

## ADEQ Pretreatment Annual Report Form

I	GENERAL INFORMATION	Enter Answers in this column below.
1	Local Agency	City of Phoenix
2	Report Date	2/26/2025
3	Reporting Period January 1- December 31. DUE: Feb 28th. Enter Year.	2024
4	Contact Name	Chelsey Mc Cluskey
5	Contact Title	Pretreatment Compliance Coordinator
6	Mailing Address	2474 S. 22nd Avenue
7	City, State, Zip Code	Phoenix, Arizona 85009
8	Phone Number	602-495-5926
9	Email	<a href="mailto:chelsey.mccluskey@phoenix.gov">chelsey.mccluskey@phoenix.gov</a>

II	WASTEWATER TREATMENT PLANT INFORMATION (Add as many rows as necessary)	
1	Wastewater treatment plant name	91st Avenue Wastewater Treatment Plant (AZ0020524)
a		
b		
c		

III	GENERAL QUESTIONS	
1	Are you required to develop or implement a Pretreatment Program?	Yes
2	Provide the initial date the pretreatment program was approved. The date must be provided in YYYY-MM-DD format where YYYY is the year, MM is the month, and DD is the day.	1982-09-30 (submittal); 1983-07 (approval)
3	Was the pretreatment Program substantially modified? If yes, complete items III.4 through III.6. If no, go to section IV. Legal Authority.	No
4	provided in YYYY-MM-DD format.	N/A
5	Select the type of substantial modification from drop down list.	N/A
a	If you selected "other", please explain.	N/A

6	Was the substantial modification submitted to the Approval Authority? All substantial modifications are shall be submitted to the Approval Authority.	N/A
a	If no, provide explanation why substantial modification was not submitted to Approval Authority.	N/A

<b>IV</b>	<b>LEGAL AUTHORITY</b>	
1	Name of Ordinance	Phoenix City Code Chapter 28 "Sewers"
2	Date of Adoption (YYYY-MM-DD format)	2024-03-06
3	Location of Ordinance (Provide website address)	<a href="https://phoenix.municipal.codes/CC/28">https://phoenix.municipal.codes/CC/28</a>

<b>V</b>	<b>LOCAL LIMITS</b>	
1	Did the Control Authority adopt any local limits during the reporting period?	No
a	If yes, provide local limit adoption date in YYYY-MM-DD format	N/A
2	Did the Control Authority conduct a local limits evaluation during the reporting period?	Yes
a	If yes, provide local limits evaluation date in YYYY-MM-DD format	2025-02-03
3	Did the Control Authority add or delete pollutants from its list of local limits during the reporting period?	No
a	Enter any pollutant(s) added	N/A
b	Enter any pollutant(s) deleted	N/A
4	Are you under a State or Federal compliance schedule that includes steps to be taken to revise local limits?	No
a	If yes, provide proposed date to revise local limits	N/A

<b>VI</b>	<b>MODIFICATIONS TO PRETREATMENT PROGRAM</b>	
1	Where there any modifications to the Pretreatment Program this reporting period? If yes, complete a-h below. If no, skip to section VII.	No
2	Administrative Structure?	
a	If yes, provide date of change in YYYY-MM-DD format	
b	If yes, explain changes	
c	If yes, was the public informed	

3	Legal Authority?	
a	If yes, provide date of change in YYYY-MM-DD format	
b	If yes, explain changes	
c	If yes, was the public informed	
4	Local Limits?	
a	If yes, provide date of change in YYYY-MM-DD format	
b	If yes, explain changes	
c	If yes, was the public informed	
5	Monitoring Program or Frequency?	
a	If yes, provide date of change in YYYY-MM-DD format	
b	If yes, explain changes	
c	If yes, was the public informed	
6	Enforcement Policy?	
a	If yes, provide date of change in YYYY-MM-DD format	
b	If yes, explain changes	
c	If yes, was the public informed	
7	Funding?	
a	If yes, provide date of change in YYYY-MM-DD format	
b	If yes, explain changes	
c	If yes, was the public informed	
8	Staffing?	
a	If yes, provide date of change in YYYY-MM-DD format	
b	If yes, explain changes	
c	If yes, was the public informed	
9	Other-explain	
a	If yes, provide date of change in YYYY-MM-DD format	
b	If yes, explain changes	
c	If yes, was the public informed	
10	Have you made any changes to the approved IPP, substantial or	
a	If yes, explain	

<b>VII</b>	<b>UPSETS, PASS-THROUGH AND INTERFERENCE</b>	
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1	Did you identify if there were any problems or violations (e.g., upset, pass-through, interference, violation of AZPDES permit limits) with the effluent discharge of this POTW covered by this Pretreatment Program during the reporting period?	No
a	If yes, describe issue including any corrective actions taken and name of SIU/CIU that caused issue, if known. Add a new row for each issue.	
2	Have you prepared a summary of all investigations into upsets, interference and pass-through during the past year, including the reason why the incident occurred and any subsequent corrective actions?	Yes
a	If no, explain why not.	
3	Have you prepared a description of monitoring, sewer inspections and evaluations which were done during the past year to detect upsets, interference and pass-through, specifying parameters and frequencies of those events?	Yes
a	If no, explain why not.	
4	Where there any additional limitations or changes to existing requirements that are necessary to prevent future upsets, pass-through and or interference?	No
a	If yes, explain.	
5	Where there were any problems with the use or disposal of biosolids or sewage sludge for this POTW during the reporting period?	No
a	If yes, describe issue, including name of SIU/CIU that caused issue if known. Add new row for each.	

<b>VIII SIGNIFICANT INDUSTRIAL USERS</b>		
1	Fill out SIU Inventory on sheet named "Table 1." Did you fill out Table 1 completely and accurately?	Yes
2	Where there any additions to the SIU/ IU list?	Yes
a	If yes, list. Add as many rows as necessary.	SFPP, LP - Phoenix Terminal (Reclassified)
		Image First of Arizona LLC dba ImageFIRST Healthcare Laundry Specialists
		Waste Management of Arizona, Inc. - Phoenix Hauling South (Reclassified)
		Wacom Quartz Corp.
		ICP Construction (Reclassified)

		APS BioGroup (new owner)
b		
3	Where there any deletitions to SIU/ IU lists?	Yes
a	If yes, list. Add as many rows as necessary.	4RB Disposal (Reclassified to an IU)
		Sagamore Camelback (new owner, name change, reclassified to an IU)
		Quantum Global Technologies, LLC. dba QuantumClean
		MPP Group of Companies
		Southwest Oil Recovery
b		
4	Where there any modifications or name changes to SIU/ IU lists?	Yes
a	If yes, list. Add as many rows as necessary.	Core Linen Services Inc. (previously Crothall)
5	Has the POTW implemented any programs to reduce pollutants from non-domestic users that are not classified as SIUs?	Yes
a	If yes, list. Add as many rows as necessary.	Permitting IU facilities under Class B Permits
b		Commercial Inspections/FOG program for non-permitted non-domestic user controls
9	Has the POTW received RCRA Waste during the reporting period?	No
a	Provide the method by which the waste is received (i.e., whether by truck, rail, or dedicated pipe)	
b	Hazardous waste number	
c	Amount received annually of each hazardous waste	
10	Has the POTW received remediation waste during the reporting period? Applicants are exempt from the notification requirements of 40 CFR 403.12(p)(1) if they receive no more than fifteen kilograms per month of hazardous wastes, unless the wastes are acute hazardous wastes as specified in 40 CFR 261.30(d) and 261.33(e).	No

a	Provide the identity and description of the site(s) or facility(ies) at which the wastewater originates	
b	Provide the identities of the wastewater hazardous constituents, as listed in 40 CFR Part 261 Appendix VIII; if known	
c	Describe the extent of treatment, if any, the wastewater receives or will receive before entering the POTW	

<b>IX</b>	<b>COMPLIANCE AND ENFORCEMENT FOR EACH SIU</b>	
1	Fill out the Summary of Enforcement Actions on the sheet named "Table 2." Did you fill out Table 2 completely and accurately?	Yes

**END**

**Table 1: Significant Industrial User Inventory** (scroll to see all columns, add as many rows as necessary)

Reference/ Identification Number	Facility Name	Street Address	City	State	Zip Code	Industrial User Type	Provide category, if subject to federal categorical standards	SIC Code(s)	Control Mechanism Coverage Status
2002-32346	4RB Disposal, LLC.	2245 West Shangri La Road	Phoenix	AZ	85029-4813	SIU	N/A	4953	Terminated
2309-5405	AAA Ajax Pumping Service, Inc.	2433 South 7th Avenue	Phoenix	AZ	85007-4302	SIU	N/A	4953	Effective
2202-2680	VHS of Phoenix, Inc. dba Abrazo Central Campus	2000 West Bethany Home Road	Phoenix	AZ	85015-2443	SIU	N/A	8062	Effective
2104-20565	VHS Acquisition Subsidiary Number 1, Inc. dba Abrazo Scottsdale Campus	3929 East Bell Road	Phoenix	AZ	85032-2112	SIU	N/A	8062	Effective
2308-47264	Advanced United Refining, Inc.	4575 West Watkins Street	Phoenix	AZ	85043-4508	CIU	437.16	3341	Effective
2103-5378	Allied Tube & Conduit Corporation	2525 North 27th Avenue	Phoenix	AZ	85009-1710	CIU	420.96(b)(3), 420.106(b)(1), 420.107(a)(1), 420.126(a)(1)	3317	Effective
2410-27301	AlSCO Inc. - Phoenix	4707 West Camelback Road	Phoenix	AZ	85031-1413	SIU	N/A	7218	Effective
2302-5397	AmeriPride Services, Inc.	6025 West Van Buren Street	Phoenix	AZ	85043-3509	SIU	N/A	7218, 7213	Effective
2309-48591	APEL Extrusions, Inc.	3033 South 59th Avenue	Phoenix	AZ	85043-7909	CIU	467.36	3354	Effective
2404R2-30755	APS BioGroup, Inc.	2235 South Central Avenue	Phoenix	AZ	85004-2909	SIU	N/A	2023	Effective
2311-1240	Arizona Public Service Co. - West Phoenix Power Plant	4606 West Hadley Street	Phoenix	AZ	85043-4900	CIU	423.16(d)	4911	Effective
2109-2180	Aramark Uniform & Career Apparel, LLC dba Aramark Uniform Services	3836 West Buckeye Road, Bldg. F	Phoenix	AZ	85009-5403	SIU	N/A	7218	Effective
2102-5325	Arizona Foods Group, Inc.	2517 East Chambers Street	Phoenix	AZ	85040-3640	SIU	N/A	2026, 2038	Effective
2103-20489	ASM America Inc.	3440 East University Drive	Phoenix	AZ	7200	CIU	469.18	3674	Effective
1910-1310	Avanti Circuits, Inc.	17650 North 25th Avenue	Phoenix	AZ	85023-2115	CIU	433.17	3672	Effective

