

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE NO. 20220401 – IN0020478 – D
DATE OF NOTICE: APRIL 1, 2022
DATE RESPONSE DUE: MAY 2, 2022

The Office of Water Quality proposes the following NPDES DRAFT PERMIT:

MAJOR – MODIFICATION

LAGRANGE (town) WWTP, Permit No. IN0020478, LAGRANGE COUNTY, 402 Nursery Street, LaGrange, IN. This modification is to include a include a Streamline Mercury Variance (SMV) in the permit. Permit Manager: Jay Hanko, jhanko@idem.in.gov, 317/233-0704. **Published in the LaGrange News.** Posted online at <https://www.in.gov/idem/public-notices/>.

PROCEDURES TO FILE A RESPONSE

Draft can be viewed or copied (10¢ per page) at IDEM/OWQ NPDES PS, 100 North Senate Avenue, (Rm 1203) Indianapolis, IN, 46204 (east end elevators) from 9 – 4, Mon - Fri, (except state holidays). A copy of the Draft Permit is on file at the local County Health Department. Please tell others you think would be interested in this matter. For your rights & responsibilities see these sites: Public Notices: <https://www.in.gov/idem/public-notices/>; Citizen Guide: <https://www.in.gov/idem/resources/citizens-guide-to-idem/>. Please tell others whom you think would be interested in this matter.

Response Comments: The proposed decision to issue a permit is tentative. Interested persons are invited to submit written comments on the Draft permit. All comments must be postmarked no later than the Response Date noted to be considered in the decision to issue a Final permit. Deliver or mail all requests or comments to the attention of the Permit Writer at the above address, (mail code 65-42 PS).

To Request a Public Hearing:

Any person may request a Public Hearing. A written request must be submitted to the above address on or before the Response Date noted. The written request shall include: the name and address of the person making the request, the interest of the person making the request, persons represented by the person making the request, the reason for the request and the issues proposed for consideration at the Hearing. IDEM will determine whether to hold a Public Hearing based on the comments and the rationale for the request. Public Notice of such a Hearing will be published in at least one newspaper in the geographical area of the discharge and sent to anyone submitting written comments and/or making such request and whose name is on the mailing list at least 30 days prior to the Hearing.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Bruno Pigott
Commissioner

April 1, 2022

VIA ELECTRONIC MAIL

Mr. Raymond E. Hoover, Council President
Town of LaGrange
1201 North Townline Road
LaGrange, Indiana 46761

Dear Mr. Hoover:

Re: Draft Modification NPDES Permit No. IN0020478
Town of LaGrange Wastewater Treatment Plant
LaGrange County

Your request for permit modification, submitted December 17, 2021, has been reviewed and processed in accordance with rules adopted under 327 IAC 5. Enclosed is the draft modification of NPDES Permit No. IN0020478 which applies to the discharge from the Town of LaGrange Wastewater Treatment Plant (WWTP). The enclosed Pages 1, 5, 5a, 6, 12, and 41a through 41e of 41 are intended to replace the corresponding pages in the facility's current permit.

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit document online at <https://www.in.gov/idem/public-notices/>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/idem/resources/citizens-guide-to-idem/>. A general notice will also be published in the newspaper with the largest general circulation within LaGrange County. A 30-day comment period is available in order to solicit input from interested parties, including the general public.

Please review this document carefully and become familiar with the proposed terms and conditions. Comments concerning the draft permit should be submitted in accordance with the procedure outlined in the enclosed public notice form. If you have any questions concerning this modification, please contact Jay Hanko at 317/233-0704 or Jhanko@idem.IN.gov.

Sincerely,

Leigh Voss, Chief
Municipal NPDES Permits Section
Office of Water Quality

Enclosures

cc: Mr. Catlyn Helmuth, Wastewater Superintendent

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AMENDED AUTHORIZATION TO DISCHARGE UNDER THE
NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Water Pollution Control Act, as amended, (33 U.S.C. 1251 et seq., the "Clean Water Act") or (CWA), and IDEMs authority under IC 13-5, the Indiana Department of Environmental Management (IDEM) is issuing this permit to the

TOWN OF LAGRANGE

hereinafter referred to as "the permittee." The permittee owns and/or operates the **Town of LaGrange Wastewater Treatment Plant**, a major municipal wastewater treatment plant located at 402 Nursery St., LaGrange, Indiana in LaGrange County. The permittee is hereby authorized to discharge from the outfalls identified in Part I of this permit to receiving waters named Fly Creek in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in the permit. This permit may be revoked for the nonpayment of applicable fees in accordance with IC 13-18-20.

