INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We Protect Hoosiers and Our Environment.
100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

VIA ELECTRONIC MAIL June 20, 2024

Mr. Scott Gregory, Director of Environmental and Safety
Indiana Packers Corporation
6755 West 100 North
Delphi, IN 46923

Dear Mr. Gregory:

Re: Final IWP Permit No. INP000047
Indiana Packers Corporation
Delphi, IN - Carroll County

Your application for an Industrial Wastewater Pretreatment (IWP) Permit has been processed in accordance with the Indiana Department of Environmental Management's (IDEM) permitting authority under IC 13-15 (formerly IC 13-7-10) and the provisions of 327 IAC 5-21. The enclosed IWP permit covers the discharge from your facility into the Delphi Publicly Owned Treatment Works. All discharges from this facility shall be consistent with the terms and conditions of this permit.

One condition of your permit requires periodic reporting of several effluent parameters. You are required to submit both federal discharge monitoring reports (DMRs) and state Monthly Monitoring Reports (MMRs) on a routine basis. The MMR form is available on the internet at the following web site: https://www.in.gov/idem/cleanwater/wastewater-compliance/wastewater-reporting-forms-notices-and-instructions/.

Once you are on this page, select the “IDEM Forms” page and locate the “Monthly Monitoring Report (MMR) for Industrial Discharge Permits-30530” under the Wastewater Facilities heading. We recommend selecting the “XLS” version because it will complete all of the calculations when you enter the data.

All NPDES permit holders are required to submit their monitoring data to IDEM using NetDMR. Please contact Rose McDaniel at (317) 233-2653 or Helen Demmings at (317) 232-8815 if you would like more information on NetDMR. Information is also available on our website at https://www.in.gov/idem/cleanwater/resources/netdmr/.

Another condition, which needs to be clearly understood, concerns violation of the effluent limitations in this permit. Exceeding the limitations constitutes a violation of the permit and may subject the permittee to criminal or civil penalties. See Part II.B.8 of this

permit for further details. It is very important for your office and treatment plant operator to understand this part of the permit.

The draft IWP permit for Indiana Packers Corporation was made available for public comment from April 30, 2024 through May 31, 2024 as part of Public Notice No. 20240430 – INP000047 – D on IDEM's website at https://www.in.gov/idem/public-notices/public-notices-all-regions/. During this comment period, no comment letters were received.

It should also be noted that any appeal must be filed under procedures outlined in IC 13-15-6, IC 4-21.5, and the enclosed Public Notice. The appeal must be initiated by filing a petition for administrative review with the Office of Environmental Adjudication (OEA) within fifteen (15) days of the emailing of an electronic copy of this letter or within eighteen (18) days of the mailing of a certified copy of this letter by filing at the following addresses:

Director
Office of Environmental Adjudication
Indiana Government Center North
Room N103
100 North Senate Avenue
Indianapolis, Indiana 46204

Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
Room 1301
100 North Senate Avenue
Indianapolis, Indiana 46204

If you have any questions concerning the permit, please contact Matt Warrener at 317-233-0798 or by email at mwarrene@idem.in.gov. More information on the appeal review process is available at the website for the Office of Environmental Adjudication at http://www.in.gov/oea.

Sincerely,

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

Enclosures
cc: Carroll County Health Department
Aaron Molskness, VP of Engineering, Indiana Packers Corporation
Ed Copeland, Vice President, Arcadis
Riley Alexander, EHS Regulatory Compliance Specialist, Arcadis
Richard VanSickle, Superintendent, Delphi POTW
Leigh Voss, Section Chief, IDEM
Aaron Deeter, Inspector, IDEM

STATE OF INDIANA

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
AUTHORIZATION TO DISCHARGE UNDER THE
INDUSTRIAL WASTEWATER PRETREATMENT PROGRAM

INDUSTRIAL WASTEWATER PRETREATMENT (IWP) PERMIT

In accordance with 327 IAC 5-21 and IDEM's permitting authority under IC 13-15, **Indiana Packers Corporation** (hereinafter referred to as the permittee) is authorized to discharge from the facility located at 6755 West 100 North, Delphi, Indiana into the **Delphi Publicly Owned Treatment Works** (POTW), in accordance with the effluent limitations, monitoring requirements, and other conditions set forth in Parts I and II hereof.

EFFECTIVE DATE: September 1, 2024.

EXPIRATION DATE: August 31, 2029.

NOTE: In order to receive authorization to discharge beyond the date of expiration, the permittee must submit a renewal IWP permit application to the Industrial NPDES Permit Section in the Office of Water Quality, no later than one hundred and eighty (180) days prior to the date this permit expires. Failure to do so will result in expiration of the authorization to discharge.

Issued on June 20, 2024 for the Indiana Department of Environmental Management.

Jerry Dittmer, Chief
Permits Branch
Office of Water Quality

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date of this permit, the permittee is authorized to discharge from Outfall 001[1][2]. Outfall 001 is located just prior to the effluent flume before the point of discharge to the City of Delphi POTW. Such discharge shall be limited and monitored by the permittee as specified below:

Table 1

		Discharge Limitations		Monitoring Requirements		
Parameter[3]	**Daily Maximum**	**Weekly Maximum**	**Monthly Average**	**Unit**	**Measurement Frequency**	**Sample Type [3]**
Flow [4]	1.4 [6]	1.2 [6]	1.2 [6]	MGD	Daily	24-Hr. Total
Oil & Grease	670 [6]	670 [6]	670 [6]	lbs/day	1 X Monthly	Grab
$CBOD_5$	3,580 [6]	3,580 [6]	3,580 [6]	lbs/day	Daily	24 Hr. Comp.
TSS	4,390 [6]	4,390 [6]	4,390 [6]	lbs/day	Daily	24 Hr. Comp.
Ammonia (as N)	860 [6]	780 [6]	780 [6]	lbs/day	Daily	24 Hr. Comp.
TKN	Report [6]	Report [6]	Report [6]	lbs/day	Daily	24 Hr. Comp.
COD	Report [6]	Report [6]	Report [6]	lbs/day	Daily	24 Hr. Comp.

Table 2

	Quality or Concentration		Monitoring Requirements		
Parameter	**Daily Minimum**	**Daily Maximum**	**Units**	**Measurement Frequency**	**Sample Type**
pH [5]	5.5 [6]	9.5 [6]	s.u.	Daily	Grab

[1] Outfall 001 shall be designated as the combined wastestreams at the point of discharge to the City of Delphi POTW.

[2] The discharge shall not exceed the local limits in the Sewer Use Ordinance upon entering the City of Delphi POTW. Sec. 52.55(A) of the SUO states, "weekly maximum shall be determined based upon the highest average of a calendar week for which daily discharges are sampled or measured."

[3] A "24-hour composite sample" means a sample consisting of at least 3 individual flow-proportional samples of wastewater, consisting of aliquots withdrawn throughout the 24-hour discharge period. The aliquots may be: (i) uniform aliquots withdrawn at uniform flow intervals; (ii) flow-proportional aliquots withdrawn at uniform time intervals; or (iii) for batch discharge, uniform aliquots withdrawn from uniform batch volumes. A flow-proportioned composite sample may be obtained by:

(1) recording the discharge flow rate at the time each individual sample is taken, (2) adding together the discharge flow rates recorded from each individuals

sampling time to formulate the “total flow” value,
(3) the discharge flow rate of each individual sampling time is divided by the total flow value to determine its percentage of the total flow value,
(4) then multiply the volume of the total composite sample by each individual sample’s percentage to determine the volume of that individual sample which will be included in the total composite sample.

Alternatively, a 24-hour composite sample may be obtained by an automatic sampler on an equal time interval basis over a twenty-four hour period provided that a minimum of 24 samples are taken and combined prior to analysis. The samples do not need to be flow-proportioned if the permittee collects samples in this manner.

[4] The flow must be measured and recorded using valid flow measurement devices, not estimated. The flow monitoring device must be calibrated at least once every twelve (12) months.

[5] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.

[6] Based on local ordinance [Delphi Ordinance No. 2022-4 Section 52.55(B) (adopted January 26, 2022)].

2. ADDITIONAL DISCHARGE PROHIBITIONS

The permittee shall not allow the introduction of the following into the City of Delphi POTW from any location, including Outfall 001:

a. A pollutant from any source of nondomestic wastewaters that could pass through or cause interference with the operation or performance of the City of Delphi POTW.

b. A pollutant that could create a fire or explosion hazard in the City of Delphi POTW, including waste streams with a closed cup flashpoint of less than 140° F degrees Fahrenheit (60° C) using the test methods in 40 CFR 261.21.

c. A pollutant that could cause corrosive structural damage to the City of Delphi POTW, including a discharge with pH lower than five (5.0), unless the City of Delphi POTW is specifically designed to accommodate such a discharge.

d. A solid or viscous pollutant in an amount that could cause obstruction to the flow in a sewer or other interference with the operation of the City of Delphi POTW.

e. A pollutant, including an oxygen demanding pollutant (such as biochemical oxygen demand) released in a discharge at a flow rate or pollutant concentration that could cause interference in the City of Delphi POTW.

f. Heat in an amount that could:

(1) inhibit biological activity in the City of Delphi POTW and result in interference or damage to the City of Delphi POTW; or

(2) exceed 40° C or 104° F at the City of Delphi POTW treatment plant unless the commissioner, upon request of the City of Delphi POTW, approves alternate temperature limits.

g. Petroleum, oil, non-biodegradable cutting oil, or products of mineral oil origin in an amount that could cause interference or pass through.

h. A pollutant that could result in the presence of toxic gases, vapors, or fumes within the City of Delphi POTW in a quantity that may cause acute worker health and safety problems.

i. A trucked or hauled pollutant, except:

(1) with the permission of the City of Delphi POTW; and

(2) when introduced to the City of Delphi POTW’s at a discharge point

designated by the POTW.

3. AFFIRMATIVE DEFENSE

The permittee shall have an affirmative defense in any action brought against the permittee alleging a violation of the prohibitions established in Part I.A.2 of this permit if the permittee can demonstrate that:

a. it did not know or have reason to know that its discharge, alone or in conjunction with a discharge from another source, would cause pass through or interference; and

b. a local limit designed to prevent pass through or interference in accordance with Part I.A.2 of this permit:

(1) was developed for each pollutant in the permittee's discharge that caused pass through or interference, and the permittee was in compliance with each such local limit directly prior to and during the pass-through or interference; or

(2) was not developed for the pollutant that caused the pass through or interference, and the permittee's discharge, directly prior to and during the pass through or interference, had not changed substantially in nature or constituents from its usual discharge condition when the POTW was regularly in compliance with the applicable:

(A) NPDES permit requirements; and

(B) requirements for sewage sludge use or disposal, in the case of interference.

B. DEFINITIONS

1. Daily Discharge

The total mass of a pollutant discharged during the calendar day or, in the case of a pollutant limited in terms other than mass pursuant to 327 IAC 5-2-11(e), the average concentration or other measurement of the pollutant specified over the calendar day or any twenty-four (24) hour period that reasonably represents the calendar day for the purposes of sampling.

2. Daily Maximum (Discharge) Limitation

The maximum allowable daily discharge for any calendar day.

3. Monthly Average Discharge (Average Monthly Discharge)

   The total mass or flow-weighted concentration of all daily discharges sampled or measured during a calendar month on which daily discharges are sampled and measured, divided by the number of daily discharges sampled and/or measured during such month.

4. Monthly Average (Discharge) Limitation

   The highest allowable average monthly discharge for any calendar month.

5. Interference

   a. "Interference" means a discharge that, alone or in conjunction with a discharge or discharges from other sources inhibits or disrupts the:

      (1) treatment processes or operations;

      (2) sludge processes; or

      (3) selected sludge:

         (A) use; or

         (B) disposal methods;

         of a POTW.

   b. The inhibition or disruption under subsection (a) must:

      (1) cause a violation of a requirement of the POTW's NPDES permit, including an increase in the magnitude or duration of a violation; or

      (2) prevent the use of the POTW's sewage sludge or its sludge disposal method selected in compliance with the following statutory provisions, regulations, or permits issued thereunder or more stringent state or local regulations:

         (A) Section 405 of the Clean Water Act (33 U.S.C. 1345).

         (B) The Solid Waste Disposal Act (SWDA) (42 U.S.C. 6901), including:

            (i) Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA); and

(ii) the rules contained in a state sludge management plan prepared pursuant to Subtitle D of the SWDA (42 U.S.C. 6941).

(C) The Clean Air Act (42 U.S.C. 7401).

(D) The Toxic Substances Control Act (15 U.S.C. 2601).

6. Pass-through

"Pass through" means a discharge proceeding through a POTW into waters of the state in quantities or concentrations that, alone or in conjunction with a discharge or discharges from other sources, are 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.

7. Pretreatment requirements

"Pretreatment requirements" means any substantive or procedural requirement related to pretreatment, other than a pretreatment standard, imposed on an industrial user.

8. Pretreatment standards

"Pretreatment standards" means:

a. state pretreatment standards as established in 327 IAC 5-18-8;

b. pretreatment standards for prohibited discharges, as established in 327 IAC 5-18-2; and

c. national categorical pretreatment standards incorporated by reference in 327 IAC 5-2-1.5.

9. Publicly Owned Treatment Works ("POTW")

A treatment works as defined by Section 212(2) of the Clean Water Act owned by the State or a municipality (as defined by Section 502(4) of the Clean Water Act), except that it does not include pipes, sewers or other conveyances not connected to a facility providing treatment. The term includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or compatible industrial wastes. The term also includes sewers, pipes, and other conveyances only if they convey wastewater to a POTW treatment plant. "POTW" also means the municipality, as defined in Section 502(4) of the Clean Water Act, that has jurisdiction over the indirect discharges to and the discharges from such a treatment works.

C. MONITORING AND REPORTING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the entire permitted discharge.

2. Reporting

The permittee shall submit monitoring reports to the Indiana Department of Environmental Management and the Town/City of Delphi containing results obtained during the previous month and shall be submitted no later than the 28th day of the month following each completed monitoring period. The first report shall be submitted by the 28th day of the month following the month in which this permit becomes effective. These reports shall include, but not necessarily be limited to, the Discharge Monitoring Report (DMR) and the Monthly Monitoring Report (MMR). All reports shall be submitted electronically by using the NetDMR application, upon registration, receipt of the NetDMR Subscriber Agreement, and IDEM approval of the proposed NetDMR Signatory. Access the NetDMR website (for initial registration and DMR/MMR submittal) via CDX at: https://cdx.epa.gov/.

If the Town/City of Delphi is agreeable to receiving an electronic version of the monthly reports, copies can be sent to the Town/City of Delphi via NetDMR. An acceptable email address for the Town/City of Delphi must be provided to IDEM's Compliance Data Section. Any non-NetDMR reports sent to the Town/City of Delphi shall be sent to the following:

Certified Operator
Town/City of Delphi
6755 West 100 North
Delphi, IN 46923

The permittee shall also comply with the applicable reporting requirements of 40 CFR 403.12.

3. Monitoring Results

Requirements for test procedures shall be as follows:

a. Test procedures identified in 40 CFR 136 shall be utilized for pollutants or parameters listed in that part, unless an alternative test procedure has been approved under 40 CFR 136.5.

b. Where no test procedure under 40 CFR 136 has been approved, analytical work shall be conducted in accordance with the most recently approved

edition of “Standard Methods for the Examination of Water and Wastewater”, published by the American Public Health Association (APHA) or as otherwise specified by the commissioner in the IWP permit.

c. Notwithstanding subdivision a., the commissioner may specify in a permit the test procedure specified in a standard or effluent limitation guideline.

