Finding Interference and/or Pass Through in Non-Pretreatment Cities

April 2018

- Traditionally, authorized States and Direct Implementation (DI) EPA Pretreatment Programs have focused on Categorical Industries when regulating those SIUs Outside Pretreatment Cities.
 - Most authorized States and DI EPA programs have reasonable inventories of Categorical Industries Outside Pretreatment Cities
- However, most States and DI EPA programs do not have complete or reliable inventories of <u>non-Categorical</u> SIUs outside Pretreatment Cities.

- Non- Categorical SIUs can have Significant Impact on smaller POTWs.
 - As an SIU, it is discharging at least 25,000 gpd Process Flow, and/or
 - 5% or more of the design dry weather organic capacity of the POTW
- In smaller POTWs, it is not uncommon for SIUs to be 50 to 90% of the design dry weather organic capacity.
- Because industries tend to locate where the feedstock is, and rural America is primarily agricultural, what we are looking at is:

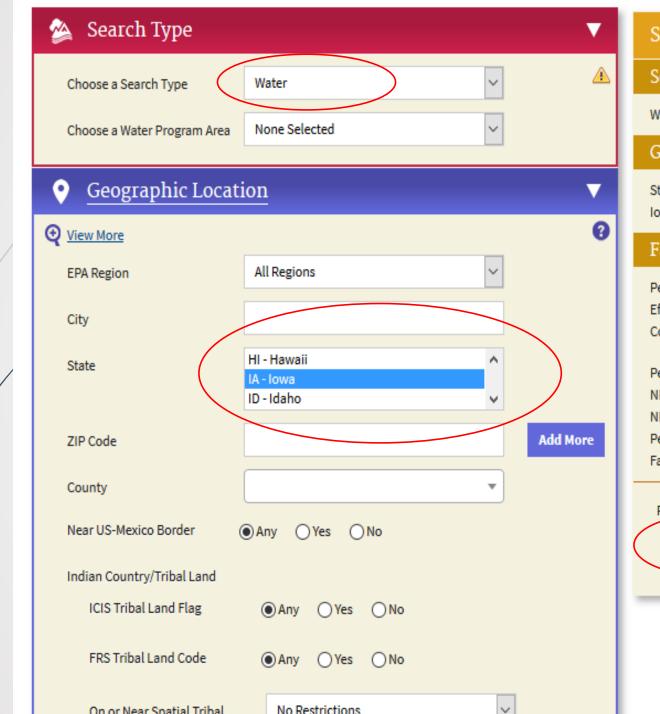
FOOD PROCESSORS

- Because most States and DI EPA programs have focused on Categorical Industries Outside Pretreatment Cities a good inventory of Non-Categorical Industries OS PT Cities does not generally exist.
- Yet resource constraints may not allow for focusing on identifying all non-Categorical SIUs Outside Pretreatment Cities,
- What we should be doing, AT A MINIMUM, IS:

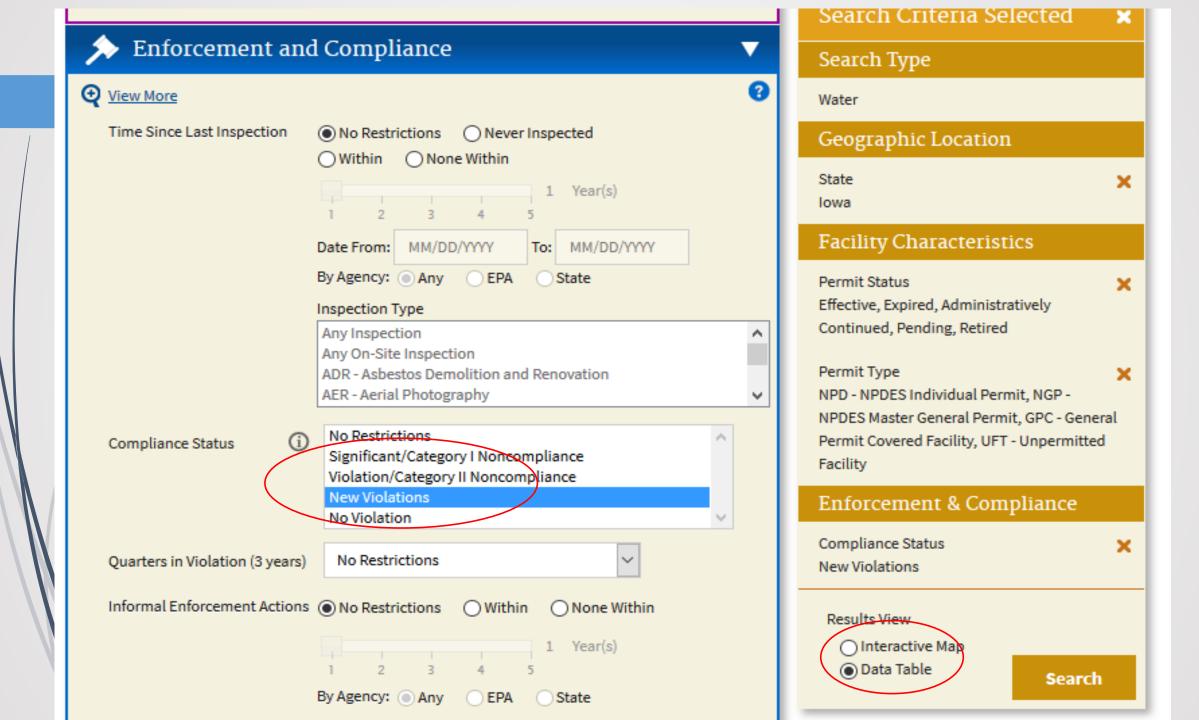
IDENTIFYING THOSE NON-CATEGORICAL SIUS THAT ARE CAUSING OR CONTRIBUTING TO INTERFERENCE AND/OR PASS THROUGH

