

REPORT OF THE PRETREATMENT COMPLIANCE INSPECTION

AT

City of Fort Dodge
Municipal Building
819 1st Avenue South
Fort Dodge, Iowa 50501

Operated by

US Water Utility Group
1406 Central Avenue
Fort Dodge, Iowa 50501

NPDES Permit No.: **IA0044849**

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
REGION 7
ENFORCEMENT AND COMPLIANCE ASSURANCE DIVISION (ECAD)
WATER BRANCH/DRINKING WATER & INSPECTIONS SECTION (WB/DWIS)

ON

MARCH 5, 6, AND 7, 2024

At the request of the Water Branch (WB), Enforcement and Compliance Assurance Division (ECAD), a Pretreatment Compliance Inspection of the Fort Dodge Approved Pretreatment Program was conducted on March 5, 6, and 7, 2024. To direct the inspection, a checklist was used that evaluates all important elements of the Pretreatment Program. A copy of the checklist is attached to this report (Attachment 1). The inspection consisted of a discussion and file review of the City's program and site visits to Nestle Purina Pet Care Co. and Elanco US Inc. In addition, I conducted brief file review of the City's Biosolids Management Program (Sludge). This narrative report presents the findings of the inspection.

Participants

US Water Utility Group

- Michelle Bemrich, IPP Coordinator
- Travis Pender, Project Manager

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tpender@uswatercorp.net

U.S. Environmental Protection Agency (EPA), Region 7

- Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS

ahmad.naji@epa.gov

Facility Description and Program Overview

The city of Fort Dodge, with an approximate population of 24,912 (2021 census estimate), owns a Vertical Loop Reactor (VLR) activated sludge Water Pollution Control Facility (WPCF) located in the southern portion of the city. The city has a contract with US Water Utilities Group (USW) to operate the WPCF and manage the Fort Dodge Industrial Pretreatment Program (IPP) that was originally approved on January 30, 1984. USW personnel initiate permit issuance and reissuance, conduct all compliance sampling for all regulated industries, annually inspect all regulated industries, determine compliance status, initiate enforcement, and generate and submit annual pretreatment report by March 1st of each year. The USW laboratory analyzes most conventional pollutants (BOD, TSS, pH, ammonia, E. coli). Samples for all other parameters are sent to a certified third-party laboratory. The USW laboratory is located at the WPCF.

Permits and formal enforcement documentations are signed by the city representative (Manager).

Treated effluent by the WPCF discharges into the Des Moines River that flows through the city from northwest to southeast. The VLR process consists of a primary clarifier splitter box that is designed to split flow to the two primary clarifiers. Flow from the primary clarifiers then travels by gravity to either of three, four-train activated sludge processes. Screenings and grit are removed, pressed, treated with lime, and disposed of at a landfill. Flow from the grit system flows into the VLR after it is measured in an 18-inch Parshall flume. After the VLRs, flow enters four, 100-foot final clarifiers. Clarifier effluent is measured in a 30-inch Parshall flume and disinfected in an ultraviolet (UV) disinfection chamber.

The WPCF is regulated under the Iowa National Pollutant Discharge Elimination System Permit (NPDES) number IA0044849 that is set to expire on September 30, 2025. According to the NPDES permit, the WPCF has a design of an average dry weather (ADW) flow of 8.4 million gallons per day (mgd), an average wet weather (AWW) flow of 15.0 mgd, a maximum wet weather (MWW) flow of 21.6 mgd, a design 5-day biochemical oxygen demand (BOD5) load of 27,164 lbs/day, a design Total Kjeldahl Nitrogen (TKN) load of 6,526 lbs/day, and a design Total Suspended Solids (TSS) load of 21,621 lbs/day.

The WPCF receives discharges from nine permitted Significant Industrial Users (SIUs) that make up fifty-four percent (54%) of its actual 2023 average influent of 8.95 mgd. Of those nine SIUs, three are currently located just outside the Fort Dodge city limits.

The current NPDES permit¹ required the city to continue implementing its approved IPP and submit to the Iowa Department of Natural Resources (IDNR) an annual report by March 1st each year describing the pretreatment program activities for the preceding calendar year. The permit also required the city to: (1) evaluate adequacy of its local limits to meet the general prohibition against interference and pass through listed in 40 CFR 403.5(a) and the specific prohibitions listed in 40 CFR 403.5(b) and submit a report by October 1, 2021, and to (2) evaluate the program with regards to the Streamlining Rule by October 1, 2021.

The USW and the city of Fort Dodge finalized the Industrial Pretreatment Study (Attachment 2) which included both evaluations in September 2021.

(1) <https://programs.iowadnr.gov/wwpie/Admin/PermitDetails?permitID=6914>

The study was submitted to the IDNR Field Office #2 on September 30, 2021, but did not receive an approval from the Iowa DNR because they did not submit it to Ben Hucka at the Iowa DNR Central Office. I recommended to the IPP personnel to send an email to Ben Hucka and include the study. On March 6, 2024, Michelle Bemrich, IPP Coordinator, sent two emails to Ben Hucka that included the IPP final study and the Sewer Use ordinance (SUO) evaluation (Attachment 3). Ben Hucka responded that he will be evaluating the study (local limits and SUO) as soon as possible.

The city incorporated the 2021 calculated local limits, which were not formally approved by the Iowa DNR, into the current cycle of the industrial user permits. However, at the time of the inspection, the city was still waiting for the Iowa DNR approval to enact the revised SUO that included the Streamlining Rule provisions.

I reminded the IPP personnel that as required by 40 CFR Part 403 and Rule 567 IAC 62.4(455B), all significant program modifications must be submitted to the Iowa DNR for review and approval before enacted on.

Legal Authority and Local Limits

As mentioned above, the city submitted the 2021 IPP and local limits evaluation to the IDNR as required by the NPDES permit. Records also indicates that the current approved program was evaluated and approved by the IDNR on June 19, 2013.

The current city Ordinance 1863 - Chapter 13.24 (Pretreatment) and Chapter 13.12 (Fees) were approved by the Iowa DNR on June 19, 2013, and was adopted on November 12, 2013. The city's current ordinance gives the authority to implement and enforce its Pretreatment Program, such as issuing permits for a duration not to exceed five years; requiring the submittal of permit renewal applications 180 days prior to the expiration date; the right to inspect, sample, enforce, collect a civil penalty up to \$1,000.00 for each violation; and includes a provision to address confidential business information.

The 2021 IPP study evaluated and identified the following pollutants as pollutants of concerns. Of the 26 pollutants, the city adopted mass limits as daily maximum (pounds per day) for eleven pollutants.

