



Submitted to:

Mr. Jim Fox – District Manager

Winter Park Ranch Water and Sanitation District

December 16, 2022

WINTER PARK RANCH, GRAND COUNTY WATER & SANITATION DISTRICT #1 AND TOWN OF FRASER

Industrial Sampling and Flow Monitoring Project 2022

Submitted By:

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Winter Park Ranch, Grand County Water & Sanitation District #1 and Town of Fraser

Industrial Sampling and Flow Monitoring Project 2022

Thank you for the opportunity to provide this report for the Winter Park Ranch, Grand County Water & Sanitation District and Town of Fraser regarding industrial contributions to the wastewater treatment facility, specifically from breweries and distilleries within the Grand County WSD and Town of Fraser service areas.

A site visit was completed on September 8, 2022 by Direct Discharge Consulting (DDC) staff to visit the areas to be sampled and flow monitored, as well as to determine the best places to install flow monitors and samplers to provide the most accurate data for this project.

The goal of the project was to determine if illicit discharge was occurring from any of the eight breweries and/or distilleries within the service areas of Grand County WSD and/or Town of Fraser. It was determined early in the project approach that the most economical way to determine the base loading from each of the eight breweries/distilleries would be to install flow monitoring devices along with portable samplers to determine which user(s) is contributing excessive loading to the wastewater treatment facility. In order to keep this initial phase to an economical cost, the Town of Fraser agreed to analyze the samples collected for Chemical Oxygen Demand (COD). COD is a quick test to determine strength of wastewater and can be correlated to Biochemical Oxygen Demand (BOD).

The duration of this project consisted of five weeks, sampling and flow monitoring at two manholes per week for seven days. Within the five-week project, flow monitoring and sampling was conducted at each of the eight industrial users as well as flow monitoring of one location in a manhole outside of a gas station in Fraser that is potentially the manhole where a brewer is discharging or physically brewing.

Each manhole nearest to the industrial user sewer service line had an area velocity flow meter installed within the main line to collect the flows from the industrial user. These flow monitors were programmed to collect flow rates every 15 minutes, in gallons per minute (GPM) and provide a total daily flow in gallons. Additionally, a portable sampler was installed in each of the manholes nearest the industrial user service line to collect samples every one (1) hour for 24 hours. This sampler was removed daily, the sample was mixed and an aliquot of the composite sample was taken to the Town of Fraser wastewater treatment plant to be analyzed for COD. This was completed for seven consecutive days at each location. After the seven days, DDC staff removed the flow monitors, downloaded the flows, removed the samplers and reprogrammed for the next manhole location.

The following data is a compilation of each of the industrial users sampled and flow monitored to assist the District and Town with determining the next course of action to limit the loading from the industrial users to the wastewater treatment facility. Within the graphs, an orange line on the COD graphs is present to reflect the average influent COD concentration from 2021 to present based on data provided by the Town of Fraser wastewater treatment facility operations staff. This orange line should be viewed as a baseline COD concentration when reviewing the attached report.



Hideaway Park Brewery:

Hideaway Park Brewery is a brewery that is located within a building with several other businesses, therefore, the flow data collected is a combination of other businesses in addition to other buildings that may be on the main line where the data collection manhole is located. In this case, the manhole where flows and samples were collected is in the back alley of the brewery, which is very representative for the data collection process.

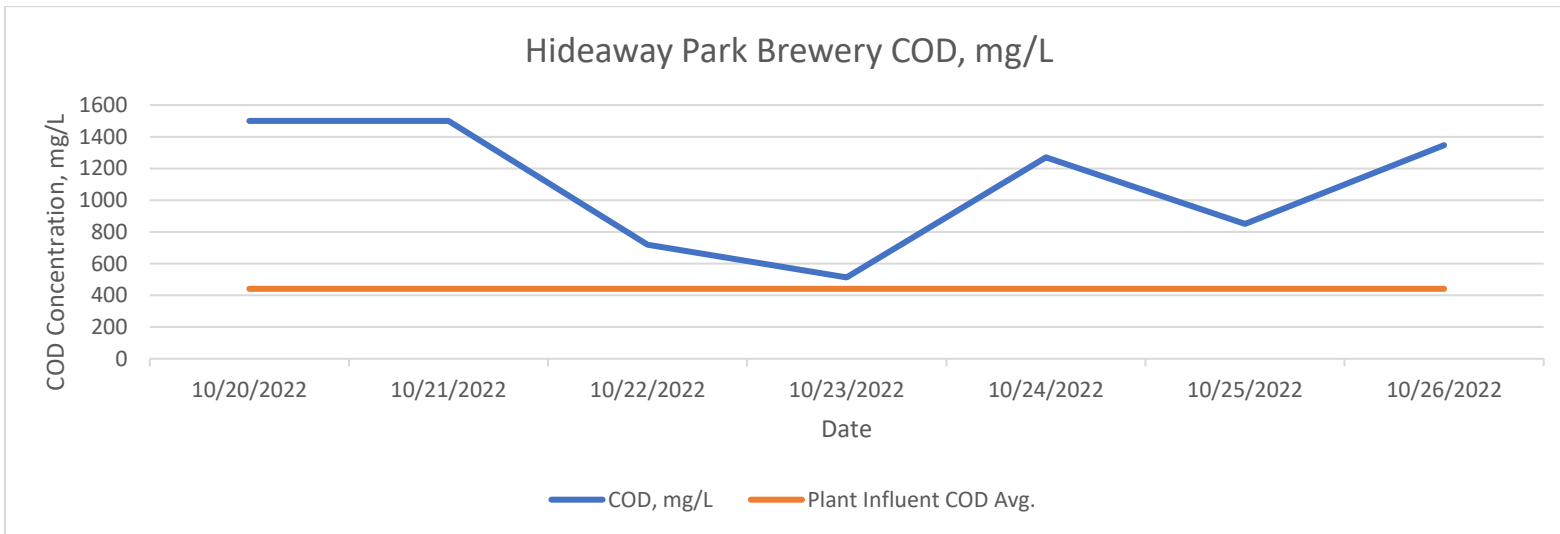
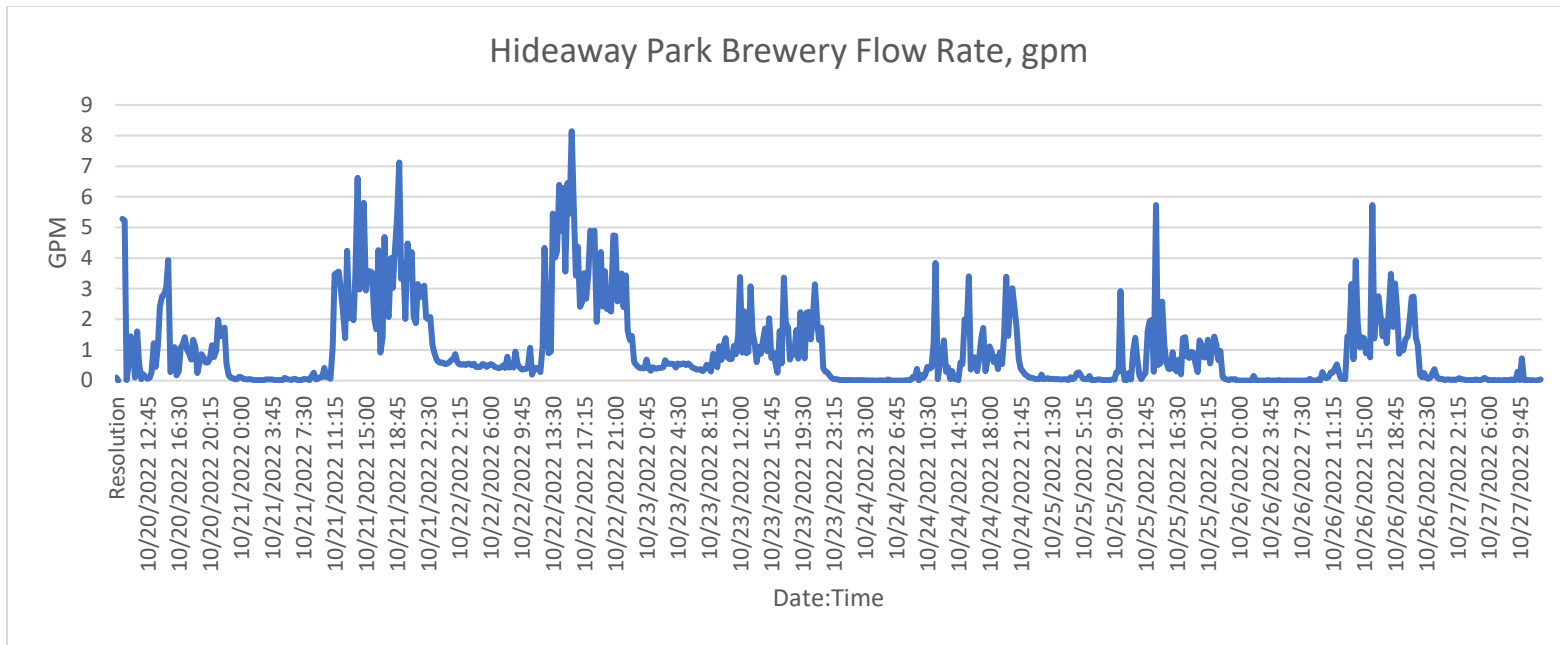
As shown in the table below, the Hideaway Park Brewery is open daily from 12p to 9p and has an average flow rate of 1,502.95 gallons or 1.04 gallons per minute. Please note that this location was the first sampling location completed for this project and the COD test vials had a maximum range of 1,500 mg/L. The first two samples on 10/20 and 10/21 were actually reported as greater than 1,500 mg/L of COD. The Town of Fraser wastewater treatment plant that was conducting the analysis purchased different test vials with a higher range for the following samples.

