |        | 0.364                          |                     |         |         |        |         |
| 3/14/2016 | 0.599                |                             |                     |         |        | 0.469                          |                     |         |         |        |         |
| 3/15/2016 | 0.591                |                             |                     |         |        | 0.484                          |                     |         |         |        | 0.12    |
| 3/16/2016 | 0.578                |                             |                     |         |        | 0.496                          |                     |         |         |        |         |
| 3/17/2016 | 0.606                |                             |                     |         |        | 0.516                          |                     |         |         |        |         |
| 3/18/2016 | 0.605                |                             |                     |         |        | 0.552                          |                     |         |         |        |         |
| 3/19/2016 | 0.573                |                             |                     |         |        | 0.557                          |                     |         |         |        |         |
| 3/20/2016 | 0.568                |                             |                     |         |        | 0.49                           |                     |         |         |        |         |
| 3/21/2016 | 0.568                |                             |                     |         |        | 0.505                          |                     |         |         |        |         |
| 3/22/2016 | 0.608                |                             |                     |         |        | 0.523                          |                     |         |         |        |         |
| 3/23/2016 | 0.607                |                             |                     |         |        | 0.534                          |                     |         |         |        |         |
| 3/24/2016 | 0.63                 |                             |                     |         |        | 0.512                          |                     |         |         |        |         |
| 3/25/2016 | 0.538                |                             |                     |         |        | 0.529                          |                     |         |         |        |         |
| 3/26/2016 | 0.498                |                             |                     |         |        | 0.5                            |                     |         |         |        |         |
| 3/27/2016 | 0.535                |                             |                     |         |        | 0.428                          |                     |         |         |        |         |
| 3/28/2016 | 0.572                |                             |                     |         |        | 0.403                          |                     |         |         |        |         |
| 3/29/2016 | 0.594                |                             |                     |         |        | 0.469                          |                     |         |         |        |         |
| 3/30/2016 | 0.599                |                             |                     |         |        | 0.499                          |                     |         |         |        |         |
| 3/31/2016 | 0.625                |                             |                     |         |        | 0.505                          |                     |         |         |        |         |
| 4/1/2016  | 0.625                |                             |                     |         |        | 0.541                          |                     |         |         |        |         |
| 4/2/2016  | 0.582                |                             |                     |         |        | 0.524                          |                     |         |         |        |         |
| 4/3/2016  | 0.582                |                             |                     |         |        | 0.53                           |                     |         |         |        |         |
| 4/4/2016  | 0.589                |                             |                     |         |        | 0.599                          |                     |         |         |        |         |
| 4/5/2016  | 0.675                |                             |                     |         |        | 0.635                          |                     |         |         |        |         |
| 4/6/2016  | 0.643                |                             |                     |         |        | 0.604                          |                     |         |         |        | 0.15    |
| 4/7/2016  | 0.687                |                             |                     |         |        | 0.52                           |                     |         |         |        |         |
| 4/8/2016  | 0.67                 |                             |                     |         |        | 0.697                          |                     |         |         |        |         |
| 4/9/2016  | 0.764                |                             |                     |         |        | 0.552                          |                     |         |         |        |         |
| 4/10/2016 | 0.691                |                             |                     |         |        | 0.535                          |                     |         |         |        |         |
| 4/11/2016 | 0.644                |                             |                     |         |        | 0.603                          |                     |         |         |        |         |
| 4/12/2016 | 0.675                |                             |                     |         |        | 0.547                          |                     |         |         |        |         |
| 4/13/2016 | 0.609                |                             |                     |         |        | 0.561                          |                     |         |         |        |         |
| 4/14/2016 | 0.622                |                             |                     |         |        | 0.457                          |                     |         |         |        |         |
| 4/15/2016 | 0.57                 |                             |                     |         |        | 0.562                          |                     |         |         |        |         |
| 4/16/2016 | 0.658                |                             |                     |         |        | 0.522                          |                     |         |         |        |         |
| 4/17/2016 | 0.587                |                             |                     |         |        | 0.545                          |                     |         |         |        |         |
| 4/18/2016 | 0.594                |                             |                     |         |        | 0.615                          |                     |         |         |        |         |
| 4/19/2016 | 0.646                |                             |                     |         |        | 0.645                          |                     |         |         |        |         |
| 4/20/2016 | 0.672                |                             |                     |         |        | 0.633                          |                     |         |         |        | 0.12    |
| 4/21/2016 | 0.641                |                             |                     |         |        | 0.623                          |                     |         |         |        |         |
| 4/22/2016 | 0.678                |                             |                     |         |        | 0.577                          |                     |         |         |        |         |

Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT  |                                  |                           |         |        | SECONDARY EFFLUENT CONSTITUENT |                           |         |         |        |         |      |
|-----------|-----------------------|----------------------------------|---------------------------|---------|--------|--------------------------------|---------------------------|---------|---------|--------|---------|------|
|           | Daily                 | Ammonia (Total<br>(as N)<br>mg/L | NITRATE<br>(as N)<br>mg/L | Cyanide | Copper | Daily                          | Quarterly                 | Nitrite | Cyanide | Copper | Ammonia |      |
|           | TOTAL FLOW<br>(calc.) |                                  |                           |         |        | FLOW<br>MGD (Q)                | NITRATE<br>(as N)<br>mg/L |         |         |        |         |      |
| 4/23/2016 | 0.664                 |                                  |                           |         |        | 0.534                          |                           |         |         |        |         |      |
| 4/24/2016 | 0.634                 |                                  |                           |         |        | 0.5                            |                           |         |         |        |         |      |
| 4/25/2016 | 0.598                 |                                  |                           |         |        | 0.564                          |                           |         |         |        |         |      |
| 4/26/2016 | 0.648                 |                                  |                           |         |        | 0.568                          |                           |         |         |        |         |      |
| 4/27/2016 | 0.648                 |                                  |                           |         |        | 0.485                          |                           |         |         |        |         |      |
| 4/28/2016 | 0.573                 |                                  |                           |         |        | 0.298                          |                           |         |         |        |         |      |
| 4/29/2016 | 0.437                 |                                  |                           |         |        | 0.393                          |                           |         |         |        |         |      |
| 4/30/2016 | 0.463                 |                                  |                           |         |        | 0.541                          |                           |         |         |        |         |      |
|           |                       |                                  |                           |         |        |                                |                           |         |         |        |         |      |
| 5/1/2016  | 0.605                 |                                  |                           |         |        | 0.536                          |                           |         |         |        |         |      |
| 5/2/2016  | 0.691                 |                                  |                           |         |        | 0.6                            |                           |         |         |        |         |      |
| 5/3/2016  | 0.668                 |                                  |                           |         |        | 0.44                           | 12                        |         |         |        |         |      |
| 5/4/2016  | 0.697                 |                                  |                           |         |        | 0.564                          |                           |         |         |        |         |      |
| 5/5/2016  | 0.688                 |                                  |                           |         |        | 0.593                          |                           |         |         |        |         |      |
| 5/6/2016  | 0.676                 |                                  |                           |         |        | 0.597                          |                           |         |         |        |         |      |
| 5/7/2016  | 0.611                 |                                  |                           |         |        | 0.537                          |                           |         |         |        |         |      |
| 5/8/2016  | 0.591                 |                                  |                           |         |        | 0.534                          |                           |         |         |        |         |      |
| 5/9/2016  | 0.712                 |                                  |                           |         |        | 0.649                          |                           |         |         |        |         |      |
| 5/10/2016 | 0.691                 |                                  |                           |         |        | 0.646                          |                           |         |         |        |         |      |
| 5/11/2016 | 0.692                 |                                  |                           |         |        | 0.652                          |                           |         |         |        |         |      |
| 5/12/2016 | 0.593                 |                                  |                           |         |        | 0.567                          |                           |         |         |        |         |      |
| 5/13/2016 | 0.721                 |                                  |                           |         |        | 0.672                          |                           |         |         |        |         |      |
| 5/14/2016 | 0.438                 |                                  |                           |         |        | 0.367                          |                           |         |         |        |         |      |
| 5/15/2016 | 0.406                 |                                  |                           |         |        | 0.333                          |                           |         |         |        |         |      |
| 5/16/2016 | 0.517                 |                                  |                           |         |        | 0.545                          |                           |         |         |        |         |      |
| 5/17/2016 | 0.645                 |                                  |                           |         |        | 0.617                          |                           |         |         |        |         |      |
| 5/18/2016 | 0.67                  |                                  |                           |         |        | 0.674                          |                           |         |         |        |         |      |
| 5/19/2016 | 0.673                 |                                  |                           |         |        | 0.623                          |                           |         |         |        |         |      |
| 5/20/2016 | 0.639                 |                                  |                           |         |        | 0.564                          |                           |         |         |        |         |      |
| 5/21/2016 | 0.61                  |                                  |                           |         |        | 0.526                          |                           |         |         |        |         |      |
| 5/22/2016 | 0.515                 |                                  |                           |         |        | 0.429                          |                           |         |         |        |         |      |
| 5/23/2016 | 0.478                 |                                  |                           |         |        | 0.407                          |                           |         |         |        |         |      |
| 5/24/2016 | 0.447                 |                                  |                           |         |        | 0.384                          |                           |         |         |        |         |      |
| 5/25/2016 | 0.397                 |                                  |                           |         |        | 0.31                           |                           |         |         |        |         |      |
| 5/26/2016 | 0.416                 |                                  |                           |         |        | 0.372                          |                           |         |         |        |         |      |
| 5/27/2016 | 0.372                 |                                  |                           |         |        | 0.365                          |                           |         |         |        |         |      |
| 5/28/2016 | 0.381                 |                                  |                           |         |        | 0.358                          |                           |         |         |        |         |      |
| 5/29/2016 | 0.314                 |                                  |                           |         |        | 0.304                          |                           |         |         |        |         |      |
| 5/30/2016 | 0.401                 |                                  |                           |         |        | 0.462                          |                           |         |         |        |         |      |
| 5/31/2016 | 0.488                 |                                  |                           |         |        | 0.599                          |                           |         |         |        |         |      |
|           |                       |                                  |                           |         |        |                                |                           |         |         |        |         |      |
| 6/1/2016  | 0.662                 |                                  |                           |         |        | 0.699                          |                           |         |         |        |         |      |
| 6/2/2016  | 0.632                 |                                  |                           |         |        | 0.665                          |                           |         |         |        |         |      |
| 6/3/2016  | 0.641                 |                                  |                           |         |        | 0.679                          | 14                        |         |         |        |         | 0.26 |
| 6/4/2016  | 0.569                 |                                  |                           |         |        | 0.584                          |                           |         |         |        |         |      |
| 6/5/2016  | 0.542                 |                                  |                           |         |        | 0.573                          |                           |         |         |        |         |      |
| 6/6/2016  | 0.637                 |                                  |                           |         |        | 0.695                          |                           |         |         |        |         |      |
| 6/7/2016  | 0.664                 |                                  |                           |         |        | 0.683                          | 12                        |         |         |        |         | 0.24 |
| 6/8/2016  | 0.61                  |                                  |                           |         |        | 0.607                          |                           |         |         |        |         |      |
| 6/9/2016  | 0.622                 |                                  |                           |         |        | 0.627                          |                           |         |         |        |         |      |
| 6/10/2016 | 0.622                 |                                  |                           |         |        | 0.609                          |                           |         |         |        |         |      |
| 6/11/2016 | 0.547                 |                                  |                           |         |        | 0.501                          |                           |         |         |        |         |      |
| 6/12/2016 | 0.562                 |                                  |                           |         |        | 0.516                          |                           |         |         |        |         |      |
| 6/13/2016 | 0.67                  |                                  |                           |         |        | 0.668                          |                           |         |         |        |         |      |
| 6/14/2016 | 0.654                 |                                  |                           |         |        | 0.648                          |                           |         |         |        |         |      |

Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT     |                                  |                           |         |        | SECONDARY EFFLUENT CONSTITUENT |                           |         |         |        |         |
|-----------|--------------------------|----------------------------------|---------------------------|---------|--------|--------------------------------|---------------------------|---------|---------|--------|---------|
|           | Daily                    | Ammonia (Total<br>(as N)<br>mg/L | NITRATE<br>(as N)<br>mg/L | Cyanide | Copper | Daily                          | Quarterly                 | Nitrite | Cyanide | Copper | Ammonia |
|           | TOTAL<br>FLOW<br>(calc.) |                                  |                           |         |        | FLOW<br>MGD<br>(Q)             | NITRATE<br>(as N)<br>mg/L |         |         |        |         |
| 6/15/2016 | 0.653                    |                                  |                           |         |        | 0.61                           |                           |         |         |        |         |
| 6/16/2016 | 0.641                    |                                  |                           |         |        | 0.588                          |                           |         |         |        |         |
| 6/17/2016 | 0.604                    |                                  |                           |         |        | 0.591                          |                           |         |         |        |         |
| 6/18/2016 | 0.555                    |                                  |                           |         |        | 0.513                          |                           |         |         |        |         |
| 6/19/2016 | 0.531                    |                                  |                           |         |        | 0.523                          |                           |         |         |        |         |
| 6/20/2016 | 0.582                    |                                  |                           |         |        | 0.67                           |                           |         |         |        |         |
| 6/21/2016 | 0.829                    |                                  |                           |         |        | 0.728                          |                           |         |         |        |         |
| 6/22/2016 | 0.677                    |                                  |                           |         |        | 0.699                          |                           |         |         |        |         |
| 6/23/2016 | 0.676                    |                                  |                           |         |        | 0.669                          |                           |         |         |        |         |
| 6/24/2016 | 0.66                     |                                  |                           |         |        | 0.631                          |                           |         |         |        |         |
| 6/25/2016 | 0.559                    |                                  |                           |         |        | 0.56                           |                           |         |         |        |         |
| 6/26/2016 | 0.553                    |                                  |                           |         |        | 0.566                          |                           |         |         |        |         |
| 6/27/2016 | 0.686                    |                                  |                           |         |        | 0.704                          |                           |         |         |        |         |
| 6/28/2016 | 0.697                    |                                  |                           |         |        | 0.72                           |                           |         |         |        |         |
| 6/29/2016 | 0.697                    |                                  |                           |         |        | 0.686                          |                           |         |         |        |         |
| 6/30/2016 | 0.628                    |                                  |                           |         |        | 0.614                          |                           |         |         |        |         |
| 7/1/2016  | 0.628                    |                                  |                           |         |        | 0.614                          |                           |         |         |        |         |
| 7/2/2016  | 0.621                    |                                  |                           |         |        | 0.616                          |                           |         |         |        |         |
| 7/3/2016  | 0.553                    |                                  |                           |         |        | 0.533                          |                           |         |         |        |         |
| 7/4/2016  | 0.516                    |                                  |                           |         |        | 0.496                          |                           |         |         |        |         |
| 7/5/2016  | 0.53                     |                                  |                           |         |        | 0.529                          |                           |         |         |        |         |
| 7/6/2016  | 0.626                    |                                  |                           |         |        | 0.612                          |                           |         |         |        |         |
| 7/7/2016  | 0.614                    |                                  |                           |         |        | 0.611                          |                           |         |         |        |         |
| 7/8/2016  | 0.632                    |                                  |                           |         |        | 0.621                          |                           |         |         |        |         |
| 7/9/2016  | 0.683                    |                                  |                           |         |        | 0.644                          |                           |         |         |        |         |
| 7/10/2016 | 0.561                    |                                  |                           |         |        | 0.518                          |                           |         |         |        |         |
| 7/11/2016 | 0.519                    |                                  |                           |         |        | 0.432                          |                           |         |         |        |         |
| 7/12/2016 | 0.621                    |                                  |                           |         |        | 0.574                          |                           |         |         |        |         |
| 7/13/2016 | 0.621                    |                                  |                           |         |        | 0.631                          |                           |         |         |        |         |
| 7/14/2016 | 0.613                    |                                  |                           |         |        | 0.625                          |                           |         |         |        |         |
| 7/15/2016 | 0.63                     |                                  |                           |         |        | 0.604                          |                           |         |         |        |         |
| 7/16/2016 | 0.644                    |                                  |                           |         |        | 0.684                          |                           |         |         |        |         |
| 7/17/2016 | 0.551                    |                                  |                           |         |        | 0.572                          |                           |         |         |        |         |
| 7/18/2016 | 0.533                    |                                  |                           |         |        | 0.555                          |                           |         |         |        |         |
| 7/19/2016 | 0.667                    |                                  |                           |         |        | 0.678                          |                           |         |         |        |         |
| 7/20/2016 | 0.649                    |                                  |                           |         |        | 0.617                          |                           |         |         |        |         |
| 7/21/2016 | 0.631                    |                                  |                           |         |        | 0.628                          |                           |         |         |        |         |
| 7/22/2016 | 0.668                    |                                  |                           |         |        | 0.535                          |                           |         |         |        |         |
| 7/23/2016 | 0.67                     |                                  |                           |         |        | 0.627                          |                           |         |         |        |         |
| 7/24/2016 | 0.656                    |                                  |                           |         |        | 0.579                          |                           |         |         |        |         |
| 7/25/2016 | 0.649                    |                                  |                           |         |        | 0.59                           |                           |         |         |        |         |
| 7/26/2016 | 0.657                    |                                  |                           |         |        | 0.663                          |                           |         |         |        |         |
| 7/27/2016 | 0.671                    |                                  |                           |         |        | 0.712                          |                           |         |         |        |         |
| 7/28/2016 | 0.651                    |                                  |                           |         |        | 0.639                          |                           |         |         |        |         |
| 7/29/2016 | 0.644                    |                                  |                           |         |        | 0.629                          |                           |         |         |        |         |
| 7/30/2016 | 0.658                    |                                  |                           |         |        | 0.634                          |                           |         |         |        |         |
| 7/31/2016 | 0.649                    |                                  |                           |         |        | 0.62                           |                           |         |         |        |         |
| 8/1/2016  | 0.65                     |                                  |                           |         |        | 0.625                          |                           |         |         |        |         |
| 8/2/2016  | 0.636                    |                                  |                           | 0       | 0.043  | 0.649                          | 10                        |         |         |        | 0.078   |
| 8/3/2016  | 0.684                    |                                  |                           |         |        | 0.665                          |                           |         |         |        |         |
| 8/4/2016  | 0.642                    |                                  |                           |         |        | 0.622                          |                           |         |         |        |         |
| 8/5/2016  | 0.638                    |                                  |                           |         |        | 0.613                          |                           |         |         |        |         |
| 8/6/2016  | 0.651                    |                                  |                           |         |        | 0.631                          |                           |         |         |        |         |