Table 1, The 2021 Local Limits

Pollutant	Daily Max	Pollutant	Daily Max	Pollutant	Daily Max
Arsenic	0.47	Selenium	0.94	1,4-Dichlorobenzene	DNA
Cadmium	0.60	Silver	0.97	Bis (2-ethylhexyl) phthalate	DNA
Nickel	4.7	Zinc	41.53	4-methylphenol	DNA
Chloride	54,114	Copper	DNA	Beryllium	DNA
Cyanide	0.77	Acetone	DNA	Chromium	DNA
Lead	6.47	Toluene	DNA	Fluoride	DNA
Mercury	0.26	Xylenes	DNA	Phenol	DNA
Molybdenum	0.70	Barium	DNA	BOD	DNA
pH	5.0 SU - 9.5 SU			TSS	DNA

DNA = Technical analysis was performed but the limit was not adopted.

Industrial Waste Survey and Significant Industrial Users

Michelle Bemrich explained that they conduct an industrial waste survey (IWS) survey once every five years. The most recent IWS was conducted from June 2017 through July 2019, and included 202 entities. The survey did not result in any new industries in addition to those twelve industries were already regulated by the city. The list of industries is maintained and updated almost continuously. Currently the city regulates nine industries by issuing permits.

In February 2023, the IPP Coordinator and the city of Fort Dodge eliminated three noncategorical SIU's from the IPP due to their little to no impact at the WPCF. The three industries were monitored for their flow rate, and officially released of their discharge permits. The three industries are Advantech, Americold, and Josephson Manufacturing Co.

Of those nine regulated industries, three are categorical industrial users (CIUs). Argenta Medical Labs- Riverside and Elanco US Inc. are manufacturers of animal health supplements and products and are subject to the Pharmaceutical Federal Categorical standard 40 CFR Part 439 and Cargill Fort Dodge is corn mill ethanol plant and is subject to the Corn Wet Milling standard 40 CFR, Part 406 Subpart A.

The IPP also regulates BHJ-USA, Inc. a meat product processing facility used as an ingredient in pet food, one hospital, a land fill, and a prison.

Cargill and CJ Bio America (amino acid) are the biggest contributors to the WPCF and are in the North Central Ag-Park outside the city limits. Elanco is also located outside the city limits west of highway 169 west of the Des Moines River.

Those nine industries contributed 54 percent (54%) to the WPCF actual average daily flow in 2023.

I compared the total permitted flow of all IUs to the WPCF design average dry weather (ADW), and the 2023 actual total average daily flows from all 9 industries to the 2023 average daily flow to the WPCF.

- (Total permitted flows for all 9 industries) to (WPCF design ADW).
 $(7.6302 \text{ mg}) / (8.4 \text{ mg}) = \mathbf{90.8358\%}$
- (2023 total average daily flows from all 9 industries) to the (2023 WPCF average daily flow).
 $(4.819 \text{ mg}) / (8.95 \text{ mg}) = \mathbf{53.84\%}$

Permits

Except for Cargill Fort Dodge, all industries have current permits. The city issued permits on January 1, 2021, with five-year durations (Attachment 4). Cargill's permit was issued on January 1, 2019, and the new permit is currently at the city offices and ready for signature by the city. Permits are well written and include the necessary elements needed in a control mechanism. Records indicate that industries submitted permit renewal applications at least 180 days prior to permit expiration as required by industrial permits. Permits include local limits and categorical

limits if applicable. Permits also require industries to develop, submit, and implement a slug control plan (SCP).

Elanco is the only industry that uses the Combined Wastestream Formula (CWF), therefore, the Elanco permit included limits based on the CWF calculations (Attachment 5).

Because the IPP performs the required sampling and analysis in lieu of the IUs and collects all the information required for the report, including flow data, the IUs are not required to submit the periodic compliance reports including the compliance certification required under 403.12 paragraphs (b)(6) and (d) of 40 CFR 403.12(g)(1). In addition, the permit included a statement that reads, “*Permittee shall not be responsible for any sampling, monitoring, or analysis*”.

I pointed out, however, that if issues with the sampling equipment arise (loss of power, equipment failure, etc.) that prevent the IPP from performing the sampling, the city should make it clear to the IUs (in the permit) that the IUs are responsible for the self-monitoring requirement.

Therefore, the city should remove the following statement from its industrial permits “*Permittee shall not be responsible for any sampling, monitoring, or analysis*”. The permits, rather, should include statement that if the city is unable to conduct the required monitoring, the responsibility should fall upon the industry to complete the monitoring within the required frequency.

Inspections, Self-Monitoring, and Reporting

The IPP Coordinator conducted inspections of all regulated industries in the past 12 months. Inspection reports appeared adequate and comprehensive (Attachment 7). As mentioned above, SCPs are required by the permits. Therefore, the IPP Coordinator evaluates the industry’s implementation of the SCP during the inspection and includes the determination in the inspection report.

Self-monitoring frequency is described in detail in the industrial permits. The IPP personnel enters all monitoring data in the LIMS program, and it is uploaded into a shared database where each industry can access its own data.

Waste Haulers

The city continues to accept domestic waste and grease at an access point equipped with an automatic pH metering device just before the headworks. Special wastes cannot be accepted unless the hauler submits a laboratory analysis result of the hauled material with a chain-of-custody.

Each hauler must be formally approved by the city (Attachment 8) and then issued a card to activate the access point and the card will register the time and date of the entry. Hauler, then, will be able to select the type of waste being dumped. The city requires each hauler to complete a manifest as a controlling mechanism. Domestic waste haulers are randomly monitored monthly by the staff of WPCF.

IPP records indicate that the 2023 approved haulers are: Al Price Septic Service, Doyle Construction, Gudmonson Services, Portable Pro, The Tile Pros, Weiss Septic Pumping &

Hauling, Advanced Waste Solutions, Mid Iowa Septic Services, and Moores Pumping & Portable Toilets LLC. Records also indicate that:

- In 2022 the WPCF received a total of 991 loads. Averaging 82 loads/month with an average 1,526 gal/load. The total volume was 1.512 million gallons.
- In 2023 the WPCF received a total of 1266 loads. Averaging 105 loads/month with an average 2,154 gal/load. The total volume was 1.710 million gallons.

Enforcement

The Enforcement Response Plan (ERP) was originally developed and approved on February 22, 1994, then revised and approved on June 19, 2013. The IPP continues to attach the ERP with each industrial permit.

The USW IPP personnel perform all technical aspects of the IPP except signing the notices of violation (NOV) and collecting penalties. IPP personnel indicated that they utilize the LIMS computer system to enter all monitoring data. The LIMS program calculates Significant Noncompliance (SNC) and the Technical Review Criteria (TRC), but it does not flag infrequent violations. Michell Bemrich mentioned that she reviews the LIMS data and flags infrequent violations and other types of violations manually. Utilizing the LIMS program allows Michell Bemrich to take enforcement accordingly. Although the NOVs are signed by the city's responsible official, records indicated that enforcement actions are taken within the 30-day time frame as required by the ERP.