It can be assumed that the flow rates from Friday through Sunday are due to weekend business as they are higher than the flows during the weekdays by a factor of approximately 1,000 gallons per day. The COD concentrations for Friday are elevated, however, the Saturday and Sunday COD values are lower, likely due to dilution from general sewer usage from patrons visiting the brewery. As seen in the graphs provided, the flow is very much diurnal and typical for industrial users with the operating hours provided. Based on flow rates for Monday through Wednesday, it is possible that the brewery is producing beer during the weekdays and cleaning vessels as it is expected that the brewery would refrain from producing/cleaning on weekends with increased patrons visiting the brewery.

The Billing Department indicated that the usage for the building where Hideaway Park Brewery is located was 3,000 gallons for the month of October. This equates to approximately 96.77 gallons per day or 0.067 gallons per minute indicating the flow data is indicative of other contributions.

Hideaway Park Brewery						
Open / Closed:	Hours:	Date of Sampling & Flow Monitoring:		Total Flow, Gals	Avg. Daily Flow, gpm	COD, mg/L
Open	12p - 9p	Thursday	10/20/2022			1500
Open	12p - 9p	Friday	10/21/2022	2375.66	1.65	1500
Open	12p - 9p	Saturday	10/22/2022	2768.47	1.92	720
Open	12p - 9p	Sunday	10/23/2022	1319.39	0.92	513
Open	12p - 9p	Monday	10/24/2022	751.52	0.52	1270
Open	12p - 9p	Tuesday	10/25/2022	734.33	0.51	851
Open	12p - 9p	Wednesday	10/26/2022	1068.33	0.74	1346
Total Flow, Gals:				9,017.70		
Average Total Daily Flow, Gals:				1,502.95		
Average Daily Flow, GPM:					1.04	
Average COD Concentration, mg/L:						1,100





Peak Brewery (Noble Buck):

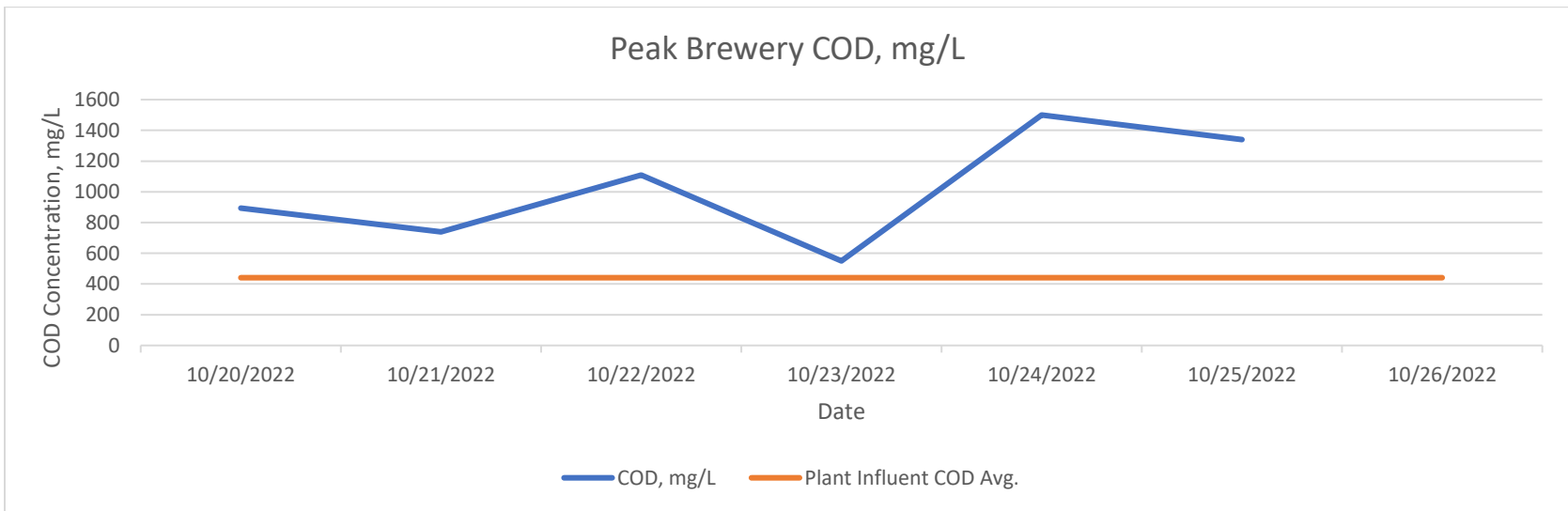
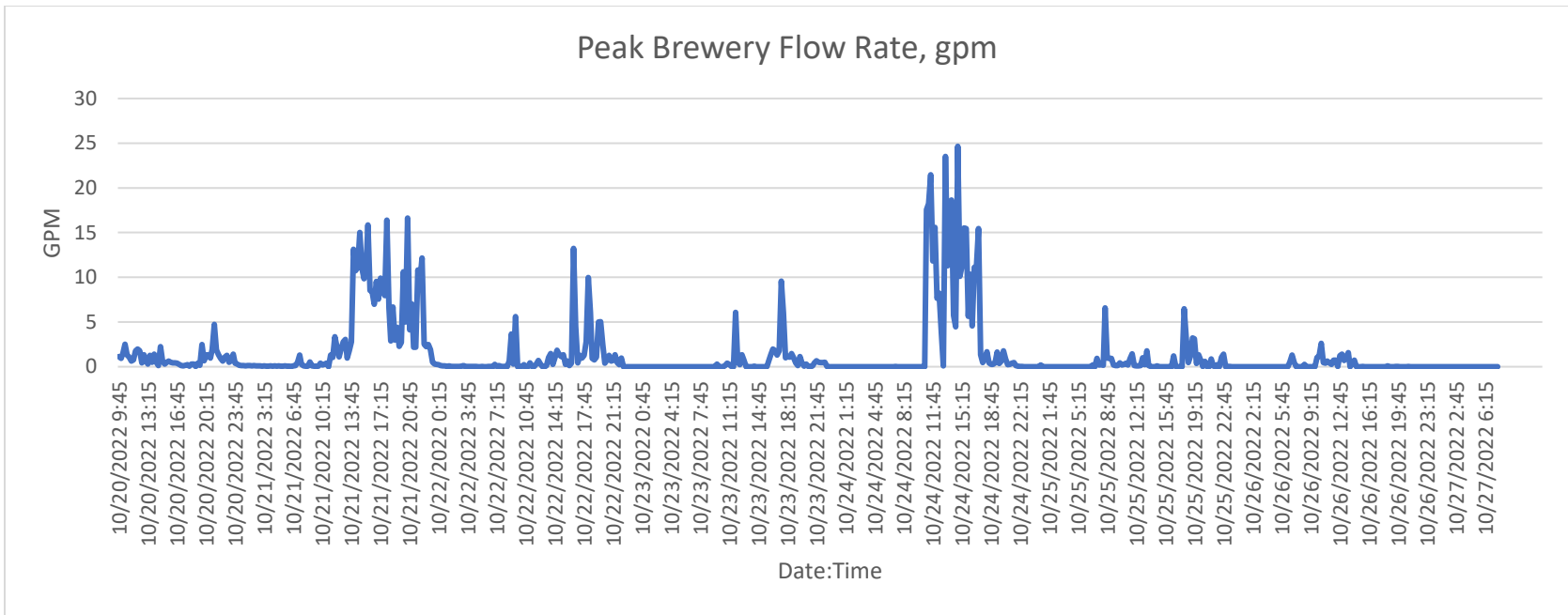
Peak Brewery, or Noble Buck, is another brewery that is located within a large building with several other businesses, therefore, the flow data collected is a combination of other businesses in addition to other buildings that may be on the main line where the data collection manhole is located. In this case, the manhole where flows and samples were collected is just downstream from the brewery.

As shown in the table below, Peak Brewery is open Thursday through Monday, and closed Tuesday and Wednesday. The average flow rate per day was 2,152.55 or 1.49 gallons per minute. The graphs illustrating flows and COD are indicative of a typical diurnal pattern, however, it should be noted that the highest flow date corresponds with the highest COD analysis, which is on Monday, just before the brewery is closed for two days. This may be an indication that brewery waste is being discharged on Mondays prior to the brewery being closed for two days.

The Billing Department indicated that the usage for the building where Peak Brewery is located was 40,000 gallons for the month of October. This equates to approximately 1,290.32 gallons per day or 0.896 gallons per minute. Based on the flow data, these numbers from billing are similar to what was discovered.

