



**ARIZONA DEPARTMENT  
OF  
ENVIRONMENTAL QUALITY**



**Pretreatment Annual Report**

**Application#: 163869**

**Phoenix Office**

1110 W.Washington Street  
Phoenix, AZ 85007  
(602) 771-2300

**Southern Regional Office**

400 W.Congress Street, Suite 433  
Tucson, AZ 85701  
(520) 628-6733

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## PRETREATMENT ANNUAL REPORT- SUMMARY

### Question: Company Information:

Answer: **Company ID:** 12380  
**Company Name:** CITY OF PHOENIX  
**Company Address:** 2474 S 22ND AVE BLDG 31 PHOENIX, AZ 85009

### Question: Facility Information:

Answer: **Public Water System Name:** CITY OF PHOENIX - 23RD AVENUE WWTP  
**Public Water System Address:** 2470 S 22ND AVE PHOENIX, AZ 85009

### Question: Which reporting period is this for?

Answer: **Reporting Period:** 01/01/2025 - 12/31/2025  
**Due Date:** 02/28/2026

### Question: Do you have any Significant Industrial Users to report in the Pretreatment Annual Report?

Answer: Yes

### Question: Contact Information

Answer: **First Name:** Chelsey  
**MI: (optional):**  
**Last Name:** Mc Cluskey  
**Title:** Pretreatment Compliance Coordinator  
**Email Address:** chelsey.mccluskey@phoenix.gov  
**Phone #:** (602) 495-5926  
**Ext:**  
**Mailing Address Line 1:** 2474 S 22nd Ave  
**Apt/Suite/Unit#:**  
**State/Province:** AZ  
**City:** Phoenix  
**ZIP/Postal Code:** 85009

## Question: Permit Information

Answer:

Wastewater Treatment Plant Name	Permit Number
23rd Avenue WWTP	AZ0020559
91st Avenue WWTP	100579
Cave Creek Water Reclamation Plant	AZ0026727

## Pretreatment Program Details

**Question: Was the pretreatment program substantially modified during this reporting period?**

Answer: No

## Ordinance Information

**Question: Name of Ordinance:**

Answer: Chapter 28 "Sewers"

**Question: Date of Adoption:**

Answer: 10/07/2020

**Question: Location of Ordinance:**

Answer: <https://phoenix.municipal.codes/CC/28>

## Local Limit Requirements

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**Question: Did the Control Authority conduct a local limits evaluation during this reporting period?**

Answer: Yes

**Question: Local Limits Evaluation Date:**

Answer: 02/03/2025

**Question: Did the Control Authority adopt any local limits during this reporting period?**

Answer: No

**Question: Are you under a State or Federal compliance schedule that includes steps to revise local limits?**

Answer: No

### **Modifications to Pretreatment Program.**

**Question: Were there any modifications to the Pretreatment Program during this reporting period?**

Answer: Yes

Monitoring Program or Frequency

Enforcement Policy

Other

Define Other: CROMERR

### **Monitoring Program or Frequency**

**Question: When was the change?**

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Answer:Date Change Occured: 09/11/2025

**Question: What was the change?**

Answer:Explain the change: City of Phoenix now averages together all data collected from the CIU and City sampling that would require a monthly average and provides that calculation to the CIU as needed for compliance purposes. This is used to determine compliance with the monthly average limits when we review the combined and averaged data (when applicable).

**Question: Did you inform the public?**

Answer: No

**Enforcement Policy**

**Question: When was the change?**

Answer:Date Change Occured: 09/11/2025

**Question: What was the change?**

Answer:Explain the change: City of Phoenix now averages together all data collected from the CIU and City sampling that would require a monthly average and provides that calculation to the CIU as needed for compliance purposes. This is used to determine compliance with the monthly average limits when we review the combined and averaged data (when applicable).

**Question: Did you inform the public?**

Answer: No

**Other**

**Question: When was the change?**

Answer:Date Change Occured: 12/02/2025

**Question: What was the change?**

Answer:Explain the change: City of Phoenix incorporated CROMERR for a new database into our

pretreatment program with EPA approval.

**Question: Did you inform the public?**

Answer: No

**Question: Have you submitted these changes to ADEQ for approval?**

Answer: Yes

**Problems or Violations of Permit Limits (Upsets, Pass-through, and Interference, etc.)**

**Question: Did you identify if there were any problems or violations (eg.; upsets, pass-through, interference, violations of AZPDES/APP permit limits) with the effluent discharge of any POTW covered by this Pretreatment Program during the reporting period?**

Answer: Yes, Problems and/or Violations were Observed

**Question: Describe the issue that caused the problem or violation:**

Answer: 23rd: 1/2025 - E.Coli exceedance; high loading events; elevated iron; 2 APP exceedances of Gross Beta (no violations attributable to non-domestic users) 91st: elevated ammonia; 1 APP exceedance of Gross Beta ((no violations attributable to non-domestic users)

**Question: Did you take any corrective action(s) for the issue?**

Answer: Yes

**Question: Please describe corrective action(s) taken:**

Answer: 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 23rd Avenue WWTP and 91st Avenue WWTP during the year ending December 31, 2025. There was one AZPDES permit exceedance during 2025; however, it was not associated with nondomestic users. It is included for

informational purposes only. In January, an exceedance of the daily maximum E. Coli limit occurred. The event was caused by a temporary equipment failure and operational problems within the plant. A 5-Day report was submitted to the Arizona Department of Environmental Quality on January 17, 2025. There were a few occurrences of high loading events at the 23rd Avenue WWTP Influent of colored water, high COD, and high Ammonia during 2025. None of these instances resulted in an upset, interference, or pass-through of the plant. During these events, emergency samples were collected at the plant Influent, and upstream collection system if needed, and the Industrial Pretreatment staff assisted with inspections and discussions with the permitted facilities in the sewer shed area. In August, the plant received dark grey colored slug loads with elevated iron levels, which were traced to the City of Phoenix 24th Street Water Treatment Plant's solids handling facility. The solids discharged to the sewer from the centrifuges contained ferric hydroxide sludge generated during the water treatment process. Staff at the 23rd Avenue Wastewater Treatment Plant are working closely with the 24th Street Water Treatment Plant team to monitor all discharges and ensure continuous compliance with operational treatment standards. During this time, 23rd Avenue WWTP did not experience any upsets, interference, or pass-through of the plant. There were two Aquifer Protection Permit (APP) exceedances observed during 2025 and provided here for informational purposes only. In January and July, an exceedance of the Gross Beta parameter was observed at the Effluent Junction Box, Outfall 002/004. Both exceedances resulted in an APP discharge limit exceedance. The Gross Beta source investigation is currently ongoing, and is believed to be the result of short-lived medical isotopes used in nuclear medicine that are common in wastewater from patients undergoing nuclear diagnosis and treatment. Excreta from individuals undergoing medical treatment 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 plans to investigate up stream of the 23rd Avenue WWTP for additional sources and has retained a contracted environmental consultant to assist in the investigation. There was one noncompliance plant upset event for elevated ammonia during 2025; however, it was not associated with nondomestic users. In January, a process ammonia sample result of 16.0 mg/L occurred at the Influent to Tres Rios FRW1 compliance sample

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point due to electrical equipment failure and operational problems within the plant. After power was restored the ammonia levels were decreased by end of day. A 5-Day report was submitted to the Environmental Protection Agency on January 16, 2025. There was one Aquifer Protection Permit (APP) exceedance observed during 2025 and is provided here for informational purposes only. In May, an exceedance of the APP Alert Level limit for the Gross Beta parameter occurred at the Influent to Tres Rios FRW1 compliance sample point. The City retained an environmental consulting firm to investigate and issued a final report in June 2025. The report concluded that elevated gross beta concentrations are primarily driven by the use of newly approved nuclear oncology therapies containing Lutetium-177 (Lu-177).