The permit, as issued on November 9, 2021 is hereby amended as contained herein. The amended provisions shall become effective on _____. All terms and conditions of the permit not modified at this time remain in effect. Further, any existing condition or term affected by the modifications will remain in effect until the modified provisions become effective.

This permit and authorization to discharge, as amended, shall expire at midnight, February 28, 2027. In order to receive authorization to discharge beyond the date of expiration, the permittee shall submit such information and forms as are required by the Indiana Department of Environmental Management no later than 180 days prior to the date of expiration.

Issued on _____ for the Indiana Department of Environmental Management.

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

- (2) are in amounts sufficient to be unsightly or deleterious;
 - (3) produce color, visible oil sheen, odor, or other conditions in such degree as to create a nuisance;
 - (4) are in amounts sufficient to be acutely toxic to, or to otherwise severely injure or kill aquatic life, other animals, plants, or humans;
 - (5) are in concentrations or combinations that will cause or contribute to the growth of aquatic plants or algae to such a degree as to create a nuisance, be unsightly, or otherwise impair the designated uses.
- b. outside the mixing zone, to contain substances in concentrations that on the basis of available scientific data are believed to be sufficient to injure, be chronically toxic to, or be carcinogenic, mutagenic, or teratogenic to humans, animals, aquatic life, or plants.
3. Additional Discharge Limitations and Monitoring Requirements

Beginning on the effective date of the permit, the effluent from Outfall 001 shall be limited and monitored by the permittee as follows:

TABLE 4

Parameter	Quantity or Loading			Quality or Concentration			Monitoring Requirements	
	Monthly Average	Daily Maximum	Units	Monthly Average	Daily Maximum	Units	Measurement Frequency	Sample Type
Mercury [1][2][3]								
Interim [4]	----	----	----	8.0	Report	ng/l	6 X Annually	Grab
Final	0.00002	0.00005	lbs/day	1.3 [5]	3.2	ng/l	6 X Annually	Grab

[1] The permittee shall measure and report this parameter as Total Recoverable Metal.

The following EPA test methods and/or Standard Methods and associated Limits of Detection (LODs) and Limits of Quantitation (LOQs) are recommended for use in the analysis of the effluent samples. Alternative 40 CFR 136 approved methods may be used provided the LOQ is less than the monthly average and/or daily maximum effluent limitations.

The permittee may determine a case-specific Method Detection Level (MDL) using one of the analytical methods specified below, or any other test method which is approved by IDEM prior to use. The MDL shall be derived by the procedure specified for MDLs contained in 40 CFR Part 136, Appendix B, and the limit of quantitation shall be set equal to 3.18 times the MDL. NOTE: The MDL for purposes of this document, is synonymous with the "limit of detection"

or "LOD" as defined in 327 IAC 5-1.5-26: "the minimum concentration of a substance that can be measured and reported with ninety-nine percent (99%) confidence that the analyte concentration is greater than zero (0) for a particular analytical method and sample matrix".