Peak Brewery (Noble Buck)						
Open / Closed:	Hours:	Date of Sampling & Flow Monitoring:		Total Flow, Gals	Avg. Daily Flow, gpm	COD, mg/L
Open	12p - 9p	Thursday	10/20/2022			893
Open	12p - 9p	Friday	10/21/2022	4951.66	3.44	740
Open	12p - 9p	Saturday	10/22/2022	1312.82	0.91	1109
Open	12p - 9p	Sunday	10/23/2022	686.06	0.48	550
Open	12p - 9p	Monday	10/24/2022	5013.22	3.48	1500
Closed		Tuesday	10/25/2022	675.6	0.47	1340
Closed		Wednesday	10/26/2022	275.93	0.19	
Total Flow, Gals:				12,915.29		
Average Total Daily Flow, Gals:				2,152.55		
Average Daily Flow, GPM:					1.49	
Average COD Concentration, mg/L:						1,022





Vicious Cycle Brewery:

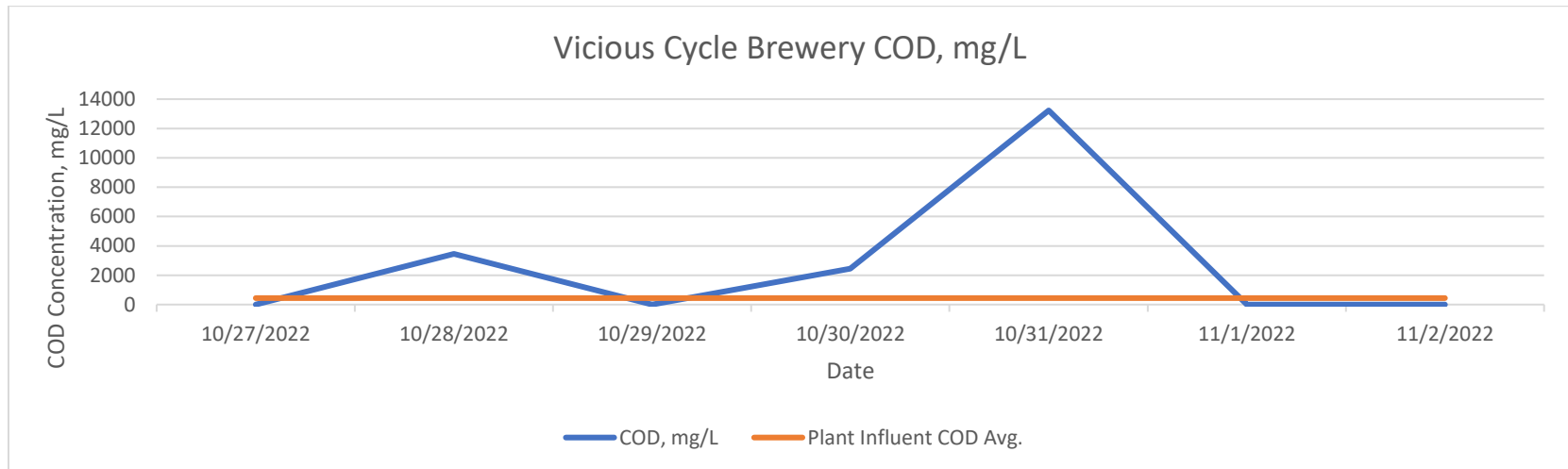
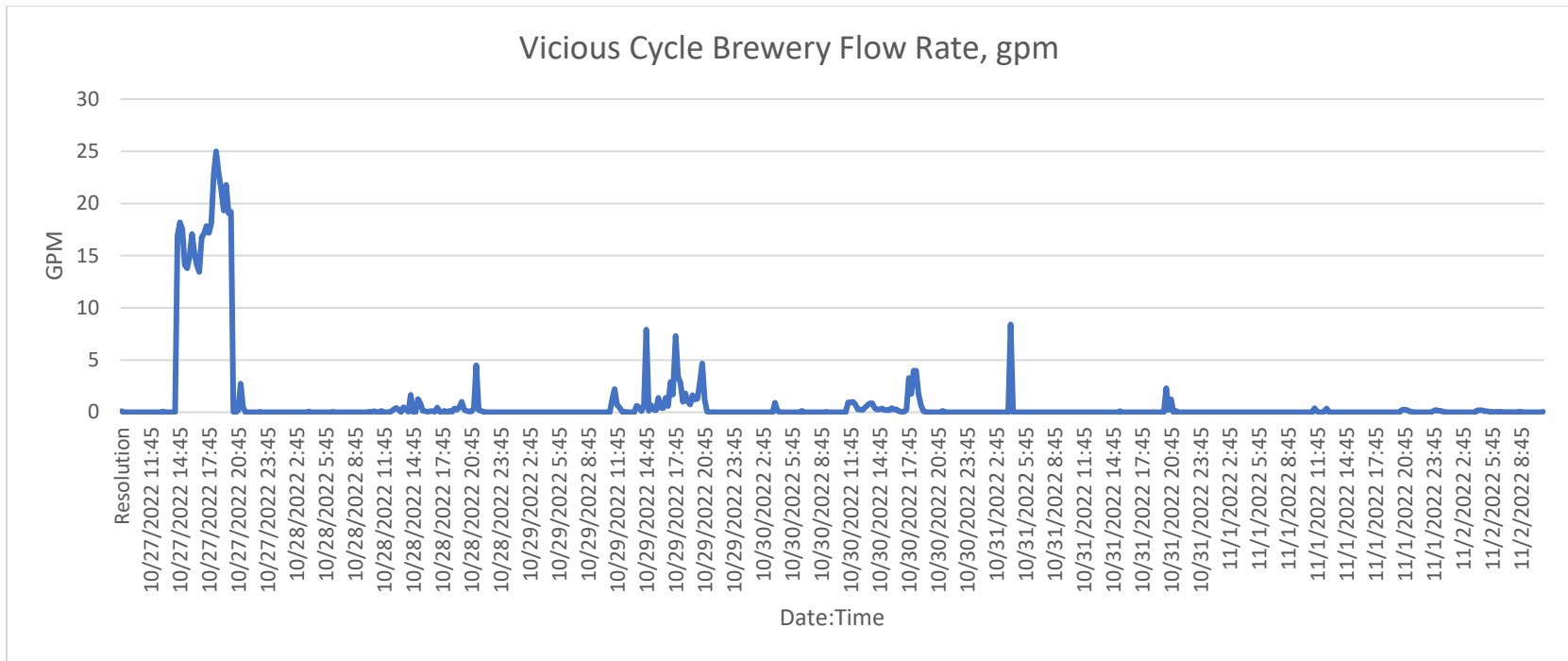
Vicious Cycle Brewery is a brewery that is fairly new and the sewer service line enters the collection system within the manhole, therefor sampling was conducted of only the service line and flow monitoring was conducted of only the flow from the brewery. This is the best-case scenario for both sampling and flow monitoring.

As shown in the table below, Vicious Cycle Brewery is open daily from 12p to 9p with an average daily flow rate of 338.81 gallons or 0.24 gallons per minute. The graphs illustrating the flows are as expected since the flow monitoring equipment was able to be used for only the discharge from Vicious Cycle Brewery. The COD concentrations are missing a few data points due to issues within the laboratory with the samples. For the COD data points that were reported, they are extremely high, indicating the discharge from Vicious Cycle is of concern. Similar to other breweries analyzed for this project, it is possible that the brewery is producing beer and/or cleaning vessels on Monday’s when fewer patrons are visiting the establishment.

The Billing Department indicated that the water usage for Vicious Cycle Brewery was estimated at 400 gallons per day, or 0.277 gallons per minute. The flow data collected for this project almost exactly correlates to the billing department in the case.

