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Re: *Effluent Limitations Guidelines and New Source Performance Standards for the Meat and Poultry Products Point Source Category, 67 Fed. Reg. 8,582 (February 25, 2002)*

Dear Samantha:

The Association of Metropolitan Sewerage Agencies (AMSA) is pleased to provide comments on the U.S. Environmental Protection Agency's (EPA's) proposed *Effluent Limitations Guidelines and New Source Performance Standards for the Meat and Poultry Products Point Source Category*. Founded in 1970, AMSA represents the interests of over 270 of the nation's publicly owned wastewater utilities (POTWs). AMSA members serve the majority of the sewered population in the United States and collectively treat and reclaim over 18 billion gallons of wastewater every day. As key stakeholders in the effluent limitations guidelines (ELG) program, AMSA members continue to oversee implementation of EPA's categorical pretreatment standards and remain engaged in the national dialogue on the development of those standards. At the same time, AMSA members along with thousands of other POTWs continue to develop and implement local programs tailored to the water quality needs of their community.

Over the last year AMSA has met with EPA on a number of occasions to discuss specific ELGs and the program as a whole. When AMSA learned that the Agency was planning to propose categorical pretreatment

standards for indirect dischargers in the meat and poultry products (MPP) point source category, we met with the Agency and explained how such standards would be duplicative of the treatment already provided by POTWs and how the standards would impact POTW operations. AMSA commends the Agency for not proposing categorical pretreatment standards for the MPP point source category. The Agency's supporting materials indicate that these wastes are not causing widespread problems for the nation's POTWs, and AMSA believes that local limits combined with proper enforcement are more than adequate to address any problems that may arise.

AMSA's recent white paper¹ on the ELG program underscored the importance of local limits. As the following passage highlights, the white paper emphasizes the need for the ELG program to acknowledge the key role local limits have in addressing regional and local water quality issues:

Since 1978, the U.S. Environmental Protection Agency (EPA or Agency) has promulgated effluent limitations guidelines (ELGs) for nearly every major industrial sector that is or might be a source of toxic pollutants. These technology-based guidelines have led to tremendous improvements in the quality of the nation's waters. However, while clean water priorities have begun to move towards watershed-based, holistic approaches, EPA continues to operate the ELG program as it did in 1978.

The array of tools available to clean water managers for controlling the release of pollutants into the nation's waters is now much broader than it was when the Clean Water Act was passed. For instance, publicly-owned wastewater agencies (POTWs) continue to expand their use of local limits to address site-specific pollution concerns. Local limits, which can be tailored to a particular pollutant and even an individual facility, can be more flexible and more innovative than national standards.

The Association of Metropolitan Sewerage Agencies' (AMSA's) members have been implementing the ELG program for over 20 years and have an understanding of how the program works, including what is effective and what is not effective, and have first-hand knowledge of how a new categorical pretreatment standard can impact an individual POTW. AMSA believes the ELG program must evolve to acknowledge that much has changed over the last two decades and supports EPA's efforts to reexamine the ELG program and its future.

¹ AMSA's White Paper – EPA's Effluent Limitations Guidelines Program can be obtained on the Association's web site at: <http://www.amsa-cleanwater.org/advocacy/#special>. A copy is attached.

In light of the progress made over the last 20 years and the tools and technologies available today to effectively address discharges with the potential to adversely impact POTWs, AMSA believes the Agency should not expend further resources to continue developing categorical pretreatment standards that ignore the critical role POTWs play on the local level.

The proposed MPP ELG provides a good example of the how improved communication between EPA and the program stakeholders, a key recommendation in AMSA's white paper, will be critical to the success of the ELG program as it evolves to conform with the Agency's larger watershed-based approach to clean water. While the Agency initially considered establishing standards for indirect MPP dischargers, discussions with stakeholders, including the POTW community, helped the Agency understand that the problems were not widespread and that the few isolated incidents would be best resolved through local controls and enforcement, not a national pretreatment standard.

AMSA's specific comments outlined below provide further justification for EPA's decision not to establish categorical pretreatment standards for the MPP point source category.