Parameter	EPA Method	LOD	LOQ
Mercury	1631, Revision E	0.2 ng/l	0.5 ng/l

- [2] Mercury monitoring shall be conducted six times annually (i.e. every other month) for the term of the permit. Monitoring shall be conducted and reported in the months of February, April, June, August, October, and December of each year. Mercury monitoring and analysis will be performed using EPA Test Method 1631, Revision E. If Method 1631, Revision E is further revised during the term of this permit, the permittee and/or its contract laboratory is required to utilize the most current version of the method immediately after approval by EPA.
- [3] The permittee applied for, and received, a variance from the water quality criterion used to establish the referenced mercury WQBELs under the streamlined mercury variance (SMV) procedures of 327 IAC 5-3.5. Compliance with the interim discharge limit will demonstrate compliance with this permit.
- [4] For the term of the NPDES permit, the permittee is subject to the interim discharge limit developed under the provisions of 327 IAC 5-3.5-8. Each reporting period (i.e., bi-monthly), the permittee shall report both a daily value and an annual average value for mercury. The annual average discharge value is to be calculated as the average of the measured effluent daily values for mercury over the most recent (rolling) twelve-month period. Reporting of the annual average value for mercury is not required during the first year of the permit term. Compliance with the interim discharge limit will be achieved when the annual average discharge value for the most recent twelve-month period is less than the interim discharge limit.
- [5] Annual average for the purpose of the mercury interim discharge limit.

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4. Additional Monitoring Requirements

Beginning on the effective date of this permit, the permittee shall conduct the following monitoring activities:

a. Influent Monitoring

In addition to the requirements contained in Part I.B.2 of the NPDES permit, the permittee shall monitor the influent to its wastewater treatment facility for the following pollutants. Samples shall be representative of the raw influent in accordance with 327 IAC 5-2-13(b).

TABLE 5

Parameter	Quality or Concentration			Monitoring Requirements	
	Monthly Average	Daily Maximum	Units	Measurement Frequency	Sample Type
Mercury [1][2]	----	Report	ng/l	6 X Annually	Grab

[1] The permittee shall measure and report this parameter as Total Recoverable Metal.

[2] Mercury monitoring shall be conducted six times annually (i.e. every other month) for the term of the permit. Monitoring shall be conducted and reported in the months of February, April, June, August, October, and December of each year. Mercury monitoring and analysis will be performed using EPA Test Method 1631, Revision E. If Method 1631, Revision E is further revised during the term of this permit, the permittee and/or its contract laboratory is required to utilize the most current version of the method immediately after approval by EPA.

B. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge flow and shall be taken at times which reflect the full range and concentration of effluent parameters normally expected to be present. Samples shall not be taken at times to avoid showing elevated levels of any parameters.

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and (E), 304(b)(2), and 307(a)(2) of the Clean Water Act, if the effluent limitation or standard so issued or approved:

- a. contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
- b. controls any pollutant not limited in the permit.

4. This permit may be modified, or, alternately, revoked and reissued after public notice and opportunity for hearing to include revised SMV and/or PMPP requirements in the event that revisions to the SMV Requirements and Application Process under 327 IAC 5-3.5 occur.

D. WHOLE EFFLUENT TOXICITY TESTING REQUIREMENTS

To adequately assess the effects of the effluent on aquatic life, the permittee is required by this section of the permit to conduct chronic Whole Effluent Toxicity (WET) testing. Part I.D.1. of this permit describes the testing procedures and Part I.D.2. describes the Toxicity Reduction Evaluation (TRE) which is only required if the effluent demonstrates toxicity in two (2) consecutive toxicity tests as described in Part I.D.1.f.

1. Whole Effluent Toxicity (WET) Tests

The permittee must conduct the series of aquatic toxicity tests described below to monitor the acute and chronic toxicity of the effluent discharged from Outfall 001. If toxicity is demonstrated in two (2) consecutive toxicity tests as described in Part I.D.1.f., with any test species during the term of the permit, the permittee is required to conduct a TRE under Part I.D.2.

a. Toxicity Test Procedures and Data Analysis

- (1) All test organisms, test procedures, and quality assurance criteria used must be in accordance with the Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Water to Freshwater Organisms, Fourth Edition, Section 11, Fathead Minnow (*Pimephales promelas*) Larval Survival and Growth Test Method 1000.0, and Section 13, Daphnid (*Ceriodaphnia dubia*) Survival and Reproduction Test Method 1002.0, EPA 821-R-02-013, October 2002 (hereinafter "Chronic Toxicity Test Method"), or most recent update that conforms to the version of 40 CFR 136 incorporated by reference in 327 IAC 5. References to specific portions of the Chronic Toxicity Test

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ATTACHMENT B
Streamlined Mercury Variance

I. Introduction

The permittee submitted an application for a streamlined mercury variance (SMV) in accordance with the provisions of 327 IAC 5-3.5. The SMV establishes a streamlined process for obtaining a variance from a water quality criterion used to establish a WQBEL for mercury in an NPDES permit. Based on a review of the SMV application, IDEM has determined the application to be complete as outlined in 327 IAC 5-3.5-4(e). Therefore, the SMV has been issued concurrently with the NPDES permit in accordance with 327 IAC 5-3.5-6.