Vicious Cycle Brewery						
Open / Closed:	Hours:	Date of Sampling & Flow Monitoring:		Total Flow, Gals	Avg. Daily Flow, gpm	COD, mg/L
Open	12p - 9p	Thursday	10/27/2022			
Open	12p - 9p	Friday	10/28/2022	232.49	0.16	3460
Open	12p - 9p	Saturday	10/29/2022	832.23	0.58	
Open	12p - 9p	Sunday	10/30/2022	412.15	0.29	2440
Open	12p - 9p	Monday	10/31/2022	186.26	0.13	13230
Open	12p - 9p	Tuesday	11/1/2022	30.91	0.02	
Open	12p - 9p	Wednesday	11/2/2022			
Total Flow, Gals:				1,694.04		
Average Total Daily Flow, Gals:				338.81		
Average Daily Flow, GPM:					0.24	
Average COD Concentration, mg/L:						6,377





Big Trout Brewery:

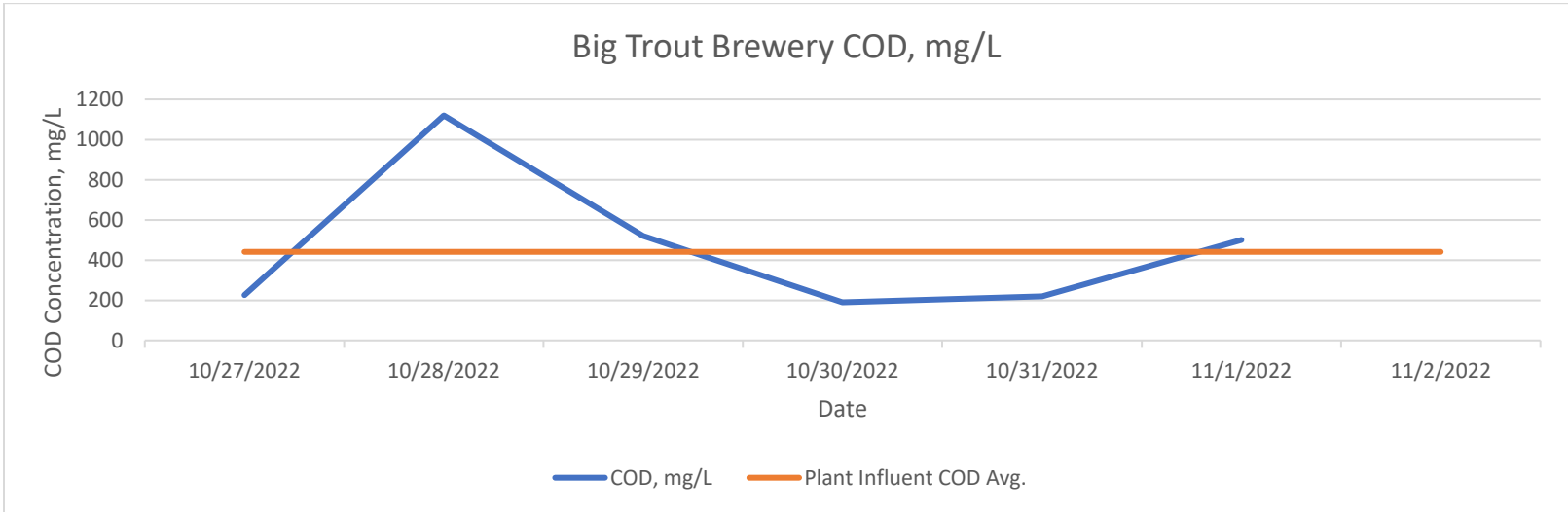
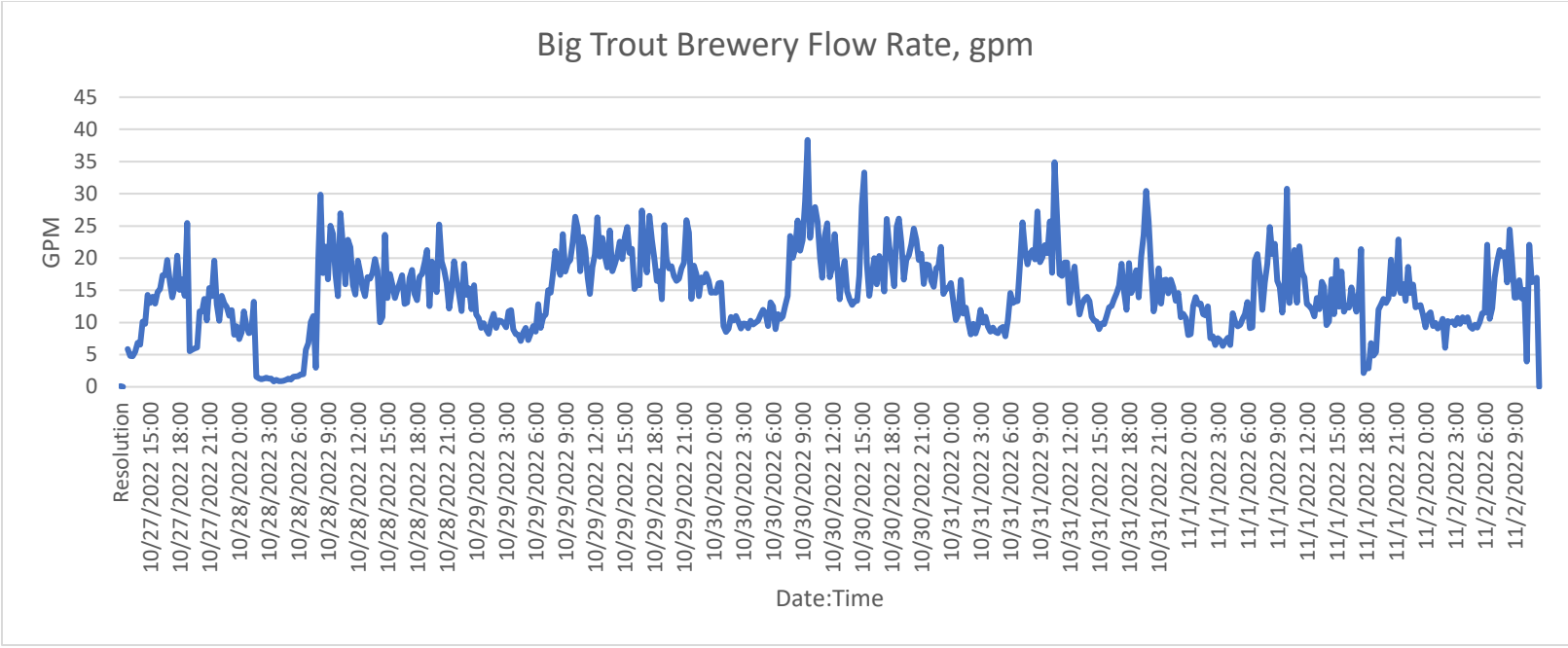
Big Trout Brewery is another brewery that is located within a large building with several other businesses, therefore, the flow data collected is a combination of other businesses in addition to other buildings that may be on the main line where the data collection manhole is located.

As shown in the table below, the flow data shows high average daily flows of 21,635.87 gallons or 15.02 gallons per minute. Due to the location of the Big Trout Brewery, the flow data was only able to be collected from the main line where several buildings are discharging. The graphs illustrate that flows from this area within the collection system have typical diurnal patterns, however, the flows from Big Trout Brewery are likely diluted which is why the COD values are lower than expected. It is also possible that Big Trout Brewery does not discharge excessive amounts of process wastewater to the collection system. The elevated COD result on Friday could be attributed to several scenarios including, but not limited to brewery discharge, restaurant usage and discharge and general increase in population and production of all food service establishments within the area that discharge to the collection system.

The Billing Department indicated that the usage for the building where Big Trout Brewery is located was 16,000 gallons for the month of October. This equates to approximately 516.13 gallons per day or 0.358 gallons per minute. Based on the flow data, these numbers are very different from what was reported by the billing department, therefore, further data is needed to quantify the loading from Big Trout Brewery.

Big Trout Brewery						
Open / Closed:	Hours:	Date of Sampling & Flow Monitoring:		Total Flow, Gals	Avg. Daily Flow, gpm	COD, mg/L
Open	11:30a - 9p	Thursday	10/27/2022			225
Open	11:30a - 9p	Friday	10/28/2022	18626.1	12.93	1120
Open	11:30a - 9p	Saturday	10/29/2022	23910.1	16.60	520
Open	11:30a - 9p	Sunday	10/30/2022	25019.74	17.37	190
Open	11:30a - 9p	Monday	10/31/2022	21614.2	15.01	220
Closed		Tuesday	11/1/2022	19009.19	13.20	500
Closed		Wednesday	11/2/2022			
Total Flow, Gals:				108,179.33		
Average Total Daily Flow, Gals:				21,635.87		
Average Daily Flow, GPM:					15.02	
Average COD Concentration, mg/L:						463





Idlewild Distillery:

Idlewild Distillery is a distillery that is located within a large building with several other businesses, therefore, the flow data collected is a combination of other businesses in addition to other buildings that may be on the main line where the data collection manhole is located. In this case, the manhole identified for sample collection had a 3-inch service line from the distillery only. To collect samples only from the Idlewild service line, a small catch pan was installed under the 3-inch pipe and samples were collected from this catch pan. For the flow monitoring, the best solution to determine Idlewild flow was to monitor the flows upstream and downstream from the sampling manhole and subtract the totals in order to determine an estimated flow rate from Idlewild.

As shown in the table below, Idlewild Distillery is open Wednesday through Sunday, and closed Monday and Tuesday. The average flow rate per day was 627.26 or 7.07 gallons per minute. The table below illustrates the calculated flow rate, which is why some data is missing as that data from installing and removing the flow meters do not exactly align, therefore, some data is lost in this process. It is clear from the table below and the graphs associated with this site that Friday is a high flow day for the Distillery, likely due to increased patrons visiting the Distillery. It is also of note that the Distillery is closed on Monday and Tuesday, however, the graphs illustrate a lower flow rate with a significant increase in COD concentration. This may be similar to other industrial users within this project that tend to have higher strength wastewater contributions on Monday, potentially due to producing product or cleaning vessels.