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| DATE      | INFLUENT CONSTITUENT |                             |                     |         |        | SECONDARY EFFLUENT CONSTITUENT |                     |         |         |        |         |
|-----------|----------------------|-----------------------------|---------------------|---------|--------|--------------------------------|---------------------|---------|---------|--------|---------|
|           | Daily                |                             |                     |         |        | Daily                          | Quarterly           |         |         |        |         |
|           | TOTAL FLOW (calc.)   | Ammonia (Total) (as N) mg/L | NITRATE (as N) mg/L | Cyanide | Copper | FLOW (MGD (Q))                 | NITRATE (as N) mg/L | Nitrite | Cyanide | Copper | Ammonia |
| 8/7/2016  | 0.635                |                             |                     |         |        | 0.593                          |                     |         |         |        |         |
| 8/8/2016  | 0.573                |                             |                     |         |        | 0.548                          |                     |         |         |        |         |
| 8/9/2016  | 0.669                |                             |                     | 0.005   | 0.06   | 0.625                          | 13                  |         |         |        | 0.11    |
| 8/10/2016 | 0.695                |                             |                     |         |        | 0.67                           |                     |         |         |        |         |
| 8/11/2016 | 0.717                |                             |                     |         |        | 0.677                          |                     |         |         |        |         |
| 8/12/2016 | 0.667                |                             |                     |         |        | 0.651                          |                     |         |         |        |         |
| 8/13/2016 | 0.637                |                             |                     |         |        | 0.609                          |                     |         |         |        |         |
| 8/14/2016 | 0.628                |                             |                     |         |        | 0.575                          |                     |         |         |        |         |
| 8/15/2016 | 0.624                |                             |                     |         |        | 0.574                          |                     |         |         |        |         |
| 8/16/2016 | 0.674                |                             |                     |         |        | 0.649                          |                     |         |         |        |         |
| 8/17/2016 | 0.691                |                             |                     |         |        | 0.654                          |                     |         |         |        |         |
| 8/18/2016 | 0.641                |                             |                     |         |        | 0.645                          |                     |         |         |        |         |
| 8/19/2016 | 0.691                |                             |                     |         |        | 0.65                           |                     |         |         |        |         |
| 8/20/2016 | 0.643                |                             |                     |         |        | 0.619                          |                     |         |         |        |         |
| 8/21/2016 | 0.609                |                             |                     |         |        | 0.574                          |                     |         |         |        |         |
| 8/22/2016 | 0.597                |                             |                     |         |        | 0.55                           |                     |         |         |        |         |
| 8/23/2016 | 0.68                 |                             |                     |         |        | 0.657                          |                     |         |         |        |         |
| 8/24/2016 | 0.634                |                             |                     |         |        | 0.6                            |                     |         |         |        |         |
| 8/25/2016 | 0.681                |                             |                     |         |        | 0.626                          |                     |         |         |        |         |
| 8/26/2016 | 0.664                |                             |                     |         |        | 0.596                          |                     |         |         |        |         |
| 8/27/2016 | 0.665                |                             |                     |         |        | 0.591                          |                     |         |         |        |         |
| 8/28/2016 | 0.643                |                             |                     |         |        | 0.56                           |                     |         |         |        |         |
| 8/29/2016 | 0.633                |                             |                     |         |        | 0.554                          |                     |         |         |        |         |
| 8/30/2016 | 0.682                |                             |                     |         |        | 0.613                          |                     |         |         |        |         |
| 8/31/2016 | 0.68                 |                             |                     |         |        | 0.608                          |                     |         |         |        |         |
| 9/1/2016  | 0.654                |                             |                     |         |        | 0.597                          |                     |         |         |        |         |
| 9/2/2016  | 0.665                |                             |                     |         |        | 0.627                          |                     |         |         |        |         |
| 9/3/2016  | 0.631                |                             |                     |         |        | 0.605                          |                     |         |         |        |         |
| 9/4/2016  | 0.602                |                             |                     |         |        | 0.529                          |                     |         |         |        |         |
| 9/5/2016  | 0.598                |                             |                     |         |        | 0.48                           |                     |         |         |        |         |
| 9/6/2016  | 0.657                |                             |                     | 0.0047  |        | 0.548                          |                     |         |         |        |         |
| 9/7/2016  | 0.674                |                             |                     |         | 0.02   | 0.62                           |                     |         |         |        |         |
| 9/8/2016  | 0.665                |                             |                     |         |        | 0.62                           |                     |         |         |        |         |
| 9/9/2016  | 0.692                |                             |                     |         |        | 0.626                          |                     |         |         |        |         |
| 9/10/2016 | 0.663                |                             |                     |         |        | 0.612                          |                     |         |         |        |         |
| 9/11/2016 | 0.582                |                             |                     |         |        | 0.538                          |                     |         |         |        |         |
| 9/12/2016 | 0.571                |                             |                     |         |        | 0.513                          |                     |         |         |        |         |
| 9/13/2016 | 0.606                |                             |                     | 0.0051  | 0.076  | 0.569                          |                     |         |         | 0.016  |         |
| 9/14/2016 | 0.577                |                             |                     |         |        | 0.506                          |                     |         |         |        |         |
| 9/15/2016 | 0.452                |                             |                     |         |        | 0.399                          |                     |         |         |        |         |
| 9/16/2016 | 0.444                |                             |                     |         |        | 0.4                            |                     |         |         |        |         |
| 9/17/2016 | 0.478                |                             |                     |         |        | 0.44                           |                     |         |         |        |         |
| 9/18/2016 | 0.614                |                             |                     |         |        | 0.567                          |                     |         |         |        |         |
| 9/19/2016 | 0.627                |                             |                     |         |        | 0.575                          |                     |         |         |        |         |
| 9/20/2016 | 0.658                |                             |                     |         |        | 0.645                          |                     |         |         |        |         |
| 9/21/2016 | 0.664                |                             |                     |         |        | 0.622                          |                     |         |         |        |         |
| 9/22/2016 | 0.638                |                             |                     |         |        | 0.582                          |                     |         |         |        |         |
| 9/23/2016 | 0.645                |                             |                     |         |        | 0.567                          |                     |         |         |        |         |
| 9/24/2016 | 0.677                |                             |                     |         |        | 0.592                          |                     |         |         |        |         |
| 9/25/2016 | 0.644                |                             |                     |         |        | 0.548                          |                     |         |         |        |         |
| 9/26/2016 | 0.682                |                             |                     |         |        | 0.563                          |                     |         |         |        |         |
| 9/27/2016 | 0.679                |                             |                     |         |        | 0.559                          |                     |         |         |        |         |
| 9/28/2016 | 0.711                |                             |                     |         |        | 0.638                          |                     |         |         |        |         |
| 9/29/2016 | 0.722                |                             |                     |         |        | 0.673                          |                     |         |         |        |         |



Pollution Prevention Plan

| DATE       | INFLUENT CONSTITUENT |                             |                     |         |        | SECONDARY EFFLUENT CONSTITUENT |                     |         |         |        |         |
|------------|----------------------|-----------------------------|---------------------|---------|--------|--------------------------------|---------------------|---------|---------|--------|---------|
|            | Daily                |                             |                     |         |        | Daily                          | Quarterly           |         |         |        |         |
|            | TOTAL FLOW (calc.)   | Ammonia (Total (as N) mg/L) | NITRATE (as N) mg/L | Cyanide | Copper | FLOW MGD (Q)                   | NITRATE (as N) mg/L | Nitrite | Cyanide | Copper | Ammonia |
| 9/30/2016  | 0.675                |                             |                     |         |        | 0.615                          |                     |         |         |        |         |
| 10/1/2016  | 0.649                |                             |                     |         |        | 0.541                          |                     |         |         |        |         |
| 10/2/2016  | 0.605                |                             |                     |         |        | 0.502                          |                     |         |         |        |         |
| 10/3/2016  | 0.656                |                             |                     |         |        | 0.612                          |                     |         |         |        |         |
| 10/4/2016  | 0.646                |                             |                     |         |        | 0.605                          |                     |         |         |        |         |
| 10/5/2016  | 0.629                |                             |                     | 0       | 0.027  | 0.538                          | 13                  |         |         | 0.015  | 0.07    |
| 10/6/2016  | 0.58                 |                             |                     |         |        | 0.498                          |                     |         |         |        |         |
| 10/7/2016  | 0.667                |                             |                     |         |        | 0.495                          |                     |         |         |        |         |
| 10/8/2016  | 0.646                |                             |                     |         |        | 0.58                           |                     |         |         |        |         |
| 10/9/2016  | 0.623                |                             |                     |         |        | 0.557                          |                     |         |         |        |         |
| 10/10/2016 | 0.67                 |                             |                     |         |        | 0.595                          |                     |         |         |        |         |
| 10/11/2016 | 0.632                |                             |                     |         |        | 0.596                          |                     |         |         |        |         |
| 10/12/2016 | 0.717                |                             |                     | 0.004   | 0.13   | 0.565                          | 14                  |         |         |        | 0.041   |
| 10/13/2016 | 0.534                |                             |                     |         |        | 0.553                          |                     |         |         |        |         |
| 10/14/2016 | 0.637                |                             |                     |         |        | 0.578                          |                     |         |         |        |         |
| 10/15/2016 | 0.6                  |                             |                     |         |        | 0.52                           |                     |         |         |        |         |
| 10/16/2016 | 0.61                 |                             |                     |         |        | 0.49                           |                     |         |         |        |         |
| 10/17/2016 | 0.655                |                             |                     |         |        | 0.559                          |                     |         |         |        |         |
| 10/18/2016 | 0.65                 |                             |                     |         |        | 0.556                          |                     |         |         |        |         |
| 10/19/2016 | 0.652                |                             |                     |         |        | 0.537                          |                     |         |         |        |         |
| 10/20/2016 | 0.663                |                             |                     |         |        | 0.581                          |                     |         |         |        |         |
| 10/21/2016 | 0.654                |                             |                     |         |        | 0.569                          |                     |         |         |        |         |
| 10/22/2016 | 0.647                |                             |                     |         |        | 0.54                           |                     |         |         |        |         |
| 10/23/2016 | 0.624                |                             |                     |         |        | 0.543                          |                     |         |         |        |         |
| 10/24/2016 | 0.652                |                             |                     |         |        | 0.559                          |                     |         |         |        |         |
| 10/25/2016 | 0.675                |                             |                     |         |        | 0.603                          |                     |         |         |        |         |
| 10/26/2016 | 0.651                |                             |                     |         |        | 0.593                          |                     |         |         |        |         |
| 10/27/2016 | 0.705                |                             |                     |         |        | 0.611                          |                     |         |         |        |         |
| 10/28/2016 | 0.641                |                             |                     |         |        | 0.547                          |                     |         |         |        |         |
| 10/29/2016 | 0.611                |                             |                     |         |        | 0.523                          |                     |         |         |        |         |
| 10/30/2016 | 0.558                |                             |                     |         |        | 0.455                          |                     |         |         |        |         |
| 10/31/2016 | 0.628                |                             |                     |         |        | 0.543                          |                     |         |         |        |         |
| 11/1/2016  | 0.628                |                             |                     |         |        | 0.543                          |                     |         |         |        |         |
| 11/2/2016  | 0.625                |                             |                     | 0.0067  | 0.17   | 0.519                          | 15                  | 0.0041  |         | 0.014  |         |
| 11/3/2016  | 0.542                |                             |                     |         |        | 0.491                          |                     |         |         |        |         |
| 11/4/2016  | 0.595                |                             |                     |         |        | 0.506                          |                     |         |         |        |         |
| 11/5/2016  | 0.608                |                             |                     |         |        | 0.537                          |                     |         |         |        |         |
| 11/6/2016  | 0.489                |                             |                     |         |        | 0.41                           |                     |         |         |        |         |
| 11/7/2016  | 0.48                 |                             |                     |         |        | 0.371                          |                     |         |         |        |         |
| 11/8/2016  | 0.617                |                             |                     | 0.0058  | 0.029  | 0.546                          | 15                  | 0.0041  |         | 0.015  |         |
| 11/9/2016  | 0.596                |                             |                     |         |        | 0.525                          |                     |         |         |        |         |
| 11/10/2016 | 0.581                |                             |                     |         |        | 0.516                          |                     |         |         |        |         |
| 11/11/2016 | 0.628                |                             |                     |         |        | 0.553                          |                     |         |         |        |         |
| 11/12/2016 | 0.582                |                             |                     |         |        | 0.329                          |                     |         |         |        |         |
| 11/13/2016 | 0.576                |                             |                     |         |        | 0.674                          |                     |         |         |        |         |
| 11/14/2016 | 0.527                |                             |                     |         |        | 0.455                          |                     |         |         |        |         |
| 11/15/2016 | 0.607                |                             |                     |         |        | 0.539                          |                     |         |         |        |         |
| 11/16/2016 | 0.617                |                             |                     |         |        | 0.551                          |                     |         |         |        |         |
| 11/17/2016 | 0.567                |                             |                     |         |        | 0.497                          |                     |         |         |        |         |
| 11/18/2016 | 0.535                |                             |                     |         |        | 0.48                           |                     |         |         |        |         |
| 11/19/2016 | 0.57                 |                             |                     |         |        | 0.507                          |                     |         |         |        |         |
| 11/20/2016 | 0.475                |                             |                     |         |        | 0.349                          |                     |         |         |        |         |
| 11/21/2016 | 0.517                |                             |                     |         |        | 0.426                          |                     |         |         |        |         |