During the inspection we discussed the systematic procedures of initiating enforcement when an exceedance occurs. The ERP requires the NOV letter be sent within 30 days of becoming aware of the violation. IPP personnel indicated that, with the use of the LIMS, the letters are drafted after they have all the monthly data for each industry. I pointed out that this method is acceptable for the monthly average violations, but it may not work for the daily maximum violations especially if violations occur early in the month. I also added, that for those samples that are analyzed by the USW laboratory, the knowledge of violation (start of the 30-day) begins when the results are uploaded into the LIMS. But for those samples that sent off to a certified third-party laboratory, the 30-day starts when the IPP receive the laboratory report.

Michell Bemrich appeared to have a good knowledge of EPA's SNC definition, and she appeared to take enforcement within 30 days when a violation is noted by issuing a written NOV (Attachment 7). In addition, the city issues compliance schedules to industries and administers them through industrial permits.

During the past 12 months, Argenta Medical Labs (AML) was the only industry placed in SNC for failure to meet a compliance schedule deadline by August 31, 2023. All requirements of the compliance schedule were completed on December 19, 2023, and a compliance schedule completion letter was signed, and electronically delivered to AML on January 10, 2024. The IPP Coordinator, the City of Fort Dodge published the AML non-compliance on November 9, 2023.

Records indicated that in 2023, the IPP Coordinator, the City of Fort Dodge issued 71 NOVs, and in 2022 issued 69 NOVs.

Data Management

Overall, industrial files have all the necessary documentation as recommended by the Agency checklist. Each file consisted of permit and permit renewal applications, inspection reports, monitoring reports, and correspondence between the IPP Coordinator and the industries. Records are well kept by the IPP Coordinator at the USW offices and maintained for more than three-year durations and are available for public review. Records are also kept electronically.

Dental Amalgam Rule

In compliance with the Dental Amalgam Rule 40 CFR 441 requirements, in 2019 the IPP identified 13 dental offices that discharge to the WPCF. All submitted the one-time compliance report to the city/IPP (Control Authority). Treatment devices were installed when required.

Sludge Quality

Primary solids at the WPCF are pumped from the primary clarifiers using three sludge pumps and one skimmings/grease pump to the two sixty-five-foot diameter anaerobic digesters with a total combined capacity of 936,410 gallons. The anaerobic digesters are operated in series. Stabilized sludge is removed from anaerobic digester number two and pumped to the sludge storage lagoons.

Biosolids are removed from the final clarifiers using two sludge pumps to the four sixty-five-foot diameter aerobic digesters with a total capacity of 2,206,308 gallons. The sludge is processed and then allowed to settle out in the four aerobic digesters. The supernatant is decanted off the top of the digester and returned to the head of the treatment plant. The secondary sludge is pumped to the four aerobic digesters. The aerobic digesters are operated in a parallel mode. Stabilized sludge is then removed from the aerobic digesters to the sludge storage lagoons.

There are two biosolids storage lagoons with a total capacity of 9.90 million gallons. Sludge's percent solids, from the digesters to the lagoons, averages between one percent and four percent (1 - 4%) from both the aerobic and anaerobic digesters.

The lagoons are settled and decanted back to the head of the treatment plant. When the last digester in the process becomes full or nears capacity, sludge is transferred to the lagoons for storage until the sludge can be disposed of through land application. Sludge has been land applied once every year.

The City of Fort Dodge operates under a 5-year agreement with seven landowners with a total of 1,289 acres of farm ground for sludge disposal.

According to the city's 5-year sludge management plan (Attachment 9), the City of Fort Dodge contracts directly with a Certified Biosolids Land Application Contractor for the dewatering and Biosolids Removal of the on-site Sludge Lagoons. By using the total solids test results provided by the state certified contract laboratory and soil samples taken, a determination of approximate land use requirements is determined. The determination of needed land helps the city and the landowner determine where to apply the biosolids. It shall be noted that the biosolids are applied to both Corn fields and Beanfields, therefore agronomic uptake rates vary from year to year.

During hauling, a sample is collected from each load and composited. Once per hour this composite sample is analyzed for total solids to determine any changes in the solids content during the hauling process and to adjust application rates in the field. These samples are averaged together for a final determination of required land need for disposal. The nutrients (nitrogen and potassium) contributed by sludge application during the crop year (October 1 – September 30), do not exceed the respective crop’s net nutrient requirements. Nutrients added by other sources of fertilizer (commercial fertilizers, manure, etc.), and nutrients carried over from previous years’ sludge application must be subtracted from the crop’s total nutrient requirements to determine the crop’s net nutrient requirements. Soil samples taken by the farmer are used to determine compliance with nutrient requirements. Phosphorus in the soil shall not exceed 1,000 lbs/acre.

One function of the IPP is to protect the city’s sludge from metals contamination. As part of this inspection, the 2022 and 2023 annual biosolids reports (Attachment 9) were reviewed to determine the IPP’s effectiveness.

In 2022 the city produced 797 dry metric tons (dmt) and applied 1,534 dmt, and in 2023, the city produced 873 dmt and land applied 924 dmt. Because the city land applied 1,534 dmt in 2022, they were required to sample once per 60 days (six times per year) as required by Table 1 of § 503.16 of 40 CFR 503. However, the city only sampled five times because the lagoon was frozen in January 2022. In 2023, however, they were required to sample quarterly which they did.

Below are the 2022 and 2023 tables that compares the city’s peak observed metals level against the statutory ceiling and the city’s average level against the exceptional quality (EQ) sludge level specified by the 40 C.F.R. Part 503 Sludge regulations. Because the city only sampled its sludge six times in 2022 and quarterly in 2023, the monthly average is the maximum value observed.

As shown in the tables below, the city’s sludge is well below both the ceiling and EQ levels for all metals except for arsenic and selenium where it exceeded the EQ levels in 2023. However, during my review of laboratory report for metal analyses data I noticed that there are significant variations in the numerical result of the data. I explained to IPP personnel that although the data is within the 503 limits, the IPP Coordinator should be investigating the reason behind the variation/spikes.