2209-5366	Baker Commodities, Inc.	3602 West Elwood Street	Phoenix	AZ	85009-6737	SIU	N/A	2077	Effective
2408-21828	Banner Health dba Banner Estrella Medical Center	9201 West Thomas Road	Phoenix	AZ	85037-6918	SIU	N/A	8062	Effective
2405-2710	Banner Health dba Banner University Medical Center Phoenix	1111 East McDowell Road	Phoenix	AZ	85006-2612	SIU	N/A	8062	Effective
2009-33399	Barrel O' Fun Snack Foods Co. Southwest, LLC	7330 West Sherman Street	Phoenix	AZ	85043-4751	SIU	N/A	2096	Effective
2312-1880	Bottling Group, LLC dba CBM Manufacturing Company, Inc. - Pepsi Phoenix	4242 East Raymond Street	Phoenix	AZ	85040-1935	SIU	N/A	2087	Effective
2211-27064	Café Valley, Inc.	7000 West Buckeye Road	Phoenix	AZ	85043-4306	SIU	N/A	2051	Effective
2106-2590	Carl T. Hayden VA Medical Center	650 East Indian School Road	Phoenix	AZ	85012-1839	SIU	N/A	8062	Effective
2010-33214	Cassavant Assembly & Processing, LLC	3725 East Atlanta Avenue	Phoenix	AZ	85040-2960	CIU	433.17	3471, 3479	Effective
2107-27278	Celgene Corporation	620 North 51st Avenue	Phoenix	AZ	85043-2702	CIU	439.47	2834	Effective
2312-1340	Certified Inspection Service Company, Inc.	21 South 41st Street	Phoenix	AZ	85034-3005	CIU	433.17	3479	Effective
2310-1350	ChemResearch Co., Inc.	1130 West Hilton Avenue	Phoenix	AZ	85007-4305	CIU	433.17	3471	Effective
2310-2760	Chromalloy Arizona	5161 West Polk Street	Phoenix	AZ	85043-2720	CIU	433.17	3471	Effective
2407-5316	CINTAS CORPORATION No. 3 - Cintas 466	5501 West Hadley Street	Phoenix	AZ	85043-4600	SIU	N/A	7218	Effective
2204-5375	Cintas Corporation	4804 West Roosevelt Street	Phoenix	AZ	85043-2809	SIU	N/A	7218	Effective
2402-26452	Cleanpart Southwest LLC	3844 E University Drive, Suite 2	Phoenix	AZ	85034-7221	CIU	433.17	3471	Effective
2406-32079	Core Linen Services Inc.	4445 South 36th Street	Phoenix	AZ	2901	SIU	N/A	7218	Effective
2203-2690	Dignity Health - St. Joseph's Hospital & Medical Center	350 West Thomas Road	Phoenix	AZ	85013-4409	SIU	N/A	8062	Effective
2402-21740	DS Services of America, Inc. dba Sparkletts	3302 West Earll Drive	Phoenix	AZ	85017-5242	SIU	N/A	2086	Effective

2410-33198	Dunn Edwards Corporation - Phoenix Facility	520 South 67th Avenue	Phoenix	AZ	85043-4432	SIU	N/A	2851	Effective
2112-49398	Emerald Phoenix, LLC	4410 West Mohave Street	Phoenix	AZ	85043-8304	SIU	N/A	7218	Effective
2309-30385	Entrepix, Inc.	4717 East Hilton Avenue	Phoenix	AZ	85034-6412	CIU	469.18	3559	Effective
2203-49093	FM Industries Inc.	2635 East Magnolia Street	Phoenix	AZ	85034-6909	CIU	433.17	3471, 3599	Effective
2110-27344	FM Industries Inc.	2104 West Roosevelt Street, Bldg D	Phoenix	AZ	85009-3702	CIU	433.17	3471	Effective
2011-20950	Frontier Group, Inc.	3518 East Wood Street	Phoenix	AZ	85040-1835	CIU	433.17	3471, 3548	Effective
2306-33358	Global Healing Center, LLC	925 East Salter Drive	Phoenix	AZ	85024-5648	CIU	439.47	2833	Effective
2307-25768	Gourmet Boutique West, LLC.	351 South Black Canyon Hwy	Phoenix	AZ	85009-5201	SIU	N/A	2015, 2099	Effective
2412-32021	Gregory Packaging, Inc. - Phoenix Plant	439 South 55th Avenue	Phoenix	AZ	85043-4621	SIU	N/A	2033, 2037	Effective
2009-33387	Hadrian, Inc	3602 West Washington Street, Suite	Phoenix	AZ	85009-4767	CIU	433.17	3479	Effective
2207-30340	Heligear Acquisition Co. dba Northstar Aerospace - Phoenix	300 South 23rd Street	Phoenix	AZ	85034-2500	CIU	433.17	3728	Effective
2207-30339	Heligear Acquisition Co. dba Northstar Aerospace - Phoenix (401)	401 South 36th Street	Phoenix	AZ	85034-2812	CIU	433.17	3471	Effective
2302-5436	Honeywell International Inc. Former Peoria Avenue Facility/EW-1	2305 West Mercer Lane	Phoenix	AZ	85051	SIU	N/A	56291	Effective
2304-2990	Honeywell International, Inc. dba Honeywell Aerospace - Phoenix R&O	1944 East Sky Harbor Circle North	Phoenix	AZ	85034-3442	CIU	433.17	3724, 3471	Effective
2204-1510	Honeywell International, Inc.- Honeywell Engines	111 South 34th Street	Phoenix	AZ	85034-2802	CIU	433.17	3724	Effective
2208-5383	Honeywell International, Inc. Former Peoria Avenue Facility/MW-10	2251 West Sierra Street	Phoenix	AZ	85029	SIU	N/A	56291	Effective
2203-5374	HonorHealth Deer Valley Medical Center	19829 North 27th Avenue	Phoenix	AZ	85027-4001	SIU	N/A	8062	Effective

2201-2700	HonorHealth John C. Lincoln Hospital North Mountain	250 East Dunlap Avenue	Phoenix	AZ	85020-2825	SIU	N/A	8062	Effective
2011-31009	HonorHealth Sonoran Crossing Medical Center	33400 North 32nd Avenue	Phoenix	AZ	85085-8876	SIU	N/A	8062	Effective
2205R1-21489	Hydro Extrusion USA, LLC - Hydro Phoenix Plant 2	50 South 49th Avenue	Phoenix	AZ	85043-3715	CIU	467.36	3365	Effective
2206R1-21490	Hydro Extrusion USA, LLC - Hydro Phoenix Remelt Operations	249 South 51st Avenue	Phoenix	AZ	85043-3715	CIU	467.36	3365	Effective
2206R1-21491	Hydro Extrusion USA, LLC - Hydro Phoenix Plant 1	249 South 51st Avenue	Phoenix	AZ	85043-3715	CIU	467.36	3354	Effective
2409-45684	ICP Construction, Inc.	4565 West Watkins Street	Phoenix	AZ	85043-4508	SIU	446.16	851, 2821, 289	Effective
2407-51321	Image First of Arizona, LLC dba ImageFIRST Healthcare Laundry Specialists	6201 W Sherman Street, Suite 2	Phoenix	AZ	85043-3504	SIU	N/A	3582	Effective
2111-1650	La Canasta Mexican Food Products, Inc.	3101 West Jackson Street	Phoenix	AZ	85009	SIU	N/A	2096, 2099	Effective
2207-21741	Liquid Environmental Solutions of Arizona LLC	5159 West Van Buren Street	Phoenix	AZ	85043-3720	CIU	437.26, 437.36	4953	Effective
2210-27287	Liquid Environmental Solutions of Arizona LLC - Magnolia Street	1095 West Magnolia Street	Phoenix	AZ	85007-	SIU	N/A	4953, 4959	Effective
2210R1-49688	Maricopa County Risk Management - Maricopa County Cave Creek Landfill	4050 East Sleepy Ranch Road	Cave Creek	AZ	85331	SIU	N/A	4959	Effective
2502-20485	Marlyn Nutraceuticals, Inc.	4404 East Elwood Street	Phoenix	AZ	85040-1909	CIU	439.47	2834	Effective
2212-49727	Mastel Linen Inc.	6005 West Sherman Street	Phoenix	AZ	85043-3514	SIU	N/A	7218	Effective

2307R1-5395	Mayo Clinic Arizona	5777 East Mayo Boulevard	Phoenix	AZ	85054-4502	SIU	N/A	8062,8063,8069	Effective
2308-47324	MEC Arizona Manufacturing LLC dba Blast Asset Acquisitions LLC	1635 South 43rd Avenue	Phoenix	AZ	85009-6026	SIU	N/A	2086	Effective
2309-27341	Mega Metals, LLC.	1325 North 22nd Avenue	Phoenix	AZ	85009-3714	CIU	421.306(m)	5093	Effective
2105-21495	Metal Finishing Solutions, Inc.	46 North 49th Avenue	Phoenix	AZ	85043-3825	CIU	433.17	3471	Effective
2011-32746	Metco Metal Finishing, LLC.	3508 East Corona Avenue	Phoenix	AZ	85040-2842	CIU	433.17	3471	Effective
2303-1780	Mission Linen Supply	2652 South 16th Street, Suite B	Phoenix	AZ	85034-6704	SIU	N/A	7218	Effective
2105-22055	Mistras Arizona Inspection Services Inc.	3027 East Washington Street	Phoenix	AZ	85034-1517	CIU	433.17	3471	Effective
2112-21009	Modern Industries, Inc.	4755 East Beautiful Lane	Phoenix	AZ	85044-5318	CIU	433.17	3471	Effective
2204-45175	Modern Industries, Inc. (Air Lane)	3001 East Air Lane, Bldg #404	Phoenix	AZ	85034-2709	CIU	433.17	3471	Effective
2212-5335	MPP Group of Companies	230 South 49th Avenue	Phoenix	AZ	85043-3805	CIU	433.17	3471	Terminated
2410-27191	Niagara Bottling, LLC	275 South 67th Avenue	Phoenix	AZ	85043-3412	SIU	N/A	2086	Effective
2411-23176	NXP USA, Inc. - Freescale Semiconductor, Inc. 52nd Street Superfund Site - OU 1	5005 East McDowell Road	Phoenix	AZ	85008-4229	SIU	N/A	562910	Effective
2409-23571	PAS Technologies, Inc. dba StandardAero	1021 North 22nd Avenue	Phoenix	AZ	85009-3717	CIU	433.17	3471	Effective
2205-21169	Phoenix Children's Hospital, Inc.	1919 East Thomas Road	Phoenix	AZ	85016-7710	SIU	N/A	8062	Effective