Pollution Prevention Plan

| DATE       | INFLUENT CONSTITUENT |                             |                     |         |        | SECONDARY EFFLUENT CONSTITUENT |                     |         |         |        |         |
|------------|----------------------|-----------------------------|---------------------|---------|--------|--------------------------------|---------------------|---------|---------|--------|---------|
|            | Daily                |                             |                     |         |        | Daily                          | Quarterly           |         |         |        |         |
|            | TOTAL FLOW (calc.)   | Ammonia (Total (as N) mg/L) | NITRATE (as N) mg/L | Cyanide | Copper | FLOW MGD (Q)                   | NITRATE (as N) mg/L | Nitrite | Cyanide | Copper | Ammonia |
| 11/22/2016 | 0.571                |                             |                     |         |        | 0.469                          |                     |         |         |        |         |
| 11/23/2016 | 0.523                |                             |                     |         |        | 0.447                          |                     |         |         |        |         |
| 11/24/2016 | 0.494                |                             |                     |         |        | 0.426                          |                     |         |         |        |         |
| 11/25/2016 | 0.393                |                             |                     |         |        | 0.335                          |                     |         |         |        |         |
| 11/26/2016 | 0.47                 |                             |                     |         |        | 0.384                          |                     |         |         |        |         |
| 11/27/2016 | 0.458                |                             |                     |         |        | 0.354                          |                     |         |         |        |         |
| 11/28/2016 | 0.45                 |                             |                     |         |        | 0.341                          |                     |         |         |        |         |
| 11/29/2016 | 0.547                |                             |                     |         |        | 0.485                          |                     |         |         |        |         |
| 11/30/2016 | 0.542                |                             |                     |         |        | 0.464                          |                     |         |         |        |         |
| Nov-16     |                      |                             |                     |         |        |                                |                     |         |         |        |         |
| 12/1/2016  | 0.552                |                             |                     |         |        | 0.448                          |                     |         |         |        |         |
| 12/2/2016  | 0.54                 |                             |                     |         |        | 0.447                          |                     |         |         |        |         |
| 12/3/2016  | 0.413                |                             |                     |         |        | 0.341                          |                     |         |         |        |         |
| 12/4/2016  | 0.423                |                             |                     |         |        | 0.329                          |                     |         |         |        |         |
| 12/5/2016  | 0.54                 |                             |                     |         |        | 0.471                          |                     |         |         |        |         |
| 12/6/2016  | 0.525                |                             |                     |         | 0.027  | 0.464                          |                     |         |         | 0.013  |         |
| 12/7/2016  | 0.541                |                             |                     |         |        | 0.447                          |                     |         |         |        |         |
| 12/8/2016  | 0.593                |                             |                     |         |        | 0.513                          |                     |         |         |        |         |
| 12/9/2016  | 0.529                |                             |                     |         |        | 0.485                          |                     |         |         |        |         |
| 12/10/2016 | 0.47                 |                             |                     |         |        | 0.407                          |                     |         |         |        |         |
| 12/11/2016 | 0.475                |                             |                     |         |        | 0.387                          |                     |         |         |        |         |
| 12/12/2016 | 0.546                |                             |                     |         |        | 0.488                          |                     |         |         |        |         |
| 12/13/2016 | 0.563                |                             |                     |         |        | 0.484                          |                     |         |         |        |         |
| 12/14/2016 | 0.595                |                             |                     |         |        | 0.467                          |                     |         |         |        |         |
| 12/15/2016 | 0.921                |                             |                     |         |        | 0.867                          |                     |         |         |        |         |
| 12/16/2016 | 0.575                |                             |                     |         |        | 0.521                          |                     |         |         |        |         |
| 12/17/2016 | 0.498                |                             |                     |         |        | 0.419                          |                     |         |         |        |         |
| 12/18/2016 | 0.412                |                             |                     |         |        | 0.405                          |                     |         |         |        |         |
| 12/19/2016 | 0.614                |                             |                     |         |        | 0.506                          |                     |         |         |        |         |
| 12/20/2016 | 0.589                |                             |                     |         |        | 0.499                          |                     |         |         |        |         |
| 12/21/2016 | 0.657                |                             |                     |         |        | 0.584                          |                     |         |         |        |         |
| 12/22/2016 | 0.611                |                             |                     |         |        | 0.551                          |                     |         |         |        |         |
| 12/23/2016 | 0.608                |                             |                     |         |        | 0.531                          |                     |         |         |        |         |
| 12/24/2016 | 0.504                |                             |                     |         |        | 0.44                           |                     |         |         |        |         |
| 12/25/2016 | 0.541                |                             |                     |         |        | 0.42                           |                     |         |         |        |         |
| 12/26/2016 | 0.533                |                             |                     |         |        | 0.452                          |                     |         |         |        |         |
| 12/27/2016 | 0.562                |                             |                     |         | 0.017  | 0.495                          |                     |         |         | 0.0087 | 0.1     |
| 12/28/2016 | 0.536                |                             |                     |         |        | 0.468                          |                     |         |         |        |         |
| 12/29/2016 | 0.565                |                             |                     |         |        | 0.506                          |                     |         |         |        |         |
| 12/30/2016 | 0.58                 |                             |                     |         |        | 0.484                          |                     |         |         |        |         |
| 12/31/2016 | 0.558                |                             |                     |         |        | 0.44                           |                     |         |         |        |         |
| 1/1/2017   | 0.531                |                             |                     |         |        | 0.41                           |                     |         |         |        |         |
| 1/2/2017   | 0.538                |                             |                     |         |        | 0.423                          |                     |         |         |        |         |
| 1/3/2017   | 0.686                |                             |                     |         |        | 0.576                          |                     |         |         |        |         |
| 1/4/2017   | 0.662                |                             |                     |         |        | 0.564                          |                     |         |         |        |         |
| 1/5/2017   | 0.56                 |                             |                     |         |        | 0.556                          |                     |         |         |        |         |
| 1/6/2017   | 0.565                |                             |                     |         |        | 0.485                          |                     |         |         |        |         |
| 1/7/2017   | 0.774                |                             |                     |         |        | 0.577                          |                     |         |         |        |         |
| 1/8/2017   | 0.657                |                             |                     |         |        | 0.611                          |                     |         |         |        |         |
| 1/9/2017   | 0.665                |                             |                     |         |        | 0.564                          |                     |         |         |        |         |
| 1/10/2017  | 0.67                 |                             |                     |         |        | 0.565                          |                     |         |         |        |         |
| 1/11/2017  | 0.745                |                             |                     |         |        | 0.592                          | 9.3                 |         |         |        | 0.038   |
| 1/12/2017  | 0.855                |                             |                     |         |        | 0.586                          |                     |         |         |        |         |

Pollution Prevention Plan

| DATE      | INFLUENT CONSTITUENT |                            |                     |         |        | SECONDARY EFFLUENT CONSTITUENT |                     |         |         |        |         |
|-----------|----------------------|----------------------------|---------------------|---------|--------|--------------------------------|---------------------|---------|---------|--------|---------|
|           | Daily                |                            |                     |         |        | Daily                          | Quarterly           |         |         |        |         |
|           | TOTAL FLOW (calc.)   | Ammonia (Total (as N) mg/L | NITRATE (as N) mg/L | Cyanide | Copper | FLOW MGD (Q)                   | NITRATE (as N) mg/L | Nitrite | Cyanide | Copper | Ammonia |
| 1/13/2017 | 0.374                |                            |                     |         |        | 0.435                          |                     |         |         |        |         |
| 1/14/2017 | 0.451                |                            |                     |         |        | 0.356                          |                     |         |         |        |         |
| 1/15/2017 | 0.457                |                            |                     |         |        | 0.343                          |                     |         |         |        |         |
| 1/16/2017 | 0.515                |                            |                     |         |        | 0.466                          |                     |         |         |        |         |
| 1/17/2017 | 0.541                |                            |                     |         |        | 0.47                           |                     |         |         |        |         |
| 1/18/2017 | 0.63                 |                            |                     |         |        | 0.534                          |                     |         |         |        |         |
| 1/19/2017 | 0.574                |                            |                     |         |        | 0.428                          |                     |         |         |        |         |
| 1/20/2017 | 0.536                |                            |                     |         |        | 0.429                          |                     |         |         |        |         |
| 1/21/2017 | 0.45                 |                            |                     |         |        | 0.364                          |                     |         |         |        |         |
| 1/22/2017 | 0.526                |                            |                     |         |        | 0.428                          |                     |         |         |        |         |
| 1/23/2017 | 0.564                |                            |                     |         |        | 0.459                          |                     |         |         |        |         |
| 1/24/2017 | 0.299                |                            |                     |         |        | 0.468                          |                     |         |         |        |         |
| 1/25/2017 | 0.785                |                            |                     |         |        | 0.466                          |                     |         |         |        |         |
| 1/26/2017 | 0.533                |                            |                     |         |        | 0.494                          |                     |         |         |        |         |
| 1/27/2017 | 0.541                |                            |                     |         |        | 0.476                          |                     |         |         |        |         |
| 1/28/2017 | 0.408                |                            |                     |         |        | 0.381                          |                     |         |         |        |         |
| 1/29/2017 | 0.428                |                            |                     |         |        | 0.374                          |                     |         |         |        |         |
| 1/30/2017 | 0.574                |                            |                     |         |        | 0.486                          |                     |         |         |        |         |
| 1/31/2017 | 0.611                |                            |                     |         |        | 0.525                          |                     |         |         |        |         |
| Jan-17    |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/1/2017  |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/2/2017  |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/3/2017  |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/4/2017  |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/5/2017  |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/6/2017  |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/7/2017  |                      |                            |                     |         |        |                                | 16                  | 0       | 0       | 0      |         |
| 3/8/2017  |                      |                            |                     | 0.013   |        |                                |                     | 0       |         |        |         |
| 3/9/2017  |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/10/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/11/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/12/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/13/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/14/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/15/2017 |                      |                            |                     |         | 0.3    |                                |                     |         |         | 0.032  |         |
| 3/16/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/17/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/18/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/19/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/20/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/21/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/22/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/23/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/24/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |
| 3/25/2017 |                      |                            |                     |         |        |                                |                     |         |         |        |         |

|  | Flow | Ammonia (as N) | Nitrate (as N) | Cyanide | Cu   |
|--|------|----------------|----------------|---------|------|
|  | gpd  | mg/l           | mg/l           | ug/l    | mg/l |

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2011

|                              |       |  |  |  |      |
|------------------------------|-------|--|--|--|------|
| January - PPG results        | 50405 |  |  |  |      |
| January - MCWD results       |       |  |  |  |      |
| February - PPG results       | 47713 |  |  |  |      |
| February - MCWD results      |       |  |  |  |      |
| March - PPG results          | 58833 |  |  |  |      |
| March - MCWD results         |       |  |  |  |      |
| April - PPG results          | 75679 |  |  |  |      |
| April - MCWD results         |       |  |  |  |      |
| May - PPG results            | 58246 |  |  |  |      |
| May - MCWD results           |       |  |  |  |      |
| June - PPG results           |       |  |  |  |      |
| June - MCWD results          |       |  |  |  |      |
| Semi Annual 1 - PPG results  | 91528 |  |  |  | 0.02 |
| Semi Annual 1 - MCWD results |       |  |  |  |      |
| July - PPG results           | 95031 |  |  |  |      |
| July - MCWD results          |       |  |  |  |      |
| August - PPG results         | 83179 |  |  |  |      |
| August - MCWD results        |       |  |  |  |      |
| September - PPG results      | 77945 |  |  |  |      |
| September - MCWD results     |       |  |  |  |      |
| October - PPG results        | 71030 |  |  |  | 0.03 |
| October - MCWD results       |       |  |  |  |      |
| November - PPG results       | 54582 |  |  |  |      |
| November - MCWD results      |       |  |  |  |      |
| December - PPG results       | 47311 |  |  |  |      |
| December - MCWD results      |       |  |  |  |      |
| Semi Annual 2 - PPG results  |       |  |  |  |      |
| Semi Annual 2 - MCWD results |       |  |  |  |      |
| Annual                       |       |  |  |  |      |

| PPG     |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 47311      | 0.047 | 0       | 0       | 0       | 0      |
| Maximum | 95031      | 0.095 | 0       | 0       | 0       | 0.0    |
| Average | 67623      | 0.068 | 0       | 0       | 0       | 0.02   |
| lb/day  |            |       | 0.00    | 0.00    | 0.00    | 0.01   |

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2012

|                              |       |  |  |  |      |
|------------------------------|-------|--|--|--|------|
| January - PPG results        | 51024 |  |  |  |      |
| January - MCWD results       |       |  |  |  |      |
| February - PPG results       | 46881 |  |  |  |      |
| February - MCWD results      |       |  |  |  |      |
| March - PPG results          | 50845 |  |  |  |      |
| March - MCWD results         |       |  |  |  |      |
| April - PPG results          | 89736 |  |  |  |      |
| April - MCWD results         |       |  |  |  | 0.01 |
| May - PPG results            | 75847 |  |  |  |      |
| May - MCWD results           |       |  |  |  |      |
| June - PPG results           | 70199 |  |  |  |      |
| June - MCWD results          |       |  |  |  |      |
| Semi Annual 1 - PPG results  |       |  |  |  |      |
| Semi Annual 1 - MCWD results |       |  |  |  |      |
| July - PPG results           | 78935 |  |  |  |      |
| July - MCWD results          |       |  |  |  |      |
| August - PPG results         | 77277 |  |  |  |      |
| August - MCWD results        |       |  |  |  |      |
| September - PPG results      |       |  |  |  |      |
| September - MCWD results     |       |  |  |  |      |
| October - PPG results        | 78100 |  |  |  |      |
| October - MCWD results       |       |  |  |  |      |
| November - PPG results       | 73722 |  |  |  |      |
| November - MCWD results      |       |  |  |  |      |
| December - PPG results       | 54881 |  |  |  |      |
| December - MCWD results      |       |  |  |  |      |
| Semi Annual 2 - PPG results  | 81814 |  |  |  | 0.04 |
| Semi Annual 2 - MCWD results |       |  |  |  |      |
| Annual                       |       |  |  |  |      |

| PPG     |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 46881      | 0.047 | 0       | 0       | 0       | 0      |
| Maximum | 89736      | 0.090 | 0       | 0       | 0       | 0.0    |
| Average | 69105      | 0.069 | 0       | 0       | 0       | 0.02   |
| lb/day  |            |       | 0.00    | 0.00    | 0.00    | 0.01   |

