

FILED

Jul 13, 2026

12:09 pm

**U.S. EPA REGION 5
HEARING CLERK**

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5**

In the Matter of:	)	Docket No. CWA-05-2026-0018
	)	
Tricor Industrial	)	
3225 W Old Lincoln Way	)	Proceeding to Assess a Class II Civil Penalty
Wooster, Ohio 44691	)	under Section 309(g) of the Clean Water
	)	Act, 33 U.S.C. § 1319(g)
Respondent.	)	
_____	)	

Consent Agreement and Final Order

Preliminary Statement

1. This is an administrative action commenced and concluded under Section 309(g) of the Clean Water Act ("CWA" or "the Act"), 33 U.S.C. § 1319(g), and Sections 22.13(b) and 22.18(b)(2)-(3) of the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties and the Revocation/Termination or Suspension of Permits (Consolidated Rules) as codified at 40 C.F.R. §§ 22.13(b) and 22.18(b)(2)-(3).

2. The Complainant is, by lawful delegation, the Director of the Enforcement and Compliance Assurance Division, EPA Region 5, U.S. Environmental Protection Agency (EPA), Region 5.

3. Respondent is Tricor Industrial (Tricor), a corporation in Wooster, Ohio.

4. Where the parties agree to settle one or more causes of action before the filing of a complaint, an administrative action may be commenced and concluded simultaneously by the issuance of a consent agreement and final order (CAFO). *See* 40 C.F.R. § 22.13(b).

5. The parties agree that settling this action without the filing of a complaint or the adjudication of any issue of fact or law is in their interest and in the public interest.

6. Respondent consents to the terms of this CAFO, including the assessment of the civil penalty specified below.

7. Pursuant to 40 C.F.R. § 22.18(b)(3), this Consent Agreement does not dispose of this proceeding without execution of the Final Order. The Final Order will not be issued until after completion of the requirements of Section 309(g)(4) of the CWA, 33 U.S.C. § 1319(g)(4), and 40 C.F.R. § 22.45(b), which require, among other things, public notice and a reasonable opportunity to comment on any proposed penalty order. Further, under Section 309(g), 33 U.S.C. § 1319(g), and 40 C.F.R. § 22.45, this Consent Agreement may be withdrawn before execution of the Final Order. Please refer to Section 309(g) of the CWA, 33 U.S.C. 1319(g), 40 C.F.R. § 22.45, and 40 C.F.R. Part 22 (the Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties) for detailed information on the procedures regarding Consent Agreement and Final Order as a penalty order under the CWA and settlement under Part 22.

8. Effective Date: In accordance with Section 309(g)(5) of the CWA, 33 U.S.C. § 1319(g)(5), and 40 C.F.R. § 22.45, this CAFO shall become effective 30 days after the date of issuance unless, if applicable, a commenter files a petition for judicial review pursuant to 33 U.S.C. § 1319(g)(8) or a request for hearing pursuant to 33 U.S.C. § 1319(g)(4)(C), or, if applicable, 30 days after the request or petition is denied. The date of issuance is the date the final order is signed by the Regional Judicial Officer or Regional Administrator.

Jurisdiction and Waiver of Right to Hearing

9. Respondent admits the jurisdictional allegations in this CAFO and neither admits nor denies the factual allegations in this CAFO.

10. Respondent waives its right to request a hearing as provided at 40 C.F.R. § 22.15(c), any right to contest the allegations in this CAFO, and its right to appeal this CAFO. Respondent waives any rights or defenses that Respondent has or may have for this matter to be resolved in federal court, including but not limited to any right to a jury trial, and waives any right to challenge the lawfulness of the final order accompanying the consent agreement.

Statutory and Regulatory Background

11. Section 301(a) of the CWA, 33 U.S.C. § 1311(a), prohibits the discharge of pollutants into navigable waters except in compliance with, *inter alia*, a National Pollutant Discharge Elimination System (NPDES) permit issued pursuant to Section 402 of the CWA, 33 U.S.C. § 1342.

12. Section 402 of the CWA, 33 U.S.C. § 1342, establishes the NPDES program under which EPA and, upon receiving authorization from EPA, a state may permit discharges into navigable waters, subject to specific conditions. A violation of a NPDES permit is a violation of Section 301(a) of the CWA, 33 U.S.C. § 1311(a).