Table 2, 2022 Fort Dodge WPCF Sludge Quality (mg/kg)

Pollutant	503 Ceiling	503 EQ	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
Arsenic, As	75	41	8.18	8.18	10.91%	19.95%
Cadmium, Cd	85	39	5.66	5.66	6.66%	14.51%
Copper, Cu	4300	1500	641	641	14.91%	42.73%
Lead, Pb	840	300	50.2	50.2	5.98%	16.73%
Mercury, Hg	57	17	2.62	2.62	4.60%	15.41%
Molybdenum, Mo	75	----	60	60	80.00%	
Nickel, Ni	420	420	34.8	34.8	8.29%	8.29%
Selenium, Se	100	36	26.7	26.7	26.70%	74.17%
Zinc, Zn	7500	2800	889	889	11.85%	31.75%

Table 3, 20203 Fort Dodge WPCF Sludge Quality (mg/kg)

Pollutant	503 Ceiling	503 EQ	Max	Mo. Avg.	Max/Ceiling	Avg./EQ
Arsenic (As)	75	41	57.5	57.5	76.67%	140.24%
Cadmium (Cd)	85	39	24	24	28.24%	61.54%
Copper (Cu)	4,300	1,500	721	721	16.77%	48.07%
Lead (Pb)	840	300	125	24.4	14.88%	8.13%
Mercury (Hg)	57	17	1.56	1.56	2.74%	9.18%
Molybdenum (Mo)	75	----	52.7	52.7	70.27%	
Nickel (Ni)	420	420	92.7	92.7	22.07%	22.07%
Selenium (Se)	100	36	99.1	99.1	99.10%	275.28%
Zinc (Zn)	7,500	2,800	918	918	12.24%	32.79%

Conclusion

Overall, Michelle Bemrich and Travis Pender of the USW IPP are responsible for the implementation of the city's pretreatment program. They appeared to have an adequate knowledge and the necessary skills to implement the program and were familiar with EPA's Significant Noncompliance definition and appeared to be making adequate compliance determination. Michelle Bemrich maintains the LIMS database and a worksheet that includes the current and recent compliance status of all regulated industries.

As required by 40 CFR Part 403 and Rule 567 IAC 62.4(455B), all significant program modifications must be submitted to the Iowa DNR for review and approval before enacted on.

Even if the IPP personal conduct all monitoring for all industries, permits should include statement that if the city is unable to conduct the required monitoring, the responsibility should fall upon the industry to complete the monitoring within the required frequency.

Because the IPP performs the required sampling and analysis in lieu of the Industrial User, the IUs are not required to submit the compliance certification required under *40 CFR 403.12(g)(1)*. However, when issues with sampling equipment arise (loss of power, equipment failure, etc.) the city should make it clear to all IUs that IUs are responsible for the self-monitoring requirement. Therefore, the city should remove the following statement from its industrial permits *"Permittee shall not be responsible for any sampling, monitoring, or analysis."*

The city and the IPP should revisit the ERP and enforcement procedures to improve the timing of issuing notice of violation letters.

The IPP Coordinator should review the biosolids laboratory reports for the concentration of metals and investigate the reason behind the variation/spikes in metal concentration in the sludge even if the concentration in compliance with the 40 CFR 503 ceiling limits.

On March 20, 2024, I received an email from the IPP Coordinator indicating that the City Manager for Fort Dodge signed the Wastewater Discharge Permit for Cargill, and it has been forwarded to the Facility Manager for her signature and acknowledgement.

NAJI AHMAD Digitally signed by NAJI AHMAD
Date: 2024.03.21 15:38:32 -05'00'

Naji J. Ahmad
Environmental Engineer, WB/DWIS

JODI BRUNO Digitally signed by JODI BRUNO
Date: 2024.03.21 15:52:44 -05'00'

Jodi Bruno
Manager, ECAD/WB

Attachments

1. Checklist
2. 2021 Industrial Pretreatment Study
3. Sewer Use ordinance (SUO) evaluation
4. Industrial permits
5. Elanco CWF calculations
6. Industrial Inspections
7. Enforcement examples
8. Waste hauler letter
9. Biosolid's supporting documents



PCI

Approved Pretreatment Program

Date(s): **March 5, 6, and 7, 2024**

FY 2024

POTW:	CITY OF FORT DODGE, IA	Date of last PCI/Audit:
Address:	Municipal Building 819 1st Avenue South Fort Dodge, IA 50501	May 4 and 25, 2022 (DNR)
Contact:	Michelle Bemrich	NPDES Permit No.:
Title:	Industrial Pretreatment Coordinator	IA 0044849
Address:	1406 Central Avenue Fort Dodge, IA 50501	State Permit No.:
Tel:	515 227 8695 email mbemrich@uswatercorp.net	94-33-0-03
		Expiration Date:
		9/30/2025

Participants

POTW:	Inspectors:
US Water, Water and Wastewater Utility Michelle Bemrich, IPP Coordinator Travis Pender, Project Manager	Naji J. Ahmad, Environmental Engineer, ECAD/WB/DWIS
Period covered by this PCI/Audit: 2021-2023	

POTW Information

Total for ALL Treatment Plants (MGD)			
Design Daily Ave. 8.4 ADW 15 AWW	Actual Daily Ave. 8.95	Design Peak: 21.6 MXWW	% Industrial Flow: 53%*
Number of Plants: 1	% Combined Sewers: NONE	Type of Treatment at Principal Plant: Vertical Loop Reactor (VLR)/Activated Sludge	
Sludge Disposal Method: Land Application (Sludge Lagoon)	Quantity (dry/met.tons/Y): 873: produced 924: land applied	Receiving Stream: Des Moines River	

Total permitted flow for all 9 industries = 7.6302 mgd
(Total permitted /WWTP ADW) = 7.6302 mgd /8.4 mgd = 90.8358%

Total average daily flows from all 9 industries in 2023 = 4.819 mgd
(2023 AVG Daily industrial flow /WWTP actual AVG flow 2023) = 4.819 mgd /8.95 mgd = 53.84%

PART I: PROGRAM BACKGROUND INFORMATION

I.A. Approved Modifications to the Original Program

1.

Date of last NPDES permit modification: 10/1/2020	Date of original Program approval:	01/30/1984
	Date NPDES Permit originally modified to require implementation [PTIM]:	01/01/1985

2. Approved Pretreatment Program modifications:

REQUIRED MODIFICATIONS	APPROVAL DATE	OTHER APPROVED MODIFICATIONS	APPROVAL DATE
PIRT SUO Revisions	02/22/1994	DNR approved	6/19/2013
List of SIUs [403.8(f)(6)]	03/01/1992	DNR approved	6/19/2013
Enforcement Response Plan	02/22/1994	DNR approved	6/19/2013
DSS SUO Revisions	02/22/1994	DNR approved	6/19/2013
LOCAL LIMITS	02/22/1994	DNR approved	6/19/2013

3. Is the POTW presently working on any program modifications? **NO.**

4. Does the POTW have any program modifications currently being reviewed by the Approval Authority?
YES. The city submitted the 2021 revision to comply with the current NPDES permit. The city submitted to the regional IDNR office not the Central Office. During the inspection, the city submitted the SUO revision and LL to Ben Hucka as EPA Instructed.

I.B. Approved Program Contents

5. Authority to enforce Pretreatment Standards contained in:
City Ordinance 1863. Chapter 13.24 (Pretreatment) and Chapter 13.12 (Fees).

6. Date enacted or adopted: **September 1994 (original)**

7. Approved Control Mechanism: **Permits/Sewer Use Agreements**

Note: Italicized question numbers indicate that the question is data base supported.

8. What is the frequency required by the **approved program**/modifications for:

Activity	Non-categorical SIUs	Categorical SIUs*
POTW sampling of:	1/Y	1/Y
POTW inspection of:	1/Y	1/y
SIU self-monitoring:	2*/Y	2*/Y
SIU reporting:	2*/Y	2*/Y

* Not required since city conducts all monitoring.