4. Recording of the Monitoring Results

For each measurement or sample taken pursuant to the requirements of this permit, including the additional monitoring described under Part I.C.5., below, the permittee shall maintain records of all monitoring information and monitoring activities, including:

a. The date, exact place and time of sampling or measurement;

b. The person(s) who performed the sampling or measurements;

c. The date(s) analyses were performed;

d. The person(s) who performed the analyses;

e. The analytical techniques or methods used; and

f. The results of such measurements and analyses.

5. Additional Monitoring by Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the calculation and reporting of the values required in the Monthly Monitoring Report and the Discharge Monitoring Report. Such increased frequency shall also be indicated.

6. Records Retention

a. All records of monitoring activities and results required by this permit (including all original strip chart recordings for continuous monitoring instrumentation and calibration and maintenance records) shall be retained at the permitted facility for a minimum of three (3) years. The three-year period shall be extended:

(1) automatically during the course of any unresolved litigation regarding the discharge of pollutants by the permittee or regarding promulgated effluent guidelines applicable to the permittee; or

(2) as requested by the commissioner.

b. The permittee shall maintain and make available to IDEM, the regional administrator, and the Town/City of Delphi personnel, records of disposal of all wastewater generated at the site. Such records shall include, but not be limited to, flow monitoring records, flow calibration records, and the volume and destination of all wastewater hauled off-site.

7. Additional Reporting Requirements

a. In accordance with 327 IAC 5-16-5(g), all categorical and noncategorical industrial users shall notify the POTW immediately of all discharges that could cause problems to the POTW, including any slug loadings as defined by 40 CFR 403.5(b).

b. In accordance with 327 IAC 5-16-5(h)(2), if sampling performed by an industrial user indicates a violation, the industrial user shall notify the control authority within twenty-four (24) hours of becoming aware of the violation. The industrial user shall also repeat the sampling and analysis and submit the results of the repeat analysis to the control authority within thirty (30) days after becoming aware of the violation.

Where the control authority has performed the sampling and analysis in lieu of the industrial user, the control authority shall perform the repeat sampling and analysis unless it notifies the industrial user of the violation and requires the industrial user to perform the repeat analysis. Resampling is not required if the control authority performs sampling at the industrial user:

(1) at a frequency of at least once per month; or

(2) between the time when the initial sampling was conducted and the time when the industrial user or the control authority receives the results of this sampling.

E. REOPENING CLAUSE

This permit shall be modified, or, alternatively, revoked and reissued, to comply with any applicable effluent limitation or standard issued or approved under Section 307(b) of the Clean Water Act, if the effluent limitation or standard so issued or approved:

1. contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or

2. controls any pollutant not limited in the permit.

The permit, as modified or reissued under this paragraph, shall also contain any other requirements of the Act then applicable.

3. To incorporate new pretreatment limitations issued under any of the applicable subcategories found in 40 CFR 432.

PART II

A. RESPONSIBILITIES

1. Duty to Comply

The permittee must comply with all terms and conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act (CWA) and the Environmental Management Act (EMA) and is grounds for:

a. enforcement action;

b. permit termination, revocation and reissuance, or modification; or

c. denial of a permit renewal application.

A permittee may claim an affirmative defense to a permit violation, however, if the circumstances of the noncompliance meet the criteria of an upset as defined in Part II.A.7, the provisions of Part I.A.3, or any defense as provided by local ordinance.

2. Right of Entry

The permittee shall allow the Commissioner of the Indiana Department of Environmental Management or the Commissioner's authorized representatives (including an authorized contractor acting as a representative of the Commissioner), upon the presentation of the credentials and such other documents as may be required by law:

a. to enter upon the permittee's premises where a point source is located or where any records must be kept under the terms and conditions of this permit;

b. to have access to and copy at reasonable times any records that must be kept under the terms and conditions of this permit;

c. to inspect, at reasonable times:

(1) any monitoring equipment or method;

(2) any collection, treatment, pollution management, or discharge facilities; or

(3) practices required or otherwise regulated under the permit; and

d. to sample or monitor, at reasonable times, any discharge of pollutants or internal wastestream (where necessary to ascertain the nature of a discharge of pollutants) for the purpose of evaluating compliance with the permit or as

otherwise authorized.

3. Change in Discharge

If the permittee intends to add a pollutant not limited by this permit or increase discharge of a pollutant limited by this permit, the permittee must notify the receiving POTW and apply for a permit modification from the commissioner prior to commencing discharge containing the additional pollutant. The application for permit modification must:

a. be completed on a form prescribed by the commissioner;

b. be signed in accordance with 327 IAC 5-2-22(a); and

c. be submitted to the commissioner no later than 120 days prior to the date that the permittee intends to commence discharge containing the additional pollutant.

4. Duty to Mitigate Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the POTW or to waters of the State resulting from noncompliance with the IWP permit, including such accelerated or additional monitoring necessary to determine the nature and impact of the non-complying discharge.

5. Noncompliance Notification

a. If the permittee does not or will not be able to comply for any reason with any discharge limitation specified in this permit, the permittee shall provide the Indiana Department of Environmental Management and the Town/City of Delphi with the following information in writing, within twenty-four (24) hours of becoming aware of the noncompliance.

(1) a description of the discharge and cause of noncompliance.

(2) the period of noncompliance, including exact dates and times of the noncomplying event and the anticipated time when the discharge will return to compliance.

(3) steps being taken to reduce, eliminate, and prevent recurrence of the noncomplying discharge.

The permittee may email the written notification of noncompliance to IDEM at wwreports@idem.in.gov.

b. If the permittee has any unexpected, unintended, abnormal, or unapproved

discharge from the facility into the POTW, the permittee shall comply with the spill reporting and response requirements contained in 327 IAC 2-6.1-7, including the requirement to report the discharge to IDEM and to the receiving POTW within two hours of discovery of the discharge.

6. Spills, Reporting, Containment, and Response

Notwithstanding the permittee's obligations under Part II.A.5 of this permit, the permittee shall comply with the spill reporting, containment, and response requirements in accordance with 327 IAC 2-6.1, as applicable.

7. Upset

a. "Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with any pretreatment standards or requirements in 327 IAC 5-2 because of factors beyond the reasonable control of the permittee. An upset does not include:

(1) noncompliance to the extent caused by operational error;

(2) improperly designed treatment facilities;

(3) inadequate treatment facilities;

(4) lack of preventive maintenance; or

(5) careless or improper operation.

b. An upset shall constitute an affirmative defense to an action brought for noncompliance with the pretreatment standards or requirements if the requirements of subsection (c) are met.

c. In order to establish an affirmative defense of upset, the permittee must provide properly signed, contemporaneous operating logs, or other relevant evidence of the following facts:

(1) An upset occurred and the permittee can identify the cause of the upset.

(2) The facility was being operated at the time in a prudent and workmanlike manner and in compliance with applicable operation and maintenance procedures.

(3) The permittee submitted a report, to the POTW and control authority, within twenty-four (24) hours of becoming aware of the upset or within five (5) days, if an initial verbal report of the information is given to the required authority, and the report contained the following information:

(A) A description of the indirect discharge and cause of noncompliance.

(B) The period of noncompliance, including exact dates and times or the anticipated time the noncompliance is expected to continue if it is not corrected.

(C) Steps being taken or planned for reducing, eliminating, and preventing recurrence of the noncompliance.

d. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset shall have the burden of proof.

e In the usual exercise of prosecutorial discretion, the control authority may review any claims that noncompliance was caused by an upset. No determinations made in the course of the review constitute the commissioner's final action subject to judicial review. The permittee will have the opportunity for a judicial determination on any claim of upset only in an enforcement action brought for noncompliance with the pretreatment standards or requirements.

f. The permittee shall control production or all discharges to the extent necessary to maintain compliance with the pretreatment standards or requirements upon reduction, loss, or failure of its treatment facility until the facility is restored or an alternative method of treatment is provided. This requirement applies when, among other things, the primary source of power of the treatment facility is reduced, is lost, or has failed.

8. Bypass

a. The following definitions apply throughout this permit:

(1) "Bypass" means the intentional diversion of waste streams from any portion of a permittee's treatment facility.

(2) "Severe property damage" means substantial physical damage to property, damage to the treatment facilities that causes them to become inoperable, or substantial and permanent loss of natural resources that can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

b. The permittee may allow a bypass to occur if:

(1) it does not cause a violation of any pretreatment standard or requirement including discharge limitations contained in this permit; and

(2) it is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of Part II.A.8.c. and Part II.A.8.d. of this permit.

c. The reporting requirements for a bypass are as follows:

(1) If the permittee knows in advance of the need for a bypass, it shall submit prior notice to the control authority, if possible, at least ten (10) days before the date of the bypass.

(2) If an unanticipated bypass exceeds a pretreatment standard or requirement including discharge limitations contained in this permit, the permittee shall give oral notice to the control authority within twenty-four (24) hours from the time the permittee becomes aware of the bypass. A written submission shall also be provided to IDEM within five (5) days of the time the permittee becomes aware of the bypass. The written submission must contain the following:

(A) A description of the bypass and its cause.

(B) The duration of the bypass, including exact dates and times and the anticipated time it is expected to continue if the bypass has not been corrected.

(C) The steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.

d. Bypass is prohibited, and an enforcement action may be taken against the permittee for a bypass unless the following are demonstrated:

(1) The bypass was unavoidable to prevent loss of life, personal injury, or severe property damage.

(2) There were no feasible alternatives to the bypass, such as any of the following:

(A) The use of auxiliary treatment facilities.

(B) Retention of untreated wastes.

(C) Maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass that occurred during normal periods of equipment downtime or preventative maintenance.

(3) The permittee submitted notices as required under Part II.A.8.c.

(4) A planned bypass is approved in advance by IDEM after determining that the bypass will not violate Part II.A.8.d.(1) through (3).

9. Facilities Operation and Maintenance

The permittee shall at all times maintain in good working order and efficiently operate all facilities or systems (and related appurtenances) for collection and treatment that are installed or used by the permittee and necessary for achieving compliance with the terms and conditions of this permit in accordance with 327 IAC 5-2-8(9).

This provision does not act as an independent source of authority to set effluent limitations. Such limitations will be based on the design removal rates of installed treatment facilities only as required under this article. Nor should this provision be construed to require the operation of installed treatment facilities that are unessential for achieving compliance with the terms and conditions of the permit.

10. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in compliance with applicable Indiana statutes and rules, including any applicable portions of 327 IAC 6.1 and 329 IAC 10.

11. Power Failures

When a power source is used to operate wastewater treatment facilities in order to maintain compliance with the effluent limitations and prohibitions of this permit, the permittee shall either:

a. provide an alternative power source sufficient to operate facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit; or

b. upon the reduction, loss, or failure of one or more of the primary sources of power to facilities utilized by the permittee to maintain compliance with the effluent limitations and conditions of this permit, the permittee shall halt, reduce, or otherwise control production and/or discharge in order to maintain compliance with the effluent limitations and conditions of this permit.

12. Wastewater Treatment Plant and Certified Operators

Pursuant to IC 13-18-11-11 and 327 IAC 5-23-6, a permittee's wastewater

treatment plant must be under the responsible charge of an operator certified by the Commissioner in a classification corresponding to the classification of the wastewater treatment plant as determined under 327 IAC 5-23-4.

A certified operator may be designated as being in responsible charge of more than one (1) wastewater treatment plant if the requirements under 327 IAC 5-23-7(b) are met. "Operator in responsible charge" is defined at 327 IAC 5 23-2(16).

Pursuant to 327 IAC 5-23-6(4)(A), the permittee shall notify IDEM when there is a change in the person serving as the certified operator in responsible charge of the wastewater treatment facility. The notification shall be made no later than thirty (30) days after a change in the operator and submitted via e-mail to the Compliance Data Section of the Office of Water Quality at WWReports@idem.IN.gov.

13. Construction Permit

The permittee shall not construct, install, or modify any water pollution control facility except in accordance with 327 IAC 3 and IC 13-14-8-11.6. Upon completion of any construction, the permittee must notify the Compliance Evaluation Section of the Office of Water Quality in writing.

14. Containment Facilities

When cyanide or cyanogen compounds are used in any of the processes at this facility the permittee shall provide approved facilities for the containment of any losses of these compounds in accordance with the requirements of 327 IAC 2-2-1.

B. ADDITIONAL RESPONSIBILITIES

1. Effect of Permit Issuance

This permit does not affect any pretreatment requirements, including any standards or prohibitions, established by local ordinance of the Town/City of Delphi.

2. Permit Renewal

If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new IWP permit. An application for an IWP permit must conform to the following:

a. Be completed on a form prescribed by the commissioner;

b. Be signed in accordance with 327 IAC 5-2-22(a);

c. Be submitted to the commissioner no later than one hundred eighty (180) days prior to the expiration date of an existing permit if the industrial user intends to continue discharging to the POTW.

3. Permit Modification

This permit may be modified in whole or in part, revoked and reissued, or terminated during its term for cause in accordance with the pertinent provisions of 327 IAC 5-2-16. The permittee must:

a. report to the commissioner plans for or information about any activity that has occurred or will occur that would constitute cause for modification or revocation and reissuance;

b. comply with the existing IWP permit until it is modified or reissued; and

c. abide by the commissioner's decision:

(1) to modify or revoke and reissue the permit; and

(2) require submission of a new application as required by 327 IAC 5-21-3.

4. Permit Transferability

a. A permit may be transferred by the permittee to a new owner or operator only if the permit has been modified or revoked and reissued under 327 IAC 5-2-16(c)(1) or 16(e)(4), to identify the new permittee and incorporate such other requirements as may be necessary under the CWA. A permit may be transferred to another person by a permittee, without modification or revocation and reissuance being required, if the following occurs:

(1) The current permittee notifies the commissioner at least thirty (30) days in advance of the proposed transfer date.

(2) A written agreement containing a specific date for transfer of permit responsibility and coverage between the current permittee and the transferee (including acknowledgment that the existing permittee is liable for violations up to that date, and that the transferee is liable for violations from that date on) is submitted to the commissioner.

(3) The transferee certifies in writing to the commissioner intent to operate the facility without making such material and substantial alterations or additions to the facility as would significantly change the nature or quantities of pollutants discharged and thus constitute cause for permit modification under 327 IAC 5-2-16(d) . However, the commissioner may allow a temporary transfer of the permit without permit modification for good cause, e.g., to enable the

transferee to purge and empty the facility's treatment system prior to making alterations, despite the transferee's intent to make such material and substantial alterations or additions to the facility.

(4) The commissioner, within thirty (30) days, does not notify the current permittee and the transferee of the intent to modify, revoke and reissue, or terminate the permit and to require that a new application be filed rather than agreeing to the transfer of the permit.

5. Signature Requirements

a. The reports required by Part I.C.2 of this Permit must be signed by one (1) of the following:

(1) A responsible corporate officer. As used in this subdivision, "responsible corporate officer" means:

(A) a president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or

(B) The manager of one (1) or more manufacturing, production, or operating facilities provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty to make major capital investment recommendations, and initiating and directing other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

(2) A general partner or proprietor or manager if the industrial user submitting the reports is a partnership or sole proprietorship, respectively.

(3) A duly authorized representative of the individual designated in either Part II.B.5.a.(1)(A) or Part II.B.5.a.(1)(B) of this permit if:

(A) the authorization is made in writing by the individual described in either Part II.B.5.a.(1)(A) or Part II.B.5.a.(1)(B) of this permit;

(B) the authorization specifies either an individual or a position having

responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of a well, or well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and

(C) the written authorization is submitted to the commissioner.

(4) If an authorization under subdivision (3) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility or overall responsibility for environmental matters for the company, a new authorization satisfying the requirements of subdivision (3) must be submitted to the commissioner prior to or together with any reports to be signed by an authorized representative.

b. A report required by this section that relates to the actual operation of or discharge from a pretreatment facility must be prepared by or under the direction of a wastewater treatment plant operator certified under IC 13-18-11, if a certified operator is required.