13. Pursuant to Section 402 of the CWA, 33 U.S.C. § 1342, the State of Ohio requested approval from EPA to administer its own permit program for discharges into navigable waters within Ohio, and such approval was granted by EPA on March 11, 1974, 39 Fed. Reg. 26,061 (July 16, 1974). Therefore, pursuant to the State's permit program, the Ohio Environmental Protection Agency ("OEPA") has issued OEPA NPDES permits.

14. Section 309(g) of the CWA, 33 U.S.C. § 1319(g), authorizes the Administrator to assess a Class II civil penalty under Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), after consultation with the State in which the violation occurs, when the Administrator finds, on the basis of any information available, that a person has violated Section 301 of the CWA, 33 U.S.C. § 1311, which prohibits unpermitted discharges of any pollutant to navigable waters and discharges of any pollutant to navigable waters not in compliance with a permit issued under Section 402 of the CWA, 33 U.S.C. § 1342, or when the Administrator finds that a person has violated a condition or limitation of a permit issued under 33 U.S.C. § 1342.

Factual Allegations

15. Respondent is a corporation, and therefore a “person” under Section 502(5) of the CWA, 33 U.S.C. § 1362(5).

16. At all times relevant to this Order, Respondent owned and operated Tricor Industrial, a metal fabrication facility, located in Wooster, Ohio (“Facility”).

17. Killbuck Creek is a “navigable water” under Section 502(7) of the CWA, 33 U.S.C. § 1362(7).

18. At all times relevant to this Order, Outfall No. 001 at the Facility discharged total suspended solids (“TSS”), aluminum, and nitrite and nitrate (“nitrite/nitrate”) into Killbuck Creek.

19. Outfall No. 001 at the Facility is a “point source” as defined in Section 502(14) of the CWA, 33 U.S.C. § 1362(14).

20. TSS, aluminum, and nitrate/nitrite are “pollutants” as defined by Section 502(6) of the CWA, 33 U.S.C. § 1362(6).

21. The discharges described in Paragraph 18 is a “discharge of pollutants,” as defined in Section 502(12) of the CWA, 33 U.S.C. § 1362(12).

22. Because Respondent owned or operated a Facility with an outfall that acted as a point source for the discharge of pollutants to navigable waters, Respondent and the Facility have been subject to the CWA and the NPDES Program at all times relevant to this Order. Thus, any such discharge has been and is subject to the specific terms and conditions prescribed in the applicable NPDES permit.

23. Respondent was issued NPDES permit OH0107557 (“Permit”) under Section 402 of the CWA, 33 U.S.C. § 1342, by OEPA.

24. EPA conducted an NPDES compliance evaluation inspection at the Facility on March 17, 2021 (“2021 Inspection”).

Count One: Failure to Comply with Effluent Limitations for TSS

25. The statements in Paragraphs 1 through 24 are hereby incorporated by reference as if set forth in full.

26. The Permit contains effluent limitations that place certain limitations on the quality and quantity of effluent discharged by Respondent for specified pollutants, including TSS.

27. The Permit requires Respondent to sample and test its effluent and monitor its compliance with Permit conditions and applicable regulations, according to specific procedures.

28. The Permit requires Respondent to file certified Discharge Monitoring Reports (“DMRs”) of the results of monitoring its effluent with Ohio EPA.

29. Certified DMRs filed by Respondent with OEPA for January 1, 2019 through September 30, 2021, as required by the Permit, show discharges of TSS that exceeded effluent limitations established in the Permit for TSS, as listed in Attachment A (Exceedances of Permitted Effluent Discharge Limits), which is incorporated herein by reference.

30. Each effluent limit exceedance listed in Attachment A is a violation of the Permit and Section 301 of the CWA, 33 U.S.C. § 1311.

Count Two: Failure to Document Response to Benchmark Exceedances

31. The statements in Paragraphs 1 through 24, 27, and 28 are hereby incorporated by reference as if set forth in full.

32. The Permit includes “Storm Water Monitoring Requirements” that specify pollutant benchmark concentrations that are applicable to Respondent’s discharge.