9. What types of enforcement options are available through the approved program:

Y	Notice of Violation (NOV)
Y	Administrative Order (AO)
Y	Show Cause Hearing
Y	Establishment of Compliance Schedules
Y	Revocation of Permit
Y	Injunctive Relief
Y	Fines; Maximum \$1000/day/violation
Y	Criminal Penalties
Y	Termination of Service

10. COMMENTS:

PART II: INTERVIEW QUESTIONS

II.A. Legal Authority and Jurisdiction

11. Have any Pretreatment modifications been made to the Sewer Use Ordinance since the last PCI/Audit that have not been approved by the Approval Authority. **NO.**

The city completed the SUO revision and LL in 2021. Submitted to the IDNR but yet to be approved.

12. List by name and location any SIUs that discharge to the POTW from outlying jurisdictions.

Elanco, CJ Bio America, and Cargill.

Indicate which of the above are not covered by a contract/agreement requiring them to abide by the POTW's legal authority. **NONE**

13. Does the POTW have the authority to seek fines up to \$1000 per day? [403.8(f)(1)(vi)]

YES. In Section 13.24.350

14. If the POTW has not yet developed an Enforcement Response Plan when does the POTW feel it will complete this requirement? **Original ERP was in 1994. A new ERP was approved by IDNR on June 19, 2013.**

15. COMMENTS: **The City attaches the ERP to all industrial users permits.**

II. B. Control Mechanism

16. General Information:

Type: PERMITS	Issued to Noncategorical SIUs? [DSS: 403.8(f)(2)(i)] YES
Duration: 5 years & 1 year for haulers	

17. Do all SIUs have current (unexpired) control mechanisms? {NOCM} **YES. Except Cargill permit is waiting for City Signature.**

18. List by name those that do not and indicate which ones have not had a current control mechanism for 180 days or more. {RNC/SNC} **NA.**

II.C. Hauled Wastes

19. Does the POTW accept hauled waste? (If "no," go to question 25)
YES. Domestic and industrial
a. if so describe (include approx. no. of loads per month):
 - **In 2022 the WPCF received a total of 991 loads. Averaging of 82 loads/month with an average 1,526 gal/load. The total volume was 1.512 MG.**
 - **In 2023 the WPCF received a total of 1266 loads. Averaging of 105 loads/month with an average 2,154 gal/load. The total volume was 1.710 MG.**
b. How does the POTW ensure that it does not accept hazardous waste?
 - **Special waste haulers are required to show sampling analysis before dumping.**
 - **Domestic waste haulers are randomly monitored or sampled monthly by the WWTP.**
20. Does the POTW have a control mechanism for regulating waste haulers, and if so describe.
YES. Each hauler must complete manifest.
21. Does the POTW have a designated discharge point (or points) for waste haulers? [DSS: 403.5(b)(8)]
Describe: **Prior to head works. Access discharge point with automatic pH metering device.**
22. Are all applicable Categorical standards and Local Limits applied to IUs whose wastes are hauled to the POTW? **YES.**
23. Describe the method used to apply local limits to hauled waste.
Comparing sampling analysis to local or Categorical limits.
24. **COMMENTS: 2023 Haulers List: Al Price Septic Service, Doyle Construction, Gudmonson Services, Portable Pro, The Tile Pros, Weiss Septic Pumping & Hauling, Advanced Waste Solutions, Mid Iowa Septic Services, and Moores Pumping & Portable Toilets LLC**

II.D. Industrial User Characterization

25. How often does the POTW update its Industrial Waste Survey (IWS) to identify new SIUs or changes to wastewater discharges? **Every five Years. On going.**
a. When was the last formal update: **March thru July in 2020.**
26. What is the POTW's current industrial base?

Current	Industrial User Type	Last Reported
3	Categorical SIUs {CIUS}	3
6	Non-Categorical SIUs	
9	Total all SIUs {SIUS}	12

Three SIUs were removed from list in February 2023: Advantech Ltd, Americold Logistics, and Josephson Manufacturing Co.

II.E. Local Limits

27. Does the POTW have numerical limits for metals in its NPDES permit? If so, list the metals and the limits (or attach list). **NONE.**
28. Have there been any numerical NPDES permit violations in the last 12 months? **NO.**
- a. Were any of the numerical NPDES violations, identified above, a result of interference or pass through? **NA.**
1. Was the interference traceable to an industrial user?
 2. Was action taken that led to elimination within 90 days of the interference or pass through? **{SNC} NA.**
 3. Was the responsible industry placed on an enforceable compliance schedule within 90 days of discovery? **{SNC} If not, why? NA.**
29. How many times per year does the POTW regularly sample its PRINCIPAL plant for the following?

Parameter	Influent	Effluent	Sludge
Metals	12*	12**	6
Toxic Organics	-	0	-
Biomonitoring		1	
TCLP			-

***Mercury and zinc, **zinc**

30. List below the numerical value for the local limits derived by technical analysis. If a technical analysis was performed but the limit not adopted enter DNA in the block. (Values assumed to be mg/l unless otherwise noted). **{EVLL} {ADLL}. The following are based on the September 2021 study. The city incorporated the local limits in the Industrial Users permits. But the IDNR has yet to approve the LL study or the SUO revision.**

POLLUTANT	DAILY MAX (lb/day)	POLLUTANT	DAILY MAX (lb/day)	POLLUTANT	DAILY MAX (lb/day)
Arsenic	0.47	Nickel	4.7	1,4-Dichlorobenzene	DNA
Cadmium	0.60	Selenium	0.94	Bis(2-ethylhexyl)phthalate	DNA
Copper	DNA	Silver	0.97	4-methylphenol	DNA
Chloride	54,114	Zinc	41.53	Beryllium	DNA
Cyanide	0.77	Acetone	DNA	Chromium	DNA
Lead	6.47	Toluene	DNA	Fluoride	DNA
Mercury	0.26	Xylenes, (T)	DNA	Phenol	DNA
Molybdenum	0.70	Barium	DNA	BOD	DNA
pH	5.0 SU - 9.5 SU			TSS	DNA

31. Are the POTW's BOD and TSS limits technically derived (ie. based on plant capacity)? **YES.**
32. Are BOD and TSS violations treated as violations of technically based local limits? **YES.**
33. If there is more than one treatment plant, were the local limits established specifically for each plant?
NA
34. Has the POTW made any changes to its Local Limits which have not been approved, and if so provide details? [403.18] **The September 2021 LL were incorporated in the Industrial Users permits. But the IDNR has yet to approve the LL study or the SUO revision.**
35. Has the POTW granted any Net/Gross allowances under 403.15? **NO**
36. **COMMENTS: The following are based on the September 2021 study. The city incorporated the local limits in the Industrial Users permits. But the IDNR has yet to approve the LL study or the SUO revision.**