2404R1-2600	Phoenix Indian Medical Center	4212 North 16th Street	Phoenix	AZ	85016-5319	SIU	N/A	8062	Effective
2112-1930	Continental Materials Corporation dba Phoenix Manufacturing, Inc.	3655 East Roeser Road	Phoenix	AZ	85040-3968	CIU	433.15	3585	Effective
2410R1-50248	PMA Industries, LLC.	18008 North Black Canyon Highway	Phoenix	AZ	85053-1715	CIU	433.17	3479; 7389	Effective
2303-1960	Prudential Overall Supply	5102 West Roosevelt Street	Phoenix	AZ	85043-2716	SIU	N/A	7218	Effective
2104-23398	Quantum Global Technology, LLC, dba QuantumClean	2101 West Roosevelt Street	Phoenix	AZ	85009-3702	CIU	433.17	3479	Terminated
2008-27319	Quantum Global Technology, LLC, dba QuantumClean	3925 East Watkins Street	Phoenix	AZ	85034-7208	CIU	433.17	3479	Effective
2210-21433	Safeway Inc., Phoenix Ice Cream Plant	2434 East Pecan Road	Phoenix	AZ	85040-3631	SIU	N/A	2024	Effective
2306-5296	Sagamore Camelback, LLC	1 East Camelback Road	Phoenix	AZ	85012-1668	SIU	N/A	562910	Terminated
2008-5300	Sav-on Plating Incorporated	25 West Watkins Street	Phoenix	AZ	85003-2824	CIU	433.17	3471	Effective
2408R1-2450	SFPP, Limited Partnership - Phoenix Terminal	49 North 53rd Avenue	Phoenix	AZ	85043	SIU	N/A	4226	Effective
2302-2090	Shamrock Foods Company - Dairy Division	2228 North Black Canyon Highway	Phoenix	AZ	85009-2707	SIU	N/A	2026	Effective
2311-46461	Sky Chefs, Inc. - Sky Chefs PHX 1692	3555 South 28th Street	Phoenix	AZ	85040-8603	SIU	N/A	5812, 2099	Effective
2202-5373	Specialty Textile Services, L.L.C.	720 West Buchanan Street	Phoenix	AZ	85007-3405	SIU	N/A	7218	Effective
2108-5340	SUMCO Southwest Corporation	19801 North Tatum Boulevard	Phoenix	AZ	85050-4201	CIU	469.28	3674	Effective

2409-21502	Sumitomo Chemical Advanced Technologies	3832 East Watkins Street, Suite 200	Phoenix	AZ	85034-7254	CIU	469.18	3674	Effective
2309-50811	Sunlit Arizona LLC	777 W Alameda Road	Phoenix	AZ	85085-6104	SIU	N/A	2819	Effective
2405-3010	The Procter & Gamble Manufacturing Company	2050 South 35th Avenue	Phoenix	AZ	85009-6705	CIU	439.46	2833, 2834	Effective
2307-49593	TSMC Arizona Corporation	5088 West Innovation Circle	Phoenix	AZ	85083	CIU	469.18	3674	Effective
2210-3770	UniFirst Corporation	104 North 14th Street	Phoenix	AZ	85034-1114	SIU	N/A	7218	Effective
2202-33224	Upper Crust Bakery	3655 West Washington Street	Phoenix	AZ	85009-4759	SIU	N/A	2051	Effective
2009-5398	Valleywise Health Behavioral Center - Maryvale Campus	5102 West Campbell Avenue	Phoenix	AZ	85031-1703	SIU	N/A	8062, 8063	Effective
2109-2670	Valleywise Health Medical Center	2601 East Roosevelt Street	Phoenix	AZ	85008-4973	SIU	N/A	8062	Effective
2405-42608	Wacom Quartz Corp.	5050 South 38th Place	Phoenix	AZ	85040-2912	CIU	426.136(b)	3231	Effective
2412-17311	Waste Management of Arizona, Inc. - Phoenix Hauling South	1580 East Elwood Street	Phoenix	AZ	85040-1331	SIU	N/A	4952	Effective
2111-5404	World Resources Company	8113 West Sherman Street	Tolleson	AZ	85353-4025	SIU	N/A	3399	Effective
2302-2280	ABS Metallurgical Processors, Inc.	4313 East Magnolia Street	Phoenix	AZ	85034-7307	NSCIU	413.54(b) and (f)	3471	Effective
2409-1120	Aero Spring & Manufacturing Co., Inc.	3325 East Wier Avenue	Phoenix	AZ	85040-2889	NSCIU	433.17	3493, 3495, 3499, 3471	Effective
2109-25914	American Aerospace Technical Castings, Inc.	2950 West Catalina Drive	Phoenix	AZ	85017-5505	NSCIU	464.36	3471	Effective
2106-27349	American Tube and Pipe	2528 North 27th Avenue	Phoenix	AZ	85009-	NSCIU	420.106, 116, 126	3498, 3547	Effective
2310-10959	Asphalt Terminals, LLC	1935 West McDowell Road	Phoenix	AZ	85009-3024	NSCIU	443.16	2951	Effective
2408-22240	Bergmann Precision, Inc. dba Bergmann Group	3730 East Southern Avenue	Phoenix	AZ	85040-3958	NSCIU	433.17	3599, 3444	Effective
2110-48221	Central Admixture Pharmacy Services, Inc.	2200 South 43rd Avenue	Phoenix	AZ	85043-3909	NSCIU	439.47	2834	Effective

2107-5402	CMR Manufacturing, Inc.	2421 East Jackson Street	Phoenix	AZ	85034-2630	NSCIU	433.17	3479	Effective
2401-2060	Coating Technologies, LLC	21438 North 7th Avenue	Phoenix	AZ	85027-2925	NSCIU	433.17	3479	Effective
2405-27098	Collins Metal Finishing, Inc.	3536 East Illini Street	Phoenix	AZ	85040-1841	NSCIU	433.17	3471	Effective
2204-33800	Contact Coatings, LLC	1930 West Quail Avenue, Suite B	Phoenix	AZ	85027-2699	NSCIU	433.17	3471	Effective
2109-3980	Controlled Thermal Technology Corporation	2617 West Cypress Street	Phoenix	AZ	85009-2622	NSCIU	433.17	3398	Effective
2304-45092	Dolphin, Inc.	440 North 51st Ave	Phoenix	AZ	85043-2706	NSCIU	464.16	3324	Effective
2303-30891	Environmental Management Utility Services, LLC.	2132 South 5th Avenue	Phoenix	AZ	85003-2809	NSCIU	437.26	4953	Effective
2311-42181	Fuels, LLC.	203 South 23rd Street	Phoenix	AZ	85034-2503	NSCIU	437.26	5093	Effective
2407-20453	Gannon & Scott Phoenix, Inc.	2113 East Sky Harbor Circle South	Phoenix	AZ	85034-4802	NSCIU	421.126(f-g), 421.266	5093	Effective
2110-1570	Honeywell International Inc. - Honeywell Aerospace - Deer Valley	21111 North 19th Avenue	Phoenix	AZ	85027-2708	NSCIU	469.16	3674	Effective
2305-32141	Intrepid Coatings, Inc.	1910 East Riverview Drive	Phoenix	AZ	85034-6736	NSCIU	446.16	2851	Effective
2307-42482	Lighting Resources, LLC.	1545 East Victory Street	Phoenix	AZ	85020-1326	NSCIU	437.16	4953	Effective
2307-39802	Lighting Resources, LLC.	1522 East Victory Street, Suite 4	Phoenix	AZ	85040-1306	NSCIU	437.26	4953	Effective
2104-27325	Louie's Metal Finishing, LLC dba Louie's Black Oxide	2008 West Jackson Street	Phoenix	AZ	85009-5226	NSCIU	433.17	3471	Effective
2110-47174	Metal Coating Solutions, LLC.	334 North 25th Avenue	Phoenix	AZ	85009-4424	NSCIU	433.17	3471	Effective
2212-26380	Modern Metal Masters, Inc. dba M3 Metals/Bernie's Brass	2326 East Magnolia Street	Phoenix	AZ	85034-6819	NSCIU	433.17	3499, 3446	Effective
2107-1840	Ohlinger Industries, Inc.	1211 West Melinda Lane	Phoenix	AZ	85027-	NSCIU	433.17	3728	Effective
2308-3900	Osborn Products Manufacturing LLC	1127 West Melinda Way	Phoenix	AZ	85027-	NSCIU	433.17	3541, 3471	Effective
2209-4400	Perma-Finish, Inc.	74 North 45th Avenue	Phoenix	AZ	85043-	NSCIU	433.17	3471	Effective
2112-1910	Phoenix Heat Treating, Inc.	2405 West Mohave Street	Phoenix	AZ	85009-6413	NSCIU	433.17	3471	Effective
2309-41418	Phoenix Welding Supply LLC	701 South 7th Street	Phoenix	AZ	85034-3202	NSCIU	414.75	2813	Effective
2212-30738	Precise Metal Products Company	4534 North 44th Avenue	Phoenix	AZ	85031-1599	NSCIU	433.17	3444, 3470, 3769	Effective
2208-10603	Precision Industrial Painting, Inc.	1139 West Hilton Avenue	Phoenix	AZ	85007-	NSCIU	433.17	3471, 3479	Effective
2212-33779	Precision Science, Inc.	1517 W. Knudsen Drive	Phoenix	AZ	85027-1307	SIU	455.47	2048, 2879	Effective
2108-4290	R.B. Machine Company, Inc.	3729 West Buchanan Street	Phoenix	AZ	85009-	NSCIU	433.15	3479	Effective

2407-45854	RLC Labs, Inc.	1850 East Riverview Drive	Phoenix	AZ	85034-6703	NSCIU	439.47	2834	Effective
2107-10920	Royal Sign Company, Inc.	2631 North 31st Avenue	Phoenix	AZ	85009-1522	NSCIU	433.17	3993	Effective
2103-48274	SenesTech, Inc.	777 West Pinnacle Peak Road, Suite B-104	Phoenix	AZ	85027-1424	SIU	455.47	2879	Effective
2107R1-6180	Solvent Recy-Clean, Inc.	1824 & 1850 West Broadway Road	Phoenix	AZ	85041	NSCIU	437.25	5093, 7389	Effective
2103-5370	Southwest Powder of Arizona, LLC.	116 North 59th Avenue	Phoenix	AZ	85043-3503	NSCIU	433.17	3471	Effective
2306-30678	STP Performance Coating, LLC	1131 West Watkins Street	Phoenix	AZ	85007-4309	NSCIU	433.17	3471	Effective
2110-5432	Sun West Engineering, Inc.	3802 West Broadway Road	Phoenix	AZ	85040-2924	NSCIU	433.17	3699	Effective
2304-20513	Thermo Fluids, Inc.	4301 West Jefferson Street	Phoenix	AZ	85043-3930	NSCIU	437.25	5093	Effective
2403-3120	Trainor & Trainor, Inc. dba Arizona Hard Chrome	2609 West Cypress Street	Phoenix	AZ	85009-2622	NSCIU	433.15	3471	Effective
2101-27320	Troy Corporation - Arizona	113 South 47th Avenue	Phoenix	AZ	85043-3897	SIU	455.47	2879	Effective
2310-10963	Veolia ES Technical Solutions, LLC	5736 West Jefferson Street	Phoenix	AZ	85043-3633	NSCIU	437.47(c)	4953, 5093	Effective
2412-2220	Verco Decking, Inc.	4340 North 42nd Avenue	Phoenix	AZ	85019-3302	NSCIU	465.14, 465.24	3444	Effective
2412-47164	Xpress Stripping, LLC dba Xpress Metal Cleaning	3402 East Wier Avenue	Phoenix	AZ	85040-2855	NSCIU	433.17	3471	Effective