33. The Permit requires Respondent to, within 30 days of discovering that a sampling result exceeds an applicable benchmark, document any corrective actions taken or to be taken, or if no corrective action is needed, the basis for that determination, and include this documentation in an annual report that is maintained onsite with the Stormwater Pollution Prevention Plan (SWPPP).

34. Certified DMRs filed by Respondent with Ohio EPA for December 1, 2018 through December 31, 2023, as required by the Permit, show discharges of pollutants from the Facility that exceeded the benchmarks established in the Permit, as specified in Attachment B

(Exceedances of Permitted Effluent Discharge Benchmark Concentrations), which is incorporated herein by reference.

35. Respondent did not, within 30 days of discovering each of the benchmark exceedances set forth in Attachment B, document corrective actions taken or to be taken, or if no corrective action was needed, the basis for that determination, and include this documentation in an annual report maintained onsite with the SWPPP, in violation of the Permit and Section 301 of the CWA, 33 U.S.C. § 1311.

Count Three: Failure to Update Stormwater Pollution Prevention Plan

36. The statements in Paragraphs 1 through 24 are hereby incorporated by reference as if set forth in full.

37. The Permit requires Respondent to update its SWPPP within 6 months of the effective date of the Permit.

38. At the time of the 2021 inspection, which occurred more than 6 months after the effective date of the Permit, Respondent did not have an updated SWPPP, in violation of the Permit and Section 301 of the CWA, 33 U.S.C. § 1311.

Count Four: Failure to Document Stormwater Inspections

39. The statements in Paragraphs 1 through 24 are hereby incorporated by reference as if set forth in full.

40. The Permit requires Respondent to perform and document stormwater inspections at the Facility in accordance with the specific terms and conditions prescribed in the Permit.

41. At the time of the 2021 inspection, Respondent did not have documentation of Facility stormwater inspections, in violation of the Permit and Section 301 of the CWA, 33 U.S.C. § 1311.

Count Five: Failure to Maintain Annual Reports with the SWPPP

42. The statements in Paragraphs 1 through 24 are hereby incorporated by reference as if set forth in full.

43. The Permit requires Respondent to prepare annual reports to keep with the SWPPP.

44. At the time of the 2021 inspection, Respondent did not have annual reports with its SWPPP, in violation of the Permit and Section 301 of the CWA, 33 U.S.C. § 1311.

Count Six: Discharges from Outfall No. 001 from Sources Not Described in the Permit

45. The statements in Paragraphs 1 through 24 are hereby incorporated by reference as if set forth in full.

46. The Permit specifies that the sources of the Outfall No. 001 discharge are limited to stormwater runoff, clean hydrostatic test water, and groundwater from the fabrication sump.

47. At the time of the 2021 inspection, in addition to the sources listed in Paragraph 46, the sources of the Outfall No. 001 discharge included sources not identified in the Permit, specifically, wastewater from a jet cutting table and indirect contact cooling water, and Respondent had not notified the permitting authority, OEPA, of these additional Outfall No. 001 discharge sources, in violation of the Permit and Section 301 of the CWA, 33 U.S.C. § 1311.

Civil Penalty

48. Under Section 309(g)(2)(B) of the CWA, 33 U.S.C. § 1319(g)(2)(B), and 40 C.F.R. Part 19, the Administrator may assess a Class II civil penalty up to \$27,378 per day of violation up to a total of \$342,218, for violations of the CWA that occurred after November 2, 2015 and for which penalties are assessed on or after January 8, 2025, or other amounts as penalty levels may be later adjusted. See 40 C.F.R. Part 19.

49. Based upon the facts alleged in this CAFO, and upon the nature, circumstances, extent and gravity of the violations alleged, as well as Respondent's ability to pay, prior history of such violations, degree of culpability, economic benefit or savings (if any) resulting from the violations, and such other matters as justice may require, U.S. EPA has determined that an appropriate civil penalty to settle this action is \$102,121.

50. Within thirty (30) days after the Effective Date of this CAFO, Respondent must pay the \$102,121 civil penalty ("Assessed Penalty"). See Paragraphs 7 and 8 for an explanation of the "Effective Date."

51. Respondent must pay the Assessed Penalty and any interest, other charges and penalties due per this CAFO using any method, or combination of appropriate methods, as provided on the EPA website: <https://www.epa.gov/financial/makepayment>. For additional instructions see: <https://www.epa.gov/financial/additional-instructions-making-payments-epa>.