II. Term of SMV

The SMV and the interim discharge limit will remain in effect until the NPDES permit expires under IC 13-14-8-9 (amended under SEA 620, May 2005). Pursuant to IC 13-14-8-9(e), when the NPDES permit is extended under IC 13-15-3-6 (administratively extended), the SMV will remain in effect as long as the NPDES permit requirements affected by the SMV are in effect.

III. Annual Reports

The annual report is a condition of the Pollutant Minimization Program Plan (PMPP) requirements of 327 IAC 5-3.5-9(a)(8). The annual report must describe the permittee's progress toward fulfilling each PMPP requirement, the results of all mercury monitoring within the previous year, and the steps taken to implement the planned activities outlined under the PMPP. The annual report will be due on **March 1**.

IV. SMV Renewal

As authorized under 327 IAC 5-3.5-7(a)(1), the permittee may apply for the renewal of an SMV at any time within 180 days prior to the expiration of the NPDES permit. In accordance with 327 IAC 5-3.5-7(c), an application for renewal of the SMV must contain the following:

- A. All information required for an initial SMV application under 327 IAC 5-3.5-4, including revisions to the PMPP, if applicable.
- B. A report on implementation of each provision of the PMPP.
- C. An analysis of the mercury concentrations determined through sampling at the facility's locations that have mercury monitoring requirements in the NPDES permit for the two (2) year period prior to the SMV renewal application.
- D. A proposed alternative mercury discharge limit, if appropriate, to be evaluated by the department according to 327 IAC 5-3.5-8(b) based on the most recent two (2) years of representative sampling information from the facility.

Renewal of the SMV is subject to a demonstration showing that PMPP implementation has achieved progress toward the goal of reducing mercury from the discharge.

V. Pollutant Minimization Program Plan (PMPP)

The PMPP is a requirement of the SMV application and is defined in 327 IAC 5-3.5-3(4) as the plan for development and implementation of Pollutant Minimization Program (PMP). The PMP is defined in 327 IAC 5-3.5-3(3) as the program developed by an SMV applicant to identify and minimize the discharge of mercury into the environment. PMPP requirements are outlined in 327 IAC 5-3.5-9. In accordance with 327 IAC 5-3.5-6, the requirements of the PMPP are appended with this Attachment.

Pollutant Minimization Program Plan (PMPP)

Part II B. Plan Schedule for Complete Inventory Wastewater Treatment Plant

A complete detailed inventory will be submitted to IDEM within twelve (12) months from the effective date of the approved SMV. The complete inventory will include all confirmed mercury-bearing chemicals and equipment, including confirmed or estimated quantities for each item, at the WWTP. Additionally, the inventory will include documentation from suppliers of the mercury content in the most purchased items. This inventory will be accomplished by confirming the items identified from the preliminary checklist in **Part Two, Section A of the SMV Application** and building upon it.

The Town of LaGrange intends to review and update the inventory on an annual basis. Any revisions to the list will be submitted to IDEM through the Annual Reporting identified in **Part Five, Section B of the SMV Application**.

Part II D. Plan and Schedule Evaluation of Possible Sources of Mercury in Influent

A complete inventory will be submitted to IDEM within twelve (12) months from the effective date of the approved SMV from IDEM. Through investigation and research, the Town will determine feasibility of alternate products or changes in procedures for a reduction in the use of products containing mercury. This information will be discussed with the individual sectors through the education and awareness initiatives discussed in Part Three, Section C.

The use of any products that can be discontinued will be disposed of in accordance with applicable procedures.