**Question: Were there any problems with the use or disposal of biosolids or sewage sludge for any POTW during the reporting period?**

Answer: No

**Question: Have you prepared a summary of all investigations into upsets, interference and pass-through during the reporting period, including the reason why the incident occurred and any subsequent corrective actions?**

Answer: Yes

**Question: Have you prepared a description of monitoring, sewer inspections and evaluations that were done during reporting period to detect upsets, interference and pass-through, specifying parameters and frequencies of those events?**

Answer: Yes

**Question: Were there any additional local limits or changes to existing requirements that are necessary to prevent future upsets, pass-through and/or interference?**

Answer: No

## Question: Significant Industrial Users (SIU) Information

Answer:

ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
AZZ000032	Certified Inspection Service Company, Inc.	21 South 41st Street		Phoenix	AZ	85034	SAVED
AZZ000136	Thermo Fluids, Inc.	4301 West Jefferson Street		Phoenix	AZ	85043	SAVED
AZZ000047	Dunn-Edwards Paints	520 South 67th Avenue		Phoenix	AZ	85043	SAVED
AZZ000009	Allied Tube & Conduit Corporation	2525 North 27th Avenue		Phoenix	AZ	85009	SAVED
AZZ000015	APS BioGroup, Inc.	2235 South Central Avenue		Phoenix	AZ	85004	SAVED
AZZ000142	Upper Crust	3655 West		Phoenix	AZ	85009	SAVED

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	Bakery	Washington Street					
AZZ000043	Core Linen Services Inc.	4445 South 36th Street		Phoenix	AZ	85040	SAVED
AZZ000041	Contact Coatings, LLC	1930 West Quail Avenue	Suite B	Phoenix	AZ	85027	SAVED
AZZ000051	FM Industries Inc. (Magnolia)	2635 East Magnolia Street		Phoenix	AZ	85034	SAVED
AZZ000081	Liquid Environmental Solutions of Arizona LLC - Magnolia Street	1095 West Magnolia Street		Phoenix	AZ	85007	SAVED
AZZ000122	Sav-On Plating, Inc.	25 West Watkins Street		Phoenix	AZ	85003	SAVED

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AZZ000133	Sunlit Arizona LLC	777 W Alameda Road		Phoenix	AZ	85085	SAVED
AZZ000007	ABS Metallurgical Processors, Inc.	4313 East Magnolia Street		Phoenix	AZ	85034	SAVED
AZZ000099	Orthopedic and Surgical Specialty Company, LLC, dba Arizona Specialty Hospital	750 North 40th Street		Phoenix	AZ	85008	SAVED
AZZ000123	SFPP, Limited Partnership - Phoenix Terminal (formerly Kinder Morgan)	49 North 53rd Avenue		Phoenix	AZ	85043	SAVED
AZZ000132	Sun West Engineering, Inc.	3802 West Broadway Road		Phoenix	AZ	85040	SAVED

ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
AZZ000008	Advanced United Refining, Inc.	4575 West Watkins Street		Phoenix	AZ	85043	SAVED
AZZ000036	Cintas - Roosevelt St (G&&K Services, Inc.)	4804 West Roosevelt Street		Phoenix	AZ	85043	SAVED
AZZ000077	La Canasta Mexican Food Products, Inc.	3101 West Jackson Street		Phoenix	AZ	85009	SAVED
AZZ000112	Precision Science	1517 W. Knudsen Drive		Phoenix	AZ	85027	SAVED
AZZ000118	Razor Emporium, LLC.	210 South 37th Street		Phoenix	AZ	85034	SAVED
AZZ000124	Shamrock Foods Company - Dairy Division	2228 North Black Canyon Highway		Phoenix	AZ	85009	SAVED

ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
AZZ000134	The Oil Guys LLC	3425 North 29th Avenue		Phoenix	AZ	85017	SAVED
AZZ000117	R.B. Machine Company, Inc.	3729 West Buchanan Street		Phoenix	AZ	85009	SAVED
AZZ000039	Coating Technologies, LLC	21438 North 7th Avenue		Phoenix	AZ	85027	SAVED
AZZ000114	Prudential Overall Supply	5102 West Roosevelt Street		Phoenix	AZ	85043	SAVED
AZZ000139	Troy Corporation Arizona	113 South 47th Avenue		Phoenix	AZ	85043	SAVED
AZZ000027	Café Valley Bakery, Inc.	7000 West Buckeye Road		Phoenix	AZ	85043	SAVED
AZZ000121	Safeway Phoenix	2434 East		Phoenix	AZ	85040	SAVED

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	Ice Cream Plant	Pecan Road					
AZZ000101	PAS Technologies, Inc. dba StandardAero	1021 North 22nd Avenue		Phoenix	AZ	85009	SAVED
AZZ000109	PMA Holdings LLC dba UWE/PMA Holdings LLC	18008 North Black Canyon Highway		Phoenix	AZ	85053	SAVED
AZZ000151	Xpress Stripping, LLC dba Xpress Metal Cleaning	3402 East Wier Avenue		Phoenix	AZ	85040	SAVED
AZZ000093	Modern Industries, Inc.	4755 East Beautiful Lane		Phoenix	AZ	85044	SAVED
AZZ000065	Honeywell International, Inc.- Honeywell Engines Product Center	111 South 34th Street		Phoenix	AZ	85034	SAVED

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AZZ000071	Hydro Extrusions North America, LLC - Remelt Operation	249 South 51st Avenue		Phoenix	AZ	85043	SAVED
AZZ000013	Ameripride Services, Inc. (Ownership Change - Aramark)	6025 West Van Buren Street		Phoenix	AZ	85043	SAVED
AZZ000135	The Procter & Gamble Manufacturing Company	2050 South 35th Avenue		Phoenix	AZ	85009	SAVED
AZZ000012	American Tube and Pipe	2528 North 27th Avenue		Phoenix	AZ	85009	SAVED
AZZ000034	Chromalloy Arizona	5161 West Polk Street		Phoenix	AZ	85043	SAVED
AZZ000094	Modern Industries, Inc.	3001 East Air Lane	Bldg #404	Phoenix	AZ	85034	SAVED

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	(Air Lane)						
AZZ000104	Phoenix Children's Hospital	1919 East Thomas Road		Phoenix	AZ	85016	SAVED
AZZ000020	Avanti Circuits, Inc.	17650 North 25th Avenue	Suite 5	Phoenix	AZ	85023	SAVED
AZZ000091	Mission Linen Supply, Inc.	2652 South 16th Street		Phoenix	AZ	85034	SAVED
AZZ000022	Banner Estrella Medical Center	9201 West Thomas Road		Phoenix	AZ	85037	SAVED
AZZ000030	Celgene Corporation	620 North 51st Avenue		Phoenix	AZ	85043	SAVED
AZZ000050	Environmental Management Utility Services,	2132 South 5th Avenue		Phoenix	AZ	85003	SAVED

ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
	LLC.						
AZZ000066	Honeywell International, Inc. Former Peoria Avenue Facility/MW-10	2251 West Sierra Street		Phoenix	AZ	85029	SAVED
AZZ000018	ASM America Inc.- University Drive Plant	3440 East University Drive		Phoenix	AZ	85034	SAVED
AZZ000148	Wacom Quartz Corp.	5050 South 38th Place		Phoenix	AZ	85040	SAVED
AZZ000052	FM Industries Inc. (Roosevelt)	2104 West Roosevelt Street	Building D	Phoenix	AZ	85009	SAVED
AZZ000058	Gregory Packaging	439 South 55th Avenue		Phoenix	AZ	85043	SAVED
AZZ000078	Ladder	1777 South	Suite	Tolleson	AZ	85353	SAVED

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	Industries, Inc. dba Wildeck Inc.	99th Avenue	150				
AZZ000080	Liquid Environmental Solutions of Arizona LLC	5159 West Van Buren Street		Phoenix	AZ	85043	SAVED
AZZ000096	Niagara Bottling, LLC	275 South 67th Avenue		Phoenix	AZ	85043	SAVED
AZZ000044	Dignity Health - St. Joseph's Hospital & Medical Center	350 West Thomas Road		Phoenix	AZ	85013	SAVED
AZZ000046	DS Services of America dba Sparkletts	3302 West Earll Drive		Phoenix	AZ	85017	SAVED
AZZ000005	Abrazo Central Campus (Phoenix Baptist Hospital)	2000 West Bethany Home Road		Phoenix	AZ	85015	SAVED

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AZZ000006	Abrazo Scottsdale Campus	3929 East Bell Road		Phoenix	AZ	85032	SAVED
AZZ000017	Arizona Foods Group, Inc.(formerly Flavor Right Foods, owned by InstantWhip)	2517 East Chambers Street		Phoenix	AZ	85040	SAVED
AZZ000097	NXP USA, Inc. 52nd ST Superfund Site - OU 1	5005 East McDowell Road		Phoenix	AZ	85008	SAVED
AZZ000102	Perma-Finish, Inc.	74 North 45th Avenue		Phoenix	AZ	85043	SAVED
AZZ000105	Phoenix Heat Treating, Inc.	2405 West Mohave Street		Phoenix	AZ	85009	SAVED
AZZ000110	Precise Metal	4534		Phoenix	AZ	85031	SAVED

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	Products Company	North 44th Avenue					
AZZ000127	Southwest Powder of Arizona, LLC.	116 North 59th Avenue		Phoenix	AZ	85043	SAVED
AZZ000042	Continental Materials Corporation dba Phoenix Manufacturing, Inc.	3655 East Roeser Road		Phoenix	AZ	85040	SAVED
AZZ000033	ChemResearch Co., Inc.	1130 West Hilton Avenue		Phoenix	AZ	85007	SAVED
AZZ000088	Mega Metals, LLC.	1325 North 22nd Avenue		Phoenix	AZ	85009	SAVED
AZZ000098	Ohlinger Industries, Inc.	1211 West Melinda Lane		Phoenix	AZ	85027	SAVED

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AZZ000064	Honeywell International, Inc.- Honeywell Aerospace - Phoenix R&O	1944 East Sky Harbor Circle Northwest		Phoenix	AZ	85034	SAVED
AZZ000060	Heligear Acquisition Co. dba Northstar Aerospace - Phoenix (300)	300 South 23rd Street		Phoenix	AZ	85034	SAVED
AZZ000035	Cintas Corporation	5501 West Hadley Street		Phoenix	AZ	85043	SAVED
AZZ000086	Mayo Clinic Arizona - Mayo Clinic Hospital	5777 East Mayo Boulevard		Phoenix	AZ	85054	SAVED
AZZ000062	Honeywell International Inc.- Honeywell Aerospace - Deer Valley	21111 North 19th Avenue		Phoenix	AZ	85027	SAVED