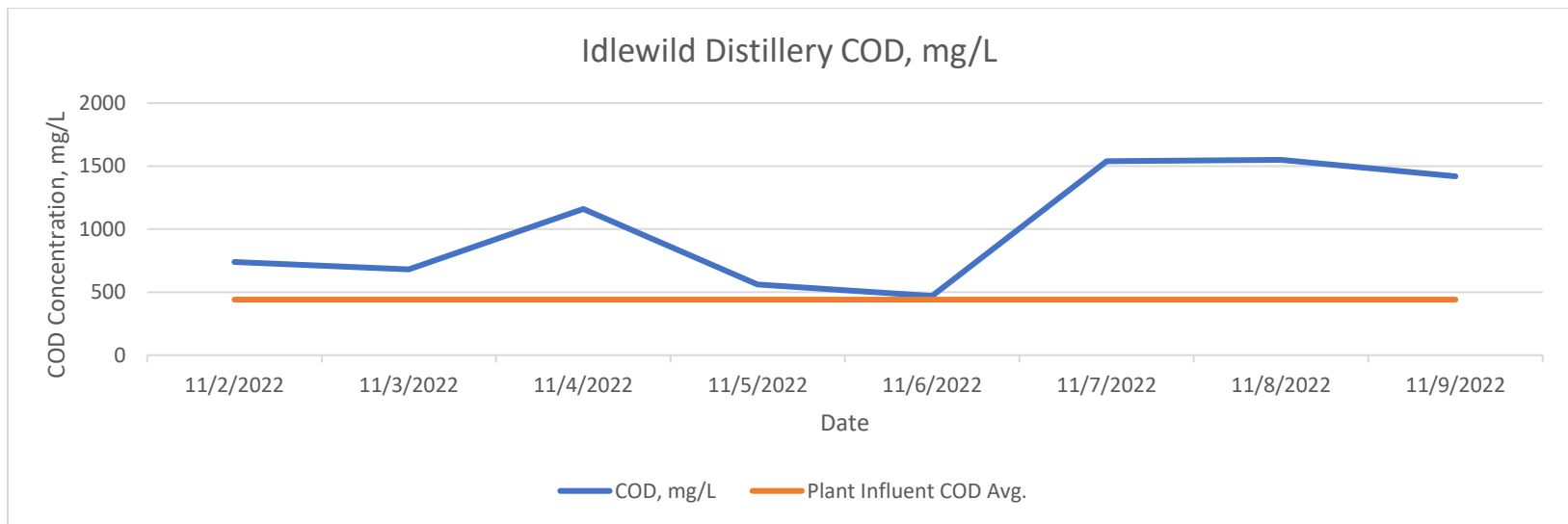
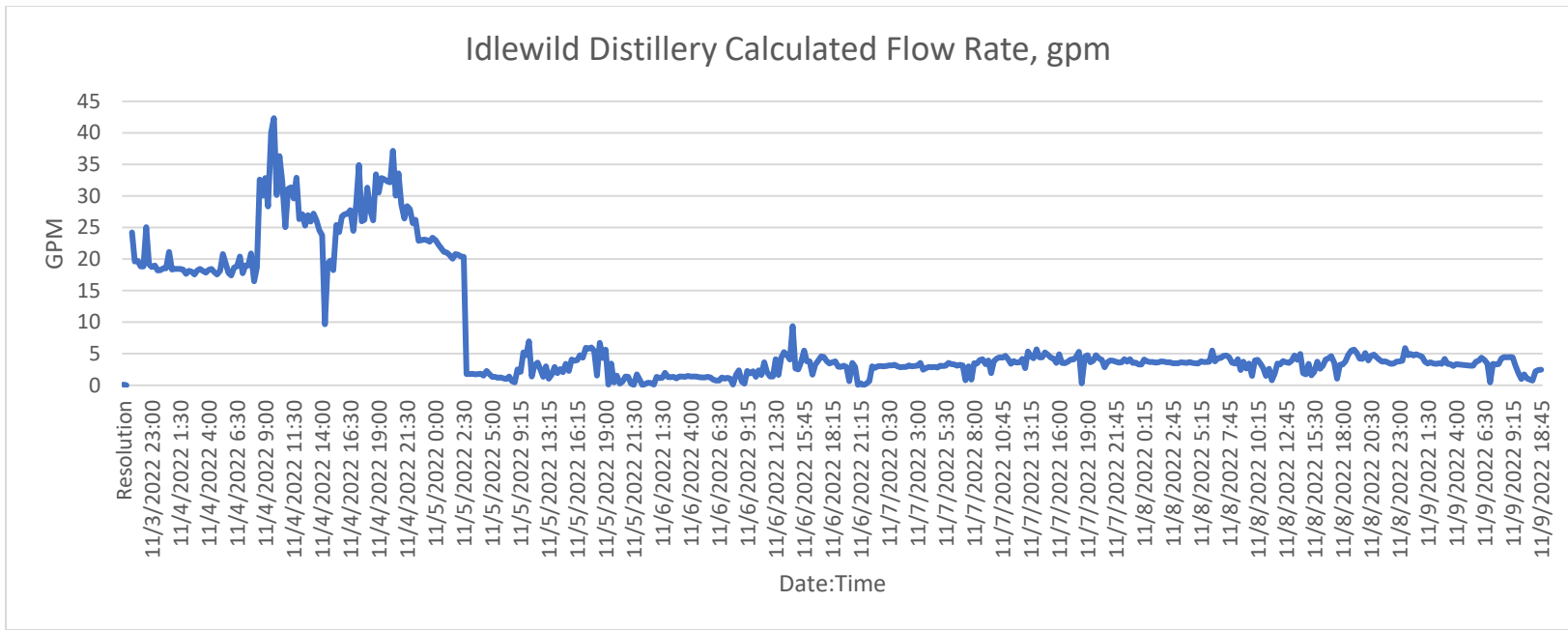
The Billing Department indicated that the usage for the building where Idlewild Distillery is located was 41,000 gallons for the month of October. This equates to approximately 1,332.6 gallons per day or 0.92 gallons per minute. Based on the flow data, these numbers are different, however much of this discrepancy could be due to using the upstream and downstream flows to calculate the estimated flow from Idlewild Distillery.

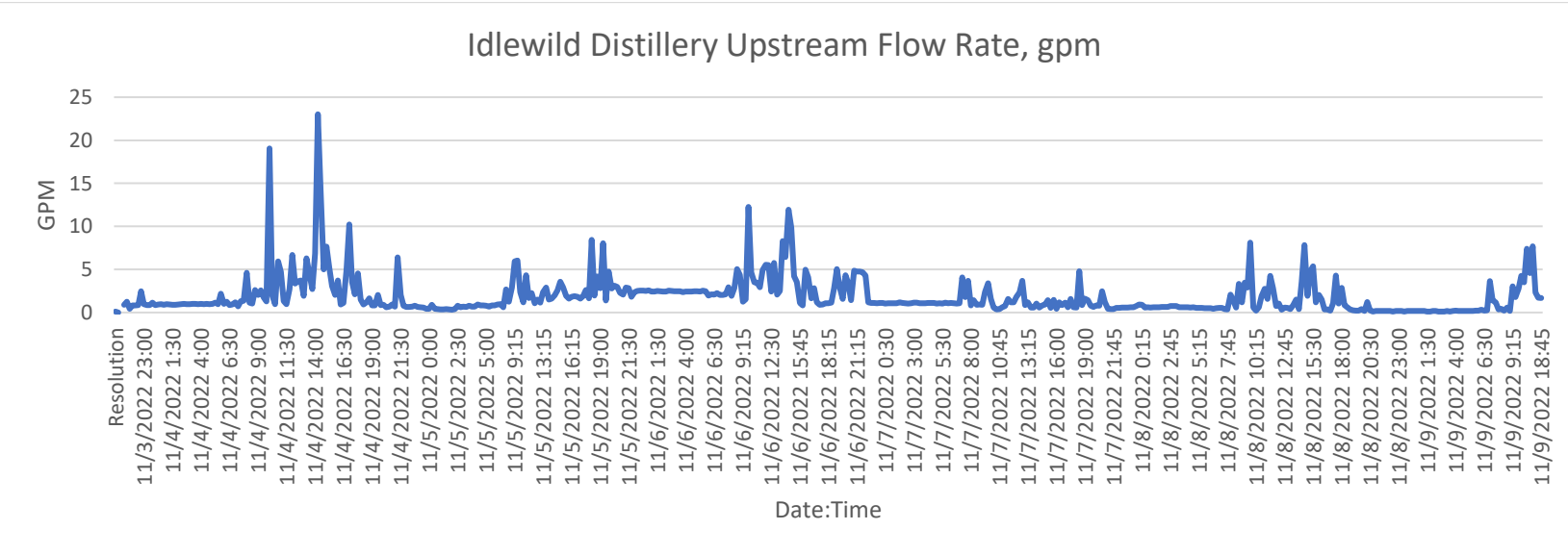
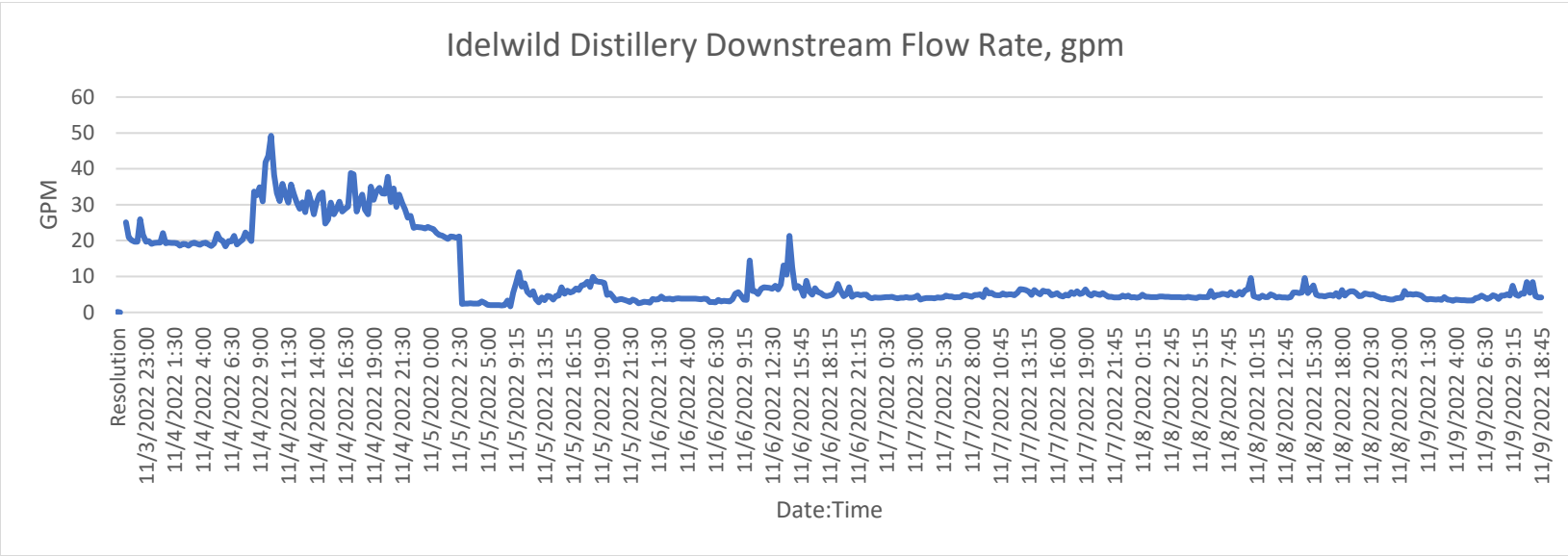
Although the flow data is somewhat difficult to analyze as it is a calculated value, the key information from the table below and the attached graphs is the COD data. The COD data was collected from the Idlewild Distillery service line pipe, with no other contributions. An average COD concentration of 1,015 mg/L is elevated and this is with dilution as an Idlewild employee provided a brief tour prior to the project where dilution was observed.