Regulation of Compatible Pollutants is Unwarranted and Will Negatively Impact POTW Pretreatment Programs and Revenues

Unlike prior ELGs that were directed at industrial categories expected to discharge toxic pollutants as a result of their industrial processes, the MPP ELG is directed at facilities engaged in the processing of food products for human consumption, or in the reprocessing of waste by-products from food product processing. As such, MPP facilities do not tend to use toxic pollutants in their operations. EPA clearly recognized this difference and did not propose regulation of any toxic pollutants for direct dischargers in any of the subcategories within the MPP. EPA also recognized the impact that MPP facilities can have on receiving streams through the discharge of conventional pollutants, and the Agency proposed regulation of the following pollutants for direct dischargers in various subcategories, with varying degrees of treatment: ammonia, biochemical oxygen demand (BOD), chemical oxygen demand (COD), fecal coliform, oil and grease (O&G), total nitrogen and total phosphorous.

In the context of indirect discharges to POTWs, however, regulation of these conventional pollutants does not make sense. First, the biological unit processes employed at POTWs are designed to effectively treat sewage constituents, the same pollutants identified above (i.e., compatible pollutants), and POTWs achieve extremely high levels of efficiency in this area. The economies of scale already in place at POTWs cannot be reproduced at indirect discharging MPP facilities even with substantial capital investment in essentially the same treatment technologies employed at POTWs. Requiring indirect discharging MPP facilities to install such technology would be unnecessarily duplicative of the treatment already provided by the POTW.

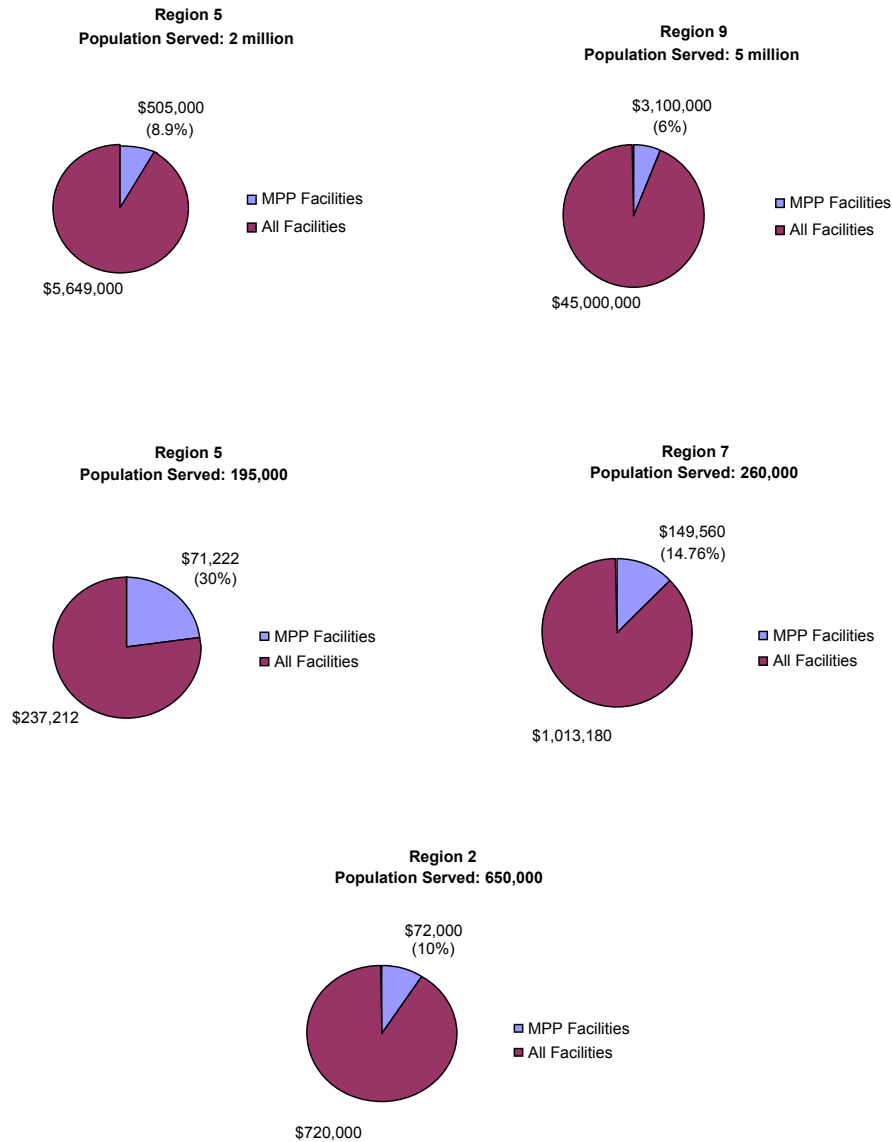
Second, POTWs are required under the Clean Water Act to recover the increased costs of providing wastewater treatment services to commercial and industrial users directly from such users, in proportion to the services provided. The revenue derived by AMSA members from MPP facilities through user charges is substantial. Figure 1 provides a clearer picture of the impact these revenue sources have on member agency activities, comparing MPP surcharge revenue to total surcharge revenue. Even more revealing is an estimate from a member agency in the Midwest that approximates the surcharge revenue from just two MPP facilities to be more than two percent of their entire agency's revenue.