II.F. Standards and Requirements for Industrial Users

37. Does the POTW compare local limits against federal Categorical standards and apply the most stringent standards to Categorical IUs? [403.4] **YES.**
- a. Are any IUs required to implement best management practices in lieu of monitoring for pollutants?
NO. If yes, describe:
38. Has the POTW notified its IUs of possible RCRA obligations? [40 CFR 403.8(f)(2)] **YES.**
39. Does the POTW allow Categorical users to use Solvent Management Plans/certification or surrogate test procedures to meet TTO requirements? **YES. Currently the city has no industry subject to TTO.**

II.G. POTW Compliance Monitoring and Inspections

40. What is the current frequency for:

Activity	Non-categorical SIUs	Categorical SIUs
POTW sampling of:	2-4-2 week	1, 3, & 4 Week
POTW inspection of:	1/Y	1/Y
SIU self-monitoring:	2-4-2 week	1, 3, & 4 Week
SIU reporting:	**NA	**NA

41. List exceptions: **City does all monitoring.**
**** Industrial permits included requirement for daily flow monitoring. The city has access to the flow data through SCADA system at lift station at all industries. All industries have access to**

their daily flow and all monitoring data. Therefore, IUs don't have to submit the data in a semiannual periodic monitoring reports with certification statement.

42. List those SIUs that were not sampled by the POTW within the last 12 months. [DSS: 403.8(f)(2)(v)] **NONE**
43. List those SIUs that were not inspected within the last 12 months. [DSS: 403.8(f)(2)(v)] **NONE**
44. How many industries were neither sampled nor inspected within the last 12 months. [DSS: 403.8(f)(2)(v)] {NOIN}{RN}. **NONE.**
45. Does the POTW sample its SIUs for all regulated pollutants at least once annually? [403.8(f)(2)(v)] **YES**

46. Sample/Analysis Procedures:

Chain-of-Custody always used? YES	Sampling method, metals: TIME COMPOSITE
Ability to sample on short notice? YES	Sampling method, CN: GRAB
In-house analysis of toxic pollutants: NONE	Sampling method, O&G: GRAB
Do in-house analytical methods conform to 40 CFR part 136? YES	

47. How does the POTW document its industrial user inspections? **7 or 8 page CHECKLIST**
48. Does the POTW evaluate all SIUs at least every two years to determine the need for a slug discharge/spill control plan? [DSS: 403.8(f)(2)(v)] **All industries are required by the permit to develop and submit a plan.**
- a. Describe the method used by the POTW to evaluate the need for a slug control plan.
NA

II.H. IU Self Monitoring and Reporting

49. Are all Categorical IUs required to self-monitor for all pollutants regulated by the respective Categorical standard at least twice per year? [403.12(e)] **NO. All samples are collected by the city.**
50. Were any Baseline Monitoring Reports or 90 day Compliance Reports due within the past 12 months?. If so, from whom? Were the reports submitted? **NONE**
51. Are IUs required to report spills, slug discharges, etc. to the POTW? [403.12(f)] **YES**
52. Are IUs required to report violations within 24 hours of knowledge of the violation? [403.12(g)(2)] **YES**
53. Are IUs required to resample and submit results within 30 days following a violation as per 403.12(g)(2)? **YES**

II.I. Data Management

54. Are files/records computerized? **YES**
55. Are all records maintained for at least 3 years? [403.12(o)] **YES.**
Records are well organized and easily accessible.
56. Are program records available to the public as required by 40 CFR 403.14(b)? **YES.**
57. Does the POTW have provisions to address confidential business information? [403.14(a)] **YES**
58. How is compliance status calculated? Describe the procedure used in determining Significant Noncompliance (eg. are mo. avg. violations considered as well as daily max?). **City logs all monitoring data in LIMS. The program then calculates and flags SNC and TRC. The IPP Coordinator will then determine compliance status based on LIMS. The program does not calculate Infrequent non compliance.**

II.J. Program Resources

59. What percent of the Pretreatment Coordinator's time is spent on pretreatment?
PC 100%.
Project Manager 25%.
Field Tech 50%.
Lab supervisor and 3 Lab Tech 40%-60%.
City 10%.

60. What computer programs does the POTW use for:

Wordprocessing:	MS WORD
Spreadsheet:	EXCEL
Database:	Hach WIMS/LIMS

61. Does the POTW believe its annual budget adequate for implementation? **YES.**
- a. If not, is the level of money available for pretreatment less than that in the approved program or approved modification?

II.K. Special Questions

62. Are there any issues that the POTW would like to discuss: **NO.**

PART III: FILE AND RECORDS REVIEW

Following is a table containing the POTW's Significant Industrial User inventory regulated by its Pretreatment Program. Please verify that all information in the table is correct and current. For those industries no longer regulated draw a line through the entry. Add all new industries and provide the information sought by the table. Below is a guide to the information sought by the table and suggested abbreviations.

INDUSTRY:

Provide the name of each industrial user regulated under the pretreatment program.

CAT STND:

Provide the categorical standard code number. For example, industries subject to the Metal Finishing regulation should be designated "433." For noncategorical industries indicate "NA" in this column.

REG PROCESS:

Indicate what process the industry performs to qualify for inclusion in the pretreatment program. For example, if an industry is subject to Metal Finishing regulations because it performs zinc and chromium plating indicate with "ZnCrPL" or a similar abbreviation.

TMT:

If the facility treats its wastestream(s) indicate "Y." If no treatment is provided indicate "N."

TYPE:

Indicate the type of pretreatment system (if applicable) the industry has. Suggested abbreviations: "precip" for precipitation/clarification; "precip/flt" for precipitation followed by filtration; "DAF" for dissolved air flotation; etc.

REG FLOW:

Provide the industry's average daily flow for its regulated processes in gallons per day. The abbreviation "K" stands for 1000.

TOT FLOW:

Provide the average daily total plant flow in gallons per day.

CWF:

Indicate if the industry uses the Combined Wastestream Formula to determine compliance with categorical standards. "Y" = yes, "N" = no.

COMPLIANCE STATUS FOR THE 6 MO PERIOD ENDING:

For the six month periods listed, indicate if the industry's compliance status. Use the following abbreviations:

CIn compliance with all standards: no violations.

IInfrequent noncompliance with discharge standards: the facility had some violations but not severe enough to be considered in significant noncompliance.

SNC,SIn significant noncompliance with discharge standards.

SNC,RIn significant noncompliance with reporting requirements: the industry failed by greater than 30 days to submit reports as required.

SNC,MIn significant noncompliance with self monitoring requirements: the industry did not properly report its compliance status on its self monitoring report.

SNC,C Failure to meet a compliance schedule milestone by 90 days.

LAST INSPECTION:

Date of the last inspection performed by the POTW.