6. Penalties for False Reporting

In accordance with 327 IAC 5-2-8(15), Section 309(c)(4) of the Clean Water Act (U.S.C. 1319(c)(4)) provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or noncompliance shall, upon conviction, be punished by a fine of not more than ten thousand dollars ($10,000) per violation, or by imprisonment for not more than one hundred eighty (180) days per violation, or by both.

IC 13-30-10-1 provides that a person who knowingly or intentionally renders inaccurate or inoperative a recording device or a monitoring device required to be maintained by a permit issued by the department commits a class B misdemeanor.

7. Penalties for Tampering or Falsification

In accordance with 327 IAC 5-2-8(10), Section 309(c)(4) of the Clean Water Act (33 U.S.C. 1319(c)(4)) provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under a permit shall, upon conviction, be punished by a fine of not more than ten thousand dollars ($10,000) per violation, or by imprisonment for not more than one hundred eighty (180) days per violation, or by both.

IC 13-30-10-1 provides that a person who knowingly or intentionally renders inaccurate or inoperative a recording device or a monitoring device required to be

maintained by a permit issued by the department commits a class B misdemeanor.

8. Enforcement

a. A violation of the pretreatment rules may:

(1) subject a person causing or contributing to the violation to administrative or judicial enforcement proceedings, under IC 13-30-3, and the penalties provided under IC 13-30-4;

(2) be cause for:

(A) modification;

(B) revocation and reissuance; or

(C) termination;

of the industrial wastewater pretreatment permit; and

(3) warrant the invocation of emergency procedures under IC 13-14-10.

b. The initiation of any action in response to a violation of the pretreatment rules does not preclude initiation of any other response.

c. A violation of the pretreatment rules includes the following:

(1) The indirect discharge of pollutants in contravention of an applicable pretreatment standard or other applicable discharge limitation.

(2) The indirect discharge of pollutants without a permit from a significant industrial discharger as determined by IDEM.

(3) A violation of discharge limitations or other terms and conditions of the permit where an IWP permit is required under the pretreatment rules.

(4) Failure to comply with any other applicable pretreatment requirement.

(5) Failure to:

(A) allow entry, inspection, and monitoring by representatives of the commissioner when requested in accordance with applicable law; or

(B) carry out monitoring, recording, and reporting required under this

permit.

d. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit.

9. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties to which the permittee is or may be subject under Section 311of the Act.

10. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights or infringement of Federal, State, or local laws or regulations.

11. Severability

The provisions of this permit are severable and if any provision of this permit, or the application of any provision of this permit to any circumstances to held invalid, the application of such provision to other circumstances and the remainder of this permit shall not be affected thereby.

Industrial Wastewater Pretreatment (IWP)

Briefing Memo for
Indiana Packers Corporation
Draft April 2024
Final June 2024

Indiana Department of Environmental Management

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

Permittee:	Indiana Packers Corporation P.O. Box 318 Delphi, IN 46923
Existing Permit Information:	Permit Number: INP000047 Expiration Date: August 31, 2024
Facility Contact:	Mr. Scott Gregory, Director of Environmental & Safety 765-564-9703 | sgregory@inpac.com
Facility Location:	6755 West 100 North Delphi, Indiana 46923 Carroll County
Receiving POTW:	City of Delphi Wastewater Treatment Plant 201 South Union Street Delphi, Indiana 46923 NPDES Permit # IN0021377
Proposed Action:	Renew Permit Date Application Received: March 4, 2024
Source Category	Industrial Pretreatment
Permit Writer:	Matt Warrener 317-233-0798 | mwarrene@idem.in.gov

Table of Contents

1.0 INTRODUCTION

The Indiana Department of Environmental Management (IDEM) received an Industrial Wastewater Pretreatment (IWP) Permit application from Indiana Packers Corporation on March 4, 2024. The current five year permit was issued with an effective date of May 1, 2019 in accordance with 327 IAC 5-2-6(a). A five year permit is proposed in accordance with 327 IAC 5-2-6(a).

The Federal Water Pollution Control Act of 1972 and subsequent amendments require a National Pollutant Discharge Elimination System (NPDES) permit for the discharge of wastewater to surface waters. Furthermore, Indiana Statute 13-15-1-2 requires a permit to control or limit the discharge of any contaminants into state waters or into a publicly owned treatment works (POTW). This proposed permit action by IDEM complies with both federal and state requirements.

In accordance with Title 40 of the Code of Federal Regulations (CFR) Sections 124.7 and 124.6, as well as Indiana Administrative Code (IAC) 327 Section 5, development of a Statement of Basis, or Briefing Memo, is required for NPDES permits. This document fulfills the requirements established in those regulations.

This Briefing Memo was prepared in order to document the factors considered in the development of IWP Permit effluent limitations. The technical basis for the Briefing Memo may consist of evaluations of prohibited discharge standards, categorical pretreatment standards, existing effluent quality, and receiving POTW limitations.

2.0 GENERAL

2.1 Facility Description

The permittee processes hog meat products. Manufacturing processes include slaughtering, chilling and processing the hog meat and parts into various products such as ham, loins, ribs, bacon, grease, and/or bone and blood meals. The plant normally operates 24 hours/day, 7 days/week.

The waste flows from the above manufacturing process are subject to the Categorical Pretreatment Standards for Existing Sources under the Meat and Poultry Products Point Source Category. The following subcategories may apply:

40 CFR 432.25 – Subpart B – Complex Slaughterhouses
40 CFR 432.64 – Subpart F – Meat Cutters
40 CFR 432.84 – Subpart H – Ham Processors
40 CFR 432.104 – Subpart J – Renderers

The above subcategories do not currently have pretreatment limits available for existing sources; however, limits may become available in the future. Therefore, if limits become

available under any of the above subcategories during the term of this permit, a permit modification will be required to incorporate applicable limits.

The process waste flows associated with the manufacturing at Indiana Packers Corporation are also subject to the applicable City of Delphi Sewer Use Ordinance (SUO) limitations. The facility accounts for approximately 88% of the discharge to the Delphi POTW and therefore meets the definition of a Significant Industrial User (SIU) as defined by 40 CFR 403.3 (v) and 327 IAC 5-17-23 (a)(2).

The source water for this facility consists of treated water from the City of Delphi (≈85%) and groundwater from a private well (≈15%).

2.2 Receiving POTW

The permittee discharges to the City of Delphi Wastewater Treatment Plant (IN0021377): a Class III, 1.5 MGD oxidation ditch treatment plant with influent flow measurement, a grit removal system, biological treatment via two (2) oxidation ditches, three (3) secondary clarifiers, chlorine disinfection, phosphorus removal, and effluent flow measurement.

The POTW does not serve any other industrial facilities. The City of Delphi POTW discharges to Deer Creek (Q7,10 = 13.3 CFS (8.6 MGD)), a tributary to the Wabash River.

2.3 Discharge Description

The permittee discharges wastewaters from the following sources to the POTW:

Source	Flow (GPD)
Process Wastestream #1:	897,730 (1)
Sanitary:	75,000
Non-Contact Cooling Water:	21,163
Boiler Blowdown:	35,909

(1) Process Wastestream #1 is wastewater from washing, dehairing, carcass preparation, rinsing, and rendering processes.

2.4 Wastewater Pretreatment

Process water from the facility is gravity fed to the rendering tunnel, where a static screen is the first step of solids removal. The flow rate of the process discharge varies from 0 – 1,000 gpm. Solids which are collected on the static screen are sent to rendering.

After flowing through the static screen, process wastewater flows into Pump Pit #1 where it is pumped into a dual drum rotating screen which removes additional solids. Solids which are collected by the rotating screen are loaded into bins and taken to rendering for processing.

After the rotating screen, process wastewater flows into two solids separation units (Flotator #1 and #2) which remove floatable grease, fats, and oils. Solids which settle on the bottom of the flotators are collected and diaphragm-pumped into bins along with the floatable material and taken to rendering for further processing.

After the flotators, process wastewater is directed into Pump Pit #2 and is pumped into a 528,000 gallon buffer tank. This buffer tank can also be utilized as a temporary wastewater storage unit in the event of equipment failure within the permittee's pretreatment system or the City of Delphi POTW.

After the buffer tank, process wastewater flows at a controlled rate into Pump Pit #3, where submersible pumps transfer the wastewater into the flocculation piping which leads to the Primary Chemical dissolved air flotation (DAF) units. Ferric chloride is injected into the wastewater as it enters into the flocculation tubes. The flocculation tubes are 18 feet long and 8 inches in diameter. During this treatment step, the direction of the wastewater is changed twenty-one (21) times to achieve complete mixing. After the wastewater leaves the Primary Chemical DAF flocculation tubes, an anionic polymer is injected into the wastewater before it is directed into the Primary Chemical DAF unit. The average flow of the DAF unit ranges from 400 – 900 gpm. The Primary Chemical DAF units are rated for a flow of 1,320 gpm and has a 10,000-gallon capacity; the retention time is fourteen minutes at a flow rate of 700 gpm. Compressed air is diffused into the recycled water stream of the Primary Chemical DAFs, which assists in the floatation of solids with the chemistry added to the process.

Solids from the Primary Chemical DAFs are skimmed into the float receiver tank and then transferred to a sludge storage tank. Solids in the sludge tank are pumped to two (2) horizontal decanter centrifuges where a cationic polymer is added and the solids are dewatered. The dewatered cake from the centrifuges averages approximately 25-30% dry solids. The dewatered sludge is loaded into trailers and transported to an off-site bio-digester for generating methane to run an electrical generator. The water from the centrifuges is routed back to Pump Pit #2 where it re-circulates through the treatment system.

Effluent from the Primary Chemical DAF units is split. Most of the discharge (85-90%) is routed to a lift station for additional processing, while the remainder (10-15%) is slip streamed. The lift station has two (2) 1,000 gpm pumps which are automatically operated by a float system. These pumps transfer the wastewater into two (2) 1,000,000-gallon equalization tanks. The slip streamed portion of the Primary Chemical DAF unit discharge bypasses the equalization tanks and is directed to the final effluent which discharges to the City of Delphi POTW.

The equalization tanks serve two purposes. 1) To provide flow equalization to the City of Delphi during weekend and non-production periods. 2) To provide aerobic biological degradation of soluble organic matter. Each equalization tank has depth of 19 feet and a diameter of 100 feet. There are 1,725 diffusers in each tank which provide aeration and promote mixing. The diffusers deliver up to 6,989 lbs/day of air to each equalization tank.

Effluent from the equalization tanks is gravity fed to a valve pit which is metered by an automated controller.

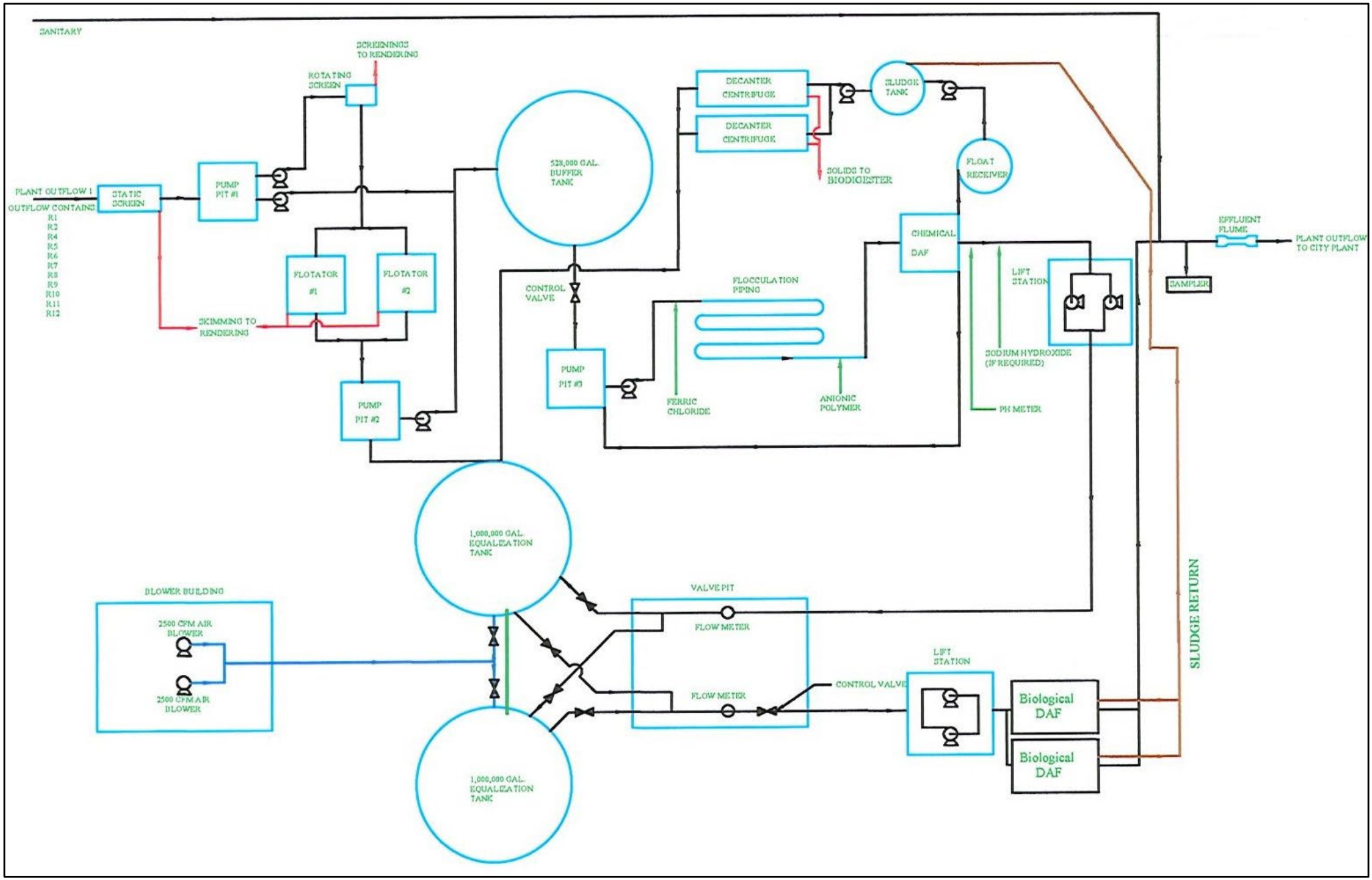
Wastewater in the valve pit flows by gravity to an interceptor/lift station. Pumps are installed on the upstream side of the lift station to transfer wastewater into two (2) 15,000-gallon clarifiers which operate in parallel. Both clarifiers are Biological DAF units which have a continuous flow rate of approximately 520 gpm.

After the Biological DAF units, wastewater flows by gravity to the downstream side of the lift station and to a manhole where it combines with IPC's sanitary wastewater. The combined wastestream is continuously monitored and recorded using a 24-hour composite sampler and Parshall flume, respectively, prior to discharge through Outfall 001 to the City of Delphi sewer system.

The sludge from the Biological DAF units is pumped into the same float receiver tank which serves the Primary Chemical DAF unit. From there, solids are transferred to the solids storage tank and dewatered in the centrifuges before being transported to an off-site bio-digester for methane generation.

A flow diagram has been included as Figure 1:

Figure 1: Flow Diagram



The permittee shall have the wastewater treatment facilities under the responsible charge of an operator certified by the Commissioner in a classification corresponding to the classification of the wastewater treatment plant as required by IC 13-18-11-11 and 327 IAC 5-23-6. Based on information supplied by the permittee, the facility is required to have a Class D Operator.

2.5 Changes in Operation

In the permit application, no changes in operation were identified as occurring since the previous permit renewal.