While it might be argued that POTWs would benefit from pretreatment standards for the MPP industry based on a presumed reduction in conventional pollutant loadings, any resulting decreases in POTW operating costs would not correspond linearly to the reduction in user charge revenues, since POTWs would continue to incur the full costs of processing the hydraulic loading from the regulated MPP facilities.

In the case of smaller POTWs, a POTW may have made substantial capital investments in infrastructure specifically built to handle wastewater discharges from MPP facilities. These POTWs are reliant upon revenue from MPP facilities to amortize these capital investments, and may be unable to meet their financial obligations minus the revenue from MPP facilities, and without substantially raising user charge rates for the remainder of their service populations.

Figure 1

ESTIMATED ANNUAL MPP USER CHARGE REVENUES AS COMPARED TO TOTAL SURCHARGE REVENUE



Limited Interference and Pass-Through Episodes at POTWs

During development of the MPP ELG, EPA’s Office of Science and Technology, Engineering and Analysis Division (EAD), surveyed Pretreatment Coordinators in the EPA Regional offices to ascertain the extent to which indirect MPP facilities caused interference or pass-through episodes at POTWs. The preamble to the proposed rule indicated that EPA had identified 22 episodes of interference or pass-through at

POTWs that could be linked to discharges from MPP facilities. These 22 episodes are identified in Attachment 1.

EPA also indicated that it would continue to seek information regarding the extent to which MPP facilities caused interference or pass-through episodes at POTWs.

During a meeting held on May 20, 2002 at EPA Headquarters, representatives of the EAD advised AMSA that the Agency had not identified any additional episodes of POTW interference or pass-through beyond the original 22 episodes identified in the proposal.

There are approximately 15,000 POTWs in the United States, 1,500 with approved pretreatment programs. Therefore, using these figures, the incidence rate of POTW interference or pass-through attributable to the MPP sector is 22 incidents per 15,000 facilities, or 0.14 percent. Of the 22 episodes identified by EPA, 4 occurred at MPP facilities discharging to POTWs with approved pretreatment programs. Thus, the incidence rate of interference or pass-through at POTWs with approved pretreatment programs is 4 incidents per 1,500 facilities, or 0.27 percent. AMSA does not believe that these incidence rates suggest a widespread problem with MPP discharges or suggest the need for national categorical pretreatment standards for the industry. Rather, the localized problems EPA has identified lend themselves to a more site-specific control strategy.

In fact, many of the 22 episodes identified by EPA have already been resolved. Either through industrial user installation of equipment or POTW upgrades, all but five of the episodes have apparently either been resolved or are in the process of being resolved to varying degrees. No information regarding the resolution of the remaining five episodes was provided in the docket, yet it is unlikely that the problems were left unresolved.