**Table 2. Summary of Enforcement Actions**

Facility Name	Types of Industrial User Enforcement Action (add row for each that applies)	If other, please describe	Number of Industrial User Enforcement Actions of this type	Describe any proposed actions for bringing the SIU into compliance
Advanced United Refining, Inc.	Notice of Violation		1	NOV Response
Advanced United Refining, Inc.	Other	Notice of Concern	1	N/A
Allied Tube & Conduit Corporation	Notice of Violation		1	NOV Response, 30-Day Resample, Temporary Increase in Self-Monitoring
Allied Tube & Conduit Corporation	Other	Notice of Concern	2	Response Letter
Allied Tube & Conduit Corporation	Other	Show Cause Meeting	1	PSA
APEL Extrusions, Inc.	Notice of Violation		20	30-Day Resample, Temporary Increase in Self-Monitoring, NOV Response; Cease and Desist still in effect for CSP .01; Show Cause Meeting will be scheduled in 1st half of 2025
APEL Extrusions, Inc.	Other	Notice of Concern	8	N/A
APS BioGroup, Inc.	Notice of Violation		5	NOV Response, 30-Day Resampling, Temporary Increase in Self-Monitoring, Root Cause Studies/Compliance Schedule, Show Cause Meeting will be scheduled in 2025
APS BioGroup, Inc.	Other	Notice of Concern	1	N/A
Arizona Foods Group, Inc.	Notice of Violation		1	NOV Response, 30-Day Resample, Temporary Increase in Self-Monitoring
Arizona Foods Group, Inc.	Other	Notice of Concern	2	N/A
Arizona Foods Group, Inc.	Other	Show Cause Meeting	1	PSA, Civil Penalty, Compliance Schedule, Pretreatment System Upgrade
Avanti Circuits, Inc.	Notice of Violation		1	NOV Response
Barrel O' Fun Snack Foods Co. Southwest, LLC	Notice of Violation		3	NOV Response, Demand Inspection
Bottling Group, LLC dba CBM Manufacturing Company, Inc. - Pepsi Phoenix	Notice of Violation		1	NOV Response, Demand Inspection, Show Cause scheduled for 2025-03
Café Valley, Inc.	Other	Notice of Concern	1	N/A
Café Valley, Inc.	Other	pH Waiver	1	N/A
Cassavant Assembly & Processing, LLC	Notice of Violation		2	NOV Response, 30-Day Resampling, Temporary Increase in Self-Monitoring, Show Cause Meeting to be scheduled in 2025.
ChemResearch Co., Inc.	Notice of Violation		1	NOV Response, 30-Day Resample, Temporary Increase in Self-Monitoring
Chromalloy	Notice of Violation		1	NOV response and additional sampling. A Show Cause Meeting will be scheduled in 2025.
Cleanpart		Notice of Concern	1	N/A
Cleanpart	Notice of Violation		1	NOV response and demand inspection
Core Linen Services Inc.	Notice of Violation		1	NOV Response
Core Linen Services Inc.	Other	Notice of Concern	1	N/A
DS Services of America, Inc. dba Sparkletts	Notice of Violation		1	NOV Response Letter, Resample

Dunn Edwards Corporation - Phoenix Facility	Notice of Violation		1	NOV Response, Temporary Increase in Self-Monitoring
Emerald Phoenix, LLC	Notice of Violation		1	NOV Response
FM Industries Inc. (Magnolia)	Other	Notice of Concern	1	N/A
Gregory Packaging, Inc. - Phoenix Plant	Notice of Violation		1	NOV Response Letter, Resample
Gourmet Boutique West, LLC	Notice of Violation		2	30-Day Resample, Temporary Increase in Self-Monitoring, NOV Response
Honeywell International, Inc dba Phoenix R&O	Other	Notice of Concern	1	N/A
Honor Health Sonoran Crossing Medical Center	Other	Notice of Concern	1	N/A
Hydro Extrusion USA, LLC - Hydro Phoenix Remelt Operations	Notice of Violation		2	NOV Response, 30-Day Resampling, Temporary Increase in Self-Monitoring, Show Cause Meeting took place 2025-01, PSA (in process), Civil Penalty (in process), Compliance Schedule (in process)
Image First of Arizona	Notice of Violation			30-Day Resample, Temporary Increase in Self-Monitoring, NOV Response
Image First of Arizona	Other	Notice of Concern	1	N/A
Liquid Environmental Solutions of Arizona LLC	Notice of Violation		5	30-Day Resample, Temporary Increase in Self-Monitoring, NOV Response, Show Cause Meeting
Liquid Environmental Solutions of Arizona LLC	Other	Notice of Concern	1	N/A
Liquid Environmental Solutions of Arizona LLC	Other	Show Cause Meeting	1	PSA, Civil Penalty, Compliance schedule, pretreatment system improvements
Marlyn Nutraceuticals, Inc.	Notice of Violation		2	NOV Response, Temporary Increase in Self-Monitoring
MEC Arizona Manufacturing LLC dba Blast Asset Acquisitions LLC	Notice of Violation		1	NOV Response, 30-Day Resampling, Temporary Increase in Self-Monitoring
Mega Metals	Notice of Violation		1	NOV Response
Mega Metals	Other	Notice of Concern	1	N/A
Metal Finishing Solutions, Inc.	Notice of Violation		6	N/A
Metal Finishing Solutions, Inc.	Other	Notice of Concern	1	N/A
Metal Finishing Solutions, Inc.	Administrative Orders		1	Cease and Desist; pretreatment system improvements, additional sampling, Civil Penalty, Compliance Schedule
Metco Metal Finishing, LLC.	Notice of Violation		1	NOV response letter, 30-day resample, Temporary Increase in Self-Monitoring
Mistras Arizona Inspection Services Inc.	Notice of Violation		2	NOV Response, 30-Day Resample, Temporary Increase in Self-Monitoring
PAS Technologies dba StandardAero		Notice of Concern	2	Corrected sampling protocols
Phoenix Indian Medical Center	Notice of Violation		3	NOV Response, 30-Day Resample, Temporary Increase in Self-Monitoring, Demand Inspection
Phoenix Indian Medical Center	Other	Notice of Concern	1	N/A
Quantum Global Technology, LLC, dba QuantumClean (Roosevelt)	Notice of Violation		1	NOV Response
Safeway Inc., Phoenix Ice Cream Plant	Other	Notice of Concern	1	N/A



City of Phoenix, AZ  
Industrial Pretreatment Annual Report  
Supplemental Information  
2024



**City of Phoenix**  
WATER SERVICES DEPARTMENT  
ENVIRONMENTAL & SAFETY DIVISION  
Quality Reliability Value

February 26, 2025

Amelia Whitson  
Pretreatment Coordinator  
NPDES Permits Office (WTR-2-3)  
US EPA, Region 9  
75 Hawthorne Street  
San Francisco, CA 94105  
R9Pretreatment@epa.gov;  
Whitson.Amelia@epa.gov  
pretreatment@azdeq.gov

To whom it may concern,

Re: **AZPDES Permit AZ0020559 – 23<sup>rd</sup> Avenue Wastewater Treatment Plant**  
**AZPDES Permit AZ0026727 – Cave Creek Water Reclamation Plant**  
**NPDES Permit AZ0020524 – 91<sup>st</sup> Avenue Wastewater Treatment Plant**  
**Industrial Pretreatment Programs Annual Report**  
**EPA Supplemental Information Submittal**

Enclosed is supplemental information as part of the new reporting format for the City of Phoenix Industrial Pretreatment (IPP) Annual Report. This report covers both 23<sup>rd</sup> Avenue and 91<sup>st</sup> Avenue Wastewater Treatment Plants as well as the Cave Creek Water Reclamation Plant for the reporting period beginning January 1, 2024, and ending December 31, 2024. This includes information required by the National Pollutant Discharge Elimination System Permit, effective May 1, 2023; and the Arizona Pollutant Discharge Elimination System Permits, effective July 1, 2024 and December 2, 2024, respectively. In addition, included in separate attachments are the City of Phoenix, Arizona Department of Environmental Quality, IPP Annual Report submittal and Certification Statement, as well as all Sub-Regional Operating Group (SROG) ADEQ Annual Report submittals excepting those who are submitting separately to the EPA and/or ADEQ.

Sincerely,

Jesse Flores  
Principal Engineering Technician

Enclosures:  
EPA & ADEQ Annual Reports (Excel Spreadsheets)  
SROG City Annual Reports

## Summary of Priority Pollutant Results

### 91st Avenue Wastewater Treatment Plant

Part II Section D.4.a. of the 91st Avenue WWTP NPDES Permit requires the following to be included within this annual report:

*A summary of analytical results from representative, flow proportioned, 24-hour composite sampling of the POTW's influent and effluent for those pollutants identified under CWA section 307(a) which are known or suspected to be discharged by nondomestic users. This will consist of an annual full priority pollutant scan, with quarterly samples analyzed only for those pollutants detected in the full scan. Influent or effluent monitoring data shall be provided for nonpriority pollutants which the Cities believe may be causing or contributing to Interferences or Pass Through. All sampling and analysis required under this paragraph must be performed using the test methods specified under 40 CFR 136. Sampling and analysis for asbestos is not required. Sludge sampling and analyses are covered elsewhere in this permit.*

As required, a summary of analytical results for influent, effluent, and biosolids samples collected from the 91<sup>st</sup> Avenue Wastewater Treatment Plants are presented in the following pages.

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# 91st Ave. Wastewater Treatment Plant

	Number of Observations	Number of Non-Detects	<sup>1</sup> Average	Maximum	Units
<b>1,1,1-Trichloroethane</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>1,1,2,2-Tetrachloroethane</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	4	4	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>1,1,2-Trichloroethane</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>1,1-Dichloroethane</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	4	4	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>1,1-Dichloroethylene</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>1,2,4-Trichlorobenzene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	8	8	All Non-Detect	-	mg/kg Dry Wt
<b>1,2-Dichlorobenzene</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	8	8	All Non-Detect	-	mg/kg Dry Wt
<b>1,2-Dichloroethane</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>1,2-Dichloropropane</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**1,2-Diphenylhydrazine**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**1,2-Trans-dichloroethylene (Trans-1,2-Dichloroethene)**

Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**1,3-Dichlorobenzene**

Influent	4	4	All Non-Detect	-	µg/L
Effluent	4	4	All Non-Detect	-	µg/L
Biosolids	8	8	All Non-Detect	-	mg/kg Dry Wt

**1,3-Dichloropropylene ( trans/cis-1,3-Dichloropropene)**

Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**1,4-Dichlorobenzene**

Influent	4	1	1.13	1.49	µg/L
Effluent	6	4	0.17	0.27	µg/L
Biosolids	8	8	All Non-Detect	-	mg/kg Dry Wt

**2,3,7,8-TCDD (Dioxin)**

Influent	4	4	All Non-Detect	-	pg/L
Effluent	3	3	All Non-Detect	-	pg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**2,4,6-Trichlorophenol**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**2,4-Dichlorophenol**

Influent	11	11	All Non-Detect	-	µg/L
Effluent	11	11	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**2,4-Dimethylphenol**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**2,4-Dinitrophenol**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>2,4-Dinitrotoluene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>2,6-Dinitrotoluene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>2-Chloroethyl vinyl ethers</b>					
Influent	1	1	All Non-Detect	-	µg/L
Effluent	1	1	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>2-Chloronaphthalene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>2-Chlorophenol</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>2-Nitrophenol</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>3,3-Dichlorobenzidine</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>4,4-DDD</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>4,4-DDE</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	14	14	All Non-Detect	-	µg/L

Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>4,4-DDT</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>4,6-Dinitro-o-cresol (2-Methyl-4,6-dinitrophenol)</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>4-Bromophenyl phenyl ether</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>4-Chlorophenyl phenyl ether</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>4-Nitrophenol</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Acenaphthene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Acenaphthylene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Acrolein</b>					
Influent	1	1	All Non-Detect	-	µg/L
Effluent	1	1	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Acrylonitrile</b>					
Influent	1	1	All Non-Detect	-	µg/L
Effluent	1	1	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

