

**City of Phoenix
Industrial Users In Significant Noncompliance with
Applicable Pretreatment Requirements for 2025**

The City of Phoenix, Arizona¹ (City) manages an industrial wastewater pretreatment program to protect the Publicly Owned Treatment Works (POTW), the safety of POTW personnel, and the environment from adverse impacts due to harmful discharges. The City issues wastewater discharge permits to Significant Industrial Users (Users), who must comply with local ordinances and federal regulations.

In accordance with the Federal Clean Water Act and the public participation requirements of 40 CFR Part 25 in the enforcement of the National Pretreatment Standards as defined by 40 CFR 403.8(f)(2)(viii), **the City** is hereby publishing the following list of Users in Significant Noncompliance (SNC) with applicable pretreatment requirements for **the period from January 1, 2025 through December 31, 2025**.

Users, and Industrial Users in cases under categories C, D and H, are considered in SNC when their violations meet one or more of the following criteria:

- 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 the City of Phoenix sewer system, please immediately notify us at (602) 495-5926.

Industrial User	Nature of Violation/ Type of Pollutant	Date Of Last Non-Compliance	Has User Returned to Compliant Status as of 12/31/2025?	Number of Times Published	Nature of Enforcement Action(s)	Comments
Global Healing Center, LLC	2 nd Evaluation Period Copper Daily Maximum TRC	12/27/2025	Yes	2	Notice of Violation 30-Day Resample Temporary Increase in Self-Monitoring SNC Notification	Escalated enforcement action is currently pending.
Gregory Packaging, Inc. – Phoenix Plant	Late Reporting – Incomplete SMR submitted 71 days late during 2 nd Quarter	08/06/2025	Yes	3	Notice of Violation SNC Notification	Escalated enforcement action is currently pending.
Liquid Environmental Solutions of Arizona, LLC.	1 st Evaluation Period p-Cresol Monthly Average TRC	01/28/2026	No	6	Notices of Violation 30-Day Resample Temporary Increase in Self-Monitoring SNC Notification	Escalated enforcement action is currently pending.
PAS Technologies, Inc. dba StandardAero	1 st Evaluation Period Cyanide (T) Monthly Average and Daily Maximum TRC	10/31/2025	Yes	2	Notice of Violation 30-Day Resample Temporary Increase in Self-Monitoring SNC Notification	Escalated enforcement action is currently pending.
PGS Realty Company, LLC dba Pan Glo Services	3 rd Evaluation Period Benzene Daily Maximum Chronic and TRC & 4 th Evaluation Period Benzene Daily Maximum TRC	02/21/2026	No	1	Notices of Violation 30-Day Resamples Temporary Increase in Self-Monitoring SNC Notification	Escalated enforcement action is currently pending.
United General Bakery, Inc. dba Upper Crust Bakery	Late Reporting – Late 24-Hour Notifications submitted 47;55;54 and 51 days late during 2 nd Quarter	01/25/2026	No	4	Notice of Violation SNC Notification Administrative Order Cease and Desist Order	The facility is no longer in operation.
VHS of Phoenix, Inc. dba Abrazo Central Campus	Late Reporting – Late NOV Response submitted 77 days late during 3 rd Quarter	02/24/2026	No	4	Notice of Violation SNC Notification	Escalated enforcement action is currently pending.

¹The 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 91st 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.