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2013

|                              |       |  |  |  |      |
|------------------------------|-------|--|--|--|------|
| January - PPG results        | 71347 |  |  |  |      |
| January - MCWD results       |       |  |  |  |      |
| February - PPG results       |       |  |  |  |      |
| February - MCWD results      |       |  |  |  | 0.01 |
| March - PPG results          | 62283 |  |  |  |      |
| March - MCWD results         |       |  |  |  |      |
| April - PPG results          | 67213 |  |  |  |      |
| April - MCWD results         |       |  |  |  |      |
| April - MCWD results 2       |       |  |  |  |      |
| May - PPG results            | 77228 |  |  |  |      |
| May - MCWD results           |       |  |  |  |      |
| June - PPG results           | 84471 |  |  |  |      |
| June - MCWD results          |       |  |  |  |      |
| Semi Annual 1 - PPG results  | 91944 |  |  |  | 0.04 |
| Semi Annual 1 - MCWD results |       |  |  |  |      |
| July - PPG results           |       |  |  |  |      |
| July - MCWD results          |       |  |  |  |      |
| August - PPG results         | 67345 |  |  |  |      |
| August - MCWD results        |       |  |  |  |      |
| September - PPG results      | 58164 |  |  |  |      |
| September - MCWD results     |       |  |  |  |      |
| October - PPG results        | 52289 |  |  |  |      |
| October - MCWD results       |       |  |  |  |      |
| November - PPG results       | 35857 |  |  |  |      |
| November - MCWD results      |       |  |  |  |      |
| December - PPG results       | 36211 |  |  |  |      |
| December - MCWD results      |       |  |  |  |      |
| Semi Annual 2 - PPG results  | 74649 |  |  |  | 0.08 |
| Semi Annual 2 - MCWD results |       |  |  |  |      |
| Annual                       |       |  |  |  |      |

| PPG     |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 35857      | 0.036 | 0       | 0       | 0       | 0      |
| Maximum | 91944      | 0.092 | 0       | 0       | 0       | 0.1    |
| Average | 64917      | 0.065 | 0       | 0       | 0       | 0.04   |
| lb/day  |            |       | 0.00    | 0.00    | 0.00    | 0.02   |

PPG Permit No. 1038  
2014

|                              |       |  |  |  |      |
|------------------------------|-------|--|--|--|------|
| January - PPG results        | 42724 |  |  |  |      |
| January - MCWD results       |       |  |  |  |      |
| February - PPG results       | 43837 |  |  |  |      |
| February - MCWD results      |       |  |  |  |      |
| March - PPG results          | 62614 |  |  |  |      |
| March - MCWD results         |       |  |  |  |      |
| April - PPG results          | 53392 |  |  |  |      |
| April - MCWD results         |       |  |  |  |      |
| April - MCWD results 2       |       |  |  |  |      |
| May - PPG results            | 47994 |  |  |  | 0.02 |
| May - MCWD results           |       |  |  |  |      |
| June - PPG results           | 53275 |  |  |  |      |
| June - MCWD results          |       |  |  |  |      |
| Semi Annual 1 - PPG results  |       |  |  |  |      |
| Semi Annual 1 - MCWD results |       |  |  |  |      |
| July - PPG results           | 47519 |  |  |  |      |
| July - MCWD results          |       |  |  |  |      |
| August - PPG results         | 59875 |  |  |  |      |
| August - MCWD results        |       |  |  |  |      |
| September - PPG results      | 68875 |  |  |  |      |
| September - MCWD results     |       |  |  |  |      |
| October - PPG results        | 66384 |  |  |  |      |
| October - MCWD results       |       |  |  |  |      |
| November - PPG results       |       |  |  |  |      |
| November - MCWD results      |       |  |  |  |      |
| December - PPG results       |       |  |  |  |      |
| December - MCWD results      |       |  |  |  |      |
| Semi Annual 2 - PPG results  |       |  |  |  |      |
| Semi Annual 2 - MCWD results |       |  |  |  |      |
| Annual                       |       |  |  |  |      |

| PPG     |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 42724      | 0.043 | 0       | 0       | 0       | 0      |
| Maximum | 68875      | 0.069 | 0       | 0       | 0       | 0.0    |
| Average | 54649      | 0.055 | 0       | 0       | 0       | 0.02   |
| lb/day  |            |       | 0.00    | 0.00    | 0.00    | 0.01   |

PPG Permit No. 1038  
2015

|                              |        |  |  |  |  |
|------------------------------|--------|--|--|--|--|
| January - PPG results        | 103992 |  |  |  |  |
| January - MCWD results       |        |  |  |  |  |
| February - PPG results       |        |  |  |  |  |
| February - MCWD results      |        |  |  |  |  |
| March - PPG results          |        |  |  |  |  |
| March - MCWD results         |        |  |  |  |  |
| April - PPG results          |        |  |  |  |  |
| April - MCWD results         |        |  |  |  |  |
| April - MCWD results 2       |        |  |  |  |  |
| May - PPG results            |        |  |  |  |  |
| May - MCWD results           |        |  |  |  |  |
| June - PPG results           |        |  |  |  |  |
| June - MCWD results          |        |  |  |  |  |
| Semi Annual 1 - PPG results  |        |  |  |  |  |
| Semi Annual 1 - MCWD results |        |  |  |  |  |
| July - PPG results           |        |  |  |  |  |
| July - MCWD results          |        |  |  |  |  |
| August - PPG results         |        |  |  |  |  |
| August - MCWD results        |        |  |  |  |  |
| September - PPG results      |        |  |  |  |  |
| September - MCWD results     |        |  |  |  |  |
| October - PPG results        | 54714  |  |  |  |  |
| October - MCWD results       |        |  |  |  |  |
| November - PPG results       |        |  |  |  |  |
| November - MCWD results      |        |  |  |  |  |
| December - PPG results       |        |  |  |  |  |
| December - MCWD results      |        |  |  |  |  |
| Semi Annual 2 - PPG results  |        |  |  |  |  |
| Semi Annual 2 - MCWD results |        |  |  |  |  |
| Annual                       |        |  |  |  |  |

| PPG     |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 54714      | 0.055 | 0.00    | 5.40    | 0.00    | 0.00   |
| Maximum | 103992     | 0.104 | 0.16    | 0.09    | 0.00    | 0.01   |
| Average | 79353      | 0.079 | 0.08    | 7.05    | 0.00    | 0.01   |
| lb/day  |            |       | 0.05    | 3.98    | 0.00    | 0.00   |

| PPG - TOTAL            |            |       |         |         |         |        |
|------------------------|------------|-------|---------|---------|---------|--------|
|                        | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum                | 35857      | 0.036 | 0.00    | 5.40    | 0.00    | 0.00   |
| Maximum                | 103992     | 0.104 | 0.16    | 8.70    | 0.00    | 0.08   |
| Average                | 65103      | 0.065 | 0.08    | 7.05    | 0.00    | 0.03   |
| lb/day at average flow |            |       | 0.04    | 3.83    | 0.00    | 0.01   |

10/22/2015                    0.16    8.70    0.00    0.01  
 5/24/2016                    0.00    5.40    0.00    0.00  
 65103 average flow (gpd)

Air Products Permit No. 1140  
2011

|                                      |       |  |  |  |      |
|--------------------------------------|-------|--|--|--|------|
| January - Air Products results       | 20715 |  |  |  | 0.03 |
| January - MCWD results               |       |  |  |  |      |
| February - Air Products results      | 21687 |  |  |  |      |
| February - MCWD results              |       |  |  |  |      |
| March - Air Products results         | 25125 |  |  |  |      |
| March - MCWD results                 |       |  |  |  |      |
| April - Air Products results         | 26797 |  |  |  | 0.02 |
| April - MCWD results                 |       |  |  |  |      |
| May - Air Products results           | 24303 |  |  |  |      |
| May - MCWD results                   |       |  |  |  |      |
| June - Air Products results          |       |  |  |  |      |
| June - MCWD results                  |       |  |  |  |      |
| Semi Annual 1 - Air Products results | 32153 |  |  |  | 0.03 |
| Semi Annual 1 - MCWD results         |       |  |  |  |      |
| July - Air Products results          | 34205 |  |  |  |      |
| July - MCWD results                  |       |  |  |  |      |
| August - Air Products results        | 33371 |  |  |  |      |
| August - MCWD results                |       |  |  |  |      |
| September - Air Products results     | 35238 |  |  |  |      |
| September - MCWD results             |       |  |  |  |      |
| October - Air Products results       | 32563 |  |  |  | 0.03 |
| October - MCWD results               |       |  |  |  |      |
| November - Air Products results      | 22179 |  |  |  |      |
| November - MCWD results              |       |  |  |  |      |
| December - Air Products results      | 54882 |  |  |  |      |
| December - MCWD results              |       |  |  |  |      |
| Semi Annual 2 - Air Products results |       |  |  |  |      |
| Semi Annual 2 - MCWD results         |       |  |  |  |      |
| Annual                               |       |  |  |  |      |

| Air Products |            |       |         |         |         |        |
|--------------|------------|-------|---------|---------|---------|--------|
|              | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum      | 20715      | 0.021 | 0       | 0       | 0       | 0      |
| Maximum      | 54882      | 0.055 | 0       | 0       | 0       | 0.0    |
| Average      | 30268      | 0.030 | 0       | 0       | 0       | 0.03   |
| lb/day       |            |       | 0.00    | 0.00    | 0.00    | 0.02   |

**Air Products Permit No. 1140**  
**2012**

|                                      |       |  |  |  |      |
|--------------------------------------|-------|--|--|--|------|
| January - Air Products results       | 18214 |  |  |  | 0.03 |
| January - MCWD results               |       |  |  |  |      |
| February - Air Products results      | 18013 |  |  |  |      |
| February - MCWD results              |       |  |  |  |      |
| March - Air Products results         | 19758 |  |  |  |      |
| March - MCWD results                 |       |  |  |  |      |
| April - Air Products results         | 21780 |  |  |  | 0.02 |
| April - MCWD results                 |       |  |  |  | 0.01 |
| May - Air Products results           | 24144 |  |  |  |      |
| May - MCWD results                   |       |  |  |  | 0.01 |
| June - Air Products results          |       |  |  |  |      |
| June - MCWD results                  |       |  |  |  |      |
| Semi Annual 1 - Air Products results | 29660 |  |  |  | 0.02 |
| Semi Annual 1 - MCWD results         |       |  |  |  |      |
| July - Air Products results          | 38225 |  |  |  |      |
| July - MCWD results                  |       |  |  |  |      |
| August - Air Products results        | 45054 |  |  |  |      |
| August - MCWD results                |       |  |  |  |      |
| September - Air Products results     |       |  |  |  |      |
| September - MCWD results             |       |  |  |  |      |
| October - Air Products results       | 43013 |  |  |  |      |
| October - MCWD results               |       |  |  |  |      |
| November - Air Products results      | 39370 |  |  |  |      |
| November - MCWD results              |       |  |  |  |      |
| December - Air Products results      | 37013 |  |  |  |      |
| December - MCWD results              |       |  |  |  |      |
| Semi Annual 2 - Air Products results | 46556 |  |  |  | 0.02 |
| Semi Annual 2 - MCWD results         |       |  |  |  |      |
| Annual                               |       |  |  |  |      |

| Air Products |            |       |         |         |         |        |
|--------------|------------|-------|---------|---------|---------|--------|
|              | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum      | 18013      | 0.018 | 0       | 0       | 0       | 0      |
| Maximum      | 46556      | 0.047 | 0       | 0       | 0       | 0.0    |
| Average      | 31733      | 0.032 | 0       | 0       | 0       | 0.02   |
| lb/day       |            |       | 0.00    | 0.00    | 0.00    | 0.01   |

**Air Products Permit No. 1140**  
**2013**

|                                      |       |  |  |  |      |
|--------------------------------------|-------|--|--|--|------|
| January - Air Products results       |       |  |  |  |      |
| January - MCWD results               |       |  |  |  |      |
| February - Air Products results      | 32504 |  |  |  |      |
| February - MCWD results              |       |  |  |  |      |
| March - Air Products results         | 34114 |  |  |  |      |
| March - MCWD results                 |       |  |  |  |      |
| April - Air Products results         | 40267 |  |  |  | 0.02 |
| April - MCWD results                 |       |  |  |  |      |
| May - Air Products results           | 53410 |  |  |  |      |
| May - MCWD results                   |       |  |  |  |      |
| June - Air Products results          | 43860 |  |  |  |      |
| June - MCWD results                  |       |  |  |  |      |
| Semi Annual 1 - Air Products results | 58038 |  |  |  | 0.01 |
| Semi Annual 1 - MCWD results         |       |  |  |  |      |
| July - Air Products results          |       |  |  |  |      |
| July - MCWD results                  |       |  |  |  |      |
| August - Air Products results        | 45463 |  |  |  |      |
| August - MCWD results                |       |  |  |  |      |
| September - Air Products results     | 40036 |  |  |  |      |
| September - MCWD results             |       |  |  |  |      |
| October - Air Products results       | 37753 |  |  |  |      |
| October - MCWD results               |       |  |  |  |      |
| November - Air Products results      | 37052 |  |  |  |      |
| November - MCWD results              |       |  |  |  |      |
| December - Air Products results      | 30667 |  |  |  |      |
| December - MCWD results              |       |  |  |  |      |
| Semi Annual 2 - Air Products results | 47858 |  |  |  | 0.01 |
| Semi Annual 2 - MCWD results         |       |  |  |  |      |
| Annual                               |       |  |  |  |      |

| Air Products |            |       |         |         |         |        |
|--------------|------------|-------|---------|---------|---------|--------|
|              | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum      | 30667      | 0.031 | 0       | 0       | 0       | 0      |
| Maximum      | 58038      | 0.058 | 0       | 0       | 0       | 0.0    |
| Average      | 41752      | 0.042 | 0       | 0       | 0       | 0.01   |
| lb/day       |            |       | 0.00    | 0.00    | 0.00    | 0.01   |



**Air Products Permit No. 1140**  
**2014**

|                                      |       |  |  |  |      |
|--------------------------------------|-------|--|--|--|------|
| January - Air Products results       | 31394 |  |  |  | 0.01 |
| January - MCWD results               |       |  |  |  |      |
| February - Air Products results      | 31799 |  |  |  |      |
| February - MCWD results              |       |  |  |  |      |
| March - Air Products results         |       |  |  |  |      |
| March - MCWD results                 |       |  |  |  |      |
| April - Air Products results         | 35646 |  |  |  |      |
| April - MCWD results                 |       |  |  |  |      |
| May - Air Products results           | 33485 |  |  |  |      |
| May - MCWD results                   |       |  |  |  |      |
| June - Air Products results          | 35840 |  |  |  |      |
| June - MCWD results                  |       |  |  |  |      |
| Semi Annual 1 - Air Products results | 36056 |  |  |  | 0.01 |
| Semi Annual 1 - MCWD results         |       |  |  |  |      |
| July - Air Products results          | 48547 |  |  |  |      |
| July - MCWD results                  |       |  |  |  |      |
| August - Air Products results        | 19780 |  |  |  |      |
| August - MCWD results                |       |  |  |  |      |
| September - Air Products results     | 25395 |  |  |  |      |
| September - MCWD results             |       |  |  |  |      |
| October - Air Products results       | 19447 |  |  |  |      |
| October - MCWD results               |       |  |  |  |      |
| November - Air Products results      | 13282 |  |  |  |      |
| November - MCWD results              |       |  |  |  |      |
| December - Air Products results      |       |  |  |  |      |
| December - MCWD results              |       |  |  |  |      |
| Semi Annual 2 - Air Products results |       |  |  |  |      |
| Semi Annual 2 - MCWD results         |       |  |  |  |      |
| Annual                               |       |  |  |  |      |

| Air Products |            |       |         |         |         |        |
|--------------|------------|-------|---------|---------|---------|--------|
|              | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum      | 13282      | 0.013 | 0       | 0       | 0       | 0      |
| Maximum      | 48547      | 0.049 | 0       | 0       | 0       | 0.0    |
| Average      | 30061      | 0.030 | 0       | 0       | 0       | 0.01   |
| lb/day       |            |       | 0.00    | 0.00    | 0.00    | 0.01   |