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AZZ000137	Total Seal Piston Rings, Inc.	22642 North 15th Avenue		Phoenix	AZ	85027	SAVED
AZZ000053	Frontier Group	3518 East Wood Street		Phoenix	AZ	85040	SAVED
AZZ000023	Banner University Medical Center Phoenix Campus	1111 East McDowell Road		Phoenix	AZ	85006	SAVED
AZZ000037	Cleanpart Southwest LLC	3844 E University Drive	Suite 2	Phoenix	AZ	85034	SAVED
AZZ000146	Verco Decking, Inc.	4340 North 42nd Avenue		Phoenix	AZ	85019	SAVED
AZZ000073	ICP Construction, Inc.	4565 West Watkins Street		Phoenix	AZ	85043	SAVED

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AZZ000107	Phoenix Tool && Gage, Inc.	2612 West Encanto Boulevard		Phoenix	AZ	85009	SAVED
AZZ000106	Phoenix Indian Medical Center	4212 North 16th Street		Phoenix	AZ	85016	SAVED
AZZ000113	Profile Extrusion Company dba Profile Precision Extrusions	6565 West Grant Street		Phoenix	AZ	85043	SAVED
AZZ000126	Solvent Recy-Clean, Inc.	1824 && 1850 West Broadway Road		Phoenix	AZ	85041	SAVED
AZZ000011	American Industries Diversified, Inc. dba AID Aerospace	3508 East Corona Avenue		Phoenix	AZ	85040	SAVED
AZZ000024	Barrel O' Fun Snack Foods Co.	7330 West Sherman		Phoenix	AZ	85043	SAVED

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	Southwest, LLC (Shearer's)	Street					
AZZ000079	Lighting Resources, LLC.	1545 East Victory Street		Phoenix	AZ	85040	SAVED
AZZ000092	Mistras Arizona Inspection Services, Inc.	3027 East Washington Street		Phoenix	AZ	85034	SAVED
AZZ000119	RLC Labs, Inc.	1850 East Riverview Drive		Phoenix	AZ	85034	SAVED
AZZ000130	SUMCO Southwest Corporation	19801 North Tatum Boulevard		Phoenix	AZ	85050	SAVED
AZZ000021	Baker Commodities, Inc.	3602 West Elwood Street		Phoenix	AZ	85009	SAVED
AZZ000128	Specialty Textile	720 West		Phoenix	AZ	85007	SAVED

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	Services	Buchanan Street					
AZZ000145	Veolia ES Technical Solutions, LLC	5736 West Jefferson Street		Phoenix	AZ	85043	SAVED
AZZ000055	GE Parallel Design, Inc.	4313 East Cotton Center Boulevard		Phoenix	AZ	85040	SAVED
AZZ000076	Jet Processing (Noranco Manufacturing (USA) LTD)	2632 West Quail Avenue		Phoenix	AZ	85027	SAVED
AZZ000067	HonorHealth Deer Valley Medical Center	19829 North 27th Avenue		Phoenix	AZ	85027	SAVED
AZZ000054	Gannon & Scott Phoenix, Inc.	2113 East Sky Harbor Circle South		Phoenix	AZ	85034	SAVED

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AZZ000059	Hadrian, Inc	3602 West Washington Street	Suite 200	Phoenix	AZ	85009	SAVED
AZZ000016	APS West Phoenix Power Plant	4606 West Hadley Street		Phoenix	AZ	85043	SAVED
AZZ000129	STP Performance Coating, LLC	1131 West Watkins Street		Phoenix	AZ	85007	SAVED
AZZ000147	Vestis Services, LLC (formerly Aramark)	3836 West Buckeye Road	Bldg. F	Phoenix	AZ	85009	SAVED
AZZ000149	Waste Management Phoenix Hauling South	1580 East Elwood Street		Phoenix	AZ	85040	SAVED
AZZ000045	Dolphin, Inc.	440 North 51st Ave		Phoenix	AZ	85043	SAVED
AZZ000116	Quantum Global	3925 East		Phoenix	AZ	85034	SAVED

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	Technology, LLC, dba QuantumClean (Watkins)	Watkins Street					
AZZ000056	Global Healing Center	925 East Salter Drive		Phoenix	AZ	85024	SAVED
AZZ000057	Gourmet Boutique West, LLC.	351 South Black Canyon Hwy		Phoenix	AZ	85009	SAVED
AZZ000085	Mastel Linen, Inc.	6005 West Sherman Street		Phoenix	AZ	85043	SAVED
AZZ000049	Entrepix, Inc.	4717 East Hilton Avenue		Phoenix	AZ	85034	SAVED
AZZ000120	Royal Sign Company, Inc.	2631 North 31st Avenue		Phoenix	AZ	85009	SAVED

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AZZ000144	Valleywise Health Medical Center (MIHS)	2601 East Roosevelt Street		Phoenix	AZ	85008	SAVED
AZZ000014	APEL Extrusions, Inc.	3033 South 59th Avenue		Phoenix	AZ	85043	SAVED
AZZ000038	CMR Manufacturing, Inc.	2421 East Jackson Street		Phoenix	AZ	85034	SAVED
AZZ000087	MEC Arizona Manufacturing LLC (formerly Vital Pharmaceuticals)	1635 South 43rd Avenue		Phoenix	AZ	85009	SAVED
AZZ000063	Honeywell International Inc. Former Peoria Avenue Facility/EW-1	2305 West Mercer Lane		Phoenix	AZ	85029	SAVED
AZZ000025	Bergmann	3730 East		Phoenix	AZ	85040	SAVED

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	Precision, Inc. - Bergmann Group	Southern Avenue					
AZZ000072	Hyrdo Extrusions North America, LLC - Plant 1 Extrusion Operation	249 South 51st Avenue		Phoenix	AZ	85043	SAVED
AZZ000031	Central Admixture Pharmacy Services, Inc.	2200 South 43rd Avenue		Phoenix	AZ	85043	SAVED
AZZ000100	Osborn Products Manufacturing LLC	1127 West Melinda Way		Phoenix	AZ	85027	SAVED
AZZ000140	TSMC Arizona Corporation	5088 West Innovation Circle		Phoenix	AZ	85083	SAVED
AZZ000095	Modern Metal Masters DBA M3 Metals/Bernies	2326 East Magnolia Street		Phoenix	AZ	85034	SAVED

ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
	Brass						
AZZ000125	Sky Chefs, Inc. - LSG Sky Chefs (28th Street)	3555 South 28th Street		Phoenix	AZ	85040	SAVED
AZZ000040	Collins Metal Finishing	3536 East Illini Street		Phoenix	AZ	85040	SAVED
AZZ000082	Louie's Metal Finishing (Louie's Black Oxide)	2008 West Jackson Street		Phoenix	AZ	85009	SAVED
AZZ000089	Metal Coating Solutions, LLC.	334 North 25th Avenue		Phoenix	AZ	85009	SAVED
AZZ000108	Phoenix Welding Supply Co., LLC	701 South 7th Street		Phoenix	AZ	85034	SAVED
AZZ000150	World Resources Company	8113 West Sherman Street		Tolleson	AZ	85353	SAVED
AZZ000103	PGS Realty Company, LLC	3401 West Sherman		Phoenix	AZ	85009	SAVED

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ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
	dba Pan Glo Services	Street					
AZZ000115	Purcell Tire Company	420 South 35th Avenue		Phoenix	AZ	85009	SAVED
AZZ000028	Carl T. Hayden VA Medical Center	650 East Indian School Road		Phoenix	AZ	85012	SAVED
AZZ000138	Trainor & Trainor, Inc. dba Arizona Hard Chrome	2609 West Cypress Street		Phoenix	AZ	85009	SAVED
AZZ000141	UniFirst Corporation	104 North 14th Street		Phoenix	AZ	85034	SAVED
AZZ000143	Valleywise Health Behavioral Center - Maryvale	5102 West Campbell Avenue		Phoenix	AZ	85031	SAVED

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ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
	Campus						
AZZ000069	HonorHealth Sonoran Crossing Medical Center	33400 North 32nd Avenue		Phoenix	AZ	85085	SAVED
AZZ000070	Hydro Extrusions North America, LLC - Plant 2 Extrusion Operation	50 South 49th Avenue		Phoenix	AZ	85043	SAVED
AZZ000075	Intrepid Coatings, Inc.	1910 East Riverview Drive		Phoenix	AZ	85034	SAVED
AZZ000111	Precision Industrial Painting, Inc.	1139 West Hilton Avenue		Phoenix	AZ	85007	SAVED
AZZ000084	Marlyn Nutraceuticals Inc. - Naturally Vitamins, Inc.	4404 East Elwood Street		Phoenix	AZ	85040	SAVED

ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
AZZ000029	Cassavant Assembly and Processing	3725 East Atlanta Avenue		Phoenix	AZ	85040	SAVED
AZZ000083	Maricopa County Risk Management - Maricopa County Cave Creek Landfill	4050 East Sleepy Ranch Road		Cave Creek	AZ	85331	SAVED
AZZ000074	Image First of Arizona, LLC dba ImageFIRST Healthcare Laundry Specialists	6201 West Sherman Street	Suite 2	Phoenix	AZ	85043	SAVED
AZZ000019	Asphalt Terminals, LLC	1935 West McDowell Road		Phoenix	AZ	85009	SAVED
AZZ000090	Metal Finishing Solutions, Inc.	46 North 49th Avenue		Phoenix	AZ	85043	SAVED

ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
AZZ000061	Heligear Acquisition Co. dba Northstar Aerospace - Phoenix (401)	401 South 36th Street		Phoenix	AZ	85034	SAVED
AZZ000026	Bottling Group, LLC. - The Pepsi Beverages Company	4242 East Raymond Street		Phoenix	AZ	85040	SAVED
AZZ000131	Sumitomo Chemical Advanced Technologies LLC	3832 East Watkins Street	Suite 200	Phoenix	AZ	85034	SAVED
AZZ000048	Emerald Phoenix LLC (formerly Angelica).	4410 West Mohave Street		Phoenix	AZ	85043	SAVED
AZZ000068	HonorHealth John C. Lincoln Hospital North Mountain	250 East Dunlap Avenue		Phoenix	AZ	85020	SAVED

ID#	Facility Site Name	Address Line 1	Address Line 2	City	State	ZIP Code	Status
AZZ000010	Alsco Inc.	4707 West Camelback Road		Phoenix	AZ	85031	SAVED
AZZ000001	AAA Ajax Pumping Service, Inc.	2433 S 7th Ave		Phoenix	AZ	85007	SAVED

**Question: File Name:**

Answer: NEW Pretreatment Annual Report - COP 23rd Ave WWTP.xlsx

**Significant Industrial Users (SIU) Information | Additional Questions**

**Question: Were there any other modifications to your SIU Inventory that were not already explained?**

Answer: Yes

**Question: Please explain**

Answer: Terminated NSCIUs: Lighting Resources, LLC; SenesTech, Inc; Controlled Thermal Technology, Inc.; Aero Spring & Manufacturing Co., Inc.; Fuels, LLC Name change SIUs: American Industries Diversified, Inc. dba AID Aerospace (formerly Metco); Orthopedic and Surgical Specialty Company, LLC. dba Arizona Specialty Hospital (formerly Southwest Orthopedic and Spine Hospital, LLC. - OASIS Hospital) Newly permitted SIUs: Ladder Industries, Inc. dba Wildeck Inc.; PGS Realty Company, LLC dba Pan Glo Services Ownership change CIUs: PMA Holdings LLC dba UWE/PMA Holdings LLC

**Question: Has any POTW implemented any programs to reduce pollutants from non-domestic users that are not classified as SIUs?**

Answer: Yes

**Question: Provide the programs implemented by any POTW to reduce pollutants:**

Answer: Commercial Inspections - Fats, Oil and Grease program for non-permitted non-domestic user controls; Class B - Industrial User (IU) permits issued to non-SIUs that have high-strength or other discharges that do not meet SIU criteria.

**Question: Has any POTW received RCRA waste during the reporting period?**

Answer: No

**Question: Has any POTW received remediation waste during the reporting period?**

Answer: No

**Question: Were there any enforcement actions taken on the Significant Industrial Users by the Control Authority?**

Answer: Yes

**APEL Extrusions, Inc.**

<b>Name of the facility:</b>	APEL Extrusions, Inc.
<b>Type of Industrial User Enforcement Action:</b>	Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)
<b>Number of Industrial User Enforcement Actions:</b>	2
<b>Describe any proposed actions for bringing the SIU into compliance:</b>	30-Day Resample, TISM, NOV Response; Show Cause Proceeding

**APEL Extrusions, Inc.**

<b>Name of the facility:</b>	APEL Extrusions, Inc.
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**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** N/A

**APEL Extrusions, Inc.**

**Name of the facility:** APEL Extrusions, Inc.

**Type of Industrial User Enforcement Action:** Other Formal Enforcement Action  
Show Cause Proceeding

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** PSA, Civil Penalty, Compliance Schedule, chemical substitution

**Liquid Environmental Solutions of Arizona LLC**

**Name of the facility:** Liquid Environmental Solutions of Arizona LLC

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 12

**Describe any proposed actions for bringing the SIU into compliance:** 30-Day Resample, TISM, NOV Response, Administrative Order

**Liquid Environmental Solutions of Arizona LLC**

**Name of the facility:** Liquid Environmental Solutions of Arizona LLC

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 3

**Describe any proposed actions for bringing the SIU into compliance:** N/A

**PGS Realty Company, LLC dba Pan Glo Services**

**Name of the facility:** PGS Realty Company, LLC dba Pan Glo Services

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 5

**Describe any proposed actions for bringing the SIU into compliance:** 30-Day Resample, TISM, NOV Response, Review Meeting will be scheduled for 2026, Show Cause Proceeding will be scheduled in 2026/2027

**PGS Realty Company, LLC dba Pan Glo Services**

**Name of the facility:** PGS Realty Company, LLC dba Pan Glo Services

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** Additional Sampling

**TSMC Arizona Corporation**

**Name of the facility:** TSMC Arizona Corporation

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 5

**Describe any proposed actions for bringing the SIU into compliance:** 30-Day Resample, TISM, NOV Response, Show Cause Proceeding will be scheduled in 2026/2027

**Upper Crust Bakery**

**Name of the facility:** Upper Crust Bakery

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 11

**Describe any proposed actions for bringing the SIU into compliance:** NOV response, 30-Day Resample, TISM; Administrative Order

**Upper Crust Bakery**

**Name of the facility:** Upper Crust Bakery  
**Type of Industrial User Enforcement Action:** Administrative Order with Fine/Penalty  
**Number of Industrial User Enforcement Actions:** 1  
**Describe any proposed actions for bringing the SIU into compliance:** Cease and Desist Order; Permit Termination

**Wacom Quartz Corp.**

**Name of the facility:** Wacom Quartz Corp.  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)  
**Number of Industrial User Enforcement Actions:** 3  
**Describe any proposed actions for bringing the SIU into compliance:** 30-Day Resample, TISM, NOV Response; Show Cause Proceeding will be scheduled in 2026

**Phoenix Welding Supply Co., LLC**

**Name of the facility:** Phoenix Welding Supply Co., LLC  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)  
**Number of Industrial User Enforcement Actions:** 1  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response

**Purcell Tire Company**

**Name of the facility:** Purcell Tire Company  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)  
**Number of Industrial User Enforcement Actions:** 1  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response

**Dignity Health - St. Joseph's Hospital & Medical Center**

**Name of the facility:** Dignity Health - St. Joseph's Hospital & Medical Center

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** NOV Response

### **Heligear Acquisition Co. dba Northstar Aerospace - Phoenix (300)**

**Name of the facility:** Heligear Acquisition Co. dba Northstar Aerospace - Phoenix (300)

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** N/A

### **Chromalloy Arizona**

**Name of the facility:** Chromalloy Arizona

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** Resample, NOV Response

### **Cintas -Roosevelt St (G&&K Services, Inc.)**

**Name of the facility:** Cintas -Roosevelt St (G&&K Services, Inc.)

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** 30-Day Resample, TISM, NOV Response

### **Liquid Environmental Solutions of Arizona LLC - Magnolia Street**

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**Name of the facility:**

Liquid Environmental Solutions of Arizona LLC -  
Magnolia Street

**Type of Industrial User Enforcement Action:**

Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:**

2

**Describe any proposed actions for bringing the SIU into compliance:**

30-Day Resample, TISM, NOV Response

**Niagara Bottling, LLC**

**Name of the facility:**

Niagara Bottling, LLC

**Type of Industrial User Enforcement Action:**

Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:**

1

**Describe any proposed actions for bringing the SIU into compliance:**

NOV Response

**PAS Technologies, Inc. dba StandardAero**

**Name of the facility:**

PAS Technologies, Inc. dba StandardAero

**Type of Industrial User Enforcement Action:**

Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:**

2

**Describe any proposed actions for bringing the SIU into compliance:**

30-Day Resample, TISM, NOV Response

**APS BioGroup, Inc.**

**Name of the facility:**

APS BioGroup, Inc.

**Type of Industrial User Enforcement Action:**

Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:**

1

**Describe any proposed actions for bringing the SIU into compliance:**

NOV Response

**APS BioGroup, Inc.**

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**Name of the facility:** APS BioGroup, Inc.