Part III A. PMP Planned Activities

Activity	Goal	Measure of Performance	Schedule
Review and modify purchasing policies and procedures with vendor products	Reduce number of products containing mercury by selecting alternates as available and economically feasible	Identify discontinued mercury containing products to track performance	Within twelve (12) months of SMV approval
Implement additional training for Town staff to raise awareness. Distribute educational handouts as available	Raise awareness for Town staff	Participation in discussion and frequency of distributed materials	Within twelve (12) months of SMV approval, education will be on-going
Implement education for public within the service area	Raise awareness within the community	Participation and feedback	Within eighteen (18) months of approval of SMV; education will be on-going.
Continued evaluation of alternatives to the use of any mercury-containing equipment or materials	Document/inventory equipment and materials and discuss alternates with vendors and suppliers	Tracking of inventory for comparison overtime	Preliminary evaluation of alternatives within twelve (12) months of approval of SMV; evaluation completed within eighteen (18) months of approval of SMV.

The Town of LaGrange has undertaken the identification of the responsibilities of their facility under P.L. 225-2001 and will address these responsibilities with the appropriate entities.

Part III.C. Planned Activities to Reduce/Eliminate Mercury from Identified Sectors

Sector	Planned Activity	Goal	Measure of Performance	Schedule for Action
Medical Facilities	Planned visit to identify sources of mercury, provide literature, and discuss alternatives	Education and Awareness for Mercury Reduction at WWTP Influent	Documentation and Participation	12 Months from SMV Approval
Dental Facilities	Planned visit to identify sources of mercury, provide literature, and discuss alternatives	Education and Awareness for Mercury Reduction at WWTP Influent	Documentation and Participation	12 Months from SMV Approval
Public and Private Labs	Planned visit to identify sources of mercury, provide literature, and discuss alternatives	Education and Awareness for Mercury Reduction at WWTP Influent	Documentation and Participation	12 Months from SMV Approval
General Industry and SIUs	Planned visit to identify sources of mercury, provide literature, and discuss alternatives	Education and Awareness for Mercury Reduction at WWTP Influent	Documentation and Participation	12 Months from SMV Approval
Other Significant Contributors	Planned visit to identify sources of mercury, provide literature, and discuss alternatives	Education and Awareness for Mercury Reduction at WWTP Influent	Documentation and Participation	12 Months from SMV Approval

Part III. D. Resource and Staff Identification

The Town currently has the appropriate staff available to implement the PMPP as proposed herein. The Wastewater Superintendent and the Town Manager will be responsible for the implementation of the PMPP. Additional Town staff may be utilized on an as needed basis. Funding for implementation of the PMPP will be from the Town's sewer fund.



National Pollutant Discharge Elimination System
Fact Sheet for
Town of LaGrange Wastewater Treatment Plant
Draft: February 2022
Final: TBD

Indiana Department of Environmental Management
 100 North Senate Avenue
 Indianapolis, Indiana 46204
 (317) 232-8603
 Toll Free (800) 451-6027
www.idem.IN.gov

Permittee:	Mr. Raymond E. Hoover, Council President Town of LaGrange 1201 N. Townline Road LaGrange, Indiana 46761 260/336-1412 councilward3@lagrangein.org
Existing Permit Information:	Permit Number: IN0020478 Expiration Date: February 28, 2027
Facility Contact:	Mr. Catlyn Helmuth, Wastewater Superintendent 260/463-2042 lagwwtp@lagrangein.org
Facility Location:	402 Nursery St., LaGrange, Indiana LaGrange County
Receiving Stream:	Fly Creek
GLI/Non-GLI:	GLI
Proposed Permit Action:	Modification
Date Application Received:	December 17, 2021
Facility Category	NPDES Major Municipal
Permit Writer:	Jay Hanko 317/233-0704 Jhanko@idem.IN.gov

Outfall Location

Latitude: 41° 39' 02" N
Longitude: 85° 24' 48" W

Background

This is the modification of the NPDES permit for the Town of LaGrange Wastewater Treatment Plant. The facility's current permit was effective on March 1, 2022 and has an expiration date of February 28, 2027. A request for permit modification was received from the permittee on December 17, 2021. The permittee requests a permit modification to include a Streamline Mercury Variance (SMV).

Modification

The following changes have been made for the modification of the NPDES permit:

Page 1 of 41 This page has been modified to reflect the modification effective date for the permit.