Air Products Permit No. 1140  
2015

|                                      |                    |      |      |      |      |
|--------------------------------------|--------------------|------|------|------|------|
| January - Air Products results       |                    |      |      |      |      |
| January - MCWD results               |                    |      |      |      |      |
| February - Air Products results      | 13939              |      |      |      |      |
| February - MCWD results              |                    |      |      |      |      |
| March - Air Products results         | 17374              |      |      |      |      |
| March - MCWD results                 |                    |      |      |      |      |
| April - Air Products results         | 20014              |      |      |      |      |
| April - MCWD results                 |                    |      |      |      |      |
| May - Air Products results           |                    |      |      |      |      |
| May - MCWD results                   |                    |      |      |      |      |
| June - Air Products results          |                    |      |      |      |      |
| June - MCWD results                  |                    |      |      |      |      |
| Semi Annual 1 - Air Products results |                    |      |      |      |      |
| Semi Annual 1 - MCWD results         |                    |      |      |      |      |
| July - Air Products results          |                    |      |      |      |      |
| July - MCWD results                  |                    |      |      |      |      |
| August - Air Products results        |                    |      |      |      |      |
| August - MCWD results                |                    |      |      |      |      |
| September - Air Products results     |                    |      |      |      |      |
| September - MCWD results             |                    |      |      |      |      |
| October - Air Products results       | 23923              |      |      |      |      |
| October - MCWD results               |                    |      |      |      |      |
| November - Air Products results      |                    |      |      |      |      |
| November - MCWD results              |                    |      |      |      |      |
| December - Air Products results      |                    |      |      |      |      |
| December - MCWD results              |                    |      |      |      |      |
| Semi Annual 2 - Air Products results |                    |      |      |      |      |
| Semi Annual 2 - MCWD results         |                    |      |      |      |      |
| Annual                               |                    |      |      |      |      |
| 11/5/2015                            |                    |      |      |      |      |
| 33590                                | average flow (gpd) | 0.28 | 7.00 | 0.01 | 0.01 |
| 5/19/2016                            |                    | 0.10 | 5.90 | 0.01 | 0.01 |

| Air Products |            |       |         |         |         |        |
|--------------|------------|-------|---------|---------|---------|--------|
|              | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum      | 13939      | 0.014 | 0.10    | 0       | 0       | 0      |
| Maximum      | 23923      | 0.024 | 0.28    | 7       | 0       | 0.0    |
| Average      | 18812      | 0.019 | 0.19    | 6.45    | 0.01    | 0.01   |
| lb/day       |            |       | 0.11    | 3.64    | 0.00    | 0.005  |

| Air Products - TOTAL   |            |       |         |         |         |        |
|------------------------|------------|-------|---------|---------|---------|--------|
|                        | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum                | 13282      | 0.013 | 0.10    | 5.90    | 0.01    | 0.01   |
| Maximum                | 58038      | 0.058 | 0.28    | 7.00    | 0.01    | 0.05   |
| Average                | 32372      | 0.032 | 0.19    | 6.45    | 0.01    | 0.02   |
| lb/day at average flow |            |       | 0.85    | 1.74    | 0.002   | 0.005  |

Rio Bravo Permit No. 1005  
2011

|                                   |        |  |  |  |  |
|-----------------------------------|--------|--|--|--|--|
| January - Rio Bravo results       | 119337 |  |  |  |  |
| January - MCWD results            |        |  |  |  |  |
| February - Rio Bravo results      | 106221 |  |  |  |  |
| February - MCWD results           |        |  |  |  |  |
| March - Rio Bravo results         | 124645 |  |  |  |  |
| March - MCWD results              |        |  |  |  |  |
| April - Rio Bravo results         | 130735 |  |  |  |  |
| April - MCWD results              |        |  |  |  |  |
| May - Rio Bravo results           | 98670  |  |  |  |  |
| May - MCWD results                |        |  |  |  |  |
| June - Rio Bravo results          |        |  |  |  |  |
| June - MCWD results               |        |  |  |  |  |
| Semi Annual 1 - Rio Bravo results | 133433 |  |  |  |  |
| Semi Annual 1 - MCWD results      |        |  |  |  |  |
| July - Rio Bravo results          | 121508 |  |  |  |  |
| July - MCWD results               |        |  |  |  |  |
| August - Rio Bravo results        | 126380 |  |  |  |  |
| August - MCWD results             |        |  |  |  |  |
| September - Rio Bravo results     | 145757 |  |  |  |  |
| September - MCWD results          |        |  |  |  |  |
| October - Rio Bravo results       | 130053 |  |  |  |  |
| October - MCWD results            |        |  |  |  |  |
| November - Rio Bravo results      | 120523 |  |  |  |  |
| November - MCWD results           |        |  |  |  |  |
| December - Rio Bravo results      | 116033 |  |  |  |  |
| December - MCWD results           |        |  |  |  |  |
| Semi Annual 2 - Rio Bravo results |        |  |  |  |  |
| Semi Annual 2 - MCWD results      |        |  |  |  |  |
| Annual                            |        |  |  |  |  |

| Rio Bravo |            |       |         |         |         |        |
|-----------|------------|-------|---------|---------|---------|--------|
|           | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum   | 98670      | 0.099 | 0       | 0       | 0       | 0      |
| Maximum   | 145757     | 0.146 | 0       | 0       | 0       | 0.0    |
| Average   | 122775     | 0.123 | 0       | 0       | 0       | 0.00   |
| lb/day    |            |       | 0.00    | 0.00    | 0.00    | 0.00   |

Rio Bravo Permit No. 1005  
2012

|                                   |        |  |  |  |  |
|-----------------------------------|--------|--|--|--|--|
| January - Rio Bravo results       | 119860 |  |  |  |  |
| January - MCWD results            |        |  |  |  |  |
| February - Rio Bravo results      | 107991 |  |  |  |  |
| February - MCWD results           |        |  |  |  |  |
| March - Rio Bravo results         | 120812 |  |  |  |  |
| March - MCWD results              |        |  |  |  |  |
| April - Rio Bravo results         | 138148 |  |  |  |  |
| April - MCWD results              |        |  |  |  |  |
| May - Rio Bravo results           | 120143 |  |  |  |  |
| May - MCWD results                |        |  |  |  |  |
| June - Rio Bravo results          |        |  |  |  |  |
| June - MCWD results               |        |  |  |  |  |
| Semi Annual 1 - Rio Bravo results | 131137 |  |  |  |  |
| Semi Annual 1 - MCWD results      |        |  |  |  |  |
| July - Rio Bravo results          |        |  |  |  |  |
| July - MCWD results               |        |  |  |  |  |
| August - Rio Bravo results        | 107654 |  |  |  |  |
| August - MCWD results             |        |  |  |  |  |
| September - Rio Bravo results     | 98240  |  |  |  |  |
| September - MCWD results          |        |  |  |  |  |
| October - Rio Bravo results       | 123222 |  |  |  |  |
| October - MCWD results            |        |  |  |  |  |
| November - Rio Bravo results      | 86166  |  |  |  |  |
| November - MCWD results           |        |  |  |  |  |
| December - Rio Bravo results      | 72230  |  |  |  |  |
| December - MCWD results           |        |  |  |  |  |
| Semi Annual 2 - Rio Bravo results | 124873 |  |  |  |  |
| Semi Annual 2 - MCWD results      |        |  |  |  |  |
| Annual                            |        |  |  |  |  |

| Rio Bravo |            |       |         |         |         |        |
|-----------|------------|-------|---------|---------|---------|--------|
|           | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum   | 72230      | 0.072 | 0       | 0       | 0       | 0      |
| Maximum   | 138148     | 0.138 | 0       | 0       | 0       | 0.0    |
| Average   | 112540     | 0.113 | 0       | 0       | 0       | 0.00   |
| lb/day    |            |       | 0.00    | 0.00    | 0.00    | 0.00   |

Rio Bravo Permit No. 1005  
2013

|                                   |        |  |  |  |      |
|-----------------------------------|--------|--|--|--|------|
| January - Rio Bravo results       | 59614  |  |  |  |      |
| January - MCWD results            |        |  |  |  |      |
| February - Rio Bravo results      | 13803  |  |  |  |      |
| February - MCWD results           |        |  |  |  | 0.02 |
| March - Rio Bravo results         | 111150 |  |  |  |      |
| March - MCWD results              |        |  |  |  |      |
| April - Rio Bravo results         | 121208 |  |  |  |      |
| April - MCWD results              |        |  |  |  |      |
| May - Rio Bravo results           | 113073 |  |  |  |      |
| May - MCWD results                |        |  |  |  |      |
| June - Rio Bravo results          | 117395 |  |  |  |      |
| June - MCWD results               |        |  |  |  |      |
| Semi Annual 1 - Rio Bravo results |        |  |  |  |      |
| Semi Annual 1 - MCWD results      |        |  |  |  |      |
| July - Rio Bravo results          |        |  |  |  |      |
| July - MCWD results               |        |  |  |  |      |
| August - Rio Bravo results        | 122585 |  |  |  |      |
| August - MCWD results             |        |  |  |  |      |
| September - Rio Bravo results     | 105744 |  |  |  |      |
| September - MCWD results          |        |  |  |  |      |
| October - Rio Bravo results       | 117742 |  |  |  |      |
| October - MCWD results            |        |  |  |  |      |
| November - Rio Bravo results      | 95159  |  |  |  |      |
| November - MCWD results           |        |  |  |  |      |
| December - Rio Bravo results      | 102797 |  |  |  |      |
| December - MCWD results           |        |  |  |  |      |
| Semi Annual 2 - Rio Bravo results | 127035 |  |  |  |      |
| Semi Annual 2 - MCWD results      |        |  |  |  |      |
| Annual                            |        |  |  |  |      |

| Rio Bravo |            |       |         |         |         |        |
|-----------|------------|-------|---------|---------|---------|--------|
|           | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum   | 13803      | 0.014 | 0       | 0       | 0       | 0      |
| Maximum   | 127035     | 0.127 | 0       | 0       | 0       | 0.0    |
| Average   | 100609     | 0.101 | 0       | 0       | 0       | 0.02   |
| lb/day    |            |       | 0.00    | 0.00    | 0.00    | 0.01   |

Rio Bravo Permit No. 1005  
2014

|                                   |        |  |  |  |  |
|-----------------------------------|--------|--|--|--|--|
| January - Rio Bravo results       | 103789 |  |  |  |  |
| January - MCWD results            |        |  |  |  |  |
| February - Rio Bravo results      | 61221  |  |  |  |  |
| February - MCWD results           |        |  |  |  |  |
| March - Rio Bravo results         | 112452 |  |  |  |  |
| March - MCWD results              |        |  |  |  |  |
| April - Rio Bravo results         | 110214 |  |  |  |  |
| April - MCWD results              |        |  |  |  |  |
| May - Rio Bravo results           | 90421  |  |  |  |  |
| May - MCWD results                |        |  |  |  |  |
| June - Rio Bravo results          | 128105 |  |  |  |  |
| June - MCWD results               |        |  |  |  |  |
| Semi Annual 1 - Rio Bravo results |        |  |  |  |  |
| Semi Annual 1 - MCWD results      |        |  |  |  |  |
| July - Rio Bravo results          | 129574 |  |  |  |  |
| July - MCWD results               |        |  |  |  |  |
| August - Rio Bravo results        | 118907 |  |  |  |  |
| August - MCWD results             |        |  |  |  |  |
| September - Rio Bravo results     | 97442  |  |  |  |  |
| September - MCWD results          |        |  |  |  |  |
| October - Rio Bravo results       | 114656 |  |  |  |  |
| October - MCWD results            |        |  |  |  |  |
| November - Rio Bravo results      | 106038 |  |  |  |  |
| November - MCWD results           |        |  |  |  |  |
| December - Rio Bravo results      | 106292 |  |  |  |  |
| December - MCWD results           |        |  |  |  |  |
| Semi Annual 2 - Rio Bravo results |        |  |  |  |  |
| Semi Annual 2 - MCWD results      |        |  |  |  |  |
| Annual                            |        |  |  |  |  |

| Rio Bravo |            |       |         |         |         |        |
|-----------|------------|-------|---------|---------|---------|--------|
|           | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum   | 61221      | 0.061 | 0       | 0       | 0       | 0      |
| Maximum   | 129574     | 0.130 | 0       | 0       | 0       | 0.0    |
| Average   | 106593     | 0.107 | 0       | 0       | 0       | 0.00   |
| lb/day    |            |       | 0.00    | 0.00    | 0.00    | 0.00   |

Rio Bravo Permit No. 1005  
2015

|                                   |        |      |      |      |      |
|-----------------------------------|--------|------|------|------|------|
| January - Rio Bravo results       | 103992 |      |      |      |      |
| January - MCWD results            |        |      |      |      |      |
| February - Rio Bravo results      | 77973  |      |      |      |      |
| February - MCWD results           |        |      |      |      |      |
| March - Rio Bravo results         | 117575 |      |      |      |      |
| March - MCWD results              |        |      |      |      |      |
| April - Rio Bravo results         | 113358 |      |      |      |      |
| April - MCWD results              |        |      |      |      |      |
| May - Rio Bravo results           | 77768  |      |      |      |      |
| May - MCWD results                |        |      |      |      |      |
| June - Rio Bravo results          | 109896 |      |      |      |      |
| June - MCWD results               |        |      |      |      |      |
| Semi Annual 1 - Rio Bravo results |        |      |      |      |      |
| Semi Annual 1 - MCWD results      |        |      |      |      |      |
| July - Rio Bravo results          | 127156 |      |      |      |      |
| July - MCWD results               |        |      |      |      |      |
| August - Rio Bravo results        | 127156 |      |      |      |      |
| August - MCWD results             |        |      |      |      |      |
| September - Rio Bravo results     | 101524 |      |      |      |      |
| September - MCWD results          |        |      |      |      |      |
| October - Rio Bravo results       | 137121 |      |      |      |      |
| October - MCWD results            |        |      |      |      |      |
| November - Rio Bravo results      |        |      |      |      |      |
| November - MCWD results           |        |      |      |      |      |
| December - Rio Bravo results      |        |      |      |      |      |
| December - MCWD results           |        |      |      |      |      |
| Semi Annual 2 - Rio Bravo results |        |      |      |      |      |
| Semi Annual 2 - MCWD results      |        |      |      |      |      |
| Annual                            |        |      |      |      |      |
| 10/20/2015                        |        | 0.33 | 8.60 | 0.00 | 0.02 |
| 5/20/2016                         |        | 0.12 | 6.40 | 0.00 | 0.01 |
| 110409 flow (gpd)                 |        |      |      |      |      |

| Rio Bravo |            |       |         |         |         |        |
|-----------|------------|-------|---------|---------|---------|--------|
|           | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum   | 77768      | 0.078 | 0.12    | 0.11    | 0       | 0.01   |
| Maximum   | 137121     | 0.137 | 0.33    | 8.60    | 0       | 0.02   |
| Average   | 109352     | 0.109 | 0.23    | 7.50    | 0       | 0.02   |
| lb/day    |            |       | 0.13    | 4.23    | 0.00    | 0.01   |

| Rio Bravo - TOTAL      |            |       |         |         |         |        |
|------------------------|------------|-------|---------|---------|---------|--------|
|                        | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum                | 13803      | 0.014 | 0.12    | 6.40    | 0.00    | 0.01   |
| Maximum                | 145757     | 0.146 | 0.33    | 8.60    | 0.00    | 0.02   |
| Average                | 110409     | 0.110 | 0.23    | 7.50    | 0.00    | 0.02   |
| lb/day at average flow |            |       | 0.21    | 6.91    | 0.00    | 0.02   |