<b>Aldrin</b>						
Influent	12	12	All Non-Detect	-		µg/L
Effluent	15	15	All Non-Detect	-		µg/L
Biosolids	4	4	All Non-Detect	-		mg/kg Dry Wt
<b>Alpha-BHC</b>						
Influent	12	12	All Non-Detect	-		µg/L
Effluent	12	12	All Non-Detect	-		µg/L
Biosolids	4	4	All Non-Detect	-		mg/kg Dry Wt
<b>Alpha-endosulfan (Endosulfan I)</b>						
Influent	12	12	All Non-Detect	-		µg/L
Effluent	12	12	All Non-Detect	-		µg/L
Biosolids	4	4	All Non-Detect	-		mg/kg Dry Wt
<b>Anthracene</b>						
Influent	12	12	All Non-Detect	-		µg/L
Effluent	12	12	All Non-Detect	-		µg/L
Biosolids	4	4	All Non-Detect	-		mg/kg Dry Wt
<b>Antimony</b>						
Influent	12	12	All Non-Detect	-		mg/L
Effluent	4	4	All Non-Detect	-		mg/L
Biosolids	4	4	All Non-Detect	-		mg/kg Dry Wt
<b>Arsenic</b>						
Influent	12	12	All Non-Detect	-		mg/L
Effluent	4	4	All Non-Detect	-		mg/L
Biosolids	12	1	6.2	8.7		mg/kg Dry Wt
<b>Benzene</b>						
Influent	4	2	0.51	0.65		µg/L
Effluent	6	6	All Non-Detect	-		µg/L
Biosolids	4	4	All Non-Detect	-		mg/kg Dry Wt
<b>Benzidine</b>						
Influent	12	12	All Non-Detect	-		µg/L
Effluent	12	12	All Non-Detect	-		µg/L
Biosolids	4	4	All Non-Detect	-		mg/kg Dry Wt
<b>Benzo(a) anthracene</b>						
Influent	12	12	All Non-Detect	-		µg/L
Effluent	12	12	All Non-Detect	-		µg/L
Biosolids	4	4	All Non-Detect	-		mg/kg Dry Wt
<b>Benzo(a)pyrene</b>						
Influent	12	12	All Non-Detect	-		µg/L

Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Benzo(b) fluoranthene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Benzo(ghi) perylene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Benzo(k) fluoranthene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Beryllium</b>					
Influent	12	5	0.00035	0.0012	mg/L
Effluent	4	1	0.00019	0.0005	mg/L
Biosolids	4	3	1.42	2.43	mg/kg Dry Wt
<b>Beta-BHC</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Beta-endosulfan (Endosulfan II)</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Bis(2-chloroethoxy) methane</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Bis(2-chloroethyl) ether</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Bis(2-chloroisopropyl) ether</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	8	8	All Non-Detect	-	mg/kg Dry Wt

**Bis(2-ethylhexyl) phthalate**

Influent	12	11	24.6	9.9	µg/L
Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Boron (Non Priority Pollutant studied for Local Limits Monitoring)**

Influent	12	0	0.324	0.392	mg/L
Effluent	12	0	0.347	0.435	mg/L
Biosolids	0	0	-	-	mg/kg Dry Wt

**Bromodichloromethane**

Influent	4	1	0.57	0.65	µg/L
Effluent	6	0	0.66	1.53	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Bromoform**

Influent	4	3	0.67	0.14	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Butyl benzyl phthalate**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Cadmium**

Influent	12	12	All Non-Detect	-	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	12	12	All Non-Detect	-	mg/kg Dry Wt

**Carbon tetrachloride**

Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Chlordane**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Chlorobenzene**

Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Chloroethane**

Influent	4	4	All Non-Detect	-	µg/L
Effluent	4	4	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Chloroform</b>					
Influent	4	0	4.5	6.7	µg/L
Effluent	6	0	1.7	2.2	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Chromium</b>					
Influent	12	0	0.0079	0.0141	mg/L
Effluent	4	2	0.0013	0.0023	mg/L
Biosolids	12	0	56.4	73.5	mg/kg Dry Wt
<b>Chrysene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Copper</b>					
Influent	12	0	0.116	0.239	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	12	0	653	791	mg/kg Dry Wt
<b>Cyanide, Total (Cyanide samples are discrete samples. )</b>					
Influent	13	13	All Non-Detect	-	mg/L
Effluent	8	5	0.004	0.010	mg/L
Biosolids	4	1	2.82	3.37	mg/kg Dry Wt
<b>Delta-BHC</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Dibenzo(a,h) anthracene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Dibromochloromethane</b>					
Influent	4	3	0.52	0.39	µg/L
Effluent	6	3	0.25	0.69	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Dieldrin</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L

Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Diethyl phthalate</b>					
Influent	12	11	22.03	3.8	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Dimethyl phthalate</b>					
Influent	12	11	3.7	0.7	µg/L
Effluent	12	11	0.25	0.5	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Di-n-butyl phthalate</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Di-n-octyl phthalate</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Endosulfan sulfate</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Endrin</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	17	17	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Endrin aldehyde</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Ethylbenzene</b>					
Influent	4	2	0.56	0.6	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Fluoranthene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Fluorene**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Fluoride (Non Priority Pollutant studied for Local Limits Monitoring)**

Influent	11	0	1.5	2.3	mg/L
Effluent	2	0	1.2	1.3	mg/L
Biosolids	0	0	-	-	mg/kg Dry Wt

**Gamma-BHC**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	17	17	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Heptachlor**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	17	17	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Heptachlor epoxide**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	17	17	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Hexachlorobenzene**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Hexachlorobutadiene**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	8	8	All Non-Detect	-	mg/kg Dry Wt

**Hexachlorocyclopentadiene**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Hexachloroethane**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Indeno (1,2,3-cd) pyrene**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Isophorone</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Lead</b>					
Influent	12	6	0.0016	0.003	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	12	12	All Non-Detect	-	mg/kg Dry Wt
<b>Mercury</b>					
Influent	12	10	0.00012	0.0002	mg/L
Effluent	4	0	1.32	1.5	ng/L
Biosolids	12	0	0.69	1.65	mg/kg Dry Wt
<b>Methyl bromide (Bromomethane)</b>					
Influent	4	4	All Non-Detect	-	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Methyl chloride (Chloromethane)</b>					
Influent	4	4	All Non-Detect	-	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Methylene chloride (Dichloromethane)</b>					
Influent	4	2	2.5	2.6	mg/L
Effluent	6	5	0.35	0.25	mg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Molybdenum (Non Priority Pollutant studied for Local Limits Monitoring)</b>					
Influent	12	0	0.0073	0.0107	mg/L
Effluent	5	0	0.0040	0.005	mg/L
Biosolids	12	8	15.5	26.7	mg/kg Dry Wt
<b>Naphthalene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	8	8	All Non-Detect	-	mg/kg Dry Wt
<b>Nickel</b>					
Influent	12	0	0.009	0.011	mg/L
Effluent	4	0	0.005	0.006	mg/L

Biosolids	12	11	25.9	46.6	mg/kg Dry Wt
<b>Nitrobenzene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>N-nitrosodimethylamine</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>N-nitrosodi-n-propylamine</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>N-nitrosodiphenylamine</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Parachlorometa cresol (4-Chloro-3-methylphenol)</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>PCB-1016 (Arochlor 1016)</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>PCB-1221 (Arochlor 1221)</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>PCB-1232 (Arochlor 1232)</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>PCB-1242 (Arochlor 1242)</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**PCB-1248 (Arochlor 1248)**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**PCB-1254 (Arochlor 1254)**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**PCB-1260 (Arochlor 1260)**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Pentachlorophenol**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	14	14	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Phenanthrene**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Phenol**

Influent	12	9	83	309	µg/L
Effluent	12	11	4.3	19.5	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Pyrene**

Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Selenium**

Influent	12	12	All Non-Detect	-	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	12	0	7.7	8.1	mg/kg Dry Wt

**Silver**

Influent	12	12	All Non-Detect	-	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	12	12	All Non-Detect	-	mg/kg Dry Wt

**Tetrachloroethylene**

Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Thallium</b>					
Influent	12	12	All Non-Detect	-	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Toluene</b>					
Influent	4	1	0.94	1.27	µg/L
Effluent	6	4	0.1	0.15	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Toxaphene</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	15	15	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Trichloroethylene (Trichloroethene)</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Vinyl chloride</b>					
Influent	4	4	All Non-Detect	-	µg/L
Effluent	6	6	All Non-Detect	-	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Zinc</b>					
Influent	12	0	0.156	0.291	mg/L
Effluent	4	0	0.020	0.027	mg/L
Biosolids	12	0	901	1020	mg/kg Dry Wt

<sup>1</sup>Average calculations include non-detect values. Non-detect values were multiplied by 0.5. Due to varying laboratory reporting levels, the average can exceed the maximum in some cases. No average was calculated when all results were non-detects.

## Upset, Interference, and Pass Through

23rd Avenue Wastewater Treatment Plant AZPDES Permit No. AZ0020559  
91st Avenue Wastewater Treatment Plant NPDES Permit No. AZ0020524  
Cave Creek Water Reclamation Plant AZPDES Permit No. AZ0026727

The following is a discussion of Upset, Interference, or Pass-Through incidents, if any, which the Cities know or suspect, were caused by nondomestic users of the POTW system during the year ending December 31, 2024. If any incidents occurred, the reasons why, the corrective actions taken, and the nondomestic user(s) or industry sector(s) responsible are provided.

Additionally, a review of the applicable pollutant limits to determine whether any additional limitations, or changes to existing requirements may be necessary to prevent Interference, Pass Through or noncompliance with sludge disposal requirements is provided.

This information is required under Part II Section D.4.b. of the NPDES Permit and Part V Section B.4.b. as well as Part IV Section B.4 of the respective AZPDES Permits.

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Analytical results of effluent samples obtained during 2024 at the 23rd Avenue and 91st Avenue Wastewater Treatment Plants (WWTP) were compared against the federal definitions of Upset, Interference, and Pass Through.

The definition for **Upset** is found at 40 CFR 122.41(n):

*"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.*

The definition for **Interference** is found at 40 CFR 403.3(i):

*The term "interference" means a Discharge which, alone or in conjunction with a discharge or discharges from other sources, both:*

- 1) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and*
- 2) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to Subtitle D or the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.*

The definition for **Pass-Through** is found at 40 CFR 403.3(n):

*The term "Pass-Through" means a Discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).*

### **23rd Avenue WWTP**

Based upon these definitions, there were no violations due to incidents of upset, interference, or pass-through that were attributable to nondomestic users of the POTW at the 23<sup>rd</sup> Avenue WWTP during 2024.