3.0 PERMIT HISTORY

3.1 Compliance History

The purpose of this section is to summarize any violations and enforcement actions associated with the permit.

A review of this facility's discharge monitoring data was conducted for compliance verification. This review indicates the following permit limitation violations at Outfall 001 between January 2021 and March 2024. There are no pending or current enforcement actions regarding this permit.

Date	Parameter	Violation Type
February 2019	Total Suspended Solids	Daily Maximum
March 2019	Total Suspended Solids	Daily Maximum
September 2019	Total Suspended Solids	Daily Maximum
July 2020	Flow	Monthly Average
October 2020	Ammonia Nitrogen	Daily Maximum
July 2021	BOD	Daily Maximum
July 2021	Ammonia Nitrogen	Daily Maximum
February 2022	Ammonia Nitrogen	Daily Maximum
April 2022	Total Suspended Solids	Daily Maximum
January 2023	Total Suspended Solids	Daily Maximum
January 2024	Flow	Monthly Average

4.0 PERMIT DRAFT DISCUSSION

4.1 Selection of Parameters

This permit regulates the substances and parameters in the permittee's wastewater that are subject to standards found in the Meat and Poultry Products Point Source Category. At this time, this point source category does not have any parameters or limits available for existing pretreatment sources. Therefore, the selected parameters were derived from the City of Delphi SUO.

This permit regulates the substances and parameters in the permittee's raw wastewater that are subject to the City of Delphi SUO, in order to protect the POTW from upset, pass through, or interference. These parameters include: Oil & Grease (O&G), Carbonaceous Biochemical Oxygen Demand ($CBOD_5$), Total Suspended Solids (TSS), Ammonia Nitrogen, Total Kjeldahl Nitrogen (TKN), and Chemical Oxygen Demand (COD).

4.2 Selection of Limits

The permittee's discharge must comply with all standards found in the applicable subcategories in the Meat and Poultry Products Point Source Category (40 CFR 432) that apply at the end of process and any existing local ordinance limits that apply at the end of pipe. At this time, the applicable subcategories in the Meat and Poultry Products Point Source Category do not have any parameters or limits available for existing pretreatment sources. Therefore, the selected limits were derived from the City of Delphi SUO.

As part of the renewal application, the facility requested that the IDEM and the City of Delphi establish season (July 1 through December 31) limits for the monthly maximum flowrate of 1.4 MGD. However, the City of Delphi SUO only contains the flow limitations as provided in Delphi Ordinance No. 2022-4 Section 52.55(B), adopted January 26, 2022. Therefore, this permit will not contain allowance for seasonal flows. The permittee may request the City of Delphi to amend the SUO to allow for seasonal flows. Upon effectiveness of the amended SUO, this permit may be modified to incorporate the changes to the SUO.

The permittee's discharge must comply with the applicable existing local ordinance limits. These limits apply at the point where the discharge enters the city sewer in accordance with the City of Delphi SUO.

4.3 Self-Monitoring Frequency

Self-Monitoring frequency is determined by the pollutants present in the permittees process and compliance history.

To assure compliance with the limits and terms of this permit, State rules [327 IAC 5-21-9 and 10] require the permittee to: (i) monitor the final pretreated discharge at a minimum frequency; and (ii) report the results to this agency. To fulfill this requirement, the samples must be: (i) representative of the daily discharge; and (ii) collected, preserved and analyzed using U.S. EPA-approved materials and methods.

5.0 PERMIT LIMITATIONS

5.1 Summary of Limits and Basis for Each:

Outfall 001

The table below summarizes the permit limits at the designated sample site (Outfall 001) [1][2]. Outfall 001 is located just prior to the effluent flume before the point of discharge to the City of Delphi POTW.

Table 1

Discharge Limitations				Monitoring Requirements		
Parameter	Daily Maximum	Weekly Maximum	Monthly Average	Unit	Measurement Frequency	Sample Type [3]
Flow [4]	1.4 [6]	1.2 [6]	1.2 [6]	MGD	Daily	24-Hr. Total
Oil & Grease	670 [6]	670 [6]	670 [6]	lbs/day	1 X Monthly	Grab
$CBOD_5$	3,580 [6]	3,580 [6]	3,580 [6]	lbs/day	Daily	24 Hr. Comp.
TSS	4,390 [6]	4,390 [6]	4,390 [6]	lbs/day	Daily	24 Hr. Comp.
Ammonia (as N)	860 [6]	780 [6]	780 [6]	lbs/day	Daily	24 Hr. Comp.
TKN	Report [6]	Report [6]	Report [6]	lbs/day	Daily	24 Hr. Comp.
COD	Report [6]	Report [6]	Report [6]	lbs/day	Daily	24 Hr. Comp.

Table 2

Parameter	Daily Minimum	Daily Maximum	Unit	Measurement Frequency	Sample Type
pH [5]	5.5 [6]	9.5 [6]	s.u.	Daily	Grab

[1] Outfall 001 shall be designated as the combined wastestreams at the point of discharge to the City of Delphi POTW.

[2] The discharge shall not exceed the local limits in the SUO upon entering the City of Delphi POTW. Sec. 52.55(A) of the SUO states, “weekly maximum shall be determined based upon the highest average of a calendar week for which daily discharges are sampled or measured.”

[3] A “24-hour composite sample” means a sample consisting of at least 3 individual flow-proportional samples of wastewater, consisting of aliquots withdrawn throughout the 24-hour discharge period. The aliquots may be: (i) uniform aliquots withdrawn at uniform flow intervals; (ii) flow-proportional aliquots withdrawn at uniform time intervals; or (iii) for batch discharge, uniform aliquots withdrawn from uniform batch volumes. A flow-proportioned composite sample may be obtained by:

(1) recording the discharge flow rate at the time each individual sample is taken,
(2) adding together the discharge flow rates recorded from each individuals sampling

time to formulate the “total flow” value,
(3) the discharge flow rate of each individual sampling time is divided by the total flow value to determine its percentage of the total flow value,
(4) then multiply the volume of the total composite sample by each individual sample’s percentage to determine the volume of that individual sample which will be included in the total composite sample.

Alternatively, a 24-hour composite sample may be obtained by an automatic sampler on an equal time interval basis over a twenty-four hour period provided that a minimum of 24 samples are taken and combined prior to analysis. The samples do not need to be flow-proportioned if the permittee collects samples in this manner.

[4] The flow must be measured and recorded using valid flow measurement devices, not estimated. The flow monitoring device must be calibrated at least once every twelve (12) months.

[5] If the permittee collects more than one grab sample on a given day for pH, the values shall not be averaged for reporting daily maximums or daily minimums. The permittee must report the individual minimum and the individual maximum pH value of any sample during the month on the Monthly Monitoring Report form.

[6] Based on local ordinance [Delphi Ordinance No. 2022-4 Section 52.55(B) (adopted January 26, 2022)].

5.2 Post Public Notice Addendum

in.gov/idem/public-notices/public-notices-western-indiana/#carroll

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Carroll				
Indiana Packers Corporation	NPDES Draft Permit Public Notice [PDF]	04/30/2024 - 05/31/2024	Yes	Permit Number: INP000047 Project Manager: Warrener, Matt

The draft IWP permit for Indiana Packers Corporation was made available for public comment from April 30, 2024 through May 31, 2024 as part of Public Notice No. 20240430 – INP000047 – D on IDEM's website at https://www.in.gov/idem/public-notices/public-notices-all-regions/. During this comment period, no comment letters were received.

STATE OF INDIANA
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
PUBLIC NOTICE NO: 20240620 – INP000047 – F
DATE OF NOTICE: June 20, 2024

The Office of Water Quality has issued the following FINAL IWP PERMIT:

MINOR – RENEWAL :

Indiana Packers Corporation, Permit INP000047, CARROLL COUNTY, 6755 West 100 North, Delphi, IN. This facility processes hog meat products. The facility discharges 0.93 million gallons daily of treated process and non-process water into City of Delphi POTW. Permit Manager: Matt Warrener at 317-233-0798 or mwarrene@idem.in.gov. Posted online at https://www.in.gov/idem/public-notices/.

Notice of Right to Administrative Review

If you wish to challenge this Permit, you must file a Petition for Administrative Review with the Office of Adjudication (OEA) and serve a copy of the Petition upon IDEM. The requirements for filing a Petition for Administrative Review are found in IC 4-21.5-3-7, IC 13-15-6-1 and 315 IAC 1-3-2. A summary of the requirements of these laws is provided below.

A Petition for Administrative Review must be filed with the Office of Environmental Adjudication (OEA) within fifteen (15) days of the issuance of this notice (eighteen (18) days if you received this notice by U.S. Mail), and a copy must be served upon IDEM. Addresses are:

Director
Office of Environmental Adjudication
Indiana Government Center North
100 North Senate Avenue - Room N103
Indianapolis, Indiana 46204

Commissioner
Indiana Department of Environmental Management
Indiana Government Center North
100 North Senate Avenue - Room 1301
Indianapolis, Indiana 46204

The Petition must contain the following information:

1. The name, address and telephone number of each petitioner.
2. A description of each petitioner's interest in the Permit.
3. A statement of facts demonstrating that each petitioner is:
   a. a person to whom the order is directed.
   b. aggrieved or adversely affected by the Permit.
   c. entitled to administrative review under any law.
4. The reasons for the request for administrative review.
5. The particular legal issues proposed for review.
6. The alleged environmental concerns or technical deficiencies of the Permit.

7. The Permit terms and conditions that the petitioner believes would be appropriate and would comply with the law.
8. The identity of any persons represented by the petitioner.
9. The identity of the person against whom administrative review is sought.
10. A copy of the Permit that is the basis of the petition.
11. A statement identifying petitioner's attorney or other representative, if any.

Failure to meet the requirements of the law with respect to a Petition for Administrative Review may result in a waiver of your right to seek administrative review of the Permit. Examples are:

1. Failure to file a Petition by the applicable deadline.
2. Failure to serve a copy of the Petition upon IDEM when it is filed; or
3. Failure to include the information required by law.

If you seek to have a Permit stayed during the Administrative Review, you may need to file a Petition for a Stay of Effectiveness. The specific requirements for such a Petition can be found in 315 IAC 1-3-2 and 315 IAC 1-3-2.1.

Pursuant to IC 4-21.5-3-17, OEA will provide all parties with Notice of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action. If you are entitled to Notice under IC 4-21.5-3-5(b) and would like to obtain notices of any pre-hearing conferences, preliminary hearings, hearings, stays, or orders disposing of the review of this action without intervening in the proceeding you must submit a written request to OEA at the address above. More information on the appeal review process is available on the website for the Office of Environmental Adjudication at http://www.in.gov/oea.

ARCADIS

February 29 2024

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Indiana Department of Environmental Management
Office of Water Quality
Industrial NPDES Permits Section
100 North Senate Avenue
Indianapolis, Indiana 46204

Re: IWP Permit Renewal Application
Indiana Packers Corporation
Delphi, Indiana
Permit No. INP000047

Dear Sir or Madam:

Arcadis, U.S., Inc. (Arcadis) on behalf of the Indiana Packers Corporation (IPC), has prepared the enclosed Industrial Wastewater Pretreatment (IWP) Permit renewal application for the IPC facility located in Delphi, Indiana. IPC currently operates under IWP Permit No. INP000047, issued September 1, 2019, with an expiration date of August 31, 2024. The IWP permit renewal application (State Form 50271) is provided in Attachment A.

NPDES

Processes Generating Wastewater

PAID

IPC is a pork meat and processed meat producer. The facility receives live hogs, which are slaughtered, chilled, and then processed as various products (i.e. ham, loins, ribs, bacon, etc.). The inedible products are rendered into various greases and/or bone and blood meals. These processes and the cleaning and sanitation of the product process areas generate process wastewater. Smaller secondary/supporting process that generate wastewater are the boiler system, ammonia refrigeration, and laundry services. Floor drains in all process areas, shipping docks, boiler room, engine room (ammonia refrigeration), and laundry services are connected and flow to the facility's pretreatment plant. IPC discharges an average of one million gallons (MG) and a daily maximum of 1.2 MGD of wastewater into the City of Delphi collection system to be conveyed to the Delphi Publicly Owned Treatment Works (POTW) for treatment.

The wastewater will be pretreated before ultimate discharge through Outfall 001 to the Delphi POTW. The current industrial pretreatment process at IPC includes screening, gravity solids separation, a primary (Chemical) Dissolved Air Flotation (DAF) unit with sludge dewatered via two centrifuge units, two aerated flow equalization/biological treatment tanks, and two secondary Biological DAF units for solids removal. A detailed description of the wastewater pretreatment system is included as Attachment B. A wastewater pretreatment flow diagram is provided as Attachment C. Wastewater sampling data is provided in Attachment D. The potentially affected persons (State Form 49456) are identified in Attachment E. Descriptions of the wastewater discharges required in Part F of the permit application are provided in Attachment F. The plant diagram is included as Attachment G.

Wastewater Characterization

The average results of the wastewater samplings from November 2022 through October 2023 are provided in Table 1 below. A more detailed summary of the effluent mass loading is provided in Attachment D1. A summary of the Discharge Monitoring Report (DMR) data for this period is provided in Attachment D2.

TABLE 1
Wastewater Sample Results

Parameter	Average Discharge Mass Loading (lb/day)
Total Flow	0.897 MGD
pH (s.u.)*	8.26 / 6.26
Oil & Grease	81
CBOD, 5 day	635
Total Suspended Solids (TSS)	1,199
Ammonia (as N)	310
Total Kjeldahl Nitrogen (TKN)	524
COD	2,739

Lb/Day = Pounds per Day
**pH is reported in standard units (s.u.) as the maximum / minimum.*

Discussion of Flow Limits

Consistent with our previous requests and allowances by IDEM and the City of Delphi, IPC requests that IDEM and the Delphi PTOW establish seasonal (July 1 through December 31) limits for the monthly maximum flowrate of 1.4 MGD, and a monthly average flowrate to 1.2 MGD, over the entire permit period. Permit limits of 1.0 MGD monthly average and 1.2 MGD monthly maximum would apply from January 1 through June 30 each year.

If you have any questions or comments, or require additional information, please do not hesitate to contact us.