When AMSA solicited input from its members on this proposal, the Association specifically asked for members to provide information on any episodes of interference or pass through caused by MPP facilities and how those issues were resolved. Only three member agencies indicated that they had experienced any problems directly attributable to MPP dischargers (two of the episodes dated from the late 1970s and 1980s). Each of the problems was related to oil and grease build up in the collection system, not interference or pass-through. In each case, the POTW worked with the facility to help them come into compliance with either an existing local limit or a limit that was developed to address that particular situation.

Use of the 100 mg/L Petroleum Refining Oil & Grease Limit is Inappropriate

The proposal solicits comment on potentially using the 100 mg/L oil & grease limit in the Petroleum Refining Point Source Category for preventing POTW interference by vegetable/animal oil and grease discharges from the MPP point source category. AMSA believes that adoption of the 100 mg/L oil and grease limit for MPP facilities is inappropriate for a number of reasons.

- AMSA members have a wealth of experience regulating the discharge of fats, oils and greases through the enforcement of local discharge limits. AMSA believes that since the problems are community specific or even site-specific, they should be dealt with on a community by community basis. AMSA members have local limits for oil and grease ranging from 50 mg/L to 900 mg/L (depending on the form: polar, non-polar, or total). Some members have chosen to implement oil and grease controls using best management practices (BMPs) instead of a numeric limit (a program that has reduced grease levels by about 99%), while others use a narrative "visual" standard. Regardless of the selected control, AMSA's members rely on the flexibility afforded them by local limits, which can be tailored to meet a wide range of community needs. If POTWs can handle oil and grease loads around 250 mg/L, for example, industry should not be required to expend unnecessary resources to meet a lower limit. On the other hand, if a POTW or collection system continues to have problems with oil and grease, they would explore a more stringent local limit.
- EPA notes in the preamble that oil and grease from Petroleum Refineries is not the same material as oil and grease from MPP facilities, but still proposes to use the 100 mg/L limit for MPP facilities. The Agency has not properly considered the unique nature of oil and grease from the MPP industry, an action that is inconsistent with EPA's own *Draft Local Limits Development Guidance*:

The specific limit for FOG [fats, oil, and grease] and the strategy for controlling it need to be based on the type of FOG, the types of sources, and the levels of FOG that begin to prevent problems in the collection system or at the POTW. Developing a technically-based local limit for FOG requires an understanding of the unique manner in which oil and grease can cause interference or pass through.

- EPA must acknowledge the inherent differences between the two types of FOG. The first type of FOG consists of petroleum-based hydrocarbons, such as motor oils and automotive greases (petroleum refining oils and greases would fall into this category). These oils and greases are considered non-polar FOG and are not readily separated from water. The second type of FOG consists of vegetable or animal based fats, oils and greases, such as those used in cooking, frying, and baking. MPP oils and greases would primarily fall into this category. These oils and greases are polar, meaning they have an electrical charge similar to that found on a molecule of water.

As stated by EPA in the *Domestic Sewage Study and Pretreatment Implementation Review Taskforce Amendments to the General Pretreatment Regulations* (January 1991), polar FOG can be metabolized by microorganisms in secondary waste treatment facilities and is readily reduced in concentration in aerobic and anaerobic biological treatment systems. Accordingly, some AMSA members have established separate local limits for polar and non-polar FOG.

- Both AMSA and EPA agree that the Agency's "50 POTW Study" is out of date and that a new study should be conducted to more accurately characterize removal efficiencies. The oil and grease parameter provides just one example of where the Agency underestimates POTW removal efficiencies. One AMSA member evaluated removal efficiencies for oil and grease through secondary treatment at their facilities where raw data were available and found an average removal of 95.7% as compared 87% (poultry) and 86% (meat) used in the proposal.
- The oil and grease parameter for the Petroleum Refining Point Source Category is used as an indicator for the presence of petroleum-based hydrocarbons in process wastewaters. The oil and grease parameter is used as a surrogate for the more costly analysis needed to detect specific toxic organic pollutants such as benzene, ethyl benzene, toluene and xylene. MPP facilities do not use such pollutants in their processes.