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** N/A

**Hydro Extrusions North America, LLC - Remelt Operation**

**Name of the facility:** Hydro Extrusions North America, LLC - Remelt Operation

**Type of Industrial User Enforcement Action:** Other Formal Enforcement Action  
Show Cause Proceeding

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** PSA, Compliance Schedule, Civil Penalty

**ICP Construction, Inc.**

**Name of the facility:** ICP Construction, Inc.

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** N/A

**MEC Arizona Manufacturing LLC (formerly Vital Pharmaceuticals)**

**Name of the facility:** MEC Arizona Manufacturing LLC (formerly Vital Pharmaceuticals)

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** NOV Response, SOP

**Safeway Phoenix Ice Cream Plant**

**Name of the facility:** Safeway Phoenix Ice Cream Plant  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)  
**Number of Industrial User Enforcement Actions:** 1  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response

**Baker Commodities, Inc.**

**Name of the facility:** Baker Commodities, Inc.  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)  
**Number of Industrial User Enforcement Actions:** 1  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response

**Emerald Phoenix LLC (formerly Angelica).**

**Name of the facility:** Emerald Phoenix LLC (formerly Angelica).  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)  
**Number of Industrial User Enforcement Actions:** 2  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response

**Honeywell International, Inc.- Honeywell Aerospace - Phoenix R&O**

**Name of the facility:** Honeywell International, Inc.- Honeywell Aerospace - Phoenix R&O  
**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
 Notice of Concern  
**Number of Industrial User Enforcement Actions:** 1  
**Describe any proposed actions for bringing the SIU into compliance:** N/A

**HonorHealth Sonoran Crossing Medical Center**

**Name of the facility:** HonorHealth Sonoran Crossing Medical Center

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 2

**Describe any proposed actions for bringing the SIU into compliance:** N/A

**Sumitomo Chemical Advanced Technologies LLC**

**Name of the facility:** Sumitomo Chemical Advanced Technologies LLC

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** NOV Response

**Barrel O' Fun Snack Foods Co. Southwest, LLC (Shearer's)**

**Name of the facility:** Barrel O' Fun Snack Foods Co. Southwest, LLC (Shearer's)

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 5

**Describe any proposed actions for bringing the SIU into compliance:** NOV Response, Demand Inspection, Show Cause Proceeding

**Barrel O' Fun Snack Foods Co. Southwest, LLC (Shearer's)**

**Name of the facility:** Barrel O' Fun Snack Foods Co. Southwest, LLC (Shearer's)

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern & pH Waiver

**Number of Industrial User Enforcement Actions:** 2

**Describe any proposed actions for bringing the SIU into compliance:** N/A

**Barrel O' Fun Snack Foods Co. Southwest, LLC (Shearer's)**

**Name of the facility:** Barrel O' Fun Snack Foods Co. Southwest, LLC (Shearer's)

**Type of Industrial User Enforcement Action:** Other Formal Enforcement Action  
Show Cause Proceeding

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** PSA, Civil Penalty, Compliance Schedule

**Café Valley Bakery, Inc.**

**Name of the facility:** Café Valley Bakery, Inc.

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** N/A

**Cintas Corporation**

**Name of the facility:** Cintas Corporation

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** NOC Response

**Mistras Arizona Inspection Services, Inc.**

**Name of the facility:** Mistras Arizona Inspection Services, Inc.

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 3

**Describe any proposed actions for bringing the SIU into compliance:** NOV Response, 30-Day Resample, Temporary Increase in Self-Monitoring, Show Cause Proceeding in 2026/7

**Arizona Foods Group, Inc.(formerly Flavor Right Foods, owned by InstantWhip)**

**Name of the facility:** Arizona Foods Group, Inc.(formerly Flavor Right Foods, owned by InstantWhip)

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 2

**Describe any proposed actions for bringing the SIU into compliance:** NOV Response, Additional Sampling

**Arizona Foods Group, Inc.(formerly Flavor Right Foods, owned by InstantWhip)**

**Name of the facility:** Arizona Foods Group, Inc.(formerly Flavor Right Foods, owned by InstantWhip)

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 2

**Describe any proposed actions for bringing the SIU into compliance:** N/A

**ChemResearch Co., Inc.**

**Name of the facility:** ChemResearch Co., Inc.

**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** NOV Response

**Entrepix, Inc.**

**Name of the facility:** Entrepix, Inc.

**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern

**Number of Industrial User Enforcement Actions:** 1

**Describe any proposed actions for bringing the SIU into compliance:** N/A

## Frontier Group

<b>Name of the facility:</b>	Frontier Group
<b>Type of Industrial User Enforcement Action:</b>	Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)
<b>Number of Industrial User Enforcement Actions:</b>	2
<b>Describe any proposed actions for bringing the SIU into compliance:</b>	30-Day Resample, TISM, NOV Response

## Quantum Global Technology, LLC, dba QuantumClean (Watkins)

<b>Name of the facility:</b>	Quantum Global Technology, LLC, dba QuantumClean (Watkins)
<b>Type of Industrial User Enforcement Action:</b>	Other Informal Enforcement Action Notice of Concern
<b>Number of Industrial User Enforcement Actions:</b>	1
<b>Describe any proposed actions for bringing the SIU into compliance:</b>	N/A

## Cassavant Assembly and Processing

<b>Name of the facility:</b>	Cassavant Assembly and Processing
<b>Type of Industrial User Enforcement Action:</b>	Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)
<b>Number of Industrial User Enforcement Actions:</b>	2
<b>Describe any proposed actions for bringing the SIU into compliance:</b>	NOV Response, Temporary Increase in Self-Monitoring, Additional Sampling, Show Cause Proceeding 2026

## The Procter & Gamble Manufacturing Company

<b>Name of the facility:</b>	The Procter & Gamble Manufacturing Company
<b>Type of Industrial User Enforcement Action:</b>	Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)
<b>Number of Industrial User Enforcement Actions:</b>	1
<b>Describe any proposed actions for bringing the SIU into compliance:</b>	NOV Response

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**bringing the SIU into compliance:**

**Metal Finishing Solutions, Inc.**

**Name of the facility:** Metal Finishing Solutions, Inc.  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)  
**Number of Industrial User Enforcement Actions:** 3  
**Describe any proposed actions for bringing the SIU into compliance:** 30-Day Resample, TISM, NOV Response; Show Cause Proceeding will be scheduled in 2026

**Metal Finishing Solutions, Inc.**

**Name of the facility:** Metal Finishing Solutions, Inc.  
**Type of Industrial User Enforcement Action:** Other Informal Enforcement Action  
Notice of Concern  
**Number of Industrial User Enforcement Actions:** 1  
**Describe any proposed actions for bringing the SIU into compliance:** N/A

**Abrazo Central Campus (Phoenix Baptist Hospital)**

**Name of the facility:** Abrazo Central Campus (Phoenix Baptist Hospital)  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)  
**Number of Industrial User Enforcement Actions:** 13  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response, 30-Day Resample, Temporary Increase in Self-Monitoring, Equipment Repair, Show Cause Proceeding in 2026

**Abrazo Scottsdale Campus**

**Name of the facility:** Abrazo Scottsdale Campus  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)  
**Number of Industrial User Enforcement Actions:** 4

**Describe any proposed actions for bringing the SIU into compliance:**

NOV Response

**Abrazo Scottsdale Campus**

**Name of the facility:**

Abrazo Scottsdale Campus

**Type of Industrial User Enforcement Action:**

Other Formal Enforcement Action

Show Cause Proceeding

**Number of Industrial User Enforcement Actions:**

1

**Describe any proposed actions for bringing the SIU into compliance:**

Civil penalty, PSA

**Advanced United Refining, Inc.**

**Name of the facility:**

Advanced United Refining, Inc.

**Type of Industrial User Enforcement Action:**

Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:**

1

**Describe any proposed actions for bringing the SIU into compliance:**

NOV Response

**Bottling Group, LLC. - The Pepsi Beverages Company**

**Name of the facility:**

Bottling Group, LLC. - The Pepsi Beverages Company

**Type of Industrial User Enforcement Action:**

Other Formal Enforcement Action

Show Cause Proceeding

**Number of Industrial User Enforcement Actions:**

1

**Describe any proposed actions for bringing the SIU into compliance:**

PSA, Civil Penalty

**Bottling Group, LLC. - The Pepsi Beverages Company**

**Name of the facility:**

Bottling Group, LLC. - The Pepsi Beverages Company

**Type of Industrial User Enforcement Action:**

Other Informal Enforcement Action

pH Waiver

**Number of Industrial User Enforcement Actions:**

1

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**Describe any proposed actions for bringing the SIU into compliance:** N/A

**Core Linen Services Inc.**

**Name of the facility:**

Core Linen Services Inc.