There were multiple instances of pink, white, and black colored (slug loads) at the influent to the 23<sup>rd</sup> Avenue WWTP during 2024. One instance of a pink colored influent in January 2024 caused a decrease in dissolved oxygen at the plant aeration basins. The other instances did not result in an upset, interference, or pass-through of the plant. Emergency samples were collected and analyzed from the plant influent during the multiple slug load events. Wastewater Collections Staff assisted in the investigation of the pink influent by tracking the pink color in the City of Phoenix Collections System. The tracking of the pink color led to a business that is currently being investigated by the Industrial Pretreatment Program (IPP). The business specializes in recycling of a variety of plastic and aluminum containers that can contain liquids with dyes in them. The IPP staff issued a Cease-and-Desist Notice of Violation (NOV) and was instructed to no longer discharge liquids with dyes into the Collection System. At the time of discharge, the business was in the beginning stages of the permitting process.

There was one Aquifer Protection Permit (APP) exceedance observed during 2024 and provided here for information purposes only. In January, an exceedance of the Gross Beta parameter was observed at the Effluent Junction Box, Outfall 004. This resulted in an APP discharge limit exceedance. The Gross Beta investigation is currently ongoing, and a medical isotope has been identified as the source of exceedance. Excreta from individuals undergoing medical diagnosis or therapy with radioactive material are not subject to regulations. The isotopes identified have half-lives in the range of several hours to several weeks and do not pose a threat to human health or the environment. The City has continued to actively monitor and investigate up stream of the 91st Avenue WWTP for additional sources and has retained a contracted environmental consultant to assist in the gross beta investigation. The final report is expected in 2025.

### **91st Avenue WWTP**

Based upon these definitions, there were no violations due to incidents of upset, interference, or pass-through that were potentially attributable to nondomestic users of the POTW at the 91<sup>st</sup> Avenue Wastewater Treatment Plant (WWTP) during 2024.

There were three Aquifer Protection Permit (APP) exceedances observed during 2024 and are provided here for information purposes only. In April and October, an exceedance of the APP Alert Level limit for the Gross Beta parameter occurred at the FRW1 Influent to Tres Rios. The Gross Beta investigation is ongoing and is believed to be the result of naturally occurring nuclides from natural sources and short-lived nuclides used in nuclear medicine that

are common in wastewater from patients undergoing nuclear diagnosis. Excreta from individuals undergoing medical diagnosis or therapy with radioactive material are not subject to regulations. The isotopes identified have half-lives in the range of several hours to several weeks and do not pose a threat to human health or the environment. The City has continued to actively monitor and investigate up stream of the 91st Avenue WWTP for additional sources and has retained a contracted environmental consultant to assist in the gross beta investigation. The final report is expected in 2025.

In October, the City of Phoenix became aware of a Total Coliform exceedance at the 91st Avenue WWTP groundwater well (MW-M). The initial and verification total coliform results were above the Aquifer Quality Limit. Total coliforms may include bacteria that are found both in soil and vegetation; these coliforms are generally harmless. The E. Coli bacteria is considered to be a species of coliform bacteria that is the best indicator of fecal pollution and the possible presence of pathogens. The associated E. Coli results from October were non-detect at MW-M . Therefore, there was no threat to human health or the environment.

### **Cave Creek Water Reclamation Plant**

The Cave Creek Water Reclamation Plant was shut down for over ten years. In August of 2024 construction was started to upgrade and retrofit the facility for advanced water purification treatment. Construction will be completed in 2027 and bring the plant back into operation.

## **Review of Local Limits**

In 2002, the City retained a consultant to evaluate local limits. The consultant identified the pollutants of concern and the SROG cities participated in a local limits data collection sampling event in December 2002. The data was evaluated, and revised local limits were established. BMP development and implementation was recommended for five pollutants: beryllium, fluoride, molybdenum, selenium, and di(2-ethylhexyl) phthalate (DEHP). Each of the SROG Cities had their revised local limits approved, incorporated into the City ordinance, and accepted by City Council. The local limits changes and revised City ordinances were approved by ADEQ on December 10, 2004. The revised limits and city ordinance changes were effective January 1, 2005. Public meetings with target industries were held in March 2005 to communicate to industries and to obtain commitment from them to implement the BMPs in accordance with the May 2004 SROG Phase II Local Limits Final Report and the June 2005 SROG BMPs Technical Memorandum prepared for the SROG cities by Malcolm Pirnie an engineering and consulting firm.

The 91<sup>st</sup> Avenue WWTP NPDES Permit effective May 1, 2023 required a written technical evaluation of the need to revise local limits as part of the second annual pretreatment report required under Part II.D.4., due by February 19, 2025. In addition, the 23<sup>rd</sup> Avenue WWTP AZPDES Permit effective July 1, 2024 required an evaluation of the need to revise local limits under 40 C.F.R. section 403.5(c)(1) within 180 days following the effective date of this permit. In order to meet these requirements, the City retained a consultant to complete a written technical evaluation of the need to revise the local limits in 2024. The 91<sup>st</sup> Avenue report was completed and submitted on February 18, 2025, while the 23<sup>rd</sup> Avenue report was completed and submitted on December 26, 2024 to the U.S. Environmental Protection Agency and Arizona Department of

Environmental Quality. This 2024 review resulted in significant changes to the headworks analysis mass balance for the 91st Avenue and 23<sup>rd</sup> Avenue WWTP compared to the prior local limits study. All pollutants listed in the 91st Avenue WWTP and 23<sup>rd</sup> Avenue WWTP Aquifer Protection and NPDES/AZDPES permits were reviewed due to the significant changes since 2004. The significant headworks analysis changes include negative MAIL, potential over-allocation of pollutants, positive pollutant detection in the effluent, significant changes in the MAHL and MAIL compared to the prior local limits study, and several Pollutants Of Concern that exceed the prior local limits study screening criteria. The report recommended a full local limits study to refine the results of this review. A full local limits study should be conducted at 91st Avenue WWTP in conjunction with a local limits study at the 23rd Avenue WWTP as the service areas are interconnected. The City of Phoenix has provided a schedule to EPA and ADEQ for the local limits study implementation.

### **Permits Renewed and Amended**

Since 2002 when local limits were last developed, the following permits have been renewed or amended:

- 91st Avenue WWTP NPDES permit renewal became effective May 23, 2023, and is effective until April 30, 2028.
- 23rd Avenue WWTP AZPDES permit became effective July 1, 2024, and is effective until June 30, 2029.
- Cave Creek Water Reclamation Plant AZPDES permit became effective on December 2, 2024, and is effective until December 1, 2029.
- 91st Avenue WWTP Aquifer Protection Permit (APP) became effective on October 4, 2002, and was last amended on October 17, 2023.
- 23rd Avenue WWTP APP became effective on April 29, 1999, and was last amended on July 16, 2020.
- Cave Creek Water Reclamation Plant APP became effective on December 14, 1998, and was last amended on February 23, 2021.

Sub-Regional Operating Group,  
City of Phoenix  
Significant Non-Compliance  
Industrial User List Published in  
2024

# THE ARIZONA REPUBLIC

PO Box 194, Phoenix, Arizona 85001-0194  
Phone 1-602-444-7315 Fax 1-877-943-0443

STATE OF WISCONSIN }  
COUNTY OF BROWN } SS.

AFFIDAVIT OF PUBLICATION

CITY OF PHOENIX  
200 W Washington St  
PHOENIX, AZ 85003

I, being first duly sworn, upon oath deposes and says: That I am the legal clerk of the Arizona Republic, a newspaper of general circulation in the counties of Maricopa, Coconino, Pima and Pinal, in the State of Arizona, published weekly at Phoenix, Arizona, and that the copy hereto attached is a true copy of the advertisement published in the said paper on the dates indicated.

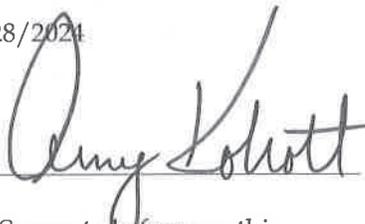
Publication: Arizona Republic

Ad number: GCI1139198

PO Field: Industrial Users - Log 13954

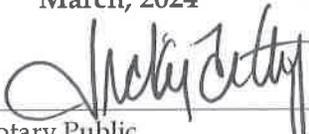
Published Date(s):

03/28/2024



Sworn to before me this

28<sup>th</sup> day of  
March, 2024

  
Notary Public  
My Commission Expires on 9/19/25

VICKY FELTY  
Notary Public  
State of Wisconsin

**Industrial Users In Significant Noncompliance with Applicable Pretreatment Requirements In 2023**

The Cities of Glendale, Mesa, Phoenix, Scottsdale, and Tempe, and the Town of Gilbert, Arizona<sup>1</sup> are responsible for implementing and operating industrial wastewater control (pretreatment) programs in each of their communities. Each program is designed to protect the wastewater treatment plants (POTW), the safety of personnel operating the wastewater collection system, and the environment from adverse impacts that could occur when toxic wastes are discharged into a wastewater collection system. Each municipality issues wastewater discharge permits to Significant<sup>2</sup> Industrial Users (Users) in their communities and the Users are responsible for ensuring that they comply with respective local ordinances and federal regulations.

In accordance with the Federal Clean Water Act and the public participation requirements of 40 CFR Part 25 in the enforcement of the National Pretreatment Standards as defined by 40 CFR 403.8(f)(2)(viii), the City of Phoenix<sup>1</sup>, Arizona is hereby publishing the following list of Users in Significant Noncompliance (SNC) with applicable pretreatment requirements. **This notice covers the period from January 1, 2023 through December 31, 2023.**

A Significant Industrial User, and in specific cases an Industrial User<sup>2</sup>, is in a state of SNC when violations meet one or more of the following:

- A. Chronic violations (CSNC) of wastewater discharge limits defined here as those in which sixty-six percent or more of all of the measurements taken during a six-month period exceed (by any magnitude) the daily maximum limit or the average limit for the same pollutant parameter.
- B. Technical Review Criteria violations (TRCSNC), defined here as those in which thirty-three percent or more of all of the measurements taken during a six-month period equal or exceed the product of the daily maximum limit or the average limit multiplied by the applicable TRC (TRC= 1.4 for BOD, TSS, fats, oil and grease; and 1.2 for all other pollutants except pH).
- C. Any other violation of a pretreatment effluent limit (daily maximum or long term average) that the POTW determines has caused alone or in combination with other discharges interference or pass through (including endangering the health of POTW personnel or the general public);
- D. Any discharge of a pollutant that has caused imminent endangerment of human health, welfare or to the environment or has resulted in the POTW's exercise of its emergency authority to halt or prevent such as discharge;
- E. Failure to meet, within 90 days after the schedule date, a compliance schedule milestone contained in a permit or enforcement order for starting construction, completing construction, or attaining final compliance;
- F. Failure to provide within 30 (45<sup>3</sup>) days after the due date the required report such as a Baseline Monitoring Report, a 90 day compliance report, periodic self-monitoring reports, and reports on compliance with compliance schedules;
- G. Failure to accurately report noncompliance; or
- H. Any other violation or group of violations, which the POTW determines will adversely affect the operation or implementation of the local pretreatment program.