Alternatives to Categorical Pretreatment Standards

Before EPA determined that it did not have enough information to justify categorical pretreatment standards for MPP facilities, the Agency considered two alternative approaches to numeric standards. The purpose of the alternatives was to help MPP facilities comply with regulations and foster voluntary adoption of environmental management systems.

Under the first alternative, EPA would not issue pretreatment standards for indirect dischargers. Instead, the Agency would work with the industry to develop and implement voluntary environmental management systems (EMS). EPA would revisit the issue after a few years to evaluate the effectiveness of the voluntary program, and take steps to develop pretreatment standards or other alternatives if program performance was lacking.

Under the second alternative, EPA would promulgate pretreatment standards for indirect dischargers. Dischargers would have the option of meeting the regulations by implementing EMSs that include environmental audit programs, in lieu of meeting the numeric pretreatment standards. Control authorities would be responsible for evaluating the adequacy of the EMS to determine compliance.

AMSA supports the idea of a voluntary EMS for the MPP industry, and supports the use of a voluntary EMS alternative in lieu of pretreatment standards. An EMS can not only help ensure compliance with environmental requirements, but it also can and should move a facility beyond compliance and begin to reap benefits that far exceed what a command and control approach can achieve. The EMS concept, however, relies heavily on its voluntary nature. EMSs used as enforceable alternatives to a more traditional environmental requirement become simply another item on the compliance checklist. Accordingly, AMSA does not support any alternative that would require by federal regulation the development of an EMS to replace a categorical pretreatment standard.

Conclusion

AMSA fully supports EPA's decision not to promulgate categorical pretreatment standards for the MPP point source category. MPP facilities discharge pollutants that are compatible with the POTW treatment processes that receive them. To require MPP facilities to install treatment to control conventional pollutants would expend unnecessary resources to duplicate treatment already provided by the POTW. Such redundant treatment procedures would also eliminate a vital source of revenue for many POTWs. As even the Agency's supporting materials demonstrate, interference and pass-through episodes caused by MPP facilities are rare, localized occurrences that are best addressed on the local level.

Thank you again for the opportunity to comment on this critical effort. AMSA looks forward to continued discussions with the Agency on this matter. If you have any questions about our comments please do not hesitate to call me at 757/460-4220 or Chris Hornback, AMSA at 202/833-9106.

Sincerely,



Guy Aydlett
Director, Water Quality
Hampton Roads Sanitation District
Chair, AMSA Pretreatment and Hazardous
Waste Committee



Chris Hornback
Director, Regulatory Affairs

ATTACHMENTS

Attachment 1

MEAT AND POULTY PRODUCTS EPISODES OF POTW INTERFERENCE OR PASS-THROUGH IDENTIFIED BY U.S. EPA

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
1	Hudson Foods, Corydon, Indiana	No approved pretreatment program	Organic over loadings contributing to pass-through or interference		“It also occurs to me that in the earlier briefing package there was the concept of limiting the scope of the pretreatment standards to situations where the IU made up more than a certain % of the POTW’s flow. That relative size approach would seem to better address the concerns underlying the decision to establish pretreatment standards for this industry, as well as the point being made by the larger POTWs, that categorical pretreatment standards aren’t necessary for this industry. The problem doesn’t seem to be the overall size of the IUs, but their relative size and loading to their POTW. Is there any chance of that being used instead of the absolute size approach in the latest draft?”—Matt Gluckman (R5)
2	Indiana Packers Corp., Delphi, Indiana	No approved pretreatment program	Organic over loadings and unequalized flows contributing to interference (nitrification)(NH3)	IU installed equalization resulting in improved POTW performance	No additional information was provided