**Type of Industrial User Enforcement Action:**

Other Informal Enforcement Action

Notice of Concern

**Number of Industrial User Enforcement Actions:**

1

**Describe any proposed actions for bringing the SIU into compliance:**

N/A

**Modern Industries, Inc. (Air Lane)**

**Name of the facility:**

Modern Industries, Inc. (Air Lane)

**Type of Industrial User Enforcement Action:**

Other Informal Enforcement Action

Notice of Concern

**Number of Industrial User Enforcement Actions:**

1

**Describe any proposed actions for bringing the SIU into compliance:**

Additional Sampling

**Orthopedic and Surgical Specialty Company, LLC, dba Arizona Specialty Hospital**

**Name of the facility:**

Orthopedic and Surgical Specialty Company, LLC, dba Arizona Specialty Hospital

**Type of Industrial User Enforcement Action:**

Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:**

1

**Describe any proposed actions for bringing the SIU into compliance:**

NOV Response

**UniFirst Corporation**

**Name of the facility:**

UniFirst Corporation

**Type of Industrial User Enforcement Action:**

Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 2  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response, 30-Day Resample, Temporary Increase in Self-Monitoring, Additional Sampling

**American Industries Diversified, Inc. dba AID Aerospace**

**Name of the facility:** American Industries Diversified, Inc. dba AID Aerospace  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 2  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response, Additional Sampling

**DS Services of America dba Sparkletts**

**Name of the facility:** DS Services of America dba Sparkletts  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 1  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response

**Global Healing Center**

**Name of the facility:** Global Healing Center  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of Noncompliance, Notice of Continuing Violation)

**Number of Industrial User Enforcement Actions:** 2  
**Describe any proposed actions for bringing the SIU into compliance:** NOV Response, Additional Sampling, 30-Day Resample, TISM

**PMA Holdings LLC dba UWE/PMA Holdings LLC**

**Name of the facility:** PMA Holdings LLC dba UWE/PMA Holdings LLC  
**Type of Industrial User Enforcement Action:** Notice of Violation (a.k.a. Warning Letter, Notice of

<b>Action:</b>	Noncompliance, Notice of Continuing Violation)
<b>Number of Industrial User Enforcement Actions:</b>	1
<b>Describe any proposed actions for bringing the SIU into compliance:</b>	NOV Response, Additional Sampling

# CERTIFICATION OF SUBMISSION

**BERAI N KIMBALL on behalf of CITY OF PHOENIX**

You validated your identity by answering your personal security question and password on myDEQ at **11:09 AM** on **02/26/2026**. At this time, you certified the summary information above by checking that you agreed to the following statement:

## Certify your Submission:

By checking this box I certify under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

**Phoenix Office**

1110 W.Washington Street  
Phoenix, AZ 85007  
(602) 771-2300

**Southern Regional Office**

400 W.Congress Street, Suite 433  
Tucson, AZ 85701  
(520) 628-6733

[www.azdeq.gov](http://www.azdeq.gov)

City of Phoenix, AZ  
Industrial Pretreatment Annual Report  
Supplemental Information  
2025



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

February 27, 2026

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, 2025, and ending December 31, 2025. 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 attachment is the City of Phoenix, Arizona Department of Environmental Quality, IPP Annual Report submittal.

Sincerely,

Jesse Flores  
Principal Engineering Technician

Enclosures:  
EPA & ADEQ Annual Reports (Excel Spreadsheets)

# 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

For the Year Ending December 31, 2025

	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	2	1.59	1.44	µg/L
Effluent	6	5	0.17	0.18	µg/L
Biosolids	8	8	All Non-Detect	-	mg/kg Dry Wt

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

Influent	3	3	All Non-Detect	-	pg/L
Effluent	2	2	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	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-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	12	12	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	11	0.0011	0.0014		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	9	0.0028	0.0107		mg/L
Effluent	4	1	0.0021	0.0028		mg/L
Biosolids	12	2	6.7	10.4		mg/kg Dry Wt
<b>Benzene</b>						
Influent	4	3	0.79	0.35		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	12	All Non-Detect	-	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	4	3	1.46	2.51	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	12	All Non-Detect	-	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	0.290	0.310	mg/L
Effluent	12	0	0.292	0.316	mg/L
Biosolids	0	0	-	-	mg/kg Dry Wt

**Bromodichloromethane**

Influent	4	2	0.58	0.33	µg/L
Effluent	6	0	0.92	1.56	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt

**Bromoform**

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

**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	14	14	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	3.5	4.1	µg/L
Effluent	6	0	1.4	2.0	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Chromium</b>					
Influent	12	0	0.0090	0.0185	mg/L
Effluent	4	3	0.0010	0.0020	mg/L
Biosolids	12	0	61.3	75.2	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	0.145	0.32	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	12	0	763	967	mg/kg Dry Wt
<b>Cyanide, Total (Cyanide samples are discrete samples. )</b>					
Influent	10	10	All Non-Detect	-	mg/L
Effluent	4	4	All Non-Detect	-	mg/L
Biosolids	4	4	All Non-Detect	-	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	4	All Non-Detect	-	µg/L
Effluent	6	1	0.41	0.81	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Dieldrin</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>Diethyl phthalate</b>					
Influent	12	12	All Non-Detect	-	µg/L
Effluent	12	11	6.9	67.8	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Dimethyl 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-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	14	14	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	0.58	0.32	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	12	0	1.8	2.2	mg/L
Effluent	2	0	1.7	1.8	mg/L
Biosolids	0	0	-	-	mg/kg Dry Wt

**Gamma-BHC**

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

**Heptachlor**

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

**Heptachlor epoxide**

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

**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	0.0037	mg/L
Effluent	4	0	All Non-Detect	-	mg/L
Biosolids	12	12	All Non-Detect	-	mg/kg Dry Wt
<b>Mercury</b>					
Influent	13	13	All Non-Detect	-	mg/L
Effluent	4	0	1.13	1.3	ng/L
Biosolids	12	0	0.65	1.48	mg/kg Dry Wt
<b>Methyl bromide (Bromomethane)</b>					
Influent	4	4	All Non-Detect	-	mg/L
Effluent	4	3	0.18	0.32	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	3	2.7	mg/L
Effluent	6	6	All Non-Detect	-	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	0.0086	0.0124	mg/L
Effluent	4	0	0.0066	0.0103	mg/L
Biosolids	12	4	19.5	26.4	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	0.011	0.019	mg/L
Effluent	4	0	0.005	0.006	mg/L

Biosolids	12	5	37.5	54	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	14	14	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	14	14	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	14	14	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	14	14	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	14	14	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	14	14	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	14	14	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	12	All Non-Detect	-	µg/L
Effluent	12	12	All Non-Detect	-	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	7.8	8.7	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	0	1.28	2.16	µg/L
Effluent	6	4	0.1	0.14	µg/L
Biosolids	4	4	All Non-Detect	-	mg/kg Dry Wt
<b>Toxaphene</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>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	0.188	0.306	mg/L
Effluent	4	0	0.016	0.021	mg/L
Biosolids	12	0	911	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, 2025. 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. of the AZPDES Permit.

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Analytical results of effluent samples obtained during 2025 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 Wastewater Treatment Plant (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 the year ending December 31, 2025.

There was one AZPDES permit exceedance during 2025; however, it was not associated with nondomestic users. It is included for informational purposes only. In January, an exceedance of the daily maximum E. Coli limit occurred. The event was caused by a temporary equipment failure and operational problems within the plant. A 5-Day report was submitted to the Arizona Department of Environmental Quality on January 17, 2025.

There were a few occurrences of high loading events at the 23<sup>rd</sup> Avenue WWTP Influent of colored water, high COD, and high Ammonia during 2025. None of these instances resulted in an upset, interference, or pass-through of the plant. During these events, emergency samples were collected at the plant Influent, and upstream collection system if needed, and the Industrial Pretreatment staff assisted with inspections and discussions with the permitted facilities in the sewer shed area.

In August, the plant received dark grey colored slug loads with elevated iron levels, which were traced to the City of Phoenix 24th Street Water Treatment Plant's solids handling facility. The solids discharged to the sewer from the centrifuges contained ferric hydroxide sludge generated during the water treatment process. Staff at the 23rd Avenue Wastewater Treatment Plant are working closely with the 24th Street Water Treatment Plant team to monitor all discharges and ensure continuous compliance with operational treatment standards. During this time, 23<sup>rd</sup> Avenue WWTP did not experience any upsets, interference, or pass-through of the plant.

There were two Aquifer Protection Permit (APP) exceedances observed during 2025 and provided here for informational purposes only. In January and July, an exceedance of the Gross Beta parameter was observed at the Effluent Junction Box, Outfall 002/004. Both exceedances resulted in an APP discharge limit exceedance. The Gross Beta source investigation is currently ongoing, and is believed to be the result of short-lived medical isotopes used in nuclear medicine that are common in wastewater from patients undergoing nuclear diagnosis and treatment. Excreta from individuals undergoing medical treatment 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 plans to investigate up stream of the 23<sup>rd</sup> Avenue WWTP for additional sources and has retained a contracted environmental consultant to assist in the investigation.

## 91st Avenue Wastewater Treatment Plant (WWTP)

Based upon these definitions, there were no violations due to upset, interference, or pass-through that were potentially attributed to nondomestic users of the POTW at the 91<sup>st</sup> Avenue WWTP during the year ending December 31, 2025.

There was one noncompliance plant upset event for elevated ammonia during 2025; however, it was not associated with nondomestic users. In January, a process ammonia sample result of 16.0 mg/L occurred at the Influent to Tres Rios FRW1 compliance sample point due to electrical equipment failure and operational problems within the plant. After power was restored the ammonia levels were decreased by end of day. A 5-Day report was submitted to the Environmental Protection Agency on January 16, 2025.

There was one Aquifer Protection Permit (APP) exceedance observed during 2025 and is provided here for informational purposes only. In May, an exceedance of the APP Alert Level limit for the Gross Beta parameter occurred at the Influent to Tres Rios FRW1 compliance sample point. The City retained an environmental consulting firm to investigate and issued a final report in June 2025. The report concluded that elevated gross beta concentrations are primarily driven by the use of newly approved nuclear oncology therapies containing Lutetium-177 (Lu-177). These treatments, recently authorized by the U.S. Food and Drug Administration (FDA), are utilized for patients with advanced prostate and neuroendocrine cancers. 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.