**Public participation and cooperation are important to a successful industrial pretreatment program. If you have comments or witness a situation that you believe may involve an illegal discharge of pollutants or hazardous material into a municipality's sewer system, please immediately notify the appropriate municipality<sup>1</sup>: Gilbert (480) 503-6411, Glendale (623) 930-4758, Mesa (480) 644-2131, Phoenix (602) 495-5926, Scottsdale (480) 391-5687, or Tempe (480) 350-2678.**

Industrial User	Nature of Violation/ Type of Pollutant	Date Of Last Non-Compliance	Has User Returned to Compliant Status as of 12/31/2023?	Number of Times Published	Nature of Enforcement Action(s)	Nature of Enforcement Action(s) Comments
<b>APS BioGroup, Inc.</b>	Late Reporting – Self-Monitoring Report submitted 103 days late during 1 <sup>st</sup> Quarter	03/08/2023	Yes	3	Notice of Violation SNC Notification	A Show Cause Proceeding did not take place for this instance of SNC. A Pretreatment Settlement Agreement for a prior SNC occurrence went into effect in the 1 <sup>st</sup> Quarter of 2023.
<b>Metal Finishing Solutions, Inc.</b>	3 <sup>rd</sup> Quarter Chromium Monthly Average & Daily Maximum TRC & Chronic; 3 <sup>rd</sup> Quarter Zinc Monthly Average & Daily Chronic; 4 <sup>th</sup> Quarter Nickel Monthly Average TRC; & Late Reporting – 24-Hour Notification	01/31/2024	No	2	Notices of Violation Temporary Increase in Self-Monitoring (TISM) Show Cause Proceeding Monetary Penalty Pretreatment Settlement Agreement SNC Notifications Administrative Order	A Show Cause Proceeding took place during the 3 <sup>rd</sup> Quarter of 2023 followed by a Pretreatment Settlement Agreement imposing monetary penalties and a compliance schedule which was executed during the 3 <sup>rd</sup> Quarter. An Administrative Order imposing additional monetary penalties and a compliance schedule will be issued in the 1 <sup>st</sup> Quarter of 2024. Violations in addition to zinc, chromium, and nickel include late reporting, failure to sample, and a silver effluent violation.
<b>United General Bakery, Inc. dba Upper Crust Bakery</b>	Late Reporting – Self-Monitoring Report submitted 49 days late during 2 <sup>nd</sup> Quarter	04/21/2023	Yes	3	Notice of Violation SNC Notification Show Cause Proceeding Monetary Penalty Pretreatment Settlement Agreement	A Show Cause Proceeding took place during the 3 <sup>rd</sup> Quarter of 2023 following a prior Show Cause Proceeding that took place during the 1 <sup>st</sup> Quarter of 2023 for previous violations. A Pretreatment Settlement Agreement addressing both Show Cause Proceedings and imposing monetary penalties and a compliance schedule was executed during the 4 <sup>th</sup> Quarter of 2023. Additional violations include pH exceedances and permit condition violations.

<sup>1</sup>The Cities of Glendale, Mesa, Phoenix, Scottsdale, and Tempe, and the Town of Gilbert, Arizona maintain an agreement through the Sub-Regional Operating Group (SROG) to jointly own and operate the 91<sup>st</sup> Avenue Wastewater Treatment Plant (WWTP) and its interceptor systems. Each municipality will publish their own list of Users in SNC beginning with this annual publication.

<sup>2</sup>Phoenix City Code Chapter 28 was amended on October 7, 2020 to incorporate the October 14, 2005 updates to 40 CFR Part 403, resulting in a change to the definition of SNC, including applicability and reporting criteria.

City of Phoenix  
Expenditures and Program  
Updates  
2024

## CITY OF PHOENIX

SUMMARY OF PRETREATMENT PROGRAM EXPENDITURES		
January 1, 2024 – December 31, 2024 – Total Pretreatment Expenditures		
		\$ 4,381,610
PRETREATMENT PROGRAM EXPENDITURES		
Personnel		\$2,855,384
Operations & Maintenance		\$315,274
Laboratory		\$1,210,953
Equipment		\$0
Vehicles		\$0
PRETREATMENT PROGRAM EQUIPMENT INVENTORY		
<u>Equipment Name</u>	<u>Purchased 2024</u>	<u>Total 2024</u>
Photo Ionization Detector	0	2
Flow Meters	0	26
Auto Samplers	0	34
Turbidimeters	0	3
pH/DO/Conductivity Meters	0	6
Chlorine Colorimeters	0	3
Air Movers	0	4
Confined Space Harnesses	0	7
Air/Gas Detectors	0	9
Cameras	0	7
Night Vision Cameras	0	1
Pole Cameras/GoPro	0	2
CCTV Sewer Camera	0	2
Computer Monitors (CH13)(C )(L0)	0	58
Computers (C9)(Ch1)(L0)	0	9
Printers	0	3
Tablets (L6)(Ch8)(C5)	0	23
PRETREATMENT PROGRAM VEHICLE INVENTORY		
<u>Equipment Name</u>	<u>Purchased 2024</u>	<u>Total 2024</u>
Sampling Passenger Vans	0	1
Sampling Pickups	0	1
Inspector Pickups	0	7
Inspector SUVs	1	1
Inspector Sedans	0	1
Sampling Vans	0	5
Vehicle Pool Sedans	0	5 (Pool) <sup>1</sup>
<sup>1</sup> Vehicle pool sedans (which are may occasionally be used for inspections of industrial facilities) are shared by all staff located on the 23rd Avenue WWTP.		

PRETREATMENT PROGRAM PERSONNEL

<u>Title</u>	<u>FTEs 2023</u>	<u>FTEs 2024</u>
Deputy Water Services Director	1.0 <sup>3</sup>	1.0 <sup>3</sup>
Environmental Programs Manager	0.5 <sup>3</sup>	0.5 <sup>3</sup>
Water Services Project Coordinator	1.0	1.0
Assistant City Attorney IV	0.25 <sup>3</sup>	0.25 <sup>3</sup>
Mechanical Plans Examiner I	1.0	1.0
Environmental Quality Specialist	0.5	1.0
Water Services Projects Planner	1.0	1.0
Principal Engineering Technician	1.0	1.0
Chief Water Quality Inspectors	2.0	2.0
Senior Water Quality Inspectors	16.0	15.0
Water Quality Inspectors	3.0	3.0
Inspector Vacancies	2.0	4.0
Information Technology Application Programmer	0.25 <sup>3</sup>	0.25 <sup>3</sup>
III Information Technology Application	0.5 <sup>3</sup>	0.5 <sup>3</sup>
Programmer I Secretary II	0.25 <sup>3</sup>	0.25 <sup>3</sup>

<sup>3</sup> These positions dedicate time to other Water Department functions.



## Pretreatment Program Changes

The City of Phoenix Industrial Pretreatment Program (Program) received initial Cross-Media Electronic Reporting Rule (CROMERR) approval on August 16, 2023 from the EPA confirming that the City of Phoenix GovOnline system is compliant with CROMERR. Furthermore, the Program notified ADEQ of the intent to use a Certified Off the Shelf solution on August 24, 2021 and received approval of the proposed modification on February 25, 2022. However, the Program changed databases in late 2024 and is in the process of submitting a new checklist for a different Certified Off the Shelf solution, SAMS, after discussion with the EPA. The Program intends to receive EPA-authorized program required submissions electronically from regulated facilities in lieu of paper submissions.

During 2024, the Program reorganized its administrative structure and staffing which was communicated to ADEQ and EPA during the PCI conducted in May 2024. The modifications to the pretreatment program were communicated to be non-substantial as 0.5 staff positions were added and no decreases were made. The Commercial Inspections/FOG and Industrial Pretreatment Program sections have been incorporated into a new overhead Pretreatment Program structure to allow for additional support and oversight. Several positions were modified, with one addition, to reflect higher level required skillsets, encompass additional duties or distribute workload appropriately.

## Pretreatment Program Activities

The Environmental & Safety Division within the Water Services Department is responsible for implementing the Program for the City of Phoenix. The Program continues to be organized into three sections: Wastewater Monitoring, Commercial Inspections/FOG, and the Industrial Pretreatment Program. An organizational chart is included in this report and appears on a page just after the Summary of Pretreatment Program Expenditures.

### ▪ **Wastewater Monitoring Section**

The Wastewater Monitoring Section collects wastewater, groundwater, and biosolids samples to support the following:

- NPDES and AZPDES Permit compliance for the City of Phoenix wastewater treatment plants
- Aquifer Protection Permit compliance for the City of Phoenix wastewater treatment plants and recharge facilities
- Industrial user permit compliance determination and enforcement
- Industrial user sewer rate recalculation (sewer billings)
- SROG Cities' sewer charges and compliance determination
- Special projects, studies, and emergency response.

Sampling crews frequently conduct sampling operations in hazardous locations such as confined spaces, streets where traffic conditions must be considered, and in the Salt and Gila Rivers. Sophisticated, computerized sampling and measuring equipment in addition to manual sample collection techniques are used to collect samples, which are then analyzed by the City's Water Services Laboratory.

### ▪ **Commercial Inspections / FOG Section**

The Commercial Inspections / Fats, Oils and Grease (FOG) Section inspects and enforces the City's sewer use ordinance at commercial/industrial facilities to support the following:

- Routine/educational inspections of pretreatment devices and systems to prevent POTW infrastructure damages; obstructions; Sanitary Sewer Overflows (SSOs); and WWTP upset, interference, and passthrough
- Complaint inspections
- Routine/educational stormwater inspections (in support of the City stormwater program)
- Construction inspections of pretreatment devices and compliance sampling points
- Investigation of potential illegal discharges
- Investigation of SSOs and sewer blockages

- FOG Pollution Prevention (P2) outreach to domestic users following SSOs in residential areas
- Referral of industries for permitting evaluation to the Industrial Pretreatment Section
- Implementation of the Dental Rule (Dental Office Point Source Category – 40 CFR Part 441).

Additionally, the section is responsible for examination of new and remodel commercial construction plans to determine the need for wastewater pretreatment and/or wastewater discharge permitting. A database is used by staff to systematically target geographic areas for preventative inspections, as well as to track pretreatment devices and enforcement history for a given facility.

***Commercial Inspections / FOG Section Metrics***

Routine/Educational Inspections	1500
Construction Inspections	197
SSO Investigations - Residential Areas (includes apartments)	35
SSO Investigations - Commercial/Industrial Areas	17
Routine/Educational Stormwater Inspections	1500
Notices of Violation	13
Plans Reviewed for Pretreatment	758

▪ ***Industrial Pretreatment Program Section***

The Industrial Pretreatment Program Section is responsible for the following:

- Inspections of permitted industrial users and potential permittees
- Routine/educational stormwater inspections (in support of the City stormwater program)
- Examination of industrial user construction plans with regard to industrial processes, pretreatment systems, and compliance sampling points
- Issuance of Wastewater Discharge Permits
- Evaluation of permitted industrial user compliance and file management
- Records retention
- Enforcement of permitted industrial users
- Periodic recalculation of industrial user sewer rates based on flow and loading
- Periodic revision of sewer use ordinances, standard operating procedures (SOPs), Civil Penalty Policy, and Enforcement Response Plan
- Pollution Prevention (P2) outreach to industrial and residential users
- Issuance of Temporary Discharge/Manhole Entry Permits
- Publication of industrial user escalated enforcement actions to enable public participation
- Annual publication of Significantly Noncompliant industrial users
- Coordination and writing of the Annual Report in conjunction with the SROG cities.