- To have Interference and or Pass Through, we must first have an NPDES permit violation
- NPDES permit violations are reported in ICIS/NPDES, either by direct entry or State data base upload.
- ICIS/NPDES feeds ECHO, which is accessible by anyone.
- Hence, one doesn't have to be an ICIS specialist to obtain a list of NPDES permit violator

https://echo.epa.gov/facilities/facility-search



Search Criteria Selected х Search Type Water Geographic Location State X lowa Facility Characteristics Permit Status x Effective, Expired, Administratively Continued, Pending, Retired Permit Type × NPD - NPDES Individual Permit, NGP -NPDES Master General Permit, GPC - General Permit Covered Facility, UFT - Unpermitted Facility **Results View** Interactive Map Data Table Search



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Facility Name	NPDES ID	Reports	¢ Street Address	⊖ ≎ City	e e State	♦ ♦	 Significant Noncompliance (SNC) Status 	 Quarters in Noncompliance (3 yrs) 	● ● Effluent Violations (3 yrs)	On-Site Inspections (5 yrs)	Formal Actions (5 yrs)	569 Facilities Found
ACKLEY CITY OF STP	IA0035297		208 STATE STREET	ACKLEY	IA	110039932035	-	11	39	2	0	Search Type: Water
ADAIR CITY OF STP	A0035416	CEL	UNKNOWN	ADAIR	IA	110039690554	S(CSchVio)	11	1	1	0	Results View: Data Table State(s): Iowa
ADAIR-CASEY COMMUNITY SCHOOL DISTRICT	IA0067156	GEL	3384 INDIGO AVE.	ADAIR	IA	110036278051	S(CSchVio)	11	-	1	0	Permit Status: Effective; Expired; Administratively X Continued; Pending; Retired Permit Type: NPD - NPDES Individual Permit; NGP - X
ADEL CITY OF STP	IA0041921	Cel	600 SOUTH 4TH STREET	ADEL	IA	110039932160		8	8	2	0	NPDES Master General Permit; GPC - General Permit Covered Facility; UFT - Unpermitted Facility Compliance Status: New Violations
AG PROCESSING INC A COOPERATIVE	IA0064262		1000 300TH ST	MANNING	IA	110000414385	S(CSchVio)	11	4		0	Explore Enforcement and Compliance Criteria
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ACKLEY CITY O	F STP	IA0035297	208 STATE STREET	ACKLEY	IA		50601 1.1E+1	1 Hardin 07	,		19083 N
ADAIR CITY OF	STP	IA0035416	UNKNOWN	ADAIR	IA		50002 1.1E+1	1 Adair 07	,		19001 N
ADAIR-CASEY	COMMUNITY SCHOOL	IA0067156	3384 INDIGO AVE.	ADAIR	IA		50002 1.1E+1	1 Adair 07	,		19001 N
ADEL CITY OF S	ТР	IA0041921	600 SOUTH 4TH STR	EET ADEL	IA		50003 1.1E+1	1 Dallas 07	,		19049 N
AG PROCESSIN	G INC A COOPERATIVE	IA0064262	1000 300TH ST	MANNING	IA		51455 1.1E+1	1 Carroll 07	,		19027 N
AG PROCESSIN	G INC.	IA0059901	500 NORTH COMME	ERCIAL AVI EAGLE GRO	IA IA		50533 1.1E+1	1 Wright 07	,		19197 N
AG PROCESSIN	G, INC ALGONA	IA0081116	2108 140TH AVE	ALGONA	IA		50511 1.1E+1	1 Kossuth 07	,		19109 N
AGRI STAR ME	AT AND POULTRY LLC	IA0077135	220 WEST STREET	POSTVILLE	IA		52162 1.1E+1	1 Allamake(07	,		19005 N
) AGRIUM U.S. II	NC.	IA0004006	1887 HIGHWAY 71	EARLY	IA		50535 1.1E+1	1 Sac 07	,		19161 N
L AGROPUR INC.		IA0081621	332 DIVISION STREE	ET HULL	IA		51239 1.1E+1	1 Sioux 07	,		19167 N
2 AINSWORTH C	ITY OF STP	IA0069183	UNKNOWN	AINSWORT	TH IA		52201 1.1E+1	1 Washingt(07			19183 N
3 AJINOMOTO H	EARTLAND, INC.	IA0065692	1116 HWY 137	EDDYVILLE	IA		52553 1.1E+1	1 Wapello 07	,		19179 N
I AJINOMOTO N	ORTH AMERICA, INC.	IA0072389	1 AJINOMOTO DRIV	/E EDDYVILLE	IA		52553 1.1E+1	1 Monroe 07			19135 N
5 AKRON CITY O	F STP	IA0035211	UNKNOWN	AKRON	IA		51001 1.1E+1	1 Plymouth 07			19149 N
3 ALBERT CITY, C	ITY OF STP	IA0034312	CITY CLERK, CITY HA	ALL ALBERT CIT	Y IA		50510 1.1E+1	1 Buena Vis 07			19021 N
7 ALBIA CITY OF	STP (NORTH)	IA0036871	UNKNOWN	ALBIA	IA		52531 1.1E+1	1 Monroe 07			19135 N