## 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 is scheduled for completion in 2027, after which the plant will be brought back online.

## 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.

In 2024, the City retained a consultant to complete a written technical evaluation of the need to revise the local limits. The reports were completed and submitted to U.S. Environmental Protection Agency and Arizona Department of Environmental Quality in December 2024 and February 2025. 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.

City of Phoenix  
Significant Non-Compliance  
Industrial User List Published in  
2025

**AFFIDAVIT OF PUBLICATION**

City Of Phoenix- Legals  
City Clerk Ofc/ Lorena Scott  
City Of Phoenix- Legals  
200 W Washington ST  
15TH Floor  
Phoenix AZ 85003-1611

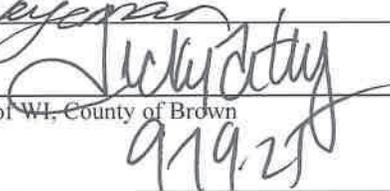
STATE OF WISCONSIN, COUNTY OF BROWN

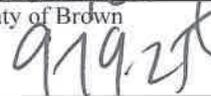
The Arizona Republic, a newspaper published in the city of Phoenix and general circulation in the counties of Maricopa, Coconino, Pima and Pinal, State of Arizona, and personal knowledge of the facts herein state and that the notice hereto annexed was Published in said newspapers in the issue:

03/27/2025

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Sworn to and subscribed before on 03/27/2025

  
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Legal Clerk

  
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Notary, State of WI, County of Brown



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VICKY FELTY  
Notary Public  
State of Wisconsin

**Industrial Users In Significant Noncompliance with  
Applicable Pretreatment Requirements In 2024**

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 Publicly Owned Treatment Works 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 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 403.6(f)(2)(viii), the City of Phoenix, 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, 2024 through December 31, 2024.

Users, and Industrial Users in cases occurring under C, D and H, are in a state of SNC when violations meet one or more of the following:

- A. Chronic SNC (CSNC) violations 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 (TRC) violations, 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 45 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: Gilbert (480) 503-6411, Glendale (623) 930-4758, Mesa (480) 644-2131, Phoenix (602) 495-5926, Scottsdale (480) 391-5667, 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 12/31/2024?	Number of Times Published	Nature of Enforcement Action(s)	Comments
Allied Tube & Conduit Corporation	1 <sup>st</sup> Eval Period Arsenic Daily Maximum TRC	01/25/2024	Yes	1	Notice of Violation Temporary Increase in Self-Monitoring SNC Notification Show Cause Proceeding Pretreatment Settlement Agreement	A Pretreatment Settlement Agreement imposing monetary penalties was executed and is currently in effect.
APEL Extrusions, Inc.	2 <sup>nd</sup> Evaluation Period Chromium Daily Maximum & Monthly Average TRC	03/14/2025	No	1	Notices of Violation Temporary Increase in Self-Monitoring Cease & Desist SNC Notification	Escalated enforcement action is currently pending.
APS BioGroup, Inc.	Late Reporting – Late Sampling Results and Lab Report submitted 112 days late during 4 <sup>th</sup> Quarter	03/14/2025	No	4	Notice of Violation SNC Notification	Escalated enforcement action is currently pending.
Cassavant Assembly & Processing, LLC	2 <sup>nd</sup> Evaluation Period Nickel Daily Maximum TRC	09/30/2024	Yes	2	Notice of Violation Temporary Increase in Self-Monitoring SNC Notification	Escalated enforcement action is currently pending.
Chromalloy Gas Turbine LLC dba Chromalloy Arizona	4 <sup>th</sup> Evaluation Period Copper & Nickel Monthly Average TRC	11/30/2024	Yes	3	Notice of Violation Temporary Increase in Self-Monitoring SNC Notification	Escalated enforcement action is currently pending.
Liquid Environmental Solutions of Arizona, LLC.	4 <sup>th</sup> Evaluation Period Copper Monthly Average TRC	12/31/2024	Yes	5	Notice of Violation Temporary Increase in Self-Monitoring SNC Notification Show Cause Proceeding Monetary Penalty Pretreatment Settlement Agreement	A Pretreatment Settlement Agreement imposing monetary penalties was executed and is currently in effect. Additional escalated enforcement action is currently pending.
Metal Finishing Solutions, Inc.	2 <sup>nd</sup> Evaluation Period Zinc Monthly Average TRC	07/12/2024	Yes	3	Notice of Violation SNC Notification Administrative Order Compliance Schedule Monetary Penalty Cease & Desist Additional Sampling	A Pretreatment Settlement Agreement imposing monetary penalties was executed and is currently in effect. Additional escalated enforcement action is currently pending.
Nistras Arizona Inspection Services LLC	4 <sup>th</sup> Evaluation Period Chromium Monthly Average TRC	12/31/2024	Yes	1	Notice of Violation Temporary Increase in Self-Monitoring SNC Notification	Escalated enforcement action is currently pending.
WHS Acquisition Subsidiary Number 1, Inc. dba Abrazo Scottsdale Campus	Late Reporting – Late NOV Response Reporting Violation submitted 80 days late during 3 <sup>rd</sup> Quarter & Late NOV Response Letter submitted 140 days late during 4 <sup>th</sup> Quarter	03/14/2025	No	1	Notice of Violation SNC Notification	Escalated enforcement action is currently pending.
WHS of Phoenix, Inc. dba Abrazo Central Campus	Late Reporting – Late Temporary Increase in Self-Monitoring (TSM) Reporting Violation submitted 98 days late during 3 <sup>rd</sup> Quarter	03/14/2025	No	3	Notice of Violation SNC Notification	Escalated enforcement action is currently pending.
Wacom Quartz Corp.	3 <sup>rd</sup> Eval Period Fluoride Monthly Average TRC	08/31/2024	Yes	1	Notice of Violation Temporary Increase in Self-Monitoring SNC Notification	Escalated enforcement action is currently pending.

<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 the 2023 annual publication.

City of Phoenix  
Expenditures and Program  
Updates  
2025

## CITY OF PHOENIX

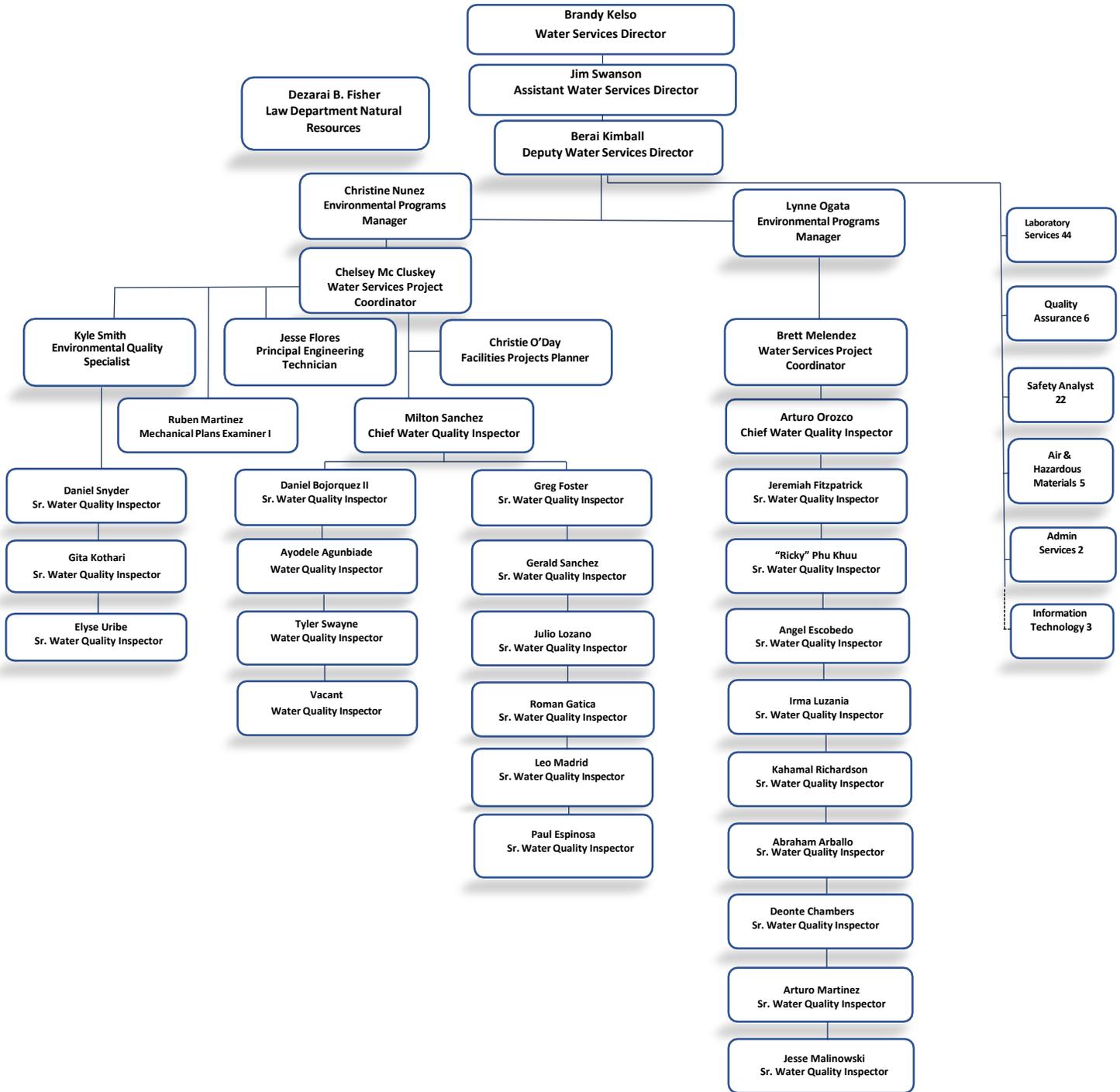
SUMMARY OF PRETREATMENT PROGRAM EXPENDITURES		
January 1, 2025 – December 31, 2025 – Total Pretreatment Expenditures		
		\$ 4,605,405
PRETREATMENT PROGRAM EXPENDITURES		
Personnel		\$2,752,564
Operations & Maintenance		\$746,957
Laboratory		\$1,105,885
Equipment		\$0
Vehicles		\$0
PRETREATMENT PROGRAM EQUIPMENT INVENTORY		
<u>Equipment Name</u>	<u>Purchased 2025</u>	<u>Total 2025</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 2025</u>	<u>Total 2025</u>
Sampling Passenger Vans	0	1
Sampling Pickups	0	1
Inspector Pickups	0	7
Inspector SUVs	0	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 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 2024</u>	<u>FTEs 2025</u>
Deputy Water Services Director	1.0 <sup>3</sup>	1.0 <sup>3</sup>
Environmental Programs Manager Water	0.5 <sup>3</sup>	0.5 <sup>3</sup>
Services Project Coordinator Assistant	1.0	1.5 <sup>3</sup>
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
IPP Chief Water Quality Inspector	1.0	1.0
WW Chief Water Quality Inspector	1.0 <sup>3</sup>	1.0 <sup>3</sup>
IPP Senior Water Quality Inspectors	9.0	10.0
WW Senior Water Quality Inspectors	8 <sup>3</sup>	9 <sup>3</sup>
IPP Water Quality Inspectors	2.0	2.0
WW Water Quality Inspectors	2 <sup>3</sup>	0
Inspector Vacancies	4.0	1.0
Information Technology Application Programmer III	0.25 <sup>3</sup>	0.25 <sup>3</sup>
Information Technology Application Programmer I	0.5 <sup>3</sup>	0.5 <sup>3</sup>
Secretary II	0.25 <sup>3</sup>	0.25 <sup>3</sup>