Idlewild Distillery						
Open / Closed:	Hours:	Date of Sampling & Flow Monitoring:		Total Flow, Gals	Avg. Daily Flow, gpm	COD, mg/L
Open	5p - 10p	Wednesday	11/2/2022			740
Open	5p - 10p	Thursday	11/3/2022			680
Open	5p - 10p	Friday	11/4/2022	2365.22	24.63	1160
Open	5p - 10p	Saturday	11/5/2022	388.29	5.04	560
Open	5p - 10p	Sunday	11/6/2022	179.47	2.22	470
Closed		Monday	11/7/2022	327.34	3.60	1540
Closed		Tuesday	11/8/2022	348.8	3.67	1550
Open	5p - 10p	Wednesday	11/9/2022	154.44	3.28	1420
Open	5p - 10p	Thursday	11/10/2022			
Total Flow, Gals:				3,763.56		
Average Total Daily Flow, Gals:				627.26		
Average Daily Flow, GPM:					7.07	
Average COD Concentration, mg/L:						1,015







Camber Brewing / Fraser River Beer Company:

Camber Brewing and Fraser River Beer Company were two breweries that we very difficult to collect flow and loading data from due to the configuration of the service lines, the unknowns of the direction of flow, and the location of the main line in Highway 40. After conversation with the Town of Fraser, it was determined that the most appropriate sampling and flow monitoring locations would provide flows and loadings data from both Camber Brewing and Fraser River Beer Company, as well as provide the upstream flow data that would be needed to quantify the flow to Fraser Distillery.

As shown in the table below, Camber Brewing and Fraser River Beer Company are open daily, with times of operation varying an hour or so. The flow totals are not representative of Camber Brewing and Fraser River Beer Company as there were simply too many other unknowns within the section of collection system to quantify only the two industrial contributions in question. It was noted after completion of the project that the Camber Brewery was possibly operating out of the Car Wash located at the Shell Gas Station near Fraser River Beer Company, therefor the flow data collected is considered not representative for this section of the project.

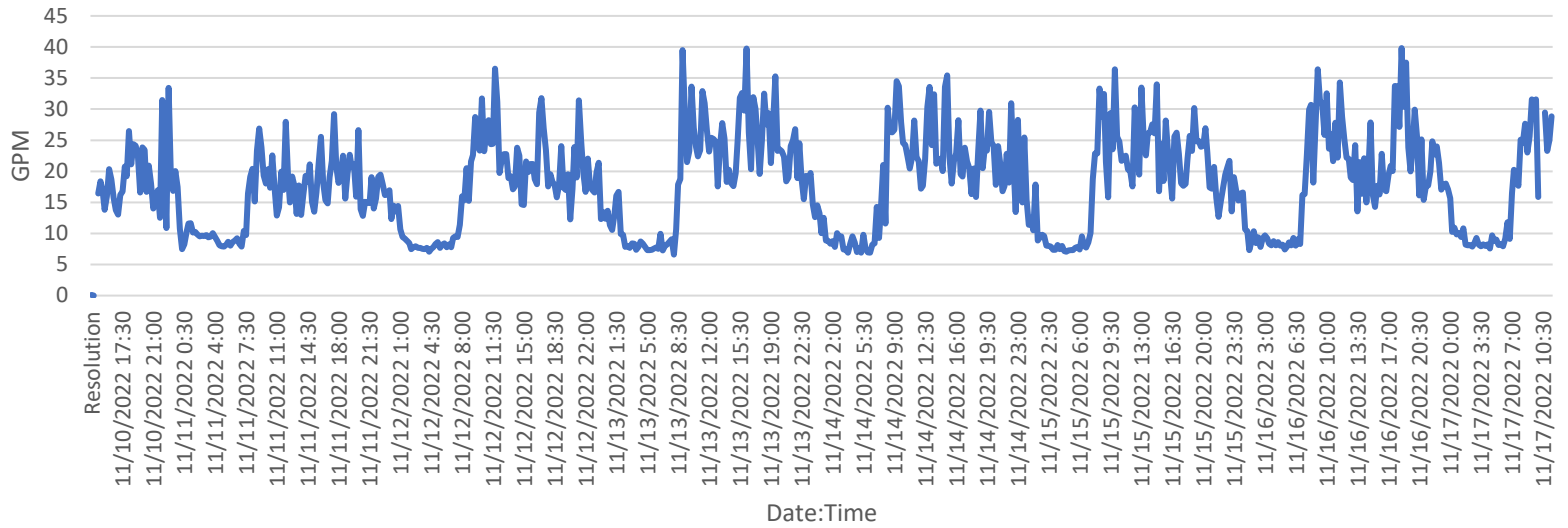
The graphs illustrating the flow data collected is of typical diurnal flow pattern as expected due to where the flow monitoring was conducted at a major collection system trunk line. The COD data is indicative of elevated levels on Wednesday, which is of concern with the amount of dilution within the sample due to all of the other contributions on this main trunk line.

Further investigation of Camber Brewing and Fraser River Beer Company would be required to gain quantifiable data for projected flows and loadings.