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
3	IBP, Logansport, Indiana	Approved pretreatment program	Pollutant over loadings and unequalized flows contributing to interference at POTW		No additional information was provided
4	Hormel Foods, Austin, Minnesota	No approved pretreatment program, no local limits	Pollutant over loadings and unequalized flows contributing to interference (trickling filter fixed film nitrification)		“My feeling is yes since some of the MPPs can intimidate the community officials. I.e.: ‘You push us too far & we’re out of here!’ This was the impression our two trainers had with Wilmar, MN.” –Russell Martin (R5)
5	Minnesota Beef Industries, Buffalo Lake, Minnesota	No approved pretreatment program, no local limits	Pollutant over loadings and unequalized flows contributing interference (pond system) ((pH, BOD, TSS, O&G)	POTW has invested in infrastructure upgrades	“Of the 14 MN situations described, only the 1 st , Albert Lea, has an approved pretreatment program.”—Matt Gluckman (R5)

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
6	Sara Lee, Inc., Chandler, Minnesota	No approved pretreatment program, no local limits	Pollutant over loadings and unequalized flows contributing to interference (stabilization ponds)		No additional information was provided
7	Long Prairie Packing, Central Bi-Products, Dans' Prize, Long Prairie, Minnesota	No approved pretreatment program, no local limits	Pollutant over loadings from three facilities contributing to interference (dedicated pond system)	POTW is investing in infrastructure improvements	No additional information was provided
8	Tony Downs, Madelia, Minnesota	No approved pretreatment program, no local limits	Oil & Grease and solids contributing to interference and pass-through	POTW owns old DAF unit which it operates for IU; POTW has invested in infrastructure upgrades, but NPDES violations continue	No additional information was provided

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
9	West Central Turkeys, Pelican Rapids, Minnesota	No approved pretreatment program, no local limits	Pollutant over loadings contributing to interference	POTW has nvested in infrastructure upgrades, resulting in POTW compliance	No additional information was provided
10	Ellison Meats, Pipestone, Minnesota	No approved pretreatment program, no local limits	Pollutant over loadings contributing to interference and pass-through (stabilization ponds) (BOD)	POTW considering infrastructure upgrades	No additional information was provided
11	Tony Downs, Armour Swift Ekrich, St. James, Minnesota	No approved pretreatment program, no local limits	Pollutant over loadings from 3 IUs contributed to interference (activated sludge plant). O&G "footballs" 10 years ago.	IU installed DAF unit	No additional information was provided

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
12	Brandon Meats, Brandon, Wisconsin	No approved pretreatment program, no local limits	Pollutant over loadings and unequalized flows contributed to interference and pass-through (BOD, DO, TSS); POTW operating in excess of design capacity	Court ordered compliance schedule resulted in IU compliance and POTW NPDES permit compliance; POTW upgrades to be completed by 01/03	<p>“The Village has been in compliance with its limits since the fall of 1999, but is still operating over its design capacity. The Village is on a compliance schedule to complete construction of a new WWTP by January 28th, 2003.</p> <p>Yes, standards would help. What happens is that with our current rules, we have no authority in regulating MPP’s. And the MPP’s carry enough clout in the small communities such that the local governments do not want to be regulating the MPP. This forces the POTW’s to carry the burden and expense of upgrading their treatment systems to handle whatever the MPP discharges to them. I think there should be some form of pretreatment required.”—Mark Stanek (WI DNR)</p>

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
13	West Liberty Foods, West Liberty, Iowa	No approved pretreatment program, no local limits	BOD and TSS over loadings contributed to interference and pass-through (TSS).	IU installed pretreatment system resulting in POTW permit compliance	<p>“Metals listed as demonstrating pass through—this concept is troubling. IF one needed to treat for a metal, how much organic load would need to be removed before the wastewater was in condition to be treated for these metals? To even suggest that these metals would be regulated is not a good idea since it is rather impractical to treat for them. THE MPI guidelines should be only for organic pollutants and some related ones (N parameters) and nothing else. Also, I believe that it is not good policy to have a regulation directed to a few special cases and then apply that regulation to the entire country. The vast majority of cities do care about the operation of their POTWs and have the capability of regulating themselves. I admit that there are extreme examples (mayor owning the meat facility) but these are the exception—let others take care of them.”—Michael Turvey (R7)</p>