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We Now Have NPDES Violators

- We now have table of all recent violations that can be filtered:
 - By SIC: 4952 is Wastewater Treatment Plants
 - Violation type: numeric, reporting, compliance schedule, etc.
 Pollutant type
 - BOD, TSS, NH3 are those expected to come from Food Processors

We now need a list of Industries potentially causing or contributing to the non-Compliance

Sources of Potential SIUs

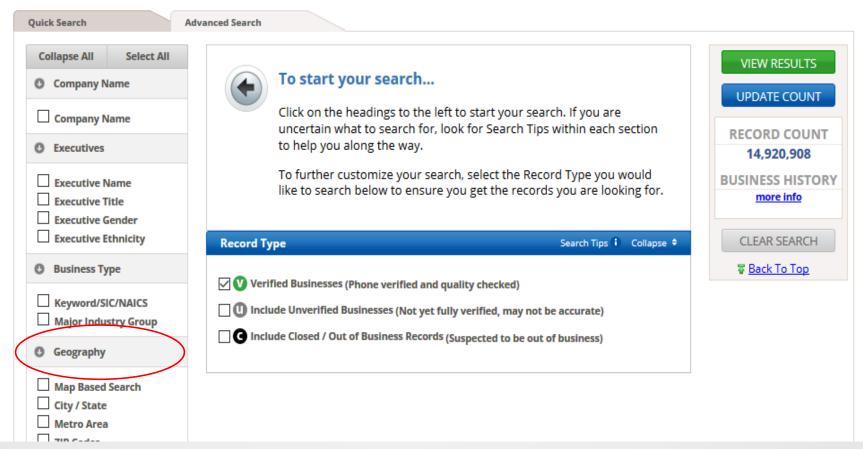
- POTW permit applications.
 - Theoretically, the POTW is to provide a list of SIUs with its permit application
 - Generally, only available to State personnel
 - May not be automated
 - Toxic Release Inventory Data (TRI)
 - Also available in ECHO (one stop shopping!)
 - All industries with > 10 employees is required to submit
 - Release levels are of little interest; it is the existence of a facility we are looking for
- Third Party Vendors

Third Party Vendors

referenceUSA[®]