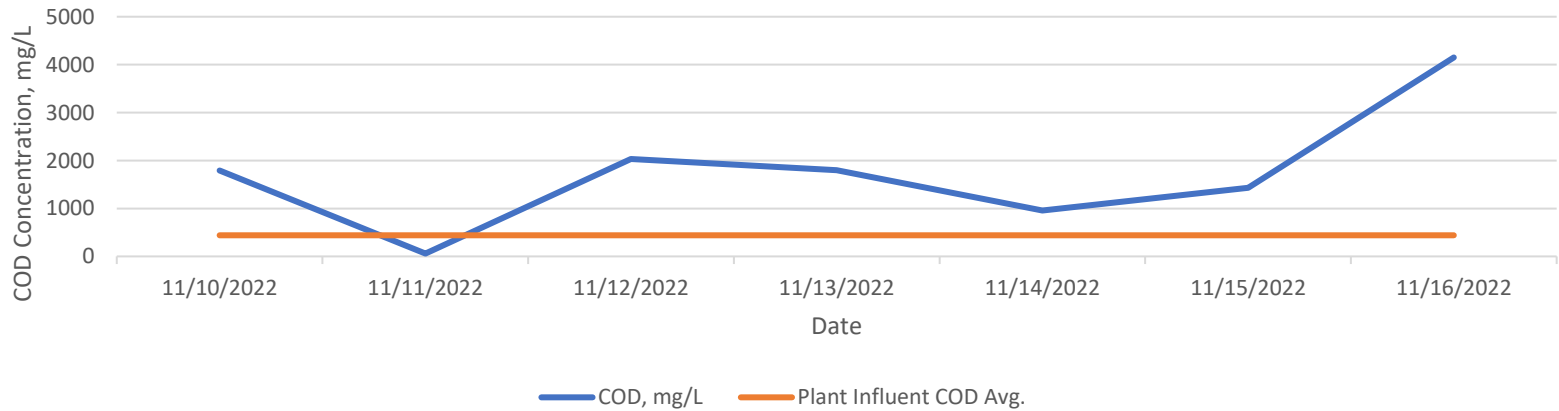
Camber Brewing / Fraser River Beer Company						
Open / Closed:	Hours:	Date of Sampling & Flow Monitoring:		Total Flow, Gals	Avg. Daily Flow, gpm	COD, mg/L
Open	12p - 9p	Thursday	11/10/2022			1790
Open	12p - 9p	Friday	11/11/2022	22,347.60	15.52	60
Open	12p - 9p	Saturday	11/12/2022	24,702.48	17.15	2030
Open	12p - 9p	Sunday	11/13/2022	27,632.88	19.19	1800
Open	12p - 9p	Monday	11/14/2022	27,065.28	18.80	960
Open	12p - 9p	Tuesday	11/15/2022	26,637.60	18.50	1430
Open	12p - 9p	Wednesday	11/16/2022	27,382.08	19.02	4150
Open	12p - 9p	Thursday	11/17/2022			
Total Flow, Gals:				155,767.92		
Average Total Daily Flow, Gals:				25,961.32		
Average Daily Flow, GPM:					18.03	
Average COD Concentration, mg/L:						1,746



Camber Brewing / Fraser River Beer Company Flow Rate,gpm



Camber Brewing / Fraser River Beer Company COD, mg/L



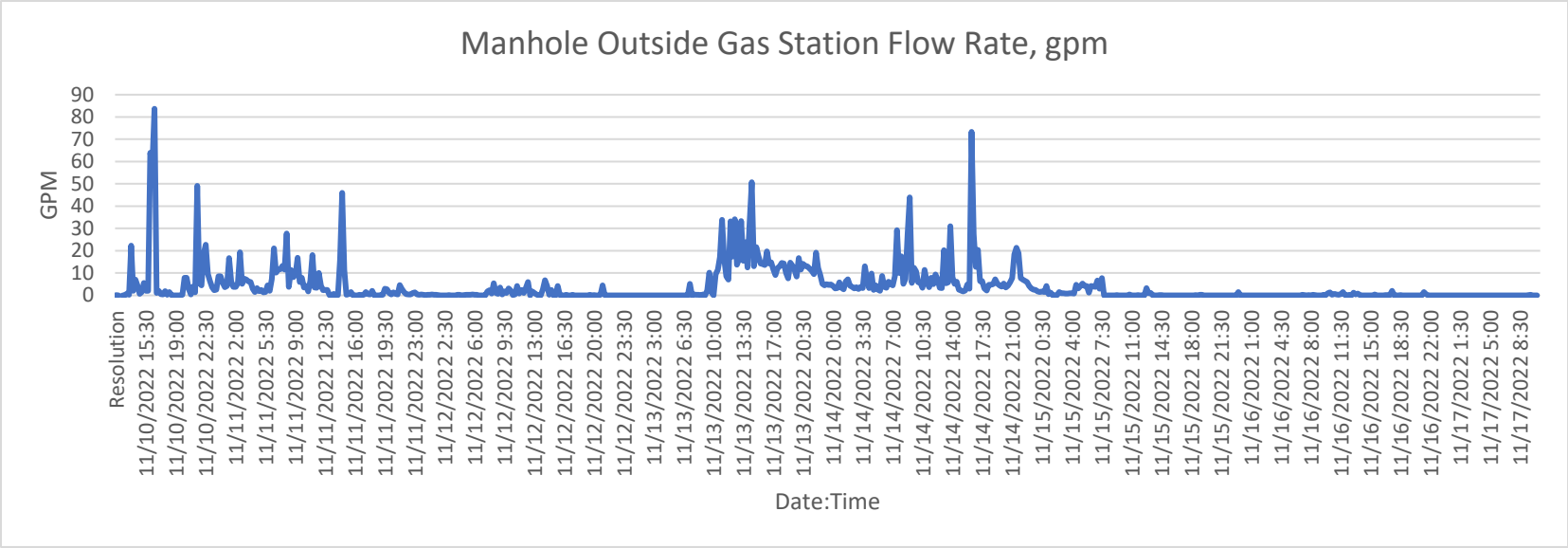
During the project, a manhole outside of the Fraser River Beer Company in the parking lot, near the gas station was of interest to the Town of Fraser and the Direct Discharge Consulting staff on the project. During the last week of the project, a flow meter was installed at the manhole to simply check the flows for anything outside of the ordinary. When the flow data was collected, the data was concluded to be normal for the area. See the table below for data collected.

After learning about the potential that Camber Brewing may be operating out of the Carwash, the flow data became much more interesting as the flows vary greatly from day to day with Wednesday being as low as 231 gallons and Sunday being elevated to almost 13,000 gallons.

In conclusion, further investigation of Camber Brewing, Fraser River Beer Company, the manhole outside of the gas station and collection system mapping would be required to gain quantifiable data for projected flows and loadings.

Manhole Outside Gas Station			
Date of Flow Monitoring:		Total Flow, Gals	Avg. Daily Flow, gpm
Thursday	11/10/2022		
Friday	11/11/2022	7,149.12	4.96
Saturday	11/12/2022	1,148.40	0.80
Sunday	11/13/2022	12,922.80	8.97
Monday	11/14/2022	11,932.80	8.29
Tuesday	11/15/2022	1,256.64	0.87
Wednesday	11/16/2022	231.53	0.16
Thursday	11/17/2022		
Total Flow, Gals:		34,641.29	
Avg. Total Daily Flow:		5,773.55	
Avg. Daily Flow, GPM:			4.01





Fraser Distillery:

As noted with Camber Brewing and Fraser River Beer Company, the flows for Fraser Distillery were derived from the flow data collected upstream and downstream of Fraser Distillery. As shown in the table below, the average daily flow calculated for Fraser Distillery was 17,066.88 gallons or 11.85 gallons per minute.