Sincerely,

Riley M. Alexander
EHS Regulatory Compliance Specialist
Email: riley.alexander@arcadis.com
Direct Line: 317 371 7465

Edward. C. Copeland, P.E.
Vice President, Principal Engineer
Email: ed.copeland@arcadis.com
Direct Line: 317 557 4010

Enclosures:

Attachment A – IWP Permit Renewal Application (State Form 50271)
Attachment B – Description of Wastewater Pretreatment
Attachment C – Wastewater Pretreatment Flow Diagram
Attachment D – Wastewater Sampling Data
Attachment E – Potentially Affected Persons (State Form 49456)
Attachment F – Description of Wastewater Discharges
Attachment G – Plant Diagram

Attachment A

Industrial Wastewater Permit Renewal Application (State Form 50271)

APPLICATION FOR INDUSTRIAL WASTEWATER PRETREATMENT (IWP) PERMIT

State Form 50271 (R3 / 7-22)
Approved by State Board of Accounts, 2022
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

IDEM - Office of Water Quality
Attn: Cashier
Pretreatment Section
100 N. Senate Avenue
Indianapolis, IN 46204
Phone: (317) 232- 8603 or toll-free
1-800-451-6027 (Indiana Residents Only)
http://www.in.gov/idem/water/permits/

INSTRUCTIONS

- ***This form must be accompanied by state form 49456.*** *You may find state form 49456 at http://www.in.gov/icpr/webfile/formsdiv/49456.pdf . Both forms must be submitted together.*
- *Unless stated otherwise, all items are to be filled out completely. Your application will not be considered complete unless every question is answered on this form. If an item is not applicable, indicate by noting "NA" to show that you considered the question.*
- *Depending upon the adequacy of the data submitted for determining issuance of a permit, additional information may be required. Please read all questions and attached information prior to completing this application.*
- *You can fill out this form electronically, using the mouse and keyboard. Simply clickinside of the first form field to begin, and advance to the next fields using the "tab" key on your keyboard, or by clicking in the fields with your mouse. Print the completed form, and submit it to IDEM, OWQ with any additional documentation in your application packet.*
- *As required by 327 IAC 5-21-12, a $100 application fee is required for new or renewal applications. A $50 application fee is required for modification requests. Please enclose a check or money order payable to the Indiana Department of Environmental Management with this form and any supporting attachments and documentation and mail the application package to the address listed in the upper-right side of this page.*
- *This application must be submitted in accordance with 327 IAC 5-21-3, including the time frames thereof.*

Type of IWP Permit

☐ New
☒ Renewal
☐ Modification

IWP PERMIT NUMBER

INP000047

PART A: APPLICANT ADDRESS AND CONTACT(S)

▶FACILITY/OPERATION

1. Facility name: Indiana Packers Corporation

2. Mailing address:
P.O. Box 318

City:	County:	State:	ZIP Code:
Delphi	Carroll	IN	46923

3. Facility phone number: (765) 564-3680

4. Facility e-mail address (optional): sgregory@inpac.com

5. Address of operation:
6755 West 100 North

City:	State:	ZIP Code:
Delphi	IN	46923

DESIGNATED FACILITY CONTACT PERSON

6. Designated contact name (first, last):
Scott Gregory

7. Title:
Director Environmental & Safety

8. Mailing address:
P.O. Box 318

City:	State:	ZIP Code:
Delphi	IN	46923

9. Phone number: (765) 564-9703

10. E-mail address (optional): sgregory@inpac.com

DESIGNATED SIGNATORYAUTHORITY

NOTE: Signatory Authorization is defined in 327 IAC 5-16-5(b)

11. Designated signatory authority name (first, last):
Aaron Molskness

12. Title:
Vice President of Engineering

13. Address:
P.O. Box 318

City:	State:	ZIP Code:
Delphi	IN	46923

14. Phone number: (765) 564-3680

15. E-mail address (optional): amolskness@inpac.com

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(Account No. and Revenue Code: 2830-433800-100600)

RECEIVING POTW: Delphi Wastewater Treatment (POTW)

16. Contact Name: **Richard VanSickle**	**17.** Title: **Utility Superintendent**
18. Address: **225 North State Road 25**	

City:	State:	ZIP Code:
Delphi	IN	46923

19. Phone number: (765) 564-2313	**20.** E-mail address (optional):

PART B: OPERATING SCHEDULE

SHIFT INFORMATION

21. Days of operation *(check all that apply)*: ☒ Mon. ☒ Tue. ☒ Wed. ☒ Thu. ☒ Fri. ☒ Sat. ☒ Sun.

22. Hours per day of operation: 24

23. Number of shifts per day: 3

24. Total number of employees per shift: 1st - 1,146; 2nd - 809; 3rd - 92

DURATION OF OPERATION

25. Date that facility began (or will begin) operation *(mm / dd / yyyy)*: 03/01/1991

26. Indicate whether the operation is (will be):

☒ a. Continuous throughout the year

☐ b. Seasonal (check the boxes below corresponding with the months of active production)

☐ Jan. ☐ Feb. ☐ Mar. ☐ April ☐ May ☐ June ☐ July ☐ Aug. ☐ Sept. ☐ Oct. ☐ Nov. ☐ Dec.

CLOSED-LOOP OPERATIONS

27. Describe any closed-loop operations:

N/A

28. Does this water ever contact the product? ☐ Yes ☒ No

29. Does the system ever discharge to the city sewer? ☐ Yes* ☒ No

***If yes,**

a. How often? _____

b. How much? _____

c. Is this water pretreated? ☐ Yes ☐ No

(Continued on page 3)

PART C: PROCESS DESCRIPTION

30. Describe the product(s) manufactured or service(s) provided:

The facility receives live hogs, which are slaughtered, chilled, and then processed as various products (i.e. ham, loins, ribs, bacon, etc.). Inedible products are rendered into various greases and/or bone and blood meals.

31. Provide a detailed description of the manufacturing process(es) or service activities conducted on premises, especially those processes that involve or generate wastewater (use additional sheets if necessary).

The production process is conducted as five (5) major processes and three (3) secondary/support processes.

Major Processes:

1. The "Kill" process includes stunning, washing, de-hairing, carcass preparation, rinsing, and inspection.
2. The "Chill" process is next and is performed to firm the product to allow for more precise processing. Drain in the Chill floor drain into the facility's pretreatment plant.
3. After chill, the next step is processing the carcass into specific cuts, curing, and then packaging.
4. The rendering process produces fats, greases, blood and bone meals, and other related products.
5. The last major process or step is cleaning and sanitizing of the product processing areas, utilizing hot water and sanitizing chemicals. Floor drains in the process area, shipping docks, boiler room, and engine room (ammonia refrigeration) are connected and flow to the facility's pretreatment plant.

Secondary/Support Processes:

1. Boilers in the boiler building produce steam for the rendering process and hot water for the various other processes throughout the facility. Drains in the boiler building are connected and flow to the facility's pretreatment plant.
2. Ammonia refrigeration is another support process. The facility has two (2) engine rooms with all drains connected and flowing to the facility's pretreatment plant.
3. The facility's laundry washes and dries gloves. Water from the laundry drains directly to the sanitary sewer system.

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PART C: PROCESS DESCRIPTION (CONTINUED)

32. List chemicals and metals used in processes (raw materials):

1) Anhydrous Ammonia
2) Ammonia Quaternary Compounds
3) Chlorine Gas
4) Ferric Chloride
5) Lactic Acid
6) Liquid Smoke
7) Modified Sodium Citrate 100
8) Phosphoric Acid
9) Sodium Bicarbonate
10) Sodium Bisulfate
11) Sodium Hydroxides
12) Sodium Hypochlorite (12.5%)
13) Sodium Nitrates
14) Sulfuric Acid
15)
16)
17)
18)
19)
20)

33. If production-based standards apply, list the amount of production (in units expressed by the standards) that passes through (or will pass through) each process that is subject to a standard (attach list if needed):

IPC is subject to 40 CFR 432, Meat and Poultry Products Point Source Category and more specifically, Subpart B, Complex Slaughterhouses, Section 432.24. Pretreatment standards for existing sources (PSES) is reserved for future use and are not applicable at this time.

PART D: INTAKE WATER INFORMATION

34. In the table below, list intake water sources and volumes:

	SOURCE	VOLUME (GPD)
a.	Municipal Water System* *Specify City: City of Delphi	748,644 [2023 avg.]
b.	Private Well	129,514 [2023 avg.]
c.	Surface Water	N/A
d.	Other** **Specify: 1) Rendering 2) Condenser Blowdown	1) 60,000 [2023 avg.] 2) 10,000 [2023 avg.]

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PART E: WATER LOSS INFORMATION

35. For the following items, provide the average volume of discharge or water loss *(GPD)*.

a. Natural outlet or storm sewer: 0.050 GPD

i) Do you have an NPDES permit for the discharge to the Natural Outlet or Storm Sewer?

☒ Yes* ☐ No

ii) *If yes, provide the permit number: IN0059471

b. Waste hauler: 14,368 GPD

c. Evaporation: 41,000 GPD

d. Contained in product: N/A GPD

e. Other*: 8,000 GPD

*Specify:

Brine solution pumped into pork bellies.

PART F: WASTEWATER DISCHARGE(S) TO SANITARY OR COMBINED SEWERS

36. For each line to the municipal sewer, list average wastewater discharge *(actual, expected or potential - please specify by checking the appropriate box)* from the following sources prior to pretreatment *(if any)*. With a checkmark, indicate the Outfall to which the waste-stream discharges *(if there are additional outfalls, please attach additional copies of this page of the form)*:

	Source	WW Discharge Volume (GPD)	Volume Based On (*Check One*)	Outfall #1	Outfall #2	Outfall #3
a.	Process Waste-stream #1	N/A	☐ Actual Volume ☐ Expected Volume	☐	☐	☐
b.	Process Waste-stream #2	N/A	☐ Actual Volume ☐ Expected Volume	☐	☐	☐
c.	Process Waste-stream #3	N/A	☐ Actual Volume ☐ Expected Volume	☐	☐	☐
d.	Pretreatment Discharge (if any)	897,730 [daily avg.]	☒ Actual Volume ☐ Expected Volume	☒	☐	☐
e.	Boiler Blowdown	35,909 [2-yr avg.]	☐ Actual Volume ☒ Expected Volume	☒	☐	☐
f.	Non-contact Cooling Water (once through)	21,163	☐ Actual Volume ☒ Expected Volume	☒	☐	☐
g.	Sanitary Water	75,000 [daily avg.]	☐ Actual Volume ☒ Expected Volume	☒	☐	☐
h.	Other Specify: 1) Ammonia Refrigeration 2) Laundry Services	1,000 [Discharge from Laundry Svcs. is included in Part 36.g]	☐ Actual Volume ☒ Expected Volume	☒	☐	☐

Include an attachment describing how each flow (36 a.-h. above) is generated See Attachment F

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PART G: WASTEWATER DISCHARGE(S) TO SANITARY OR COMBINED SEWERS (DETAILS)

37. Is the discharge to the sewer?

☒ a. Continuous

☐ b. batch*

*If batch discharge,

i) Provide the frequency of discharge occurrence: _____

ii) What is the average volume (in gallons) of each batch? _____

38. Do you have, or plan to have, automatic sampling equipment or continuous wastewater flow metering equipment at this facility?

a.	Flow metering equipment	☒ Yes[1]	☐ No	☐ N/A
b.	Sampling equipment	☒ Yes[1]	☐ No	☐ N/A

39. If "Yes" for item #38a or #38b, describe the type of flow meter(s) and sampling equipment.

A mixed effluent of wastewater and sanitary sewer water flow through a Parshall flume. The flow is measured using an ultrasonic flow meter. Effluent samples are collected by an automated composite sampler, which is programed to collect a 24-hour composite. The flow meter is calibrated annually.

40. Are any process changes or expansions planned in the immediate future that could alter wastewater volumes or characteristics? (Consider production processes as well as air or water pollution treatment processes that may affect the discharge).

☐ Yes ☒ No

41. Are any materials or water reclamation systems in use or planned?

☒ Yes[2]** ☐ No

42. **If "Yes" for Item #41, describe the recovery process, substances recovered, percent recovered, and the concentrations in the spent solution. Submit a flow diagram for each process. (Attach additional sheets if needed):

IPC has implemented and is considering a number of modifications in-plant to reduce/reuse/recover water and/or thermal energy as part of its global commitment to Sustainability. These modifications are business-sensitive. Therefore, we respectfully submit a claim of confidentiality in accordance with 327 IAC 12.1-4-1, as the changes pertain to manufacturing processes and product handling, and have no material effect on the mass of contaminants present in the wastestream. IPC is also considering modifications to its pretreatment system as a result of changes proposed to the City of Delphi Publicly Owned Treatment Works. These evaluations are on-going at this time.

PART H: CHARACTERISTICS OF DISCHARGE

▸ **BUILDING LAYOUT** See Attachment G.

Submit scale drawings (or blueprints) showing the location of each building on the premises. Show map orientation and location of all water meters, storm drains, numbered unit processes (from schematic flow diagram), and public sewers. Show existing and/or proposed sampling locations.

▸ **SCHEMATIC FLOW DIAGRAM** See Attachment B & C.

For each major activity in which wastewater is or will be generated, on an attached sheet, draw a diagram of the flow of materials, products, water, and wastewater from start of the activity to its completion, showing all unit processes. Indicate which processes use water and which generate wastestreams. Include the average daily volume and maximum daily volume of each wastestream (new facilities or new dischargers may estimate). If estimates are used for flow data, this must be indicated. Number each unit process having wastewater discharges to the community sewer.

(Continued on page 7)

[1] If the facility has, or will have, automatic sampling equipment or continuous wastewater flow metering equipment, please indicate the present or future location of this equipment on the sewer schematic (Part H: Schematic Flow Diagram).

[2] If Yes, attach a description of these changes and their effects on the wastewater volume and characteristics.

PART I: SEWER INFORMATION

▶ **Existing Facility**

43. If source is not connected to sanitary sewer, has the source applied for sanitary sewer hookup?

☐ Yes ☐ No

▶ **NEW FACILITY OR NEW DISCHARGER**

44. Will the source be connected to the public sanitary sewer system?

☐ Yes ☐ No

PART J: TREATMENT

45. Is any form of wastewater treatment practiced at this facility?

☒ Yes ☐ No

46. Do you have a certified operator for your pretreatment facility?

☒ Yes ☐ No

47. Is any form of wastewater treatment (or changes to an existing wastewater treatment) planned for this facility within the immediate future?

☒ Yes* ☐ No

*If yes, please describe:

Please see response to Item #42 above.

48. Description of Pretreatment:

Include step-by-step procedure, including any process equipment, design capacity, and operating conditions. Attach a process-flow diagram of the pretreatment.

A description of pretreatment is included as Attachment B, while a pretreatment process flow diagram is provided as Attachment C.

▶ Attach a process-flow diagram of the pretreatment.

PART K: SAMPLING DATA

49. Attach any representative sampling data[3] pertaining to the facility discharge to the sewer system. Explain below and/or in the attachment(s) where and when the sampling was accomplished, what type of sample was taken (i.e., grab, composite), and how many samples were analyzed. Be sure the sampling and analytical methods conform to 40 CFR Part 136. If they do not, indicate what method was used.

In accordance with the current permit, discharge at Outfall 001 was sampled daily for total flow, pH, CBOD5, TSS, Ammonia, TKN, and COD, and monthly for oil and grease. All samples were 24-hour composites except for the pH and oil and grease samples, which were grab samples. Wastewater sampling data is provided in Attachment D.

▶ Attach any sampling data[3] pertaining to the facility discharge to the sewer system.

(Continued on page 8)

[3] If no sampling data is available, testing must be performed on the discharge for any pollutant believed to be present. The sample must be a 24-hour composite taken during normal production activity and/or representing typical wastewater flows. A representative list of pollutants is contained in Table I (on page 10 of this application). Please check the pollutants you know or suspect of being in your discharge. New facilities should use the table to indicate what pollutants will be present or suspected to be present in proposed wastestreams.

PART L: SPILL PREVENTION

50. Do you have chemical storage containers, bins, or ponds at your facility?

☒ Yes ☐ No

51. Do you have floor drains in your manufacturing or chemical storage area(s)?

☒ Yes** ☐ No

**If yes, identify where they discharge to:

All process floor drains are connected and flow to the facility's pretreatment plant.

▶ Attach a list of the types and quantity of chemicals used or planned for use. Copies of Manufacturer's Safety Data Sheets (MSDS) may be requested for additional information.

PART M: NON-DISCHARGED WASTES

52. Are any waste liquids or sludges generated and not disposed of in the sanitary sewer system?

☒ Yes* ☐ No

*If YES, provide the following information (attach additional sheets if necessary):

	Waste(s) Generated	Quantity (per year; specify units)	Disposal Method
a.	Dewatered Sludge	12,523 ton	Sent to offsite bio-digester
b.	Used Oil	2,300 gal	Recycled
c.	Scald Tub Water	3,168,000 gal	Sent to offsite
d.			
e.			
f.			
g.			
h.			
i.			
j.			