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U.S. Businesses Database

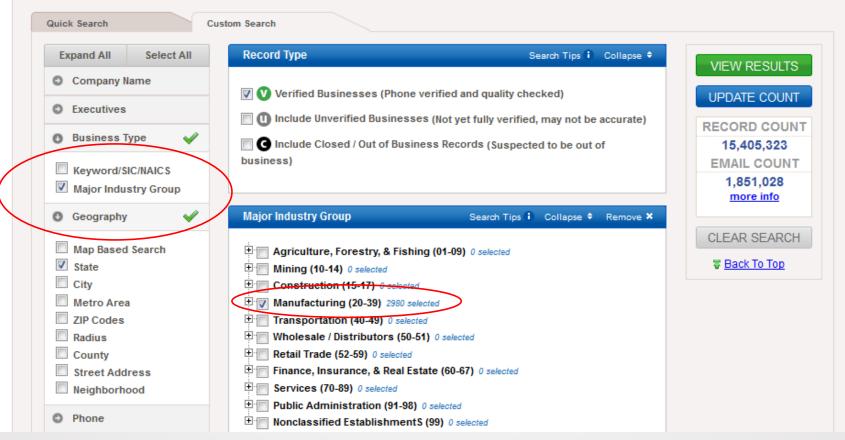


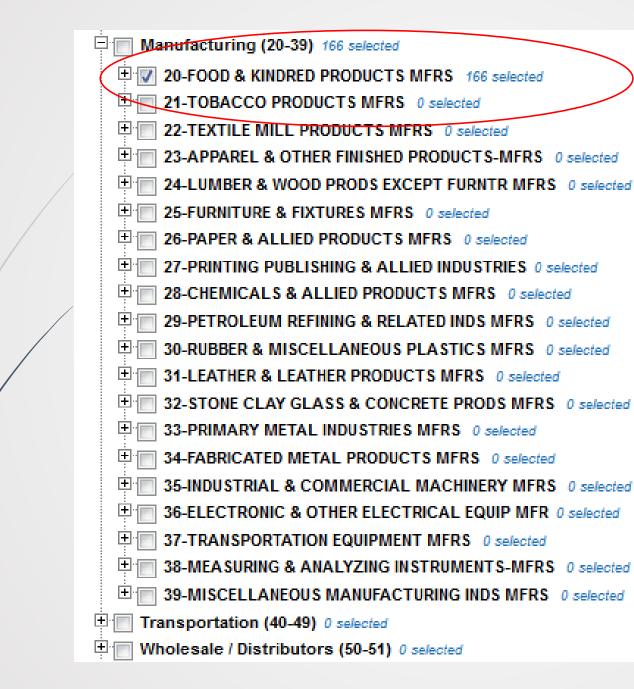
referenceUSA[°]

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Available Databases

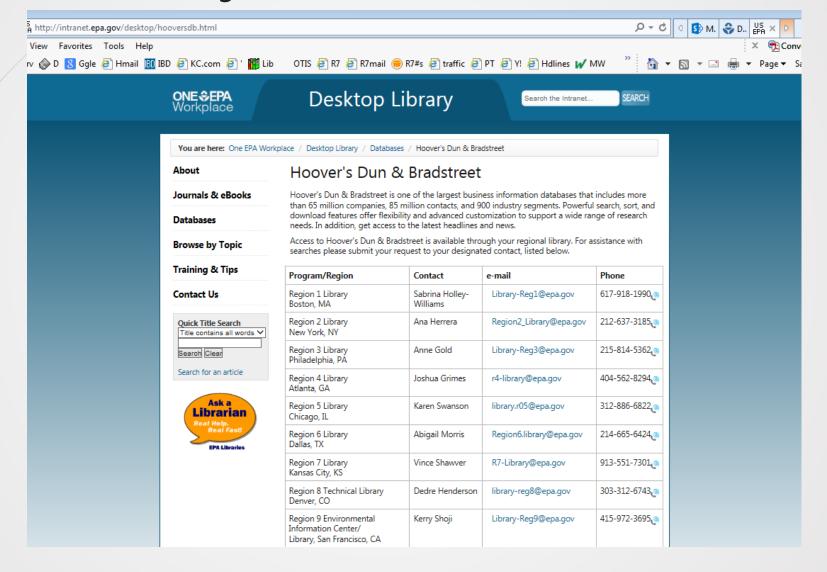
U.S. Businesses Database





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	.1 • · · × · ·	f _x Company Name								
	Α	В	с	D	E	F	G	н	I	J
	Company Name	Executive First Name	Executive Last Name	Professional Title	Executive Title	Executive Gender	Executive Biography	Address	City	State
	4 & 20 Blackbirds	Nancy	Ackerman		Owner	Female		610 Village Walk	Guilford	ст
	A Fiorillo Co Inc	Gary	Gaber		Manager	Male		396 Clark St Ext	Milldale	ст
	Abilities Without Boundaries	Nicole	DE Renzo		Exec Director	Female		615 W Johnson Ave # 101	Cheshire	ст
	Affinity Beverages Inc	Stan	Rottell		President	Male		4 Maplegrove Ave	Westport	ст
		Scott	Brown		President	Male		230 Pepes Farm Rd # C	Milford	СТ
/	Alexandra's Ice Cream Factory							240 Park Rd # 2	West Hartford	<u> </u>
	ALK Wines & Liquor							1635 Dixwell Ave	Hamden	СТ
	Allan S Goodman Inc	Roger	Loeb		Owner	Male		180 Goodwin St	East Hartford	ст