52. When making a payment, Respondent must:

- a. Identify every payment with Respondent's name and the docket number of this CAFO, CWA-05-2026-0018.
- b. Concurrently with any payment or within 24 hours of any payment, Respondent must serve proof of such payment to the following persons:

Regional Hearing Clerk, U.S. EPA
r5hearingclerk@epa.gov

William Jones, Water Enforcement and Compliance Branch, U.S. EPA
jones.william@epa.gov

Hala Kuss, Office of Regional Counsel, U.S. EPA
kuss.hala@epa.gov

Cincinnati Finance Center, U.S. EPA
CINWD_AcctsReceivable@epa.gov

“Proof of Payment” means, as applicable, confirmation of credit card or debit card payment, or confirmation of wire or automated clearinghouse transfer, and any other information required to demonstrate that payment has been made according to EPA requirements, in the amount due, and identified with the appropriate docket number and Respondent’s name.

53. Pursuant to 33 U.S.C. § 1319(g)(9), 31 U.S.C. § 3717, 31 C.F.R. § 901.9, and 40 C.F.R. § 13.11, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this CAFO. including any stipulated penalty demanded by EPA pursuant to Paragraph 69, the entire unpaid balance of the Assessed Penalty or, if applicable, demanded stipulated penalty, and all accrued interest will become immediately due and owing, and EPA is authorized to recover the following amounts.

- a. Interest. Interest on the Assessed Penalty begins to accrue from the Effective Date. If the Assessed Penalty is paid in full within thirty (30) days, interest accrued on the Assessed Penalty is waived. If the Assessed Penalty is not paid in full within thirty (30) days, interest will continue to accrue until the

unpaid portion of the Assessed Penalty as well as any interest, penalties, and other charges are paid in full. Interest will be assessed at prevailing rates, per 33 U.S.C. § 1319(g)(9). The rate of interest is the IRS large corporate underpayment rate.

b. Handling Charges. The United States' enforcement expenses including, but not limited to, attorneys' fees and costs of collection proceedings.

c. Late Payment Penalty. A twenty percent (20%) quarterly non-payment penalty.

54. Late Penalty Actions. In addition to the amounts described in Paragraph 53, if Respondent fails to timely pay any portion of the Assessed Penalty, interest, or other charges and penalties per this CAFO EPA may take additional actions. Such actions EPA may take include, but are not limited to, the following.

a. Refer the debt to a credit reporting agency or a collection agency, per 40 C.F.R. §§ 13.13 and 13.14;

b. Collect the debt by administrative offset (i.e., the withholding of money payable by the United States government to, or held by the United States government for, a person to satisfy the debt the person owes the United States government), which includes, but is not limited to, referral to the Internal Revenue Service for offset against income tax refunds, per 40 C.F.R. Part 13, Subparts C and H.

c. Suspend or revoke Respondent's licenses or other privileges, or suspend or disqualify Respondent from doing business with EPA or engaging in programs EPA sponsors or funds, per 40 C.F.R. § 13.17.

d. Request that the Attorney General bring a civil action in the appropriate district court to recover the full remaining balance of the Assessed Penalty, in addition to interest and the amounts described above, pursuant to 33 U.S.C. § 1319(g)(9). In any such action, the validity, amount, and appropriateness of the Assessed Penalty will not be subject to review.

55. Allocation of Payments. Pursuant to 31 C.F.R. § 901.9(f) and 40 C.F.R. § 13.11(d), a partial payment of debt will be applied first to outstanding handling charges, second to late penalty charges, third to accrued interest, and last to principal that is the outstanding Assessed Penalty or, if applicable, demanded stipulated penalty amount.

56. Tax Treatment of Penalties. Penalties, interest, and other charges paid pursuant to this CAFO are not deductible for purposes of federal taxes.