ADM Stratas Permit No. 1008

2011

|                             |       |  |  |  |  |
|-----------------------------|-------|--|--|--|--|
| January - Stratas results   | 14413 |  |  |  |  |
| January - MCWD results      |       |  |  |  |  |
| February - Stratas results  | 16987 |  |  |  |  |
| February - MCWD results     |       |  |  |  |  |
| March - Stratas results     | 16169 |  |  |  |  |
| March - MCWD results        |       |  |  |  |  |
| April - Stratas results     | 18356 |  |  |  |  |
| April - MCWD results        |       |  |  |  |  |
| May - Stratas results       | 14803 |  |  |  |  |
| May - MCWD results          |       |  |  |  |  |
| June - Stratas results      | 14022 |  |  |  |  |
| June - MCWD results         |       |  |  |  |  |
| July - Stratas results      | 11125 |  |  |  |  |
| July - MCWD results         |       |  |  |  |  |
| August - Stratas results    | 12269 |  |  |  |  |
| August - MCWD results       |       |  |  |  |  |
| September - Stratas results | 13715 |  |  |  |  |
| September - MCWD results    |       |  |  |  |  |
| October - Stratas results   | 14707 |  |  |  |  |
| October - MCWD results      |       |  |  |  |  |
| November - Stratas results  | 12234 |  |  |  |  |
| November - MCWD results     |       |  |  |  |  |
| December - Stratas results  | 13962 |  |  |  |  |
| December - MCWD results     |       |  |  |  |  |
| Annual                      |       |  |  |  |  |

| Stratas |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 11125      | 0.011 | 0       | 0       | 0       | 0      |
| Maximum | 18356      | 0.018 | 0       | 0       | 0       | 0.0    |
| Average | 14071      | 0.014 | 0       | 0       | 0       | 0.00   |
| lb/day  |            |       | 0.00    | 0.00    | 0.00    | 0.00   |

ADM Stratas Permit No. 1008

2012

|                             |       |  |  |  |  |
|-----------------------------|-------|--|--|--|--|
| January - Stratas results   | 10157 |  |  |  |  |
| January - MCWD results      |       |  |  |  |  |
| February - Stratas results  | 8984  |  |  |  |  |
| February - MCWD results     |       |  |  |  |  |
| March - Stratas results     | 10457 |  |  |  |  |
| March - MCWD results        |       |  |  |  |  |
| April - Stratas results     | 0     |  |  |  |  |
| April - MCWD results        |       |  |  |  |  |
| May - Stratas results       | 9545  |  |  |  |  |
| May - MCWD results          |       |  |  |  |  |
| June - Stratas results      | 9634  |  |  |  |  |
| June - MCWD results         |       |  |  |  |  |
| July - Stratas results      | 10823 |  |  |  |  |
| July - MCWD results         |       |  |  |  |  |
| August - Stratas results    | 13214 |  |  |  |  |
| August - MCWD results       |       |  |  |  |  |
| September - Stratas results | 8836  |  |  |  |  |
| September - MCWD results    |       |  |  |  |  |
| October - Stratas results   | 6705  |  |  |  |  |
| October - MCWD results      |       |  |  |  |  |
| November - Stratas results  | 5451  |  |  |  |  |
| November - MCWD results     |       |  |  |  |  |
| December - Stratas results  | 9922  |  |  |  |  |
| December - MCWD results     |       |  |  |  |  |
| Annual                      |       |  |  |  |  |

| Stratas |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 0          | 0.000 | 0       | 0       | 0       | 0      |
| Maximum | 13214      | 0.013 | 0       | 0       | 0       | 0.0    |
| Average | 8959       | 0.009 | 0       | 0       | 0       | 0.00   |
| lb/day  |            |       | 0.00    | 0.00    | 0.00    | 0.00   |

ADM Stratas Permit No. 1008  
2013

|                             |       |  |  |  |      |
|-----------------------------|-------|--|--|--|------|
| January - Stratas results   | 12743 |  |  |  |      |
| January - MCWD results      |       |  |  |  |      |
| January - MCWD results 2    |       |  |  |  |      |
| February - Stratas results  | 11233 |  |  |  |      |
| February - MCWD results     |       |  |  |  | 0.03 |
| March - Stratas results     | 7107  |  |  |  |      |
| March - MCWD results        |       |  |  |  |      |
| April - Stratas results     | 9826  |  |  |  |      |
| April - MCWD results        |       |  |  |  |      |
| May - Stratas results       | 10984 |  |  |  |      |
| May - MCWD results          |       |  |  |  |      |
| June - Stratas results      | 11576 |  |  |  |      |
| June - MCWD results         |       |  |  |  |      |
| July - Stratas results      | 9580  |  |  |  |      |
| July - MCWD results         |       |  |  |  |      |
| August - Stratas results    | 9426  |  |  |  |      |
| August - MCWD results       |       |  |  |  |      |
| August - MCWD results 2     |       |  |  |  |      |
| September - Stratas results | 7318  |  |  |  |      |
| September - MCWD results    |       |  |  |  |      |
| September - MCWD results 2  |       |  |  |  |      |
| October - Stratas results   | 7232  |  |  |  |      |
| October - MCWD results      |       |  |  |  |      |
| November - Stratas results  | 6083  |  |  |  |      |
| November - MCWD results     |       |  |  |  |      |
| December - Stratas results  | 4776  |  |  |  |      |
| December - MCWD results     |       |  |  |  |      |
| Annual                      |       |  |  |  |      |

| Stratas |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 4776       | 0.005 | 0       | 0       | 0       | 0      |
| Maximum | 12743      | 0.013 | 0       | 0       | 0       | 0.0    |
| Average | 8990       | 0.009 | 0       | 0       | 0       | 0.03   |
| lb/day  |            |       | 0.00    | 0.00    | 0.00    | 0.002  |

ADM Stratas Permit No. 1008  
2014

|                             |      |  |  |  |  |
|-----------------------------|------|--|--|--|--|
| January - Stratas results   | 3712 |  |  |  |  |
| January - MCWD results      |      |  |  |  |  |
| January - MCWD results 2    |      |  |  |  |  |
| February - Stratas results  | 5157 |  |  |  |  |
| February - MCWD results     |      |  |  |  |  |
| March - Stratas results     | 3433 |  |  |  |  |
| March - MCWD results        |      |  |  |  |  |
| April - Stratas results     | 4008 |  |  |  |  |
| April - MCWD results        |      |  |  |  |  |
| May - Stratas results       | 4924 |  |  |  |  |
| May - MCWD results          |      |  |  |  |  |
| June - Stratas results      | 6072 |  |  |  |  |
| June - MCWD results         |      |  |  |  |  |
| July - Stratas results      | 4965 |  |  |  |  |
| July - MCWD results         |      |  |  |  |  |
| August - Stratas results    | 5221 |  |  |  |  |
| August - MCWD results       |      |  |  |  |  |
| August - MCWD results 2     |      |  |  |  |  |
| September - Stratas results | 4966 |  |  |  |  |
| September - MCWD results    |      |  |  |  |  |
| September - MCWD results 2  |      |  |  |  |  |
| October - Stratas results   | 3921 |  |  |  |  |
| October - MCWD results      |      |  |  |  |  |
| November - Stratas results  | 4364 |  |  |  |  |
| November - MCWD results     |      |  |  |  |  |
| December - Stratas results  | 5382 |  |  |  |  |
| December - MCWD results     |      |  |  |  |  |
| Annual                      |      |  |  |  |  |

| Stratas |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 3433       | 0.003 | 0       | 0       | 0       | 0      |
| Maximum | 6072       | 0.006 | 0       | 0       | 0       | 0.0    |
| Average | 4677       | 0.005 | 0       | 0       | 0       | 0.00   |
| lb/day  |            |       | 0.00    | 0.00    | 0.00    | 0.00   |

ADM Stratas Permit No. 1008  
2015

|                             |      |      |      |      |      |
|-----------------------------|------|------|------|------|------|
| January - Stratas results   | 4570 |      |      |      |      |
| January - MCWD results      |      |      |      |      |      |
| January - MCWD results 2    |      |      |      |      |      |
| February - Stratas results  | 5354 |      |      |      |      |
| February - MCWD results     |      |      |      |      |      |
| March - Stratas results     | 3675 |      |      |      |      |
| March - MCWD results        |      |      |      |      |      |
| April - Stratas results     |      |      |      |      |      |
| April - MCWD results        |      |      |      |      |      |
| May - Stratas results       |      |      |      |      |      |
| May - MCWD results          |      |      |      |      |      |
| June - Stratas results      |      |      |      |      |      |
| June - MCWD results         |      |      |      |      |      |
| July - Stratas results      |      |      |      |      |      |
| July - MCWD results         |      |      |      |      |      |
| August - Stratas results    |      |      |      |      |      |
| August - MCWD results       |      |      |      |      |      |
| August - MCWD results 2     |      |      |      |      |      |
| September - Stratas results |      |      |      |      |      |
| September - MCWD results    |      |      |      |      |      |
| September - MCWD results 2  |      |      |      |      |      |
| October - Stratas results   | 3621 |      |      |      |      |
| October - MCWD results      |      |      |      |      |      |
| November - Stratas results  |      |      |      |      |      |
| November - MCWD results     |      |      |      |      |      |
| December - Stratas results  |      |      |      |      |      |
| December - MCWD results     |      |      |      |      |      |
| Annual                      |      |      |      |      |      |
| 10/19/2015                  |      | 0.24 | 0.23 | 0.01 | 0.02 |

8802 average flow (gpd)

| Stratas |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 3621       | 0.004 | 0.24    | 0.02    | 0.01    | 0.02   |
| Maximum | 5354       | 0.005 | 0.24    | 0.23    | 0.01    | 0.02   |
| Average | 4305       | 0.004 | 0.13    | 0.23    | 0.01    | 0.02   |
| lb/day  |            |       | 0.005   | 0.008   | 0.0003  | 0.001  |

| Stratas - TOTAL        |            |       |         |         |         |        |
|------------------------|------------|-------|---------|---------|---------|--------|
|                        | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum                | 0          | 0.000 | 0.24    | 0.23    | 0.01    | 0.02   |
| Maximum                | 18356      | 0.016 | 0.24    | 0.23    | 0.01    | 0.05   |
| Average                | 8802       | 0.009 | 0.24    | 5.08    | 0.01    | 0.02   |
| lb/day at average flow |            |       | 0.02    | 0.373   | 0.001   | 0.0017 |

Calpine - Permit No. 1001  
2011

|                                 |  |  |  |  |  |
|---------------------------------|--|--|--|--|--|
| January - Calpine results       |  |  |  |  |  |
| January - MCWD results          |  |  |  |  |  |
| February - Calpine results      |  |  |  |  |  |
| February - MCWD results         |  |  |  |  |  |
| March - Calpine results         |  |  |  |  |  |
| March - MCWD results            |  |  |  |  |  |
| Quarter 1                       |  |  |  |  |  |
| April - Calpine results         |  |  |  |  |  |
| April - MCWD results            |  |  |  |  |  |
| May - Calpine results           |  |  |  |  |  |
| May - MCWD results              |  |  |  |  |  |
| June - Calpine results          |  |  |  |  |  |
| June - MCWD results             |  |  |  |  |  |
| Quarter 2                       |  |  |  |  |  |
| Semi Annual 1 - Calpine results |  |  |  |  |  |
| Semi Annual 1 - MCWD results    |  |  |  |  |  |
| July - Calpine results          |  |  |  |  |  |
| July - MCWD results             |  |  |  |  |  |
| August - Calpine results        |  |  |  |  |  |
| August - MCWD results           |  |  |  |  |  |
| September - Calpine results     |  |  |  |  |  |
| September - MCWD results        |  |  |  |  |  |
| Quarter 3                       |  |  |  |  |  |
| October - Calpine results       |  |  |  |  |  |
| October - MCWD results          |  |  |  |  |  |
| November - Calpine results      |  |  |  |  |  |
| November - MCWD results         |  |  |  |  |  |
| December - Calpine results      |  |  |  |  |  |
| December - MCWD results         |  |  |  |  |  |
| Quarter 4                       |  |  |  |  |  |
| Semi Annual 2 - Calpine results |  |  |  |  |  |
| Semi Annual 2 - MCWD results    |  |  |  |  |  |
| Annual                          |  |  |  |  |  |

| Calpine |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 0          | 0.000 | 0       | 0       | 0       | 0      |
| Maximum | 0          | 0.000 | 0       | 0       | 0       | 0.0    |
| Average | 0          | 0.000 | 0       | 0       | 0       | 0.00   |
| lb/day  |            |       | 0.00    | 0.00    | 0.00    | 0.00   |



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|                                  |       |       |  |      |      |
|----------------------------------|-------|-------|--|------|------|
| January - RockTenn results       |       |       |  |      |      |
| Week 1                           | 16557 |       |  |      |      |
| Week 2                           | 6028  |       |  |      |      |
| Week 3                           | 6550  |       |  |      |      |
| Week 4                           | 6816  |       |  |      |      |
| January - MCWD results           |       |       |  |      |      |
| 1/4/2013                         | 16557 |       |  |      |      |
| 1/30/2013                        | 6816  |       |  |      |      |
| February - RockTenn results      |       |       |  |      |      |
| Week 1                           | 7028  |       |  |      |      |
| Week 2                           | 7257  |       |  |      |      |
| Week 3                           | 7700  |       |  |      |      |
| Week 4                           | 6385  |       |  |      |      |
| February - MCWD results          |       |       |  |      |      |
| 2/13/2013                        | 7257  |       |  | 0.01 |      |
| March - RockTenn results         |       |       |  |      |      |
| Week 1                           | 7000  |       |  |      |      |
| Week 2                           | 7100  |       |  |      |      |
| Week 3                           | 6386  |       |  |      |      |
| Week 4                           | 6388  |       |  |      |      |
| Quarter 1                        |       |       |  |      |      |
| April - RockTenn results         |       |       |  |      |      |
| Week 1                           | 4913  |       |  |      |      |
| Week 2                           | 4871  |       |  |      |      |
| Week 3                           | 6057  |       |  |      |      |
| Week 4                           | 6243  |       |  |      |      |
| April - MCWD results             |       |       |  |      |      |
| 4/8/2013                         | 4871  |       |  |      |      |
| May - RockTenn results           |       |       |  |      |      |
| Week 1                           | 11743 |       |  |      |      |
| Week 2                           | 14743 |       |  |      |      |
| Week 3                           | 15200 |       |  |      |      |
| Week 4                           | 13966 |       |  |      |      |
| June - RockTenn results          |       |       |  |      |      |
| Week 1                           | 14500 |       |  |      |      |
| Week 2                           | 26466 |       |  |      |      |
| Week 3                           | 12971 |       |  |      |      |
| Week 4                           | 12971 |       |  |      |      |
| Quarter 2                        |       |       |  |      |      |
| Semi Annual 1 - RockTenn results |       | 26466 |  |      | 0.00 |

| Rocktenn |            |       |         |         |         |        |
|----------|------------|-------|---------|---------|---------|--------|
|          | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum  | 1400       | 0.001 | 0       | 0       | 0       | 0      |
| Maximum  | 26466      | 0.026 | 0       | 0       | 0       | 0.01   |
| Average  | 12431      | 0.012 | 0       | 0       | 0       | 0.004  |
| Number   | 15         | 14    | 12      | 0       | 0       | 0      |
| lb/day   |            |       | 0.000   | 0.000   | 0.000   | 0.000  |

|                                  |       |  |  |  |      |
|----------------------------------|-------|--|--|--|------|
| July - RockTenn results          |       |  |  |  |      |
| Week 1                           | 22571 |  |  |  |      |
| Week 2                           | 21771 |  |  |  |      |
| Week 3                           | 20071 |  |  |  |      |
| Week 4                           | 22087 |  |  |  |      |
| July - MCWD results              |       |  |  |  |      |
| 7/2/2013                         | 22571 |  |  |  |      |
| August - RockTenn results        |       |  |  |  |      |
| Week 1                           | 21533 |  |  |  |      |
| Week 2                           | 17400 |  |  |  |      |
| Week 3                           | 16542 |  |  |  |      |
| Week 4                           | 11625 |  |  |  |      |
| August - MCWD results            |       |  |  |  |      |
| 8/6/2013                         | 21533 |  |  |  |      |
| September - RockTenn results     |       |  |  |  |      |
| Week 1                           | 14966 |  |  |  |      |
| Week 2                           | 15842 |  |  |  |      |
| Week 3                           | 13057 |  |  |  |      |
| Week 4                           | 11900 |  |  |  |      |
| Quarter 3                        |       |  |  |  |      |
| September - MCWD results         |       |  |  |  |      |
| 9/7/2013                         | 15842 |  |  |  |      |
| October - RockTenn results       |       |  |  |  |      |
| Week 1                           | 13628 |  |  |  |      |
| Week 2                           | 12237 |  |  |  |      |
| Week 3                           | 5433  |  |  |  |      |
| Week 4                           | 5975  |  |  |  |      |
| October - MCWD results           |       |  |  |  |      |
| 10/10/2013                       | 12237 |  |  |  |      |
| November - RockTenn results      |       |  |  |  |      |
| Week 1                           | 4942  |  |  |  |      |
| Week 2                           | 5378  |  |  |  |      |
| Week 3                           | 5378  |  |  |  |      |
| Week 4                           | 4143  |  |  |  |      |
| December - RockTenn results      |       |  |  |  |      |
| Week 1                           | 3714  |  |  |  |      |
| Week 2                           | 3900  |  |  |  |      |
| Week 3                           | 1400  |  |  |  |      |
| Week 4                           | 3912  |  |  |  |      |
| Quarter 4                        |       |  |  |  |      |
| Semi Annual 2 - RockTenn results | 3912  |  |  |  | 0.01 |
| Annual                           |       |  |  |  |      |