## Pollution Prevention Program

Part II Section D.4.h. of the National Pollutant Discharge Elimination System (NPDES) Permit № AZ0020524 including AZPDES Permits № AZ0020559 and № AZ0026727 requires the City of Phoenix (City) to submit a summary of activities to involve and inform the public of the Program. The Program includes Pollution Prevention (P2) outreach for controllable sources of pollutants within the service area of the 23rd and 91st Avenue Wastewater Treatment Plants (WWTPs) as well as the Cave Creek Water Reclamation Plant. In accordance with the City's "Implementation of Best Management Practices in the Service Area of the 23rd and 91st Avenue WWTPs Project Schedule", as revised on March 22, 1996, the City's efforts for the period January 1, 2024 through December 31, 2024 are summarized below.

- **General Community Outreach / Education**

**IPP and/or Commercial Staff participated in the following Community Outreach Events:**

Community Outreach Events			
Event	Organizer	Dates	Attendees
Doggie Street Festival	Jude Artenstein	01/27/2024	General Public
Chinese Cultural Week	Phoenix Chinese Week	02/02/2024 – 02/04/2024	General Public
Tres Rios Nature Festival	Tres Rios	02/24/2024 – 02/25/2024	General Public
2024 AZEHA Hybrid Spring Conference	Arizona Environmental Health Association (AZEHA)	03/06/2024 – 03/07/2024	Enviro. Health Professionals
'Slope Fest	East Sunnyslope Neighborhood Association & Block Watch	04/13/2024	General Public
602 Day	City of Phoenix Community & Economic Development Department	05/31/2024	General Public
Monsoon Safety Week	City of Phoenix Fire Department	06/12/2024	General Public
Monsoon Safety Week	City of Phoenix CIO	07/02/2024	General Public
Sunnyslope Community Center Trunk or Treat	City of Phoenix Parks & Recreation Department	10/19/2024	General Public
Nature Fest	City of Phoenix Office of Environmental Programs	10/19/2024	General Public
Arcadia Fall Festival	Arcadia Osborn Neighborhood Association	11/09/2024	General Public

Angeles del Barrio Event	Chicanos Por La Causa	12/07/2024	General Public
Christmas Tree Burn and Holiday Safety Media Event	City of Phoenix Fire Department	12/19/2024	General Public

▪ **Industrial Pretreatment Compliance Academy**

The Industrial Pretreatment Section continues to deliver the Industrial Pretreatment Compliance Academy it developed in 1995 to support a P2 education/outreach program directed at industrial and commercial facilities located in Phoenix. The Compliance Academy classes include a PowerPoint presentation, a reference handbook, and a laboratory tour. The presentation and handbook include P2 information and demonstrate ideas to specific industry sectors including metal finishers, hospitals, industrial laundries, etc. During 2024 all courses were presented in a virtual or hybrid in-person and webinar format with a .pdf booklet; class information and participation is noted below:

<b>Industrial Outreach Events: Industrial Pretreatment Compliance Academy</b>			
<b>Class Name</b>	<b>Place &amp; Date</b>	<b>Attendee Types</b>	<b>No of Attendees</b>
Wastewater Discharge Permit	Hybrid January 24, 2024	<ul style="list-style-type: none"> <li>▪ Industrial Permitted Users</li> <li>▪ Pretreatment Staff from other Municipalities</li> <li>▪ Staff from Arizona Department of Environmental Quality</li> <li>▪ Pretreatment Consulting Staff</li> </ul>	44
Wastewater Compliance Sampling	Hybrid March 27, 2024		43
Laboratory Analytical Issues	Hybrid May 22, 2024		36
Enforcement	Hybrid July 24, 2024		41
Pollution Prevention (P2)	Hybrid September 25, 2024		30

▪ **Social Media Posts**

The Water Services Department published multiple social media posts in 2024 with messaging related to Industrial Pretreatment as well as fats, oil and grease:

- Industrial Pretreatment Program Compliance Academy 2024 Class Schedule – January 19, 2024 (Facebook)
- Industrial Pretreatment Program Compliance Academy 2024 Classes – March 28, 2024 (Facebook, X)
- Industrial Pretreatment Program Compliance Academy Laboratory Analytical Class Advertisement – May 7, 2024 (Instagram)
- Industrial Pretreatment Program Compliance Academy Enforcement Class Advertisement – July 12, 2024 (Instagram, X)
- Industrial Pretreatment Program Compliance Academy Pollution Prevention Class Advertisement – September 16, 2024 (Instagram)
- Industrial Pretreatment Program Compliance Academy Pollution Prevention Class Advertisement – September 19, 2024 (LinkedIn, Facebook)
- Fats, oils, and grease best management practices on Thanksgiving – November 26, 2024 (Instagram)

- Fats, oils, and grease best management practices on Thanksgiving – November 27, 2024 (Instagram)
- Fats, oils, and grease best management practices – December 7, 2024 (Facebook, X, Instagram)
- Fats, oils, and grease best management practices – December 20, 2024 (Facebook, X, Instagram)
- Fats, oils, and grease best management practices during Christmas – December 24, 2024

- ***Water Cooler (Employee Newsletter)***

The Industrial Pretreatment Section and Commercial Inspections / FOG Section regularly contribute articles to the Water Cooler employee newsletter throughout the year in order to provide information on a variety of P2 topics. Specific topics and months include:

- Illegal Dumping – February 2024
- National Prescription Drug Take Back Day – March 2024
- Holiday Fats, Oils and Grease – December 2024

- ***Environmental & Safety Division Newsletter***

The Water Services Department, Environmental & Safety Division, continued to issue a biannual newsletter in April and November 2024. The April 2024 newsletter included information on the Industrial Pretreatment Compliance Academy as well as an article about preventing illegal dumping to the sewer or storm drain systems. Also, the November 2024 newsletter included information on fats, oils and grease messaging related to the holidays. Finally, both editions included information on environmental programs.

- ***Point Source Control***

- The Industrial Pretreatment Program Section actively identifies, by SIC code, categorical classification, industry practices, Safety Data Sheet review, plan review, and other existing data, those businesses located in Phoenix that were likely to use the pollutants so that onsite inspections and wastestream sampling could be conducted to determine (1) whether or not they actually used the pollutants; (2) whether or not the pollutants are actually discharged to the WWTPs and at what levels and (3) the feasibility and benefit of implementing BMPs at businesses which discharge measurable levels of pollutants of concern. Meetings with the industrial groups and annual site inspections continue to reinforce BMP practices.
- Best Management Practices (BMPs) continue to be implemented on four pollutants. These pollutants are Fluoride, Molybdenum, Selenium, and DEHP. On January 1, 2005, the SROG cities adopted and implemented revised local limits. During the local limits review process, these four pollutants were identified as candidates for BMPs. The City determined the target industries which discharge these pollutants and identified opportunities for their reduction through the control document (Permit), inspections, and the IPP Compliance Academy.
- Class B Wastewater Discharge Permits continue to be issued for special dischargers. Industrial users that do not meet the definition of an SIU, but discharge high strength BOD/TSS wastewater, remediated groundwater, or pollutants of concern (conventional pollutants) are issued Class B Wastewater Discharge Permits. Through the end of 2024, the Industrial Pretreatment Section inspected 18 Class B Permittees.

- Class C Wastewater Discharge Permits continue to replace the Class B Zero Categorical Wastewater Discharge Permit. This permit type was issued beginning in 2021 to industrial users who meet the definition of a non-significant categorical industrial user (NSCIU). They include industrial users who perform manufacturing or service processes from one of the federal point source categories but do not discharge wastewater generated from those processes. Through the end of 2024, the Industrial Pretreatment Section inspected 51 Class B Zero and/or C Permittees. The City is in the process of recategorizing 4 of these facilities to Class A Significant Industrial User Permits with a discharge prohibition due to categorical pretreatment standards prohibiting discharge for 40 CFR Part 446 and 455 facilities.

## **Training and Participation in Conferences and Workshops**

### **▪ *Individual Training:***

WSD/ESD Staff continue to enhance professional growth by enrolling in courses from various educational and training resources. To broaden their education, some inspectors take self-study courses through American Water College and obtain certifications through ADEQ. Operator Certifications include Water Distribution, Water Treatment, Wastewater Collection, and Wastewater Treatment.

On March 6-7, 2024, staff attended, volunteered, and provided outreach at the Arizona Environmental Health Association (AZEHA) 2024 Spring Conference. The conference provides a forum for environmental health professionals to network, learn and discuss the latest topics including drinking water and wastewater as well as food safety and pest management. Staff sponsored a booth and provided outreach on fats, oils and grease (FOG) as well as grey water disposal for mobile food trucks, sanitary sewer overflow prevention and stormwater management.

### **▪ *Group Training:***

On February 1, 2024, staff attended and hosted the in-person Pollution Prevention and Resource Center (PPRC) and Western States Alliance technical training workshop covering FOG abatement for new and existing programs, and dealing with emerging pollutants like PFAS/PFOS. Attendees included regulators from other municipalities and organizations.

On April 23-25, 2024, staff attended and presented at the AZ Water Annual Conference & Exhibition hosted in-person at the Phoenix Convention Center. The three-day program provides professional development, continuing education, and technology transfer to support the vision of “a vibrant Arizona through resilient, reliable and safe water.” The event attracts over 3,000 attendees from throughout the state and nation. Staff learned about a variety of topics during the Conference & Exhibition including: case studies, regulatory updates, reuse, resource planning, drought, wastewater treatment, stormwater topics, conservation, energy, and more.

On November 5-6, 2024, staff attended, volunteered and presented at the AZ Water Pretreatment/FOG Workshop held at the Desert Willow Conference Center and hosted by the AZ Water Pretreatment Committee. The workshop helps to inform, educate, and train water and wastewater professional technicians, regulatory inspectors, managers, policymakers, and others on the latest developments in wastewater, (industrial) pretreatment and FOG program management. Topics of discussion and education included starting a FOG program, FOG inspections, local limits, sample collection, industrial user inspections, pretreatment plans review, wastewater treatment, regulatory updates and more.

## Other Activities

- ***Coordination with Other Pretreatment Programs***

Phoenix continued to provide counsel and guidance to the Pretreatment Programs of the contributing jurisdictions and Programs throughout the state during 2024. Multi-city coordination for purposes of encouraging compliance with federal requirements and consistency of implementation was accomplished through periodic multi-city meetings attended by representatives from each Program, as well as through periodic meetings with individual Program staff.

Phoenix personnel along with members from the other SROG cities continue the monthly sampling program at all 14 Metering Stations. This sampling program provides representative information about the quality of wastewater discharged to the 91st Avenue WWTP.

- ***Enforcement Activities to Involve and Inform the Public***

In addition to publication of Industrial Users having a status of Significant Noncompliance during the reporting year, the City used several types of legal instruments designed to bring industrial users back into compliance. The City continued to conduct Show Cause Meetings and to collect monetary penalties from industrial users which violated pretreatment requirements during the year. A summary of these enforcement activities which identify the permittees, the nature of the violations, published Pretreatment Settlement Agreements, and any monetary penalties associated with those actions is included in the attached spreadsheets.

- ***NEFAP Accreditation***

The City of Phoenix Environmental & Safety Division achieved ISO/IEC 17025:2005 International Standard and the Field Sampling and Measurement Organizations (FSMO) Accreditation. The Certificate of Accreditation includes demonstration of technical competence in the fields defined by the Divisions scope of sampling and field tests. The Water and Wastewater Monitoring groups are one of eleven having this accreditation in the United States and the only accredited entities in Arizona.