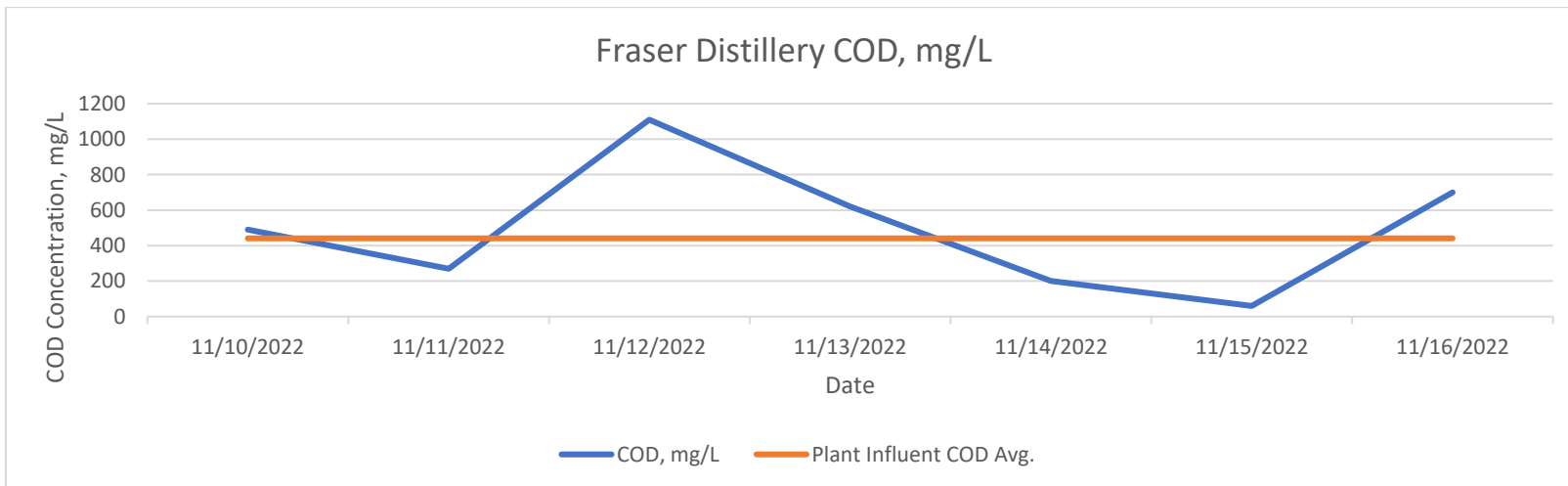
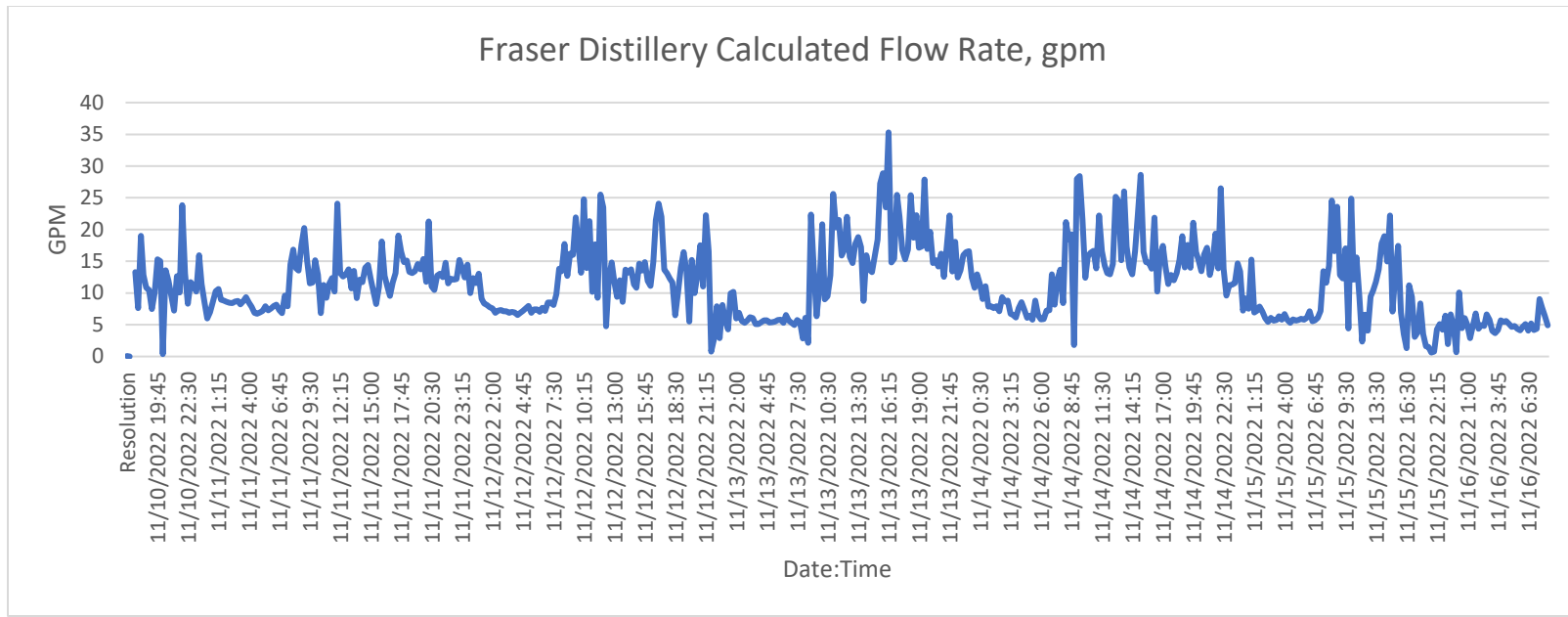
As illustrated in the attached graph, the flow is typical of diurnal flow pattern which includes additional flows from other buildings that could not be excluded from the calculated flow rate.

The COD concentrations are lower than some of the other project areas, however, it is anticipated that dilution is occurring due to the flows seen within the collection system and the anticipated flow rate from the Fraser Distillery. The 1,110 mg/L COD value is of concern with the assumed volume of dilution, but could be from various sources including restaurants on the same collection system line.

The Billing Department indicated that the usage for Fraser Distillery from 11/7 to 11/17/2022 was 12,000 gallons or 1,200 gallons per day. This data further suggests that dilution was evident as the average daily flow calculated was 17,066.88 gallons.

Fraser Distillery						
Open / Closed:	Hours:	Date of Sampling & Flow Monitoring:		Total Flow, Gals	Avg. Daily Flow, gpm	COD, mg/L
Open	3p - 8p	Thursday	11/10/2022			490
Open	3p - 8p	Friday	11/11/2022	16,761.60	11.64	270
Open	11a - 8p	Saturday	11/12/2022	17,121.60	11.89	1110
Open	11a - 3p	Sunday	11/13/2022	19,065.60	13.24	620
Closed		Monday	11/14/2022	19,742.40	13.71	200
Closed		Tuesday	11/15/2022	12,643.20	8.78	60
Open	3p - 8p	Wednesday	11/16/2022			700
Open	3p - 8p	Thursday	11/17/2022			
Total Flow, Gals:				85,334.40		
Average Total Daily Flow, Gals:				17,066.88		
Average Daily Flow, GPM:					11.85	
Average COD Concentration, mg/L:						493





In conclusion, Direct Discharge Consulting would like to make some further recommendations not noted previously within this report. It was noted on several of the project specific locations that elevated COD concentrations were observed and reported. Flow data for several of the project locations were representative with Billing Department records, however, some flows were not quantifiable and need to be investigated further. In order to better understand and control the sources of industrial contributions, the following actions should be considered.

1. Start with reviewing the Municipal Code(s), District Rules and Regulations, etc. for Winter Park Ranch, Grand County WSD and the Town of Fraser to assure that legal authority is outlined to prohibit excessive industrial contributions. This can be done by reviewing 40 CFR Part 136 for the legal framework to implement Industrial Pretreatment provisions within the legal portion of your code or regulations. It would be best if all 3 entities had the same legal framework built into each code and/or regulations to maintain consistency with all discharges to the Town of Fraser wastewater treatment facility.
2. Once this legal framework is provided in the code, the next step would be to develop and implement Best Management Practices (BMP's). These are similar to permits that a larger municipality would use to limit industrial contributions to the wastewater facility, but without all of the factors that go into formal permitting. Essentially, a well written BMP will be a generic form that is provided to each Brewery or Distillery with guidance on how to minimize impact to the wastewater treatment process, followed by the quarterly (could be more or less frequent) sampling data provided by the industrial user to the managers of the Towns/Districts. This data would be provided to the wastewater treatment facility for process control and loading calculations.
3. Designation of a person or persons for the Town/Districts to act as pretreatment personnel to be trained on inspections. Inspections are a critical step to assuring the wastewater treatment facility and collection systems are protected from industrial contributions that may cause issue with the treatment facility operations and/or collection system, as well as worker health and safety. While completing this project, we inspected the Idlewild Distillery grease interceptor and found it to be at 100% capacity and in severe need of pumping. On another occasion, we found a collection system line almost completely plugged with grease and rocks. We removed this debris to assure flow would not be restricted, but were unable to remove whatever may have been upstream of this grease which in the future, may result in a blockage and potential sanitary sewer overflow (SSO).
4. Fats, Oil & Grease (FOG) Policy needs to be implemented into the District(s) and Town municipal code and/or Rules and Regulations, if not already. Most of the manholes the Direct Discharge Consulting team entered to install flow monitors and samplers were obviously having excessive grease accumulation. It seems as though a formal FOG program may not be implemented including FOG inspections. Each restaurant within the service area that has a grease interceptor or grease trap should be inspected quarterly. The code and/or regulations should outline this inspection and provide a narrative for violations, and escalating measures if a user does not comply with the violation.
5. Depending on how serious the District(s) and Town want to take these actions, a surcharge could be implemented for contaminants of concern, such as BOD, COD, TSS, Ammonia, Nitrogen, Phosphorus, metals, etc. The surcharge cannot be implemented without legal



justification and noted in the code or regulations. A surcharge is calculated by the design loading to the facility, including items outside of the NPDES permit including, but not limited to pollutants of concern (Reg 85 pollutants, nitrification/denitrification inhibition, collection system hazards, etc.) that can be calculated on how much of each pollutant the wastewater treatment facility can effectively remove, and then determining the cost to treat these pollutants.

For example, if it is determined it costs \$0.25 to treat 1 pound of BOD and the domestic population is determined to contribute 1,000 pounds per day at 250 mg/L BOD and the wastewater treatment facility is at 50% organic capacity, the facility could in theory treat up to 500 mg/L BOD or 2,000 pounds per day at \$0.50 per pound of BOD. A surcharge would be calculated for any industrial user (including restaurants) that discharges over 500 mg/L BOD. If we use a simple number of \$0.50 per pound of BOD as a surcharge, then an industrial user that contributes a BOD of 1,000 mg/L such as a brewery and discharges 10,000 gallons per day would be issued a surcharge of \$41.70 per day (0.01 MGD Flow x 1,000 mg/L BOD x 8.34 = 83.4 pounds per day BOD x \$0.50 per pound BOD Surcharge = \$41.70)

It is evident from this project that further investigation is required to fully understand the industrial contributions to the wastewater treatment facility and to control the sources of industrial contributions. Direct Discharge Consulting is prepared to assist in any way possible to achieve the goals of the District(s) and Town. We would like to thank all of the folks that assisted in this project including all of the Managers, Jim Fox, Lucas Seffens, Buff Borrás, Ed Cannon, and Joe Fuqua. A special thanks to Matt Wyant and Logan Wray for the boots on the ground work and laboratory assistance with this project.

Please do not hesitate to contact me to discuss this report or anything further you may wish to implement based on our recommendations at 970-619-8216 or dave@directdischarge.com.

Respectfully,

Dave Lewis, CWP

President – Direct Discharge Consulting