Third Party Vendors- EPA Resource



Hoovers Example Data

A J	К	L	N	AE	AF	AG	AH	BF	BL	
Company Name	- SIU?	👻 Primary Addr 👻	Primary City 🚽	Web Address	Latitude 👻	Longitud 👻	Line Of Business	🗸 Revenue (U 🗸	Emple 👻	Primary Industry
Seaboard Corporation		9000 W 67th St	Shawnee Miss	http://www.se 🚸 ar	39.007704	-94.689609	Meat packing plants, nsk	6473.076	175	Finance & Insuran
Mgp Ingredients, Inc.		100 Commercia	Atchison	http://www.mgpingr	39.561725	-95.113898	Distilled and blended liquors	313.403	95	Beer, Wine & Distil
ADM Milling Co.		8000 W 110th St	Overland Park	www.admmilling.co	38.929177	-94.678579	Flour and other grain mill products, nsk	259.4	60	Grain Milling
Creekstone Farms Premium Beef L	LC	604 Goff Industri	Arkansas City	www.creekstonefar	37.104188	-97.049029	Meat packing plants, nsk	71.3	700	Meat Product Manu
The Wichita Coca-Cola Bottling Con	npany	10001 Industrial	Lenexa	www.coca-cola.con	38.946306	-94.749565	Bottled and canned soft drinks, nsk	70.1	180	Soft Drink Manufac
Danisco USA Inc.		4 New Century P	New Century	www.danisco.com	38.839533	-94.896351	Food preparations, nec, nsk	55.4	250	Food Manufacturin
CROSSWIND INDUSTRIES, INC.		509 S Us Old Hi	Sabetha	www.crosswindind	39.897825	-95.788447	Prepared feeds, nec, nsk	50.8	140	Livestock & Other A
Menu Foods Midwest Corporation		1400 E Logan A	Emporia	www.simfoods.con	38.390594	-96.162522	Dog and cat food	46	321	Pet Food Manufact
Triple - T Foods, Inc.		1601 W Mckay S	Frontenac	www.tripletfoods.co	37.455023	-94.722721	Dog and cat food	45.3	50	Pet Food Manufact
Dold Foods, LLC		2929 N Ohio St	Wichita	www.hormel.com	37.737352	-97.324341	Meat packing plants, nsk	39.8	250	Meat Product Manu
2 Mgpi Processing, Inc.		100 Commercia	Atchison	www.mgpingredier	39.561725	-95.113898	Distilled and blended liquors	39.5		Distilleries
CFS WEST HOLDINGS, INC.		101 Prairie Villag	New Century	www.cfsauer.com	38.828113	-94.901301	Edible fats and oils	36.1	174	Edible Oils Manufa
Williams Foods, Inc.		13301 W 99th St	Lenexa		38.949172	-94.740889	Food preparations, nec, nsk	32.1	130	Seasoning & Dres
5 Ceva Animal Health, LLC		8735 Rosehill R	Lenexa		38.97069	-94.732788	Prepared feeds, nec, nsk	23.4	95	Livestock & Other /
King Tortilla Inc		249 23rd Ave	Moundridge		38.206707	-97.500875	Food preparations, nec, nsk	21.4	140	Bakery Product Ma
7 Hitchin Post Steak Co.		1101 S 5th St	Kansas City		39.07902	-94.621004	Poultry slaughtering and processing, nsk	21.2	100	Poultry Product Ma
MCSHARES, INC.		1835 E North St	Salina	www.researchprod	38.84896	-97.582231	Flour and other grain mill products, nsk	15.9	46	Grain Milling
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IN SUMMARY

Finding Interference/Pass Through

Two Basic Approaches

 With a list of NPDES violators from ECHO, check Industrial User Data Base for contributing industries

With a list of Industrial Users from an Industrial User Data Base, check the compliance status of the receiving WWTP, but remember:

- The receiving POTW may not have sampling frequency requirements sufficient enough for reliable determination.
- There are types of Interference that don't show up as numeric violations.

INSPECTIONS MAY BE WARRANTED

QUESTIONS?

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