Pages 5, 5a of 41 These pages have been modified to include an interim effluent limit for mercury in Table 4, and footnotes for mercury monitoring specific to the SMV.

Page 6 of 41 This page has been modified to maintain the page numbering and continuity of the remaining pages of the permit.

Page 12 of 41 This page has been modified to replace Reopening Clause 4. The clause in the current permit pertains to the mercury limit and monitoring frequency. The revised clause in the permit modification is specific to the SMV and Pollutant Minimumization Program Plan (PMPP), and to maintain the page numbering and continuity of the remaining pages of the permit.

Pages 41a-e of 41 These pages have been modified to include the specifics of the SMV and PMPP.

The SMV establishes a streamlined process for obtaining a variance from a water quality criterion used to establish a WQBEL for mercury in an NPDES permit. The goal of the SMV is to reduce the effluent levels of mercury towards, and achieve as soon as practicable, compliance with the mercury WQBELs through implementation of a pollutant minimization program plan (PMPP). The SMV renewal will remain in effect until the permit expires under IC 13-14-8-9. Pursuant to IC 13-14-8-9(c), when the SMV renewal is incorporated into a permit extended under IC 13-15-3-6 (administratively extended), the renewal will remain in effect until the permit expires.

Mercury Interim Discharge Limit

The permit includes an interim discharge limit for mercury of 8.0 ng/l. Compliance with the interim discharge limit will be achieved when the average of the measured effluent daily values over the rolling twelve month period is less than the interim limit. The interim discharge limit was developed in accordance with 327 IAC 5-3.5-7 and with 327 IAC 5-3.5-8. Specifically, the interim discharge limit shall be based upon available, valid, and representative data of the effluent mercury levels collected and analyzed over the most recent two (2) year period from the WWTP.

Pollutant Minimization Program Plan (PMPP)

PMPP requirements are outlined in 327 IAC 5-3.5-9 and are included in Attachment B of the NPDES permit in accordance with 327 IAC 5-3.5-6. The PMPP focuses on pollution prevention and source control measures to achieve mercury reduction in the effluent. The PMPP was public noticed prior to submittal to IDEM in accordance with 327 IAC 5-3.5-9(c). No comments were received during the public notice period. The goal of the PMPP is to reduce the effluent levels of mercury towards, and achieve as soon as practicable, compliance with the mercury WQBELs established for the permitted facility.

SMV Annual Reports

The permittee is required to submit annual reports to IDEM by March 1st of each year in which the SMV is in effect. The annual report must describe the SMV applicant's progress toward fulfilling each PMPP requirement, the results of all mercury monitoring within the previous year, and the steps taken to implement the planned activities outlined under the PMPP.

Expiration Date

The expiration date of the permit has not changed. The permit, as modified, will expire at midnight on February 28, 2027.

Permit Processing/Public Comment

Pursuant to IC 13-15-5-1, IDEM will publish the draft permit modification document online at <https://www.in.gov/idem/public-notices/>. Additional information on public participation can be found in the "Citizens' Guide to IDEM", available at <https://www.in.gov/idem/resources/citizens-guide-to-idem/>. A 30-day comment period is available to solicit input from interested parties, including the public. A general notice will also be published in the newspaper with the largest general circulation within LaGrange County.

ATTACHMENT 1
Effluent Data Collected by Town of LaGrange WWTP for the
Two (2) Year Period Prior to SMV Renewal Application being considered complete
Outfall 001 (IN0020478)

Date SMV Application Deemed Complete: Jan 26, 2022

Sample Date	Total Mercury Normal Sample (ng/L)	Total Mercury Duplicate Sample (ng/L)	Total Mercury Daily Average (ng/L)
08/19/22	1.3		1.3
10/19/22	2.1		2.1
12/19/22	2.2		2.2
02/20/22	6.4		6.4
04/20/22	8.0		8.0
06/20/22	4.7		4.7
08/20/22	2.0		2.0
10/20/22	2.2		2.2
12/20/22	1.7		1.7
02/21/22	2.9		2.9
04/21/22	1.8		1.8
06/21/22	1.5		1.5
Number	12		12
Max	8.0		8.0
SMV Limit	8.0		8.0