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

**CITY OF PHOENIX, WATER SERVICES DEPARTMENT, ENVIRONMENTAL & SAFETY  
DIVISION 2025**



## 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. Additionally, the Program submitted a new checklist for a different Certified Off the Shelf solution, SAMS, in late 2024 after discussion with the EPA. The Program intends to receive EPA-authorized program required submissions electronically from regulated facilities in lieu of paper submissions through SAMS once migration from the current database and setup in the new database has been completed. The EPA CROMERR program confirmed that our application for SAMS was compliant on September 26, 2025, and modifications were approved by ADEQ on December 2, 2025.

## 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	3321
Construction Inspections	192
SSO Investigations - Residential Areas (includes apartments)	21
SSO Investigations - Commercial/Industrial Areas	10
Routine/Educational Stormwater Inspections	3321
Notices of Violation	22
Plans Reviewed for Pretreatment	980

#### ▪ ***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, 2025 through December 31, 2025 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	01/25/2025	General Public
Chinese Cultural Week	Phoenix Chinese Week	02/01/2025 – 02/02/2025	General Public
Touch A Truck Event	Touch A Truck Event	02/01/2025	General Public
Grand Canalscape Phase 3 Opening Celebration	Street Transportation Department	03/29/2025	General Public
'Slope Fest	East Sunnyslope Neighborhood Association & Block Watch	04/05/2025	General Public
Earth Day Event Phoenix Zoo	Salt River Project	04/26/2025	General Public
602 Day	Community & Economic Development	06/02/2025	General Public
Monsoon Safety Week	City of Phoenix CIO	06/10/2025	General Public
City of Phoenix GAIN Kick-Off Event	City of Phoenix Police Department	10/04/2025	General Public
Planting Hope, Edison-Eastlake Community Event	Arizona Public Service	10/07/2025	General Public
Sunnyslope Community Center Trunk or Treat	City of Phoenix Parks & Recreation Department	10/18/2025	General Public
City of Phoenix, Thrive Outreach Event	Planning & Development Department	10/21/2025	General Public

Nature Fest Phoenix	Nature Fest Phoenix	11/08/2025	General Public
Arcadia Fall Festival	Arcadia Osborn Neighborhood Association	11/08/2025	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 2025 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 22, 2025	<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>	46
Wastewater Compliance Sampling	Hybrid March 26, 2025		43
Laboratory Analytical Issues	Virtual May 20, 2025		55
Enforcement	Hybrid July 23, 2025		61
Pollution Prevention (P2)	Hybrid September 25, 2025		53
Stormwater Compliance Overview	Webinar November 18, 2025		55

▪ **Social Media Posts**

The Water Services Department published multiple social media posts in 2025 with messaging related to Industrial Pretreatment as well as fats, oil and grease:

- Industrial Pretreatment Program Compliance Academy 2025 Class Schedule – January 22, 2025 (Facebook, Instagram, LinkedIn, X)
- Industrial Pretreatment Program Compliance Academy 2025 Classes – March 26, 2025 (Facebook, Instagram, LinkedIn)
- Industrial Pretreatment Program Compliance Academy Laboratory Analytical Class Advertisement – May 20, 2025 (Facebook, Instagram, LinkedIn)
- Industrial Pretreatment Program Compliance Academy Enforcement Class Advertisement – July 23, 2025 (Facebook, Instagram, LinkedIn)
- Industrial Pretreatment Program Compliance Academy Pollution Prevention Class Advertisement – September 15, 2025 (X)
- Industrial Pretreatment Program Compliance Academy Pollution Prevention Class Advertisement – September 25, 2025 (Facebook, Instagram, LinkedIn)
- Fats, oils, and grease best management practices - February 8, 2025 (Facebook, Instagram, X)

- Fats, oils, and grease best management practices – December 20, 2025 (Facebook, Instagram, X)
- Fats, oils, and grease best management practices – December 22, 2025 (Facebook, Instagram, X)

- ***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:

- FOG/Flushable Wipes – March 2025
- Compliance Academy – June 2025
- Holiday Fats, Oils and Grease – September 2025

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

The Water Services Department, Environmental & Safety Division, continued to issue a biannual newsletter for Spring/Summer and Fall/Winter in 2025. The Spring/Summer 2025 newsletter included information on flushable wipes and messaging on the 3 P's (Pee, Poop and Paper) as well as information about the IPP Compliance Academy. Also, the Fall/Winter 2025 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 2025, the Industrial Pretreatment Section inspected 18 Class B Permittees.
- Class C Wastewater Discharge Permits have replaced 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 2025, the Industrial Pretreatment Section inspected 43 Class C Permittees. The City is in the process of recategorizing 2 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 or multi-day training courses through a City of Phoenix contractor, and obtain certifications through ADEQ. Operator Certifications include Water Distribution, Water Treatment, Wastewater Collection, and Wastewater Treatment.

On August 5-7, 2025, staff attended the 40<sup>th</sup> Annual Tri-State Seminar, located in Las Vegas, Nevada, to present “Remote Sewer Monitoring Technology for Pretreatment Programs” and attended technical sessions regarding a variety of wastewater, pretreatment, safety and leadership topics.

### ▪ **Group Training:**

On April 15-17, 2025, staff attended, volunteered, and presented at the 98<sup>th</sup> 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 July 14-16, 2025, staff attended and provided outreach at the 88th National Environmental Health Association Annual Education Conference (AEC) & Exhibition at the Phoenix Convention Center. The AEC provides environmental health training, education, networking, and advancement for environmental health professionals around the world. Staff sponsored a booth and provided outreach on fats, oils and grease (FOG) and industrial pretreatment, as well as grey water disposal for mobile food trucks, sanitary sewer overflow prevention and stormwater management.

On October 14-25, 2025, staff attended, volunteered and presented at the AZ Water Pretreatment/FOG Fall Workshop held at the Desert Willow Conference Center in Phoenix 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 case studies, investigations, local limits considerations, AI technologies, enforcement, program development and more.

On October 20-24, 2025, staff attended and participated in the Intro to Environmental CRIMES Enforcement training presented by Western States Project training and the Arizona Department of Environmental Quality. The training provided an environmental investigation course designed to give participants a basic understanding and working knowledge of the process and requirements for successful environmental crimes investigations. The course’s primary focus was on the process of enforcement within the regulatory system and how to use environmental crimes enforcement as an effective tool, supplementing administrative and civil enforcement.

## 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 2025. 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 Proceedings 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.