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| January - RockTenn results       |       |  |  |  |      |
|----------------------------------|-------|--|--|--|------|
| Week 1                           | 4592  |  |  |  |      |
| Week 2                           | 4592  |  |  |  |      |
| Week 3                           | 5075  |  |  |  |      |
| Week 4                           | 3814  |  |  |  |      |
| February - RockTenn results      |       |  |  |  |      |
| Week 1                           | 3943  |  |  |  |      |
| Week 2                           | 4243  |  |  |  |      |
| Week 3                           | 4200  |  |  |  |      |
| Week 4                           | 5129  |  |  |  |      |
| March - RockTenn results         |       |  |  |  |      |
| Week 1                           | 4814  |  |  |  |      |
| Week 2                           | 5029  |  |  |  |      |
| Week 3                           | 5714  |  |  |  |      |
| Week 4                           | 4086  |  |  |  |      |
| Quarter 1                        |       |  |  |  |      |
| April - RockTenn results         |       |  |  |  |      |
| Week 1                           | 6057  |  |  |  |      |
| Week 2                           | 3143  |  |  |  |      |
| Week 3                           | 3057  |  |  |  |      |
| Week 4                           | 3429  |  |  |  |      |
| May - RockTenn results           |       |  |  |  |      |
| Week 1                           | 22715 |  |  |  |      |
| Week 2                           | 3472  |  |  |  |      |
| Week 3                           | 3822  |  |  |  |      |
| Week 4                           | 5917  |  |  |  |      |
| June - RockTenn results          |       |  |  |  |      |
| Week 1                           | 6950  |  |  |  |      |
| Week 2                           | 7471  |  |  |  |      |
| Week 3                           | 6500  |  |  |  |      |
| Week 4                           | 6367  |  |  |  |      |
| Quarter 2                        |       |  |  |  |      |
| Semi Annual 1 - RockTenn results |       |  |  |  | 0.07 |
| July - RockTenn results          |       |  |  |  |      |
| Week 1                           | 7900  |  |  |  |      |
| Week 2                           | 7329  |  |  |  |      |
| Week 3                           | 8515  |  |  |  |      |
| Week 4                           | 8443  |  |  |  |      |
| August - RockTenn results        |       |  |  |  |      |
| Week 1                           | 8029  |  |  |  |      |
| Week 2                           | 7222  |  |  |  |      |
| Week 3                           | 7222  |  |  |  |      |
| Week 4                           | 6375  |  |  |  |      |
| September - RockTenn results     |       |  |  |  |      |
| Week 1                           | 6125  |  |  |  |      |
| Week 2                           | 6067  |  |  |  |      |
| Week 3                           | 5715  |  |  |  |      |
| Week 4                           | 5372  |  |  |  |      |
| Quarter 3                        |       |  |  |  |      |
| October - RockTenn results       |       |  |  |  |      |
| Week 1                           | 5700  |  |  |  |      |
| Week 2                           | 5943  |  |  |  |      |
| Week 3                           | 5300  |  |  |  |      |
| Week 4                           | 5250  |  |  |  |      |
| November - RockTenn results      |       |  |  |  |      |
| Week 1                           | 5250  |  |  |  |      |
| Week 2                           | 4758  |  |  |  |      |
| Week 3                           | 4200  |  |  |  |      |
| Week 4                           | 3722  |  |  |  |      |
| December - RockTenn results      |       |  |  |  |      |
| Week 1                           | 3722  |  |  |  |      |
| Week 2                           | 4029  |  |  |  |      |
| Week 3                           | 3643  |  |  |  |      |
| Week 4                           | 3543  |  |  |  |      |
| Quarter 4                        |       |  |  |  |      |
| Semi Annual 2 - RockTenn results |       |  |  |  | 0.01 |
| Annual                           |       |  |  |  |      |

| Rocktenn |            |       |         |         |         |        |
|----------|------------|-------|---------|---------|---------|--------|
|          | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum  | 3057       | 0.003 | 0       | 0       | 0       | 0      |
| Maximum  | 22715      | 0.023 | 0       | 0       | 0       | 0.1    |
| Average  | 5698       | 0.006 | 0       | 0       | 0       | 0.04   |
| Number   | 16         | 16    | 16      | 0       | 0       | 0      |
| lb/day   |            |       | 0.00    | 0.00    | 0.00    | 0.002  |

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| Month                            | Week                  | Flow (gpd) | Ammonia (mg/l) | Nitrate (mg/l) | Cyanide (ug/l) | Copper (mg/l) |
|----------------------------------|-----------------------|------------|----------------|----------------|----------------|---------------|
| January - RockTenn results       |                       |            |                |                |                |               |
| Week 1                           |                       | 3543       |                |                |                |               |
| Week 2                           |                       | 3843       |                |                |                |               |
| Week 3                           |                       | 3713       |                |                |                |               |
| Week 4                           |                       | 3683       |                |                |                |               |
| February - RockTenn results      |                       |            |                |                |                |               |
| Week 1                           |                       | 6815       |                |                |                |               |
| Week 2                           |                       | 3843       |                |                |                |               |
| Week 3                           |                       | 3890       |                |                |                |               |
| Week 4                           |                       | 3890       |                |                |                |               |
| March - RockTenn results         |                       |            |                |                |                |               |
| Week 1                           |                       | 3850       |                |                |                |               |
| Week 2                           |                       | 4314       |                |                |                |               |
| Week 3                           |                       | 4614       |                |                |                |               |
| Week 4                           |                       | 3175       |                |                |                |               |
| Quarter 1                        |                       |            |                |                |                |               |
| April - RockTenn results         |                       |            |                |                |                |               |
| Week 1                           |                       | 3643       |                |                |                |               |
| Week 2                           |                       | 3743       |                |                |                |               |
| Week 3                           |                       | 2900       |                |                |                |               |
| Week 4                           |                       | 2986       |                |                |                |               |
| May - RockTenn results           |                       |            |                |                |                |               |
| Week 1                           |                       | 4038       |                |                |                |               |
| Week 2                           |                       | 4984       |                |                |                |               |
| Week 3                           |                       | 5486       |                |                |                |               |
| Week 4                           |                       | 4350       |                |                |                |               |
| June - RockTenn results          |                       |            |                |                |                |               |
| Week 1                           |                       | 4929       |                |                |                |               |
| Week 2                           |                       | 6143       |                |                |                |               |
| Week 3                           |                       | 7057       |                |                |                |               |
| Week 4                           |                       | 7889       |                |                |                |               |
| Quarter 2                        |                       |            |                |                |                |               |
| Semi Annual 1 - RockTenn results |                       |            |                |                |                |               |
|                                  |                       |            |                |                |                | 0.04          |
| July - WestRock results          |                       |            |                |                |                |               |
| Week 1                           |                       | 6929       |                |                |                |               |
| Week 2                           |                       | 7786       |                |                |                |               |
| Week 3                           |                       | 8275       |                |                |                |               |
| Week 4                           |                       | 8634       |                |                |                |               |
| August - WestRock results        |                       |            |                |                |                |               |
| Week 1                           |                       | 8600       |                |                |                |               |
| Week 2                           |                       | 9057       |                |                |                |               |
| Week 3                           |                       | 8414       |                |                |                |               |
| Week 4                           |                       | 8729       |                |                |                |               |
| September - WestRock results     |                       |            |                |                |                |               |
| Week 1                           |                       | 7675       |                |                |                |               |
| Week 2                           |                       | 7300       |                |                |                |               |
| Week 3                           |                       | 8233       |                |                |                |               |
| Week 4                           |                       | 8672       |                |                |                |               |
| Quarter 3                        |                       |            |                |                |                |               |
| October - WestRock results       |                       |            |                |                |                |               |
| Week 1                           |                       | 8758       |                |                |                |               |
| Week 2                           |                       | 8700       |                |                |                |               |
| Week 3                           |                       | 9514       |                |                |                |               |
| Week 4                           |                       | 9272       |                |                |                |               |
| November - WestRock results      |                       |            |                |                |                |               |
| Week 1                           |                       | 9286       |                |                |                |               |
| Week 2                           |                       | 9672       |                |                |                |               |
| Week 3                           |                       | 6800       |                |                |                |               |
| Week 4                           |                       | 3543       |                |                |                |               |
| December - WestRock results      |                       |            |                |                |                |               |
| Week 1                           |                       | 3686       |                |                |                |               |
| Week 2                           |                       | 3500       |                |                |                |               |
| Week 3                           |                       | 3491       |                |                |                |               |
| Week 4                           |                       | 3491       |                |                |                |               |
| Quarter 4                        |                       |            |                |                |                |               |
| Semi Annual 2 - WestRock results |                       |            |                |                |                |               |
|                                  |                       |            |                |                |                | 0.00          |
| Annual                           |                       |            |                |                |                |               |
| 10/26/2015                       |                       | 0.00       | 5.60           | 0.00           | 0.02           |               |
| 6/2/2016                         |                       | 0.33       | 7.60           | 0.00           | 0.02           |               |
| 7871                             | average flow (gpd)    |            |                |                |                |               |
|                                  | Total (mgd)           | mg/l       | mg/l           | ug/l           | mg/l           |               |
|                                  | Max                   | 0.330      | 8.700          | 0.008          | 0.075          |               |
|                                  | Average (sum/number)  | 0.224      | 6.159          | 0.002          | 0.020          |               |
|                                  | Number                | 367        | 9              | 9              | 41             |               |
|                                  | lbs/day (at ave conc) | 0.32       | 11.51          | 0.004          | 0.04           |               |

| RockTenn |            |       |         |         |         |        |
|----------|------------|-------|---------|---------|---------|--------|
|          | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum  | 2900       | 0.003 | 0       | 0       | 0       | 0      |
| Maximum  | 9672       | 0.010 | 0       | 8       | 0       | 0.0    |
| Average  | 5945       | 0.006 | 0       | 7       | 0       | 0.02   |
| Number   | 15         | 15    | 15      | 0       | 0       | 0      |
| lb/day   |            |       | 0.00    | 0.33    | 0.00    | 0.001  |

| Rock Tenn- TOTAL       |            |         |         |         |         |        |
|------------------------|------------|---------|---------|---------|---------|--------|
|                        | Flow (gpd) | MGD     | Ammonia | Nitrate | Cyanide | Copper |
| Minimum                | 1400       | 0.001   | 0.00    | 5.60    | 0.00    | 0.00   |
| Maximum                | 26466      | 0.026   | 0.33    | 7.60    | 0.00    | 0.07   |
| Average                | 7871       | 0.00787 | 0.17    | 6.60    | 0.00    | 0.03   |
| lb/day at average flow |            |         | 0.0108  | 0.433   | 0.00    | 0.0022 |

| 2015-2016 SIU's Report Data |        |
|-----------------------------|--------|
| Ammonia (lbs/day)           | 0.33   |
| Nitrate (lbs/day)           | 13.288 |
| Cyanide (lbs/day)           | 0.00   |
| Copper (mg/L)               | 0.0387 |
| Average Flow (MGD)          | 0.225  |
| Minimum Flow (MGD)          | 0.064  |
| Maximum Flow (MGD)          | 0.146  |

|                              | Flow       | Ammonia (mgd) | Nitrate (mg/l) | Cyanide (ug/L) | Cu (mg/l) |      |
|------------------------------|------------|---------------|----------------|----------------|-----------|------|
| Fresno Truck Wash (26 units) | 10/27/2015 | 6000          | 0.93           | 2.60           | 0.00      | 0.01 |
|                              | 6/7/2016   | 6000          | 8.30           | 2.50           | 0.00      | 0.09 |
| Speedy                       | 10/29/2015 | 2300          | 0.93           | 0.00           | 0.00      | 0.07 |
|                              | 10/30/2015 | 1614          | 2.30           | 3.30           | 0.00      | 0.20 |
| Georgia Pacific (14 units)   | 11/5/2015  | 120           | 300.00         | 1.10           | 5.30      | 0.00 |
|                              | 11/16/2015 | 120           | 160.00         |                |           |      |
|                              | 5/18/2016  | 120           | 210.00         | 0.00           | 0.02      | 0.00 |
| 5th Wheel Truck Wash         | 11/5/2015  | 3578          | 0.00           | 0.03           | 0.00      | 0.10 |
|                              | 5/25/2016  | 3578          | 0.83           | 1.60           | 0.00      | 0.23 |
| Kinder Morgan                | 11/2/2015  | 6320          | 91.00          | 1.60           | 14.00     | 0.00 |
|                              | 12/17/2015 | 10500         |                |                |           |      |
| Average (sum/number)         |            | 0.04          | 77.43          | 1.41           | 2.15      | 0.08 |
| Number                       |            | 11            | 10             | 9              | 9         | 9    |
| lbs/day (at ave conc)        |            | 26.01         | 0.48           | 0.0007         | 0.03      |      |

| Fresno Truck |            |       |         |         |         |        |
|--------------|------------|-------|---------|---------|---------|--------|
|              | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum      | 6000       | 0.006 | 0.93    | 2.50    | 0       | 0      |
| Maximum      | 6000       | 0.006 | 8.30    | 2.60    | 0       | 0.1    |
| Average      | 6000       | 0.006 | 2.42    | 2.55    | 0       | 0.05   |
| lb/day       |            |       | 0.121   | 0.128   | 0.0000  | 0.003  |

| Speedy  |            |       |         |         |         |        |
|---------|------------|-------|---------|---------|---------|--------|
|         | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum | 2300       | 0.002 | 0.93    | 0.00    | 0.000   | 0.07   |
| Maximum | 2300       | 0.002 | 0.93    | 0.00    | 0.000   | 0.07   |
| Average | 2300       | 0.002 | 0.93    | 0.00    | 0.000   | 0.07   |
| lb/day  |            |       | 0.02    | 0.00    | 0.0000  | 0.001  |