57. Pursuant to 26 U.S.C. § 6050X and 26 C.F.R. § 1.6050X-1, EPA is required to send to the Internal Revenue Service ("IRS") annually, a completed IRS Form 1098-F ("Fines, Penalties, and Other Amounts") with respect to any court order or settlement agreement (including administrative settlements), that require a payor to pay an aggregate amount that EPA reasonably believes will be equal to, or in excess of, \$50,000 for the payor's violation of any law or the investigation or inquiry into the payor's potential violation of any law, including amounts paid for "restitution or remediation of property" or to come "into compliance with a law." EPA is further required to furnish a written statement, which provides the same

information provided to the IRS, to each payor (i.e. a copy of the IRS Form 1098-F). Failure to comply with providing IRS Form W-9 or Tax Identification Number (“TIN”), as described below, may subject Respondent to a penalty, per 26 U.S.C. § 6723, 26 U.S.C. § 6724(d)(3), and 26 C.F.R. § 301.6723-1. In order to provide EPA with sufficient information to enable it to fulfil these obligations, EPA herein requires, and Respondent herein agrees, that:

- a. Respondent shall complete an IRS Form W-9 (“Request for Taxpayer Identification Number and Certification”), which is available at <https://www.irs.gov/pub/irs-pdf/fw9.pdf>;
- b. Respondent shall therein certify that its completed IRS Form W-9 includes Respondent’s correct TIN or that Respondent has applied and is waiting for issuance of a TIN;
- c. Respondent shall email its completed Form W-9 to EPA’s Cincinnati Finance Center at wise.milton@epa.gov, within 30 days after the Effective Date of this CAFO, and EPA recommends encrypting IRS Form W-9 email correspondence; and
- d. In the event that Respondent has certified in its completed IRS Form W-9 that it does not yet have a TIN but has applied for a TIN, Respondent shall provide EPA’s Cincinnati Finance Center with Respondent’s TIN, via email, within five (5) days of Respondent’s receipt of a TIN issued by the IRS.

General Provisions

58. The parties consent to service of this CAFO by email at the following valid email addresses: kuss.hala@epa.gov (for Complainant) and sfarolino@ralaw.com (for Respondent).

Respondent understands that the CAFO will become publicly available upon proposal for public comment and upon filing.

59. Full payment of the penalty as described in Paragraphs 49 and 50 and full compliance with this CAFO shall not in any case affect the right of the U.S. EPA or the United States to pursue appropriate injunctive or other equitable relief or criminal sanctions for any violations of law.

60. As provided under 40 C.F.R. § 22.18(c), full payment of the penalty as described in Paragraphs 49 and 50 and full compliance with this CAFO shall only resolve Respondent's liability for federal civil penalties under Section 309(g) of the CWA, 33 U.S.C. § 1319(g), for the violations alleged in this CAFO.

61. This CAFO does not affect Respondent's responsibility to comply with the CWA and other applicable laws, regulations, or permits.

62. Respondent certifies that it is complying with Sections 301(a) and 402 of the CWA, 33 U.S.C. §§ 1311(a), 1342.

63. The terms of this CAFO bind Respondent and its successors and assigns.

64. Each person signing this CAFO certifies that he or she has the authority to sign for the party whom he or she represents and to bind that party to the terms of this CAFO.

65. Each party agrees to bear its own costs and attorneys fees in this action.

66. This CAFO constitutes the entire agreement between the parties.

67. When final and effective, this CAFO is a "final order" for purposes of 40 C.F.R. §§ 22.13, 22.18, 22.31, 22.45 and the EPA's Interim Clean Water Act Settlement Penalty Policy (Mar. 1995).

68. See Paragraphs 7 and 8 for an explanation of how the CAFO becomes final and effective.

Signature Page

**In the Matter of:
Tricor Industrial
Docket No. CWA-05-2026-0018**

Tricor Industrial, Respondent

Laura Warner

04/01/2026

Laura Warner
Controller
Tricor Industrial

Date

In the Matter of:
Tricor Industrial
Docket No. CWA-05-2026-0018

United States Environmental Protection Agency, Complainant

Carolyn Persoon
Division Director
Enforcement and Compliance Assurance Division
U.S. Environmental Protection Agency, Region 5

In the Matter of:
Tricor Industrial
Docket No. CWA-05-2026-0018

Final Order

In accordance with Section 309(g)(5) of the CWA, 33 U.S.C. § 1319(g)(5), and 40 C.F.R.