PART N: ADMINISTRATIVE OPERATIONS AND PROCEDURES ACT (AOPA)

▶ On copies of the form entitled, "Identification Of Potentially Affected Persons" (Form # 49456) (available from the IDEM Office of Water Quality or on the Internet at http://www.IN.gov/icpr/webfile/formsdiv/49456.pdf), list the names and addresses of all persons who, to your knowledge, may be potentially affected by the discharge from your facility. The AOPA (Administrative Operations And Procedures Act) requires such parties to be individually notified by IDEM when the proposed and final permit is public noticed. Persons not notified may have the final permit rendered null and void if they have been substantially prejudiced by the lack of notice. See Attachment E.

(Continued on page 9)

PART O: AUTHORIZED REPRESENTATIVE STATEMENT

"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 gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the 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."

Aaron Molskness / Vice President of Engineering
Name/Title

02-29-2024
Date (mm/dd/yyyy)

Aaron Molskness
Signature

(765) 564-3680
Phone # ((xxx) xxx-xxxx)

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TABLE 1: POLLUTANTS OF CONCERN

PRIORITY POLLUTANTS LIST
(40 CFR 403, APPENDIX B)

HEAVY METALS AND INORGANICS

- ☐ Antimony (Sb)md
- ☐ Arsenic (As)
- ☐ Asbestos
- ☐ Beryllium (Be)
- ☐ Cadmium (Cd)
- ☐ Chromium (Cr)
- ☐ Copper (Cu)
- ☐ Cyanides (CN)
- ☐ Lead (Pb)
- ☐ Mercury (Hg)
- ☐ Nickel (Ni)
- ☐ Selenium (Se)
- ☐ Silver (Ag)
- ☐ Thallium (Tl)
- ☐ Zinc (Zn)

TOXIC ORGANICS: ETHERS

- ☐ Ether, bis(2-chloroethyl)
- ☐ Ether, bis(2-chloroisopropyl)
- ☐ Ether, 2-chloroethyl vinyl
- ☐ Ether, 4-chlorophenyl phenyl
- ☐ Ether, 4-bromophenyl phenyl
- ☐ Bis (2-chloroethoxy) methane

TOXIC ORGANICS: PHTHALATES

- ☐ Phthalate, dimethyl; DMP
- ☐ Phthalate, diethyl; DEP
- ☐ Phthalate, di-n-butyl; DBP
- ☐ Phthalate, di-n-octyl; DOP
- ☐ Phthalate, bis(2-ethylhexyl); DEHP
- ☐ Phthalate, butyl benzyl; BBP

TOXIC ORGANICS: NITROGEN COMPOUNDS

- ☐ Nitrosamine, dimethyl-
- ☐ Nitrosamine, diphenyl-
- ☐ Nitrosamine, di-n-propyl-
- ☐ Benzidine
- ☐ Benzidine, 3,3'-dichloro-
- ☐ Hydrazine, 1,2-diphenyl-
- ☐ Acrylonitrile

TOXIC ORGANICS: PHENOLS

- ☐ Phenol
- ☐ Phenol, 2-chloro
- ☐ Phenol, 2,4-dichloro-; 2,4-DCP
- ☐ Phenol, 2,4,6-trichloro-
- ☐ Phenol, pentachloro-; PCP
- ☐ Phenol, 2-nitro-
- ☐ Phenol, 4-nitro-
- ☐ Phenol, 2,4-dinitro-; 2,4-DNP
- ☐ Phenol, 2,4-dimethyl-
- ☐ m-Cresol, p-chloro-
- ☐ o-Cresol, 4,6-dinitro-; DNOC

TOXIC ORGANICS: AROMATICS

- ☐ Benzene
- ☐ Benzene, chloro-
- ☐ Benzene, 1,2-dichloro-
- ☐ Benzene, 1,3-dichloro-
- ☐ Benzene, 1,4-dichloro-
- ☐ Benzene, hexachloro-; HCB
- ☐ Benzene, ethyl-
- ☐ Benzene, nitro-
- ☐ Toluene
- ☐ Toluene, 2,4-dinitro-; DNT
- ☐ Toluene, 2,6-dinitro-
- ☐ Benzene, 1,2,4-trichloro-

TOXIC ORGANICS: POLYNUCLEAR AROMATIC HYDROCARBONS (PAHs)

- ☐ 2-Chloronaphthalene
- ☐ Benzo (a) anthracene
- ☐ Benzo (b) fluoranthene; B(b)F
- ☐ Benzo (k) fluoranthene; B(k)F
- ☐ Benzo (a) pyrene; B(a)P
- ☐ Ideno (1,2,3-cd) pyrene; IP
- ☐ Dibenzo (a,h) anthracene; DBA
- ☐ Benzo (ghi) perylene
- ☐ Acenaphthene
- ☐ Acenaphthylene
- ☐ Anthracene
- ☐ Chrysene
- ☐ Fluoranthene
- ☐ Fluorene
- ☐ Naphthalene
- ☐ Phenanthrene
- ☐ Pyrene

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TOXIC ORGANICS: PCB's

- ☐ PCB-1016; Aroclor 1016
- ☐ PCB-1221; Aroclor 1221
- ☐ PCB-1232; Aroclor 1232
- ☐ PCB-1242; Aroclor 1242
- ☐ PCB-1248; Aroclor 1248
- ☐ PCB-1254; Aroclor 1254
- ☐ PCB-1260; Aroclor 1260

TOXIC ORGANICS: HALOGENATED ALIPHATIC HYDROCARBONS

- ☐ Methane, chloro-; methyl chloride
- ☐ Methane, dichloro-; Methylene chloride
- ☐ Methane, trichloro-; chloroform
- ☐ Methane, tetrachloro-; Carbon tetrachloride
- ☐ Methane, bromo-; methyl bromide
- ☐ Methane, dichlorobromo-
- ☐ Methane, chlorodibromom-
- ☐ Methane, tribromo-; bromoform
- ☐ Ethane, chloro-

TABLE 1: POLLUTANTS OF CONCERN (CONTINUED)

☐	Ethane, 1,1-dichloro-
☐	Ethane, 1,2-dichloro-
☐	Ethane, 1,1,1-trichloro-
☐	Ethane, 1,1,2-trichloro-
☐	Ethane, 1,1,2,2-tetrachloro-
☐	Ethane, hexachloro-
☐	Ethylene, chloro-; Vinyl Chloride
☐	Ethylene, 1,1-dichloro-; 1,1-DCE
☐	Ethylene, 1,2-trans-dichloro-
☐	Ethylene, trichloro-; TCE
☐	Ethylene, tetrachloro-; Perchloroethylene
☐	Propane, 1,2-dichloro-
☐	Propylene, 1,3-dichloro-
☐	Butadiene, hexachloro-; HCBD
☐	Cyclopentadiene, hexachloro-; HCCPD

TOXIC ORGANICS: PESTICIDES

☐	alpha-Endosulfan
☐	Endosulfan sulfate
☐	beta-Endosulfan
☐	Hexachlorocyclohexanes:
☐	
☐	
☐	
☐	
☐	
☐	alpha-BHC
☐	beta-BHC
☐	gamma-BHC
☐	delta-BHC; Lindane
☐	Aldrin; HHDN
☐	Dieldrin; HEOD
☐	4,4'-DDE
☐	4,4'-DDT; p,p'-DDT
☐	4,4'-DDD; p,p'-DDD; p,p'-TDE
☐	Endrin
☐	Endrin aldehyde
☐	Heptachlor
☐	Heptachlor epoxide
☐	Chlordane
☐	Toxaphene

TOXIC ORGANICS: OXYGENATED COMPOUNDS

☐	Acrolein

TOXIC ORGANICS: MISCELLANEOUS

☐	Isophorone
☐	2,3,7,8-tetrachlorodibenzo-p-dioxin; TCDD; dioxin

☒	Biochemical Oxygen Demand (BOD)
☒	pH (Acid or Base)
☒	Total Suspended Solids (TSS)
☒	Oil and Grease (O&G)

NONCONVENTIONAL POLLUTANTS OF CONCERN: (NOT LISTED AS TOXIC OR CONVENTIONAL)

☒	Ammonia (NH3)
☒	Chlorides (Cl-1)
☐	Sulfides (S-2)
☐	Total Dissolved Solids (TDS)
☐	Phosphate (PO4)
☒	Chemical Oxygen Demand (COD)

Attachment B

Description of Wastewater Pretreatment

48. Attachment – Part J: Wastewater Treatment

Plant process water is gravity fed to the Rendering tunnel, where a static screen is the first step of solids removal. The flow rate of the process wastewater may vary from 0 to 1,000 gallons per minute (gpm). Solids are collected from the static screen and sent to rendering.

After the static screen, process wastewater flows into Pump Pit No. 1, where it is pumped into a dual drum rotatory screen that removes solids not retained by the static screen. Solids collected by the rotary screen are loaded into bins and taken to rendering for processing. Process wastewater from the rotary screen then flows into two solids separation units (Floater #1 and #2), which have a capacity of 3,000 gallons each. These floaters (#1 and #2) remove floatable greases, fats, and oils. Solids that settle on the bottom of the floaters are collected and diaphragm pumped into bins with the floatable greases, fats, and oils and taken to rendering for further processing.

After the floaters, process wastewater is directed into Pump Pit #2 and is pumped into a 528,000-gallon buffer tank. This buffer tank can also be utilized as temporary wastewater storage in the event of an equipment failure within the facility's pretreatment plant or Delphi's POTW.

From the buffer tank, process wastewater flows at a controlled rate into Pump Pit No. 3, where submersible pumps transfer the wastewater into the Primary (Chemical) DAF. The average flow is 700 gpm, with flows ranging from 400 to 900 gpm. Ferric chloride is injected into the wastewater as it enters the DAF flocculation tubes. The flocculation tubes are 18 feet in length and 8 inches in diameter. In this step, the wastewater changes direction 21 times to ensure thorough and complete mixing. At the effluent end of the flocculation tube, an anionic polymer is injected into the wastewater before it is directed into the Primary (Chemical) DAF. This DAF is rated for a flow of 1,320 gpm and has a 10,000-gallon capacity with a retention time of 14 minutes at 700 gpm. Compressed air is diffused into the recycled water stream of the DAF, which assists in the floatation of solids with the chemistry added to the process. These solids are skimmed into the float receiver tank and then transferred to a sludge storage tank.

From the sludge tank, the sludge is pumped to two (2) horizontal decanter centrifuges where a cationic polymer is added and then the solids are dewatered. The dewatered cake from the centrifuges averages approximately 25 to 30 percent dry solids. The dewatered sludge is loaded into trailers and transported to an offsite bio-digester for generating methane to run an electrical generator. The water from the centrifuges is routed to Pit No. 2.

The effluent from the Primary DAF is split; a majority of the wastewater is routed to a lift station for further processing, while the remainder (approximately 10%-15%) is slip streamed. The lift station has two (2) 1,000 gpm pumps which are automatically operated by a float system. These pumps transfer the wastewater into two (2) 1,000,000-gallon equalization tanks.

The slip streamed portion of the Primary DAF effluent is directed to the final effluent to the City of Delphi, bypassing the equalization tanks. This is in accordance with an agreement between IPC and the City to facilitate a better CBOD/ammonia ratio for easier treatment at the POTW.

The equalization tanks serve two purposes. The first is flow equalization to the City during weekend and non-production periods. The second is to provide aerobic biological degradation of organic soluble matter. Each equalization tank has a depth of 19 feet and a diameter of 100 feet. There are 1,725 diffusers in each tank to provide aeration and promote mixing. The diffusers deliver up to 6,989 pounds

of air to each equalization tank per day. The effluent is then gravity fed to a valve pit that is metered by an automated controller.

From the valve pit, the wastewater gravity flows to an interceptor/lift station. Pumps are installed on the upstream side of the lift station to transfer wastewater into two (2) clarifiers operated in parallel. The clarifiers are 15,000-gallon Dissolved Air Floatation (DAF) units and are referred to as the Biological DAFs. The DAFs have a continuous flow rate of approximately 520 gpm.

The effluent from the Biological DAFs is gravity fed to the downstream side of the lift station and then to a manhole where it is combined with the facility's sanitary sewer discharge. The combined flow is continuously monitored and recorded by a 24-hour composite sampler and Parshall flume, respectively, prior to discharge through Outfall 001 to the City of Delphi sewer system.

The sludge from the Biological DAFs is pumped into the Primary DAF float receiver tank and processed through the centrifuge dewatering system as described above.

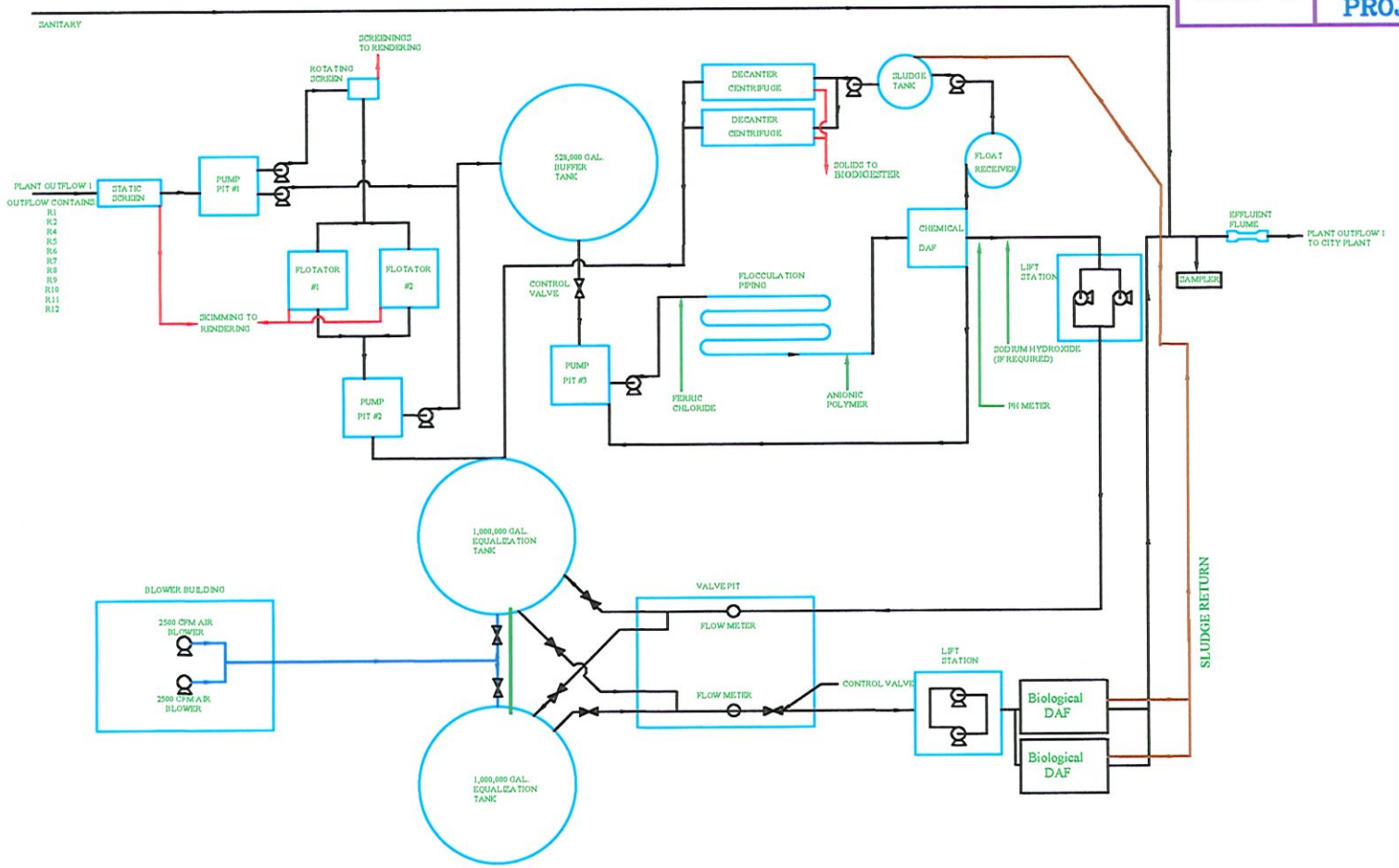
Attachment C

Wastewater Pretreatment Flow Diagram

PFD–1

SITE ID NUM

PROJ–NO



SHEET

REVISION			
NO.	DATE	DESCRIPTION	DATE
1	01/00	General correction	08-23-99
2	03/01	System Modifications Update	SCALE
3	02/14	Added Biological DAF	NONE
4	02/24	Added 2nd Biological DAF	DRAWN BY
5	02/24	Added sludge return Bio-DAFs >Sludge Tank	RWP
			CHECKED BY
			JML