SECTION VII: SIGNIFICANT INDUSTRIAL USERS

Industry Name	Cat. Standard	Reg. Process	T M T	Type	Reg. ³ Flow (MGD)	Total Flow	C W F	Compliance Status for Six Month Period Ending:				Last Inspection
								JUNE 2022	DEC. 2022	JUNE 2023	DEC. 2023	
Argenta Medical Labs- Riverside ⁽²⁾	439	VETMEDCN	N	NA	.0142	0.02	N	I-M	I-M	SNC	SNC	9/27/2023
BHJ-USA, Inc. (3)	NA	Cold Storage	Y	Rotary screen	0.14	0.02	N	I-M	I-M	I-M	I-M	11/13/2023
Cargill Fort dodge	406.15 (A)	WetCornMill	Y	EQ Aeration Basin, MBR	3.5	2,439	N	I-M	I-M	I-M	I-M	10/20/2023
CJ Bio America	NA	Amino Acids	Y	3 holding ponds w/ Aeration, pH	2.533	1.47	N	I-M	I-M	I-M	I-M	12/13/2023
Elanco US Inc.	439	VETMEDC	Y	pH, Hg Pre-Filter, Auto clave MBBR	0.93	.41	YES	C	C	C	C	12/5/2023
Fort Dodge Correctional Facility	NA	Prison	Y	Grease Trap, pH	0.24	.13	N	I-M	I-M	I-M	C	11/20/2023
North Central Regional Solid Waste Agency	NA	Munic.Landfill	N	NA	0.02	.21	N	C	C	C	I-M	11/2/2023
Nestle Purina Pet Care	NA	PetFood	Y	Rotary Screen, pH, GEM Syst	0.175	.09	N	I-M	I-M	I-M	I-M	12/20/2023
Unity Point Health-Trinity Regional MC	NA	Hospital	N	NA	0.08	.03	N	I-M	I-M	I-M	I-M	11/10/2023
Advantech Ltd. ⁽¹⁾	NA	VETMED	N		0.0003		N	I-M	C	C	NA	10/18/2022
Josephson Manufacturing Co ⁽¹⁾	NA	Radiators	Y		0.002		N	C	C	C	NA	9/13/2022
Americold Logistics ⁽¹⁾	NA	Cold Storage	N		0.01		N	I-M	I-M	C	NA	9/7/2022

(1) eliminated February 2023

(2) Failure to meet a Compliance Order/Schedule.

(3) Permitted flows

III.B. Significant Industrial User Compliance Evaluation

63. From the above list of industries, how many are in Significant Noncompliance (SNC) with either discharge standards or reporting requirements based on the most recent six-month reporting period?
{PSNC} Argenta Medical Labs- Riverside

64. List by name, those industries currently on a compliance schedule. Complete the table below. **NONE.**
But in the past 12 months:

Industry Name	Date Schedule Issued	Compliance Deadline	How Administered*
Argenta Medical Labs- Riverside	January 1, 2021	December 31, 2023.	Permit

65. List those industries last published in the newspaper for noncompliance and provide the date (or attach a copy of the public notice). **Argenta Medical Labs- Riverside.**

66. If an industry has been deleted from the list of Significant Industrial Users list by name below and provide the reason.

Advantech, Americold, and Josephson Manufacturing Co. in Fort Dodge, Iowa.

It was determined by the IPP Coordinator and the City of Fort Dodge to eliminate three Noncategorical SIU's from the Pretreatment Program due to their little to no impact at the WWTP. The 3 industries were monitored for their flow rate, solely, in January 2023, not inspected nor sampled, and officially released of their discharge permits in February 2023.

67. For those industries in SNC within the last 12 months complete the following table for all written enforcement actions.

IU Name	Violation	Date of POTW knowledge	Date of Action	Enforcement Action	ERP required action
Argenta Medical Labs- Riverside.	Failure to meet compliance schedule by January 31, 2023	January 31, 2023	August 31, 2023	NOV	NOV

68. Provide the total number of NOV's, Administrative actions, Judicial referrals, and criminal prosecutions that occurred in the last twelve months. {FENF} {JUDI}

There were 71 NOV's issued in 2023.

69. Were all actions taken by the POTW within 30 days of knowledge of a violation? {RNC/SNC} **YES**

70. Did all industries in SNC either return to compliance within 90 days, receive escalated enforcement action by the POTW within 90 days, or become placed on an enforceable compliance schedule within 90 days (of knowledge by the POTW) of the violation? {RNC/SNC} **YES.**

III.C. Control Mechanism Evaluation

71. Do the POTWs control mechanisms:

Permittee: **AML**

REQUIRED [DSS: 403.8(f)(1)(iii)]		SUGGESTED PROVISIONS	
Specify duration (no > 5 yrs.):	Y	Cite the POTW's legal authority:	Y
Contain the correct discharge limits:	Y	Identify TTO alternatives, if applicable:	Y
Specify sample type for IU self monitoring:	Y	Require notification within 24 hrs of a violation:	Y
Adequately identify sampling location:	Y	Require resample/report in 30 days of violation:	Y
Specify sampling frequency:	Y	Specify right of entry:	Y
State applicability of civil or criminal penalties:	Y	Reserve right to revoke permit:	Y
Stipulate reporting frequency:	NA	Specify immediate slug load notification:	Y
Properly require records retention:	Y	Require submission of all sampling results*	NA
Specify limited transferability:	Y		

***City conducts all monitoring for the industries and industries have access to all data.**

Result of this review from the last PCI/audit:

Permits has clear formats, has all necessary elements needed and included the Enforcement Response Plan as an attachment.

Because the City does all monitoring, permits should include statement that if the City is unable to conduct the required monitoring, the responsibility should fall upon the industry to complete the monitoring within the required frequency.

III.D. Industrial Inspection Evaluation

72. Do the Industrial Inspection reports contain? **Cargill -Fort Dodge**

Name of Company contact:	Y	Evaluation of IU's monitoring procedures*	NA
Date of inspection:	Y	Verification of wastewater flow rates:	Y
Time of inspection:	Y	Determination of applicability of the CWF:	Y
Description of manufacturing process:	Y	Description of the chemical storage area:	Y
Description of treatment process, if any:	Y	Identification of potential spill conditions:	Y
Evaluation of IU's monitoring methods*	NA		Y
Verification of production rates that would affect production based standard:			Y

***City conducts all monitoring for the industries.**

III.E. Slug Discharge Control Procedures

73. If the POTW has required the submittal of a Slug Control Plan does it contain: [DSS: 403.8(f)(2)(v)]

- ☒ A description of discharge practices including non-routine batch discharges
- ☒ A description of stored chemicals
- ☒ Procedures for immediate notification of slug discharges with written follow-up notification
- ☒ Procedures necessary to prevent adverse effects at the POTW's treatment plant:
 - ☒ inspection and maintenance of storage areas
 - ☒ handling and transfer of materials
 - ☒ loading and unloading operations
 - ☒ control of plant site runoff
 - ☒ worker training
 - ☒ building of containment structures
 - ☒ measures for the control of toxic organics
 - ☒ measures for emergency response

74. **COMMENTS: All industries are required by the SUO and the permit to develop, submit and implement a Slug Discharge Control Plan. All industries did submit such plans.**

III.F. Industrial User File Review Checklists

Following are worksheets to aid in the assessment of the nature of the oversight activities and compliance status of the POTW's Significant Industrial Users. When reviewing SIU files priority should be placed on Categorical industries that either have a history of violations or that appear to be in compliance but have not installed that prescribed BAT technology to consistently meet discharge limits. While only three pages are provided the reviewer is encouraged to copy and add additional review pages for larger POTWs.