§ 22.45, this CAFO shall become effective 30 days after the date of issuance unless, if applicable, a commenter files a petition for judicial review pursuant to 33 U.S.C. § 1319(g)(8) or a request for hearing pursuant to 33 U.S.C. § 1319(g)(4)(C), or, if applicable, 30 days after the request or petition is denied. The date of issuance is the date the undersigned signed this Final Order. This Final Order concludes this proceeding pursuant to 40 C.F.R. §§ 22.18, 22.31, and 22.45. IT IS SO ORDERED.

By: _____ Date: _____
Ann L. Coyle
Regional Judicial Officer
U.S. Environmental Protection Agency
Region 5

ATTACHMENT A
Exceedances of Permitted Effluent Discharge Limits

Outfall: 001

Parameter: Total Suspended Solids

Monitoring Period Date	Limit Type	DMR Value	Limit Value	Unit	% Exceedance
1/31/2019	MO AVG	39	<= 30	mg/L	30
5/31/2019	MO AVG	158	<= 30	mg/L	427
5/31/2019	DAILY MX	158	<= 45	mg/L	251
6/30/2019	MO AVG	38	<= 30	mg/L	27
8/31/2019	MO AVG	84	<= 30	mg/L	180
8/31/2019	DAILY MX	84	<= 45	mg/L	87
9/30/2019	MO AVG	156	<= 30	mg/L	420
9/30/2019	DAILY MX	156	<= 45	mg/L	247
11/30/2019	MO AVG	74	<= 30	mg/L	147
11/30/2019	DAILY MX	74	<= 45	mg/L	64
1/31/2020	MO AVG	34	<= 30	mg/L	13
2/29/2020	MO AVG	58	<= 30	mg/L	93
2/29/2020	DAILY MX	58	<= 45	mg/L	29
3/31/2020	MO AVG	52	<= 30	mg/L	73
3/31/2020	DAILY MX	52	<= 45	mg/L	16
4/30/2020	MO AVG	50	<= 30	mg/L	67
4/30/2020	DAILY MX	50	<= 45	mg/L	11
6/30/2020	MO AVG	166	<= 30	mg/L	453
6/30/2020	DAILY MX	166	<= 45	mg/L	269
7/31/2020	MO AVG	58	<= 30	mg/L	93
7/31/2020	DAILY MX	58	<= 45	mg/L	29
2/28/2021	MO AVG	34	<= 30	mg/L	13
7/31/2021	MO AVG	328	<= 30	mg/L	993
7/31/2021	DAILY MX	328	<= 45	mg/L	629
9/30/2021	MO AVG	48	<= 30	mg/L	60
9/30/2021	DAILY MX	48	<= 45	mg/L	7

ATTACHMENT B
Exceedances of Permitted Effluent Discharge Benchmark Concentrations

Outfall: 001

Parameter: Aluminum

Limit: 0.75 mg/L

Monitoring Period End Date	DMR Value (mg/L)
5/31/2019	0.99
8/31/2019	0.81
9/30/2019	1.33
11/30/2019	1.30
3/31/2020	0.87
4/30/2020	1.21
6/30/2020	12.10
7/31/2020	5.51
1/31/2021	1.36
2/28/2021	2.13
7/31/2021	3.20
9/30/2021	3.47
11/30/2021	1.38
8/31/2023	0.79
11/30/2023	2.0

Outfall: 001

Parameter:

Nitrite/Nitrate Limit:

0.68 mg/L

Monitoring Period End Date	DMR Value (mg/L)
12/31/2018	2.21
1/31/2019	1.20
3/31/2019	0.73
4/30/2019	0.76
5/31/2019	1.38
7/31/2019	1.92
12/31/2019	0.77
1/31/2020	1.07
2/29/2020	0.83
3/31/2020	2.25
4/30/2020	1.53
6/30/2020	0.73
9/30/2020	1.17
11/30/2020	0.93
12/31/2020	1.39
1/31/2021	0.78
3/31/2021	0.75
5/31/2021	3.58
6/30/2021	0.81
7/31/2021	1.05
8/31/2021	1.06
10/31/2021	1.20
12/31/2021	2.44
2/28/2022	1.93
3/31/2022	1.39
4/30/2022	1.2
5/31/2022	0.69
7/31/2022	1.49
8/31/2022	2.04
9/30/2022	1.82
10/31/2022	0.89
1/31/2023	0.85
6/30/2023	1.06
9/30/2023	1.45