INDIANA PACKERS CORPORATION
DELPHI INDIANA

NOTICE – DO NOT SCALE THIS DRAWING

ESTABLISHMENT NUMBER 17564

WASTE WATER

Attachment D

Wastewater Sampling Data

Date	Outfall 001 Wastewater Sample Results (lb/day)[a,b]								
	Total Flow (MGD)	pH (s.u.)		Oil & Grease[c]	CBOD	TSS	Ammonia	TKN	COD
		Maximum	Minimum						
11/01/2022	1.072	7.79	7.77		1,300	2,058	352	673	4,137
11/02/2022	1.060	7.20	7.19		1,915	2,609	547	973	5,922
11/03/2022	1.075	7.40	7.40		1,350	2,467	622	1,166	5,705
11/04/2022	1.021	7.49	7.49		1,464	2,939	592	1,065	5,713
11/05/2022	0.703	7.62	7.61		543	1,144	432	681	2,508
11/06/2022	0.348	7.92	7.92		155	334	144	283	836
11/07/2022	0.967	7.62	7.61		672	1,345	337	549	3,062
11/08/2022	1.055	6.87	6.86		1,620	1,761	375	627	4,578
11/09/2022	1.061	7.05	7.03	< 44	1,338	1,771	471	719	4,622
11/10/2022	1.074	7.45	7.45		1,279	1,658	405	713	4,329
11/11/2022	1.107	7.74	7.74		586	1,339	380	615	2,891
11/12/2022	1.101	7.07	7.07		405	1,792	298	549	2,412
11/13/2022	0.858	7.05	7.05		95	251	106	420	1,346
11/14/2022	0.987	7.42	7.41		305	659	166	483	1,886
11/15/2022	1.178	7.23	7.21		851	1,081	442	712	3,352
11/16/2022	1.106	7.42	7.42		695	1,800	419	675	3,493
11/17/2022	1.105	7.75	7.73		496	1,445	379	596	2,762
11/18/2022	1.063	7.86	7.85		312	931	346	575	2,125
11/19/2022	0.581	7.81	7.80		533	1,503	161	434	2,861
11/20/2022	0.270	7.36	7.36		38	192	32	121	460
11/21/2022	0.961	6.90	6.90		457	1,002	196	391	2,274
11/22/2022	1.082	7.70	7.70		431	1,219	397	579	2,375
11/23/2022	1.012	7.80	7.80		219	887	342	435	1,942
11/24/2022	0.642	7.57	7.57		200	696	195	386	1,787
11/25/2022	0.966	6.83	6.83		277	806	229	468	1,999
11/26/2022	1.059	7.13	7.13		353	1,458	289	468	2,470
11/27/2022	0.699	7.30	7.30		127	379	140	314	1,178
11/28/2022	0.974	7.53	7.52		258	650	200	474	1,857
11/29/2022	1.054	7.50	7.49		238	792	339	504	1,975
11/30/2022	1.129	7.42	7.41		453	1,178	391	546	2,558
12/01/2022	1.099	7.26	7.26		244	1,009	398	512	2,114
12/02/2022	1.105	7.55	7.54		888	1,383	494	745	3,232
12/03/2022	0.906	7.64	7.64		552	1,739	322	530	3,950
12/04/2022	0.253	7.50	7.49		35	391	56	120	850
12/05/2022	0.930	6.95	6.95		883	1,203	321	529	3,232
12/06/2022	1.135	7.45	7.44		1,011	1,231	473	732	3,519
12/07/2022	1.070	7.82	7.82		772	1,116	459	658	3,286
12/08/2022	0.967	7.66	7.66		343	1,291	382	494	2,219
12/09/2022	1.050	7.09	7.09		736	1,490	472	585	2,856
12/10/2022	1.006	7.18	7.18		254	1,343	417	482	2,023
12/11/2022	0.664	7.11	7.11		57	305	175	335	884
12/12/2022	0.925	7.48	7.45		677	926	274	495	2,482
12/13/2022	1.079	7.51	7.50	120	759	1,081	397	644	2,823
12/14/2022	1.045	7.82	7.82		1,226	1,788	474	767	4,033
12/15/2022	1.054	7.26	7.24		1,033	1,451	549	756	3,637
12/16/2022	1.020	7.71	7.71		538	1,234	500	697	2,971
12/17/2022	0.985	7.99	7.99		413	1,192	449	685	2,692
12/18/2022	0.729	7.64	7.64		110	213	234	411	1,192
12/19/2022	0.979	7.32	7.31		271	694	242	540	2,067
12/20/2022	1.006	7.39	7.39		369	965	310	537	2,011
12/21/2022	0.843	7.27	7.27		167	739	241	488	1,952
12/22/2022	0.954	7.27	7.27		136	677	253	502	2,122
12/23/2022	0.465	7.60	7.59		204	524	126	308	1,418

Date	Outfall 001 Wastewater Sample Results (lb/day)[a,b]								
	Total Flow (MGD)	pH (s.u.)		Oil & Grease[c]	CBOD	TSS	Ammonia	TKN	COD
		Maximum	Minimum						
12/24/2022	0.373	7.59	7.58		193	327	72	184	1,108
12/25/2022	0.336	7.16	7.14		132	322	44	156	1,019
12/26/2022	0.333	6.98	6.98		396	903	56	176	1,785
12/27/2022	1.131	7.20	7.19		1,228	1,085	354	747	4,252
12/28/2022	1.099	7.42	7.41		672	1,146	426	716	3,279
12/29/2022	1.134	7.49	7.49		842	1,278	592	856	3,852
12/30/2022	0.916	7.54	7.53		2,729	1,987	681	1,001	6,861
12/31/2022	1.051	7.17	7.17		2,530	2,543	758	1,088	7,464
01/01/2023	0.322	7.50	7.50		676	699	210	238	2,213
01/02/2023	0.444	7.60	7.59		1,191	1,667	283	471	4,272
01/03/2023	0.933	7.33	7.33		841	1,713	367	617	3,959
01/04/2023	1.024	7.35	7.35		960	2,094	527	914	4,982
01/05/2023	1.067	7.17	7.17		1,344	2,360	681	1,095	5,058
01/06/2023	1.051	7.26	7.25		1,427	2,368	726	1,166	5,657
01/07/2023	0.624	7.69	7.68		706	1,484	449	635	3,038
01/08/2023	0.722	7.31	7.31		2,967	1,416	680	874	6,335
01/09/2023	1.065	6.76	6.75		2,848	1,733	529	858	6,315
01/10/2023	1.018	7.13	7.12		3,073	4,078	776	1,215	8,538
01/11/2023	0.797	7.58	7.58	< 33	2,867	4,988	775	1,051	9,172
01/12/2023	1.003	7.34	7.33		1,151	3,348	580	954	5,696
01/13/2023	1.085	7.11	7.09		827	2,626	621	933	4,115
01/14/2023	1.143	7.39	7.39		754	1,908	607	880	3,629
01/15/2023	0.260	7.54	7.54		40	119	113	190	483
01/16/2023	0.950	7.00	6.98		519	1,031	404	562	3,005
01/17/2023	0.937	6.97	6.97		906	1,486	577	852	3,272
01/18/2023	1.036	7.30	7.30		1,881	2,421	725	1,081	7,232
01/19/2023	0.659	7.44	7.44		1,205	2,447	450	858	4,482
01/20/2023	0.813	7.29	7.27		2,103	3,290	577	909	6,706
01/21/2023	1.033	7.93	7.92		1,207	2,500	795	1,164	5,086
01/22/2023	0.909	8.20	8.19		622	1,290	728	1,062	3,156
01/23/2023	1.032	7.69	7.69		1,482	1,809	691	1,051	4,823
01/24/2023	1.093	7.50	7.50		841	1,779	638	958	3,603
01/25/2023	1.091	7.70	7.69		622	1,866	564	869	5,130
01/26/2023	1.110	7.62	7.60		763	1,343	546	924	3,381
01/27/2023	0.991	7.77	7.76		558	1,116	350	630	2,435
01/28/2023	0.616	8.03	8.02		521	977	243	415	1,984
01/29/2023	0.381	7.89	7.88		84	270	127	254	706
01/30/2023	1.023	7.58	7.57		798	1,579	457	625	4,554
01/31/2023	1.000	7.52	7.52		2,143	2,754	432	749	6,013
02/01/2023	1.023	7.23	7.22		1,499	2,092	339	764	4,350
02/02/2023	0.814	7.05	7.05		911	1,325	292	636	3,047
02/03/2023	1.070	7.74	7.73		1,973	2,813	544	819	5,532
02/04/2023	0.399	7.67	7.67		386	816	174	281	1,575
02/05/2023	0.508	7.62	7.62		334	615	214	370	1,378
02/06/2023	1.048	7.27	7.26		1,697	1,749	424	659	4,473
02/07/2023	1.061	7.75	7.74	116	1,435	1,461	416	714	3,816
02/08/2023	1.004	7.34	7.32		1,778	1,843	429	743	5,396
02/09/2023	0.998	7.59	7.58		1,030	1,874	390	704	3,910
02/10/2023	1.085	7.85	7.84		1,546	2,399	523	897	5,559
02/11/2023	0.669	7.79	7.78		404	893	265	429	1,974
02/12/2023	0.239	7.92	7.92		32	529	51	103	2,566
02/13/2023	0.927	7.85	7.84		1,429	1,625	360	653	4,266
02/14/2023	1.046	7.92	7.92		2,368	2,531	432	846	6,520

49. Attachment – Part K: Sampling Data

Date	Outfall 001 Wastewater Sample Results (lb/day)[a,b]								
	Total Flow (MGD)	pH (s.u.)		Oil & Grease[c]	CBOD	TSS	Ammonia	TKN	COD
		Maximum	Minimum						
02/15/2023	0.969	7.79	7.78		2,056	2,668	364	825	5,988
02/16/2023	1.004	7.25	7.24		1,750	2,178	425	755	5,274
02/17/2023	0.954	7.23	7.22		1,295	2,110	471	712	4,168
02/18/2023	0.505	7.34	7.34		355	759	255	313	1,631
02/19/2023	0.401	8.00	8.00		209	435	173	280	1,118
02/20/2023	0.911	7.28	7.26		1,345	1,787	397	667	3,904
02/21/2023	1.003	7.92	7.91		1,536	2,260	483	813	4,524
02/22/2023	1.115	7.63	7.61		1,339	1,907	500	737	4,155
02/23/2023	1.104	7.59	7.58		1,132	1,889	550	774	3,952
02/24/2023	1.034	7.92	7.91		549	1,165	523	770	2,796
02/25/2023	0.704	7.47	7.45		815	1,351	383	734	3,096
02/26/2023	0.430	7.91	7.91		82	305	258	311	755
02/27/2023	1.001	7.71	7.71		254	418	554	733	1,671
02/28/2023	1.062	7.74	7.73		627	1,019	604	871	2,575
03/01/2023	1.067	7.95	7.95		546	1,202	609	831	2,515
03/02/2023	1.059	7.79	7.79		388	663	643	843	2,143
03/03/2023	0.908	7.79	7.79		292	1,061	489	620	1,572
03/04/2023	0.625	8.02	8.02		98	365	279	316	1,048
03/05/2023	0.547	7.98	7.98		218	297	249	403	1,118
03/06/2023	0.949	7.70	7.69		638	832	388	621	2,407
03/07/2023	1.044	7.87	7.87		379	741	440	575	2,065
03/08/2023	1.062	7.86	7.85		565	709	502	619	2,437
03/09/2023	0.919	7.95	7.94		199	422	375	561	1,392
03/10/2023	1.040	7.75	7.75		636	911	284	684	2,625
03/11/2023	0.710	7.75	7.75		143	711	124	455	1,668
03/12/2023	0.518	7.41	7.40		72	144	55	159	681
03/13/2023	0.942	7.66	7.66		628	550	225	469	2,240
03/14/2023	1.091	7.70	7.69	93	1,059	1,184	386	625	3,328
03/15/2023	1.096	7.78	7.77		357	869	532	729	2,433
03/16/2023	1.064	8.12	8.11		395	1,243	542	812	2,886
03/17/2023	0.971	7.90	7.90		426	1,337	523	687	3,452
03/18/2023	0.579	7.79	7.79		163	556	303	384	1,423
03/19/2023	0.337	8.18	8.18		117	267	156	227	758
03/20/2023	0.999	8.02	8.01		902	1,167	475	719	3,243
03/21/2023	1.042	7.67	7.65		751	1,435	526	741	3,183
03/22/2023	1.100	7.83	7.82		648	1,102	549	825	2,905
03/23/2023	1.116	8.05	8.05		676	1,180	531	834	2,892
03/24/2023	1.005	7.50	7.48		292	755	431	611	2,474
03/25/2023	0.707	7.79	7.78		90	295	278	389	1,121
03/26/2023	0.586	7.82	7.82		48	245	135	366	990
03/27/2023	0.849	7.74	7.73		576	886	185	429	2,381
03/28/2023	1.054	7.89	7.89		659	1,363	427	794	3,008
03/29/2023	1.073	7.47	7.44		555	851	457	707	2,695
03/30/2023	1.103	7.43	7.42		658	1,243	478	665	2,890
03/31/2023	1.123	7.77	7.77		606	1,499	536	707	3,899
04/01/2023	0.595	7.80	7.80		170	521	264	364	1,157
04/02/2023	0.523	7.34	7.34		97	306	110	271	1,004
04/03/2023	0.969	7.06	7.04		1,547	1,577	257	521	3,740
04/04/2023	1.060	7.45	7.44		1,214	1,858	415	745	3,936
04/05/2023	1.112	7.94	7.93		906	1,624	457	654	3,452
04/06/2023	1.051	8.02	8.01		1,000	2,149	437	750	3,758
04/07/2023	0.956	7.67	7.66		810	1,436	511	745	2,896
04/08/2023	0.465	7.86	7.85		487	1,242	249	470	2,249