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
14	Mariah Packing, Columbus, Indiana	No local limits, surcharge fee imposed on NH3	Pollutant over loadings contributed to cold weather interference (NH3)	IU installed pretreatment system (sequencing batch reactor) to reduce discharge NH3 concentrations from 100 mg/L to 1 mg/L	<p>“Perhaps a limit on O&G. This is the only parameter that is somewhat universal, due to the need to prevent sewer blockage. Beyond that, a limit that protects one POTW will probably rob another one of income.</p> <p>Flow control seems to be an issue in several situations. Could something be worked out requiring the MPP flow variation to be a function of their percent contribution to the POTW? Small % contribution, large variation allowed, large % contribution, small variation allowed. This would help and be fair if it could be implemented.”—Bill Blue (IN DEM)</p>
15	Tennessee Valley Hams, Paris, Tennessee	No approved pretreatment program, no local limit for salinity	High salinity discharge contributed to corrosion of POTW lift station	IU installed unspecified pretreatment system to reduce salinity	<p>“The real problem with the Tennessee Valley Hams facility is high salinity. Corrosion from the salt has resulted in the City having to replace a nearby lift station on more than one occasion.</p> <p>I do know that the consultant that the City of Paris uses promotes plant expansion to accept industrial waste containing conventional pollutants rather than installation of pt equipment at the industry. I’ve seen it over and over at other municipalities in that area of the State.”—Charles Durham (Tetrattech)</p>

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
16	IBP, Gibbons, Nebraska	No approved pretreatment program, no local limits	Pollutant over loadings contributed to interference and pass-through (NH ₃ – 125 mg/L) and fish kill in receiving stream	POTW has invested in infrastructure upgrades, resulting in POTW compliance	No additional information was provided
17	Jimmy Dean Sausage, Newbern, Tennessee		Pollutant over loadings contributed to interference and NPDES permit violations	IU installed DAF several years ago, but failed to maintain trained staff; recently installed additional unspecified equipment	“Overloading from Jimmy Dean Sausage has definitely resulted in violations of Newbern’s NPDES permit. Several years ago, the IU installed a DAF unit, but never really assigned or properly trained personnel to operate it. They have since installed additional equipment. Violations are less frequent, but still evident. The wastewater plant operation and pretreatment program are contracted out to Severn Trent, Inc.”—Charles Durham (IN DNR)
18	Jennie-O-Foods, Willmar, Minnesota	No local limits	Pollutant over loadings and unequalized flows contributed to interference		No additional information was provided

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
19	Excel Corp., Fort Morgan, Colorado	Approved pretreatment program, local limits established	Pollutant over loadings and unequalized flows contributed to interference and pass-through. IU exceeded POTW local limits	EPA enforcement action against POTW for failure to implement pretreatment program and against IU resulted in penalties and IU disconnection from POTW; IU currently operating as direct discharger under NPDES permit	No additional information was provided
20	Perdue Farms, Inc., Salisbury, Maryland	Approved pretreatment program, local limits established: (BOD – 350 mg/L; TSS – 350 mg/L)	BOD over loadings and flow contributed to pass-through. IU repeatedly failed to comply with local limits (BOD, TSS); POTW failed to take adequate enforcement action	EPA enforcement action against POTW for failure to implement pretreatment program	No additional information was provided

Case No.	Industrial User/Location	Approved Pretreatment Program? Local Limit Developed?	Problem	Resolution	Approval Authority / EPA Regional Comments
21	Allen Family Foods, Inc., Hurlock, Maryland	Approved pretreatment program, local limits established (BOD, TSS, O&G, pH)	BOD over loadings and flow exceedances contributed to pass-through	EPA enforcement action against IU. EPA also cited POTW failure to seek penalties against IU to deter noncompliance.	No additional information was provided
22	Carriage Hill Foods, Salem, Ohio	Local limits established (TDS)	TDS and P loadings contributed to pass-through and biological index degradation in receiving stream	POTW under Ohio EPA compliance schedule for conductivity and P; POTW investing in infrastructure (tertiary treatment) to meet P limit	No additional information was provided