| Imperial Truck Wash |            |       |         |         |         |        |
|---------------------|------------|-------|---------|---------|---------|--------|
|                     | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum             | 1614       | 0.002 | 2.30    | 3.30    | 0.00    | 0.20   |
| Maximum             | 1614       | 0.002 | 2.30    | 3.30    | 0.00    | 0.20   |
| Average             | 1614       | 0.002 | 2.30    | 3.30    | 0.00    | 0.20   |
| lb/day              |            |       | 0.03    | 0.04    | 0.0000  | 0.00   |

| Georgia Pacific |            |         |         |         |         |        |
|-----------------|------------|---------|---------|---------|---------|--------|
|                 | Flow (gpd) | MGD     | Ammonia | Nitrate | Cyanide | Copper |
| Minimum         | 120        | 0.00012 | 160.000 | 0.000   | 0.015   | 0.000  |
| Maximum         | 120        | 0.00012 | 300     | 1       | 0.005   | 0      |
| Average         | 120        | 0.00012 | 223     | 1       | 0.003   | 0      |
| lb/day          |            |         | 0.22    | 0.00    | 0.0000  | 0.00   |

| 5th Wheel |            |       |         |         |         |        |
|-----------|------------|-------|---------|---------|---------|--------|
|           | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum   | 3578       | 0.004 | 0.0     | 0.0     | 0       | 0      |
| Maximum   | 3578       | 0.004 | 0.8     | 1.6     | 0       | 0.2    |
| Average   | 3578       | 0.004 | 0.2     | 0.4     | 0       | 0.16   |
| lb/day    |            |       | 0.01    | 0.01    | 0.0000  | 0.0049 |

| Kinder Morgan |            |       |         |         |         |        |
|---------------|------------|-------|---------|---------|---------|--------|
|               | Flow (gpd) | MGD   | Ammonia | Nitrate | Cyanide | Copper |
| Minimum       | 6320.0000  | 0.006 | 91      | 2       | 0.014   | 0      |
| Maximum       | 10500      | 0.011 | 91      | 2       | 0.014   | 0.0    |
| Average       | 8410       | 0.008 | 91      | 2       | 0.014   | 0.00   |
| lb/day        |            |       | 6.39    | 0.11    | 0.0010  | 0.00   |

| 2015-2016 Commercial User Data |        |
|--------------------------------|--------|
| Ammonia (lbs/day)              | 6.79   |
| Nitrate (lbs/day)              | 0.297  |
| Cyanide (lbs/day)              | 0.001  |
| Copper (lbs/day)               | 0.0116 |
| Average Flow (MGD)             | 0.022  |
| Minimum Flow (MGD)             | 0.020  |
| Maximum Flow (MGD)             | 0.024  |

Pollution Prevention Plan

ND =

0

| MCL (mg/l)      | Wed 10/28/2015 CS-02 | Fri 11/13/2015 CS-01 | Tues 11/17/2015 CS-06 CS-03 | Tues 11/24/2015 CS-05 CS-04 | Wed 12/9/2015 CS-01 CS-02 | Tue 2/9/2016 CS-02 | Wed 2/10/2015 CS-01 | Wed 3/16/2016 CS-03 CS-04 | Fri 3/18/2016 CS-05 CS-08 | Mon 4/4/2016 CS-01 CS-02 | Thur 4/7/2016 CS-08 | Mon 5/23/2016 CS-01 | Fri 5/20/2016 CS-02 | Sun 5/22/2016 CS-02 | Thur 5/26/2016 CS-02 | Thur 6/2/2016 CS-01 | Tue 6/7/2016 CS-01 |       |        |       |      |       |       |       |
|-----------------|----------------------|----------------------|-----------------------------|-----------------------------|---------------------------|--------------------|---------------------|---------------------------|---------------------------|--------------------------|---------------------|---------------------|---------------------|---------------------|----------------------|---------------------|--------------------|-------|--------|-------|------|-------|-------|-------|
| Ammonia as N    |                      |                      |                             | 4.9                         |                           |                    |                     |                           |                           |                          |                     |                     |                     |                     |                      |                     |                    |       |        |       |      |       |       |       |
| Nitrate as N    | 10                   | 0.12                 | 0.15                        | 0.13                        | 3.5                       | 0.47               | 0.28                | 0.21                      | 0                         |                          |                     | 4.4                 | 2.3                 | 0                   | 0                    | 0                   | 0                  | 0     | 0      | 0     | 0.16 | 0.047 |       |       |
| Cyanide (Total) | 0.2                  | 0                    |                             |                             |                           |                    |                     |                           |                           |                          |                     |                     |                     |                     |                      |                     |                    |       |        |       |      |       |       |       |
| Copper          | 1.3                  | 0.01                 | 0.0045                      |                             | 0.0096                    | 0.013              | 0.008               | 0.067                     | 0.011                     | 0.014                    | 0.011               | 0.014               | 0.014               | 0.013               | 0.068                | 0.0084              | 0.0082             | 0.033 | 0.0063 | 0.011 | 0.01 | 0.016 | 0.014 | 0.012 |
|                 |                      | CS-02                | CS-01                       | CS-06 CS-03                 | CS-05 CS-04               | CS-01 CS-02        | CS-02               | CS-01                     | CS-03 CS-04               | CS-05 CS-08              | CS-01 CS-02         | CS-08               | CS-01 CS-02         | CS-02               | CS-02                | CS-02               | CS-01 CS-01        |       |        |       |      |       |       |       |

Average

23.96 mg/L Ammonia as N  
 0.41 mg/L Nitrate as N  
 6.55 ug/L Cyanide (Total)  
 0.02 mg/L Copper  
 0.08 mgd

Pollution Prevention Plan

|             |         |
|-------------|---------|
| Well Number | Well 06 |
|-------------|---------|

| Row Labels              | Sampling Date | Max of Result_1 |                      |             |
|-------------------------|---------------|-----------------|----------------------|-------------|
| <b>COPPER</b>           |               | <b>2.8</b>      |                      |             |
| UG/L                    | 11/19/1996    | 0               |                      |             |
|                         | 9/8/1998      | 0               |                      |             |
|                         | 10/23/2001    | 0               |                      |             |
|                         | 11/12/2003    | 0               | WELL 6               |             |
|                         | 12/6/2007     | 0               | 1996                 | 3546000     |
|                         | 9/30/2009     | 0               | 1997                 | 71192000    |
|                         | 11/13/2012    | 0               | 1998                 | 97752000    |
|                         | 11/9/2015     | 2.8             | 1999                 | 70943000    |
|                         | 8/9/2016      | 0               | 2000                 | 230390000   |
| <b>CYANIDE</b>          |               | <b>0</b>        | 2001                 | 250573000   |
| UG/L                    | 11/19/1996    | 0               | 2002                 | 253250000   |
|                         | 9/8/1998      | 0               | 2003                 | 309014000   |
|                         | 10/23/2001    | 0               | 2004                 | 344974000   |
|                         | 11/12/2003    | 0               | 2005                 | 212315000   |
| <b>NITRATE (as N)</b>   |               | <b>4.5</b>      | 2006                 | 242418000   |
| MG/L                    | 1/12/2016     | 3.7             | 2007                 | 222317000   |
|                         | 2/3/2016      | 4.3             | 2008                 | 201030000   |
|                         | 3/2/2016      | 4.2             | 2009                 | 99201000    |
|                         | 4/5/2016      | 3.7             | 2010                 | 171603000   |
|                         | 5/4/2016      | 3.6             | 2011                 | 237684000   |
|                         | 7/6/2016      | 4               | 2012                 | 256946000   |
|                         | 8/3/2016      | 3.6             | 2013                 | 83940000    |
|                         | 9/6/2016      | 4               | 2014                 | 22434000    |
|                         | 10/6/2016     | 4               | 2015                 | 108550000   |
|                         | 12/6/2016     | 3.7             | 2016                 | 151909000   |
|                         | 1/9/2017      | 4.5             | 2017                 | 0           |
|                         | 2/13/2017     | 2.9             |                      |             |
| <b>NITRATE (AS NO3)</b> |               | <b>21</b>       | Minimum              | 0.009715068 |
| <b>NITRITE (AS N)</b>   |               | <b>0</b>        | Maximum              | 0.945134247 |
| UG/L                    | 11/19/1996    | 0               | Average              | 0.475144292 |
|                         | 9/8/1998      | 0               | St. Dev              |             |
|                         | 10/23/2001    | 0               | Number               | 22          |
|                         | 11/12/2003    | 0               | lb/day               | 0           |
|                         | 1/14/2009     | 0               |                      |             |
|                         | 9/30/2009     | 0               | % Removal at average |             |
|                         | 11/13/2012    | 0               | lbs/day removed      |             |
|                         | 4/8/2014      | 0               |                      |             |
|                         | 11/9/2015     | 0               |                      |             |
| <b>Grand Total</b>      |               | <b>21</b>       |                      |             |

|                          | Average mg/L | Average lbs/day |
|--------------------------|--------------|-----------------|
| <b>Copper (lbs/day)</b>  | 0.311111111  | 0.010959957     |
| <b>Cyanide (lbs/day)</b> | 0            | 0               |
| <b>Nitrate (lbs/day)</b> | 3.85         | 19.8333305      |
| <b>Ammonia(lbs/day)</b>  | 0            | 0               |

Pollution Prevention Plan

| Well Number           | Well 07              | WELL 7                 |                             |           |
|-----------------------|----------------------|------------------------|-----------------------------|-----------|
| <b>Row Labels</b>     | <b>Sampling Date</b> | <b>Max of Result_1</b> | 1996                        | )         |
| <b>COPPER</b>         |                      | <b>8.1</b>             | 1997                        | -         |
| <b>UG/L</b>           | 12/6/2007            | <b>8.1</b>             | 1998                        | -         |
|                       | 9/30/2009            | 0                      | 1999                        | -         |
|                       | 11/13/2012           | 1.1                    | 2000                        | -         |
|                       | 8/9/2016             | 0                      | 2001                        | -         |
|                       | 7/18/2006            | 0                      | 2002                        | -         |
|                       | 11/5/2015            | 0                      | 2003                        | -         |
| <b>NITRATE (as N)</b> |                      | <b>4.1</b>             | 2004                        | -         |
| <b>MG/L</b>           | 1/12/2016            | 3.6                    | 2005                        | 177840000 |
|                       | 2/3/2016             | 3.2                    | 2006                        | 362360000 |
|                       | 7/6/2016             | 3.2                    | 2007                        | 353256000 |
|                       | 8/3/2016             | 3                      | 2008                        | 182349000 |
|                       | 9/6/2016             | 3                      | 2009                        | 297389000 |
|                       | 10/6/2016            | 2.9                    | 2010                        | 353915000 |
|                       | 12/6/2016            | 2.1                    | 2011                        | 311032000 |
|                       | 1/9/2017             | 2.9                    | 2012                        | 297614000 |
|                       | 2/13/2017            | 4.1                    | 2013                        | 377744000 |
| <b>NITRITE (AS N)</b> |                      | <b>0</b>               | 2014                        | 380270000 |
| <b>UG/L</b>           | 1/14/2009            | 0                      | 2015                        | 221841000 |
|                       | 9/30/2009            | 0                      | 2016                        | 167619000 |
|                       | 11/13/2012           | 0                      | 2017                        | 0         |
|                       | 4/8/2014             | 0                      |                             |           |
|                       | 11/5/2015            | 0                      | <b>Minimum(MGD)</b>         | 0.4872329 |
| <b>Grand Total</b>    |                      | <b>8.1</b>             | <b>Maximum(MGD)</b>         | 1.0418356 |
|                       |                      |                        | <b>Average(MGD)</b>         | 0.7952578 |
|                       |                      |                        | <b>St. Dev(MGD)</b>         | 0.2239754 |
|                       |                      |                        | <b>Number</b>               | 22        |
|                       |                      |                        | <b>lb/day</b>               | 0         |
|                       |                      |                        | <b>% Removal at average</b> |           |
|                       |                      |                        | <b>lbs/day removed</b>      |           |

|                          | Average mg/L | Average lbs/day |
|--------------------------|--------------|-----------------|
| <b>Copper (lbs/day)</b>  | 1.533333333  | 0.0904091       |
| <b>Cyanide (lbs/day)</b> | -            | -               |
| <b>Nitrate (lbs/day)</b> | 3.111111111  | 26.824575       |
| <b>Nitrite (lbs/day)</b> | 0            | 0               |



Pollution Prevention Plan

|             |         |
|-------------|---------|
| Well Number | Well 08 |
|-------------|---------|

WELL 8

| Row Labels            | Sampling Date | Max of Result_1 |                             |             |
|-----------------------|---------------|-----------------|-----------------------------|-------------|
|                       |               |                 | 1996                        | -           |
| <b>COPPER</b>         |               | <b>0</b>        | 1997                        | -           |
| <b>UG/L</b>           | 11/5/2015     | 0               | 1998                        | -           |
|                       | 4/9/2012      | 0               | 1999                        | -           |
|                       | 8/8/2016      | 0               | 2000                        | -           |
| <b>CYANIDE</b>        |               | <b>0</b>        | 2001                        | -           |
| <b>UG/L</b>           | 4/9/2012      | 0               | 2002                        | -           |
| <b>NITRATE (as N)</b> |               | <b>2.8</b>      | 2003                        | -           |
| <b>MG/L</b>           | 1/12/2016     | 2.4             | 2004                        | -           |
|                       | 3/2/2016      | 2.3             | 2005                        | -           |
|                       | 4/5/2016      | 2.3             | 2006                        | -           |
|                       | 5/4/2016      | 2.2             | 2007                        | -           |
|                       | 7/6/2016      | 2.3             | 2008                        | -           |
|                       | 8/9/2016      | 2.7             | 2009                        | -           |
|                       | 10/6/2016     | 2.5             | 2010                        | -           |
|                       | 12/6/2016     | 2.8             | 2011                        | -           |
|                       | 1/9/2017      | 2.6             | 2012                        | -           |
|                       | 2/13/2017     | 2.1             | 2013                        | 101120000   |
|                       | 2/16/2016     | 2.7             | 2014                        | 278189000   |
|                       | 9/7/2016      | 2.6             | 2015                        | 165342000   |
| <b>NITRITE (AS N)</b> |               | <b>0</b>        | 2016                        | 127739000   |
| <b>UG/L</b>           | 4/8/2014      | 0               | 2017                        | 0           |
|                       | 11/5/2015     | 0               |                             |             |
|                       | 4/9/2012      | 0               | <b>Minimum(MGD)</b>         | 0.02770411  |
| <b>Grand Total</b>    |               | <b>2.8</b>      | <b>Maximum(MGD)</b>         | 0.762161644 |
|                       |               |                 | <b>Average(MGD)</b>         | 0.460541096 |
|                       |               |                 | <b>St. Dev(MGD)</b>         | 0.213643156 |
|                       |               |                 | <b>Number</b>               | 22          |
|                       |               |                 | <b>lb/day</b>               | 0           |
|                       |               |                 | <b>% Removal at average</b> |             |
|                       |               |                 | <b>lbs/day removed</b>      |             |

|                          | Average mg/L | Average lbs/day |
|--------------------------|--------------|-----------------|
| <b>Copper (lbs/day)</b>  | 0            | 0               |
| <b>Cyanide (lbs/day)</b> | 0            | -               |
| <b>Nitrate (lbs/day)</b> | 2.458333333  | 12.27491696     |
| <b>Nitrite (lbs/day)</b> | 0            | 0               |