Industry Name: **Cargill Fort Dodge**
Principal Pollutants: **Flow, BOD, TSS, NH₃, pH**
Products: **Wet Corn Milling**

40 CFR 406.15 Subpart A
No. of Employees: **150**

A. Does the file system for the industrial user contain:

Y	Permit application	Y	POTW sampling results
Y	Current Permit	NA	Self-monitoring reports
Y	Correct limits in Permit	Y	Enforcement documentation
Y	Correspondence/meeting notes/phone log	NA	Solvent Management Plan
Y	Most recent inspection report	NA	Correct application of the CWF
Y	Evaluation for need for Slug control	Y	Slug Control Plan
Y	Compliance status determination	Y	Correspondence/ emails

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months?
[403.12(f)] **NO**.

_____ Immediate notification by the IU	_____ Follow-up written notification
_____ POTW response	_____ Effect on the plant

C. In the last complete calendar year, how many times did the POTW:

Sample the IU **5/ Week** Inspect the IU **1/ Year**

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year? **YES**.

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six-month period during the last full calendar year? **YES**.

F. Frequency in the IU's control mechanism for: Self-monitoring: **NA** Reporting: **NA**

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism? **NA**.

H. Did the POTW identify all IU violations from:

IU Self-monitoring: **NA** POTW Compliance monitoring: **YES**.

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly?

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
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Information correctly reported on the annual report.

Industry Name: **Elanco US Inc.**

Principal Pollutants: **Flow, BOD, TSS, NH3, O&G, Metals (LL),
chloride, and Organics.**

Products: **Pet Food**

40 CFR 439.16(c)

No. of Employees: **550**

A. Does the file system for the industrial user contain:

Y	Permit application	Y	POTW sampling results
Y	Current Permit	NA	Self-monitoring reports
Y	Correct limits in Permit	Y	Enforcement documentation
Y	Correspondence/meeting notes/phone log	Y	Solvent Management Plan (SPCC)
Y	Most recent inspection report	NA	Correct application of the CWF
Y	Evaluation for need for Slug control	Y	Slug Control Plan 6/11/2020
Y	Compliance status determination	Y	Phone Log

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months?
[403.12(f)] **NO**.

_____ Immediate notification by the IU
_____ POTW response

_____ Follow-up written notification
_____ Effect on the plant

C. In the last complete calendar year, how many times did the POTW:

Sample the IU **3/ Week** Inspect the IU **1/ Year**

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year? **YES**.

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six-month period during the last full calendar year? **YES**.

F. Frequency in the IU's control mechanism for: Self-monitoring: **NA** Reporting: **NA**

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism? **NA**.

H. Did the POTW identify all IU violations from:

IU Self-monitoring: **NA**

POTW Compliance monitoring: **YES**.

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly?

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
------------------	------------------------------	---------------------------------------	--------------------------------------	--------------------------------------	--------------------------

NONE

Industry Name: **AML Riverside.**

Principal Pollutants: **Flow, BOD, TSS, NH₃, O&G, Metals (LL),
chloride, and Organics.**

Products: **Animal Health**

40 CFR 439.2(a)

No. of Employees: **90**

A. Does the file system for the industrial user contain:

Y	Permit application	Y	POTW sampling results
Y	Current Permit	NA	Self-monitoring reports
Y	Correct limits in Permit	Y	Enforcement documentation
Y	Correspondence/meeting notes/phone log	Y	Solvent Management Plan
Y	Most recent inspection report	Y	Correct application of the CWF
Y	Evaluation for need for Slug control	Y	Slug Control Plan
Y	Compliance status determination		

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months?
[403.12(f)] **NO.**

_____ Immediate notification by the IU
_____ POTW response

_____ Follow-up written notification
_____ Effect on the plant

C. In the last complete calendar year, how many times did the POTW:

Sample the IU **52**

Inspect the IU **1/Year**

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year? **YES.**

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six-month period during the last full calendar year? **YES.**

F. Frequency in the IU's control mechanism for: Self-monitoring: **NA** Reporting: **NA**

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism? **NA.**

H. Did the POTW identify all IU violations from:

IU Self-monitoring: **NA**

POTW Compliance monitoring: **YES.**

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly?

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
SNC Information correctly reported on the annual report.					

Industry Name: **Nestle Purina**

Principal Pollutants: **Flow, BOD, TSS, NH3, FOG, Metals (LL0**

Products: **Cat Food**

No. of Employees: **280**

A. Does the file system for the industrial user contain:

Y	Permit application	Y	POTW sampling results
Y	Current Permit	NA	Self-monitoring reports
Y	Correct limits in Permit	Y	Enforcement documentation
Y	Correspondence/meeting notes/phone log	Y	Solvent Management Plan
Y	Most recent inspection report	NA	Correct application of the CWF
Y	Evaluation for need for Slug control	Y	Slug Control Plan
Y	Compliance status determination	Y	Phone Log

B. Did the industry discharge any slug loads or spills to the POTW in the past 12 months?
[403.12(f)] **NO**.

_____ Immediate notification by the IU	_____ Follow-up written notification
_____ POTW response	_____ Effect on the plant

C. In the last complete calendar year, how many times did the POTW:

Sample the IU **52** Inspect the IU **1/ Year**

D. Were all regulated pollutants analyzed by the POTW at least once in the most recent calendar year? **YES**.

E. If the industry is subject to Categorical Standards did its self-monitoring reports contain analysis for all regulated pollutants at least once during every six-month period during the last full calendar year? **YES**.

F. Frequency in the IU's control mechanism for: Self-monitoring: **52** Reporting: **NA**

G. Did the industry comply with the sampling and reporting frequency requirements of its Control Mechanism? **NA**.

H. Did the POTW identify all IU violations from:

IU Self-monitoring: **NA** POTW Compliance monitoring: **YES**.

I. Was the IU's compliance status (i.e. SNC, Infrequent noncompliance, Consistent compliance) determined properly?

J. Complete the following table for all violations in the last 12 months. (If this information has already been provided in Question 85, please indicate).

<u>Violation</u>	<u>Date of Violation</u>	<u>Date of POTW Knowledge</u>	<u>Date of POTW Response</u>	<u>ERP Required Response</u>	<u>POTW Response</u>
------------------	--------------------------	-------------------------------	------------------------------	------------------------------	----------------------

I. **Information correctly reported on the annual report.**