Date	Outfall 001 Wastewater Sample Results (lb/day)[a,b]								
	Total Flow (MGD)	pH (s.u.)		Oil & Grease[c]	CBOD	TSS	Ammonia		
		Maximum	Minimum						
04/09/2023	0.522	7.62	7.62		39	131	140	342	921
04/10/2023	0.955	7.43	7.42		414	757	250	521	2,068
04/11/2023	1.062	7.49	7.49		1,100	2,083	387	638	3,913
04/12/2023	1.070	7.48	7.48	91	657	1,473	415	639	3,009
04/13/2023	1.114	7.42	7.42		908	651	474	699	3,193
04/14/2023	1.196	7.69	7.68		886	1,647	451	588	3,344
04/15/2023	0.776	7.69	7.69		78	583	199	370	1,366
04/16/2023	0.373	6.97	6.97		73	311	52	218	845
04/17/2023	0.956	7.49	7.48		604	1,316	245	602	2,752
04/18/2023	1.065	7.82	7.81		383	933	332	515	2,124
04/19/2023	1.138	7.79	7.78		517	1,519	424	652	2,659
04/20/2023	1.116	7.50	7.49		1,341	792	538	722	3,567
04/21/2023	1.073	7.33	7.32		1,128	851	461	670	3,125
04/22/2023	0.567	7.54	7.54		69	237	123	317	811
04/23/2023	0.475	6.79	6.78		39	159	35	221	646
04/24/2023	0.975	7.13	7.12		474	936	198	372	2,063
04/25/2023	1.106	7.57	7.56		619	1,338	370	563	2,644
04/26/2023	1.130	7.18	7.17		1,469	1,697	492	631	4,272
04/27/2023	1.132	7.65	7.65		848	945	444	557	3,132
04/28/2023	1.087	7.25	7.25		646	907	348	466	2,309
04/29/2023	0.485	7.35	7.35		52	223	75	207	684
04/30/2023	0.506	7.17	7.17		169	507	51	253	1,189
05/01/2023	0.976	7.47	7.46		470	896	207	450	2,285
05/02/2023	1.138	7.89	7.87		477	1,045	380	573	2,455
05/03/2023	1.103	7.68	7.67		494	966	398	584	2,361
05/04/2023	1.103	7.79	7.77		505	1,197	500	591	2,669
05/05/2023	1.130	7.74	7.74		246	802	273	561	2,164
05/06/2023	0.623	7.21	7.20		57	260	101	305	959
05/07/2023	0.809	7.08	7.07		120	405	104	425	1,431
05/08/2023	1.012	7.46	7.44		440	1,098	256	444	2,175
05/09/2023	1.082	7.63	7.62		422	1,038	291	467	2,257
05/10/2023	1.098	7.46	7.44		330	1,008	176	369	2,272
05/11/2023	1.154	7.57	7.57		263	1,348	230	456	2,311
05/12/2023	1.123	7.21	7.21		203	750	205	473	2,090
05/13/2023	0.738	7.16	7.16		133	657	79	203	1,752
05/14/2023	0.663	6.87	6.87		79	314	34	332	1,383
05/15/2023	0.976	7.60	7.60		307	937	221	484	2,374
05/16/2023	1.098	7.76	7.74	61	617	1,374	467	623	3,496
05/17/2023	1.112	7.24	7.24		877	1,144	525	877	3,276
05/18/2023	1.123	7.60	7.60		531	937	340	590	2,479
05/19/2023	1.106	7.67	7.67		445	1,154	259	480	2,626
05/20/2023	0.811	8.26	8.25		34	316	74	430	1,086
05/21/2023	0.795	6.86	6.85		147	332	70	403	1,241
05/22/2023	0.976	7.38	7.37		202	760	188	406	1,613
05/23/2023	1.117	7.29	7.28		292	979	341	428	2,102
05/24/2023	1.124	7.40	7.39		346	750	279	478	2,007
05/25/2023	1.087	7.85	7.85		477	1,315	248	486	2,386
05/26/2023	1.075	7.90	7.89		127	688	153	489	1,687
05/27/2023	0.765	7.54	7.52		65	468	58	430	1,229
05/28/2023	0.801	6.67	6.67		33	290	62	368	1,350
05/29/2023	0.680	7.14	7.14		67	303	52	312	1,098
05/30/2023	0.965	7.63	7.62		603	1,329	268	461	2,605
05/31/2023	1.033	7.87	7.86		1,208	1,638	557	897	4,056

Date	Outfall 001 Wastewater Sample Results (lb/day)[a,b]								
	Total Flow (MGD)	pH (s.u.)		Oil & Grease[c]	CBOD	TSS	Ammonia	TKN	
		Maximum	Minimum						
06/01/2023	1.060	7.94	7.94		637	1,209	701	873	3,061
06/02/2023	1.065	7.71	7.71		1,107	1,007	684	746	3,599
06/03/2023	0.936	7.59	7.58		270	677	479	651	1,898
06/04/2023	0.703	8.05	8.04		100	684	215	468	1,288
06/05/2023	0.823	7.60	7.60		434	1,076	165	341	1,964
06/06/2023	1.015	7.75	7.75		1,110	1,920	485	679	4,523
06/07/2023	0.922	7.90	7.90		1,213	2,180	563	792	4,201
06/08/2023	0.913	7.85	7.85		561	1,930	494	728	3,657
06/09/2023	0.850	7.49	7.49		697	1,868	477	634	3,490
06/10/2023	0.417	7.87	7.87		124	777	194	259	1,030
06/11/2023	0.262	7.81	7.81		67	189	43	118	533
06/12/2023	0.962	6.95	6.95		403	1,070	199	451	2,160
06/13/2023	0.992	7.63	7.63		759	1,711	371	501	3,075
06/14/2023	1.058	7.34	7.34		1,113	1,560	478	603	3,479
06/15/2023	1.026	7.42	7.42		1,088	1,456	487	620	3,827
06/16/2023	0.992	7.17	7.16		527	1,283	376	532	2,587
06/17/2023	0.345	7.20	7.19		86	288	113	157	648
06/18/2023	0.308	7.16	7.14		37	137	25	150	475
06/19/2023	0.943	7.09	7.07		445	1,062	188	384	2,172
06/20/2023	0.982	7.68	7.68		737	1,926	365	570	3,610
06/21/2023	0.997	7.46	7.45		741	1,706	426	684	3,399
06/22/2023	0.971	7.55	7.54		498	972	424	532	2,524
06/23/2023	1.070	7.43	7.43		554	1,488	449	547	2,380
06/24/2023	0.418	7.98	7.98		42	291	106	179	658
06/25/2023	0.161	7.31	7.31		16	72	7	40	169
06/26/2023	0.975	7.59	7.57		711	1,709	192	396	2,998
06/27/2023	1.002	7.62	7.61		866	1,589	293	451	3,290
06/28/2023	0.779	7.45	7.44		367	1,138	176	298	2,038
06/29/2023	0.984	7.48	7.47	80	528	1,273	276	391	2,357
06/30/2023	0.551	7.02	7.01		302	897	103	193	1,239
07/01/2023	0.714	7.34	7.34		53	357	75	282	846
07/02/2023	0.773	6.78	6.77		38	323	48	281	832
07/03/2023	0.894	7.03	7.02		181	771	140	333	1,365
07/04/2023	0.647	7.76	7.76		166	684	186	250	1,091
07/05/2023	0.677	7.35	7.34		796	1,158	238	357	2,675
07/06/2023	0.894	7.41	7.41	52	1,282	1,753	448	659	4,320
07/07/2023	0.963	7.68	7.68		404	1,286	456	618	2,335
07/08/2023	0.769	7.66	7.66		105	685	316	457	1,255
07/09/2023	0.323	7.58	7.58		60	216	39	104	441
07/10/2023	0.915	7.12	7.12		257	916	157	389	1,737
07/11/2023	0.997	7.79	7.78		671	1,664	302	504	2,924
07/12/2023	1.075	7.39	7.38		479	1,390	299	503	2,651
07/13/2023	1.056	7.32	7.31		470	1,454	332	545	2,415
07/14/2023	1.030	7.61	7.60		315	1,289	240	413	2,527
07/15/2023	0.544	7.32	7.32		144	454	26	93	1,040
07/16/2023	0.273	7.38	7.36		29	220	11	39	428
07/17/2023	0.925	7.16	7.15		419	1,042	106	240	2,034
07/18/2023	1.016	7.67	7.66		449	1,441	328	557	2,756
07/19/2023	1.033	8.05	8.04		302	1,250	344	484	2,306
07/20/2023	0.980	7.58	7.56		224	1,390	341	501	2,588
07/21/2023	1.044	7.55	7.54		423	2,439	353	553	3,450
07/22/2023	0.486	6.79	6.79		151	757	124	238	1,320
07/23/2023	0.849	6.59	6.59		249	638	71	199	1,289

Date	Outfall 001 Wastewater Sample Results (lb/day)[a,b]								
	Total Flow (MGD)	pH (s.u.)		Oil & Grease[c]	CBOD	TSS	Ammonia	TKN	COD
		Maximum	Minimum						
07/24/2023	0.941	6.80	6.78		900	2,238	211	522	3,809
07/25/2023	0.979	7.74	7.74		1,380	3,186	429	779	5,576
07/26/2023	1.067	7.69	7.69		1,043	3,072	506	839	5,169
07/27/2023	1.048	7.56	7.56		437	1,312	558	729	2,812
07/28/2023	1.053	7.76	7.76		751	2,021	581	888	3,765
07/29/2023	0.454	7.59	7.58		231	530	196	311	1,277
07/30/2023	0.635	7.67	7.67		108	406	113	285	1,182
07/31/2023	0.931	7.08	7.08		549	1,165	171	402	2,583
08/01/2023	0.916	7.29	7.29		518	1,491	207	404	2,630
08/02/2023	0.992	7.19	7.18		1,767	2,690	407	969	5,294
08/03/2023	0.822	7.91	7.90		572	2,218	354	579	3,776
08/04/2023	1.009	7.66	7.66		677	3,424	301	591	4,787
08/05/2023	0.786	7.13	7.13		408	831	99	312	2,916
08/06/2023	0.539	6.49	6.49		31	300	11	132	726
08/07/2023	0.918	7.06	7.06		273	804	68	262	1,632
08/08/2023	1.046	7.15	7.13		770	1,440	138	320	2,915
08/09/2023	1.033	7.69	7.69		903	1,465	251	523	3,306
08/10/2023	1.098	7.49	7.49		515	1,313	196	425	2,964
08/11/2023	1.010	7.68	7.68		312	1,068	222	425	2,558
08/12/2023	0.643	7.84	7.84		291	859	250	384	2,050
08/13/2023	0.450	7.51	7.50		106	275	90	169	881
08/14/2023	1.000	6.74	6.74	113	683	1,043	275	455	2,620
08/15/2023	1.089	7.22	7.22		714	1,727	353	555	3,531
08/16/2023	1.099	7.43	7.42		1,184	1,834	426	681	4,343
08/17/2023	1.070	7.67	7.66		787	1,756	327	456	3,152
08/18/2023	1.108	7.44	7.44		485	1,140	213	426	2,413
08/19/2023	0.553	7.11	7.11		92	661	33	147	932
08/20/2023	0.364	7.29	7.29		28	182	2	86	511
08/21/2023	1.069	6.99	6.99		588	1,740	82	244	3,892
08/22/2023	1.114	7.43	7.42		1,070	929	172	332	2,886
08/23/2023	1.102	7.85	7.85		480	1,425	131	263	2,276
08/24/2023	1.161	7.30	7.28		1,501	1,098	237	363	3,808
08/25/2023	1.117	7.48	7.48		1,222	979	214	571	3,398
08/26/2023	1.017	6.82	6.81		496	594	86	205	1,714
08/27/2023	0.856	7.36	7.35		60	310	5	100	793
08/28/2023	1.058	6.83	6.82		536	559	74	276	1,730
08/29/2023	1.055	6.80	6.79		636	704	110	210	1,928
08/30/2023	1.043	6.52	6.51		227	435	94	195	1,297
08/31/2023	1.067	6.81	6.81		1,756	1,336	249	408	4,372
09/01/2023	1.035	6.73	6.72		525	1,324	110	203	2,241
09/02/2023	0.644	6.72	6.72		43	412	32	117	742
09/03/2023	0.610	6.81	6.81		20	238	9	35	477
09/04/2023	0.665	7.48	7.48		55	499	8	39	713
09/05/2023	0.870	7.32	7.30		368	1,452	109	242	2,142
09/06/2023	0.970	7.58	7.57		524	931	201	334	2,275
09/07/2023	0.991	6.99	6.98		1,079	1,819	298	526	3,949
09/08/2023	1.004	7.49	7.49		505	1,382	357	529	2,945
09/09/2023	0.988	7.72	7.72		409	1,196	282	520	2,614
09/10/2023	0.893	6.69	6.69		257	1,242	70	275	1,990
09/11/2023	0.804	7.25	7.25		631	1,577	171	476	3,086
09/12/2023	0.749	7.67	7.67		1,348	2,406	372	756	5,347
09/13/2023	0.848	7.56	7.55		533	2,618	390	736	4,596
09/14/2023	1.118	7.80	7.80		447	2,706	477	827	4,548

Date	Outfall 001 Wastewater Sample Results (lb/day)[a,b]								
	Total Flow (MGD)	pH (s.u.)		Oil & Grease[c]	CBOD	TSS	Ammonia	TKN	COD
		Maximum	Minimum						
09/15/2023	0.953	7.68	7.66		127	1,591	183	458	3,074
09/16/2023	0.974	7.21	7.20		352	1,002	56	166	1,991
09/17/2023	0.865	6.87	6.87		227	794	36	150	1,722
09/18/2023	0.986	7.69	7.69		260	1,070	78	279	1,917
09/19/2023	1.123	7.46	7.46	< 47	591	1,312	305	556	3,060
09/20/2023	1.157	7.52	7.52		529	1,497	414	758	3,543
09/21/2023	1.114	7.77	7.76		599	1,394	498	926	3,695
09/22/2023	1.132	7.73	7.70		512	1,039	614	875	3,415
09/23/2023	0.588	7.05	7.04		74	564	154	320	1,521
09/24/2023	0.869	6.96	6.95		51	218	210	289	1,454
09/25/2023	1.004	6.98	6.98		335	880	307	501	2,354
09/26/2023	1.112	7.48	7.47		784	1,531	526	813	3,498
09/27/2023	1.053	7.82	7.81		351	791	486	597	2,197
09/28/2023	1.050	7.78	7.77		658	935	451	624	2,611
09/29/2023	1.108	7.61	7.60		2,635	2,404	581	852	6,227
09/30/2023	0.800	7.53	7.53		128	490	199	306	1,329
10/01/2023	0.677	6.71	6.71		115	301	72	136	768
10/02/2023	0.955	7.18	7.18		617	1,315	238	425	2,502
10/03/2023	1.007	7.55	7.55		1,175	1,218	355	531	3,580
10/04/2023	1.088	7.48	7.47		1,058	1,317	503	665	3,704
10/05/2023	1.015	7.93	7.93		1,139	1,355	423	616	3,752
10/06/2023	0.963	7.74	7.74		1,059	1,286	278	481	3,363
10/07/2023	0.593	6.94	6.93		123	495	40	183	1,037
10/08/2023	0.567	7.05	7.04		265	852	26	228	1,661
10/09/2023	0.888	6.96	6.94		898	1,297	168	434	3,105
10/10/2023	1.001	6.84	6.83		1,088	1,545	210	472	3,734
10/11/2023	0.818	7.39	7.38		253	1,092	124	322	2,178
10/12/2023	0.824	7.44	7.44		359	928	158	405	2,169
10/13/2023	0.961	6.77	6.76		171	1,016	199	403	1,849
10/14/2023	0.831	6.91	6.91		233	1,294	259	543	2,202
10/15/2023	0.119	6.40	6.40		49	328	30	66	712
10/16/2023	0.734	6.77	6.77		376	1,011	254	407	2,150
10/17/2023	1.065	6.55	6.53		814	2,133	324	649	3,786
10/18/2023	1.056	6.27	6.26	117	1,842	2,556	348	736	5,517
10/19/2023	1.020	6.83	6.82		580	2,014	169	613	3,341
10/20/2023	0.993	6.74	6.72		310	414	133	286	1,583
10/21/2023	0.394	7.25	7.25		25	153	24	75	404
10/22/2023	0.422	7.39	7.38		70	563	10	95	921
10/23/2023	0.969	7.03	7.01		826	1,213	157	327	2,515
10/24/2023	1.098	7.34	7.33		604	962	236	399	2,433
10/25/2023	1.108	7.09	7.09		752	1,248	190	454	2,900
10/26/2023	1.093	7.18	7.17		441	1,231	147	379	2,399
10/27/2023	1.126	6.81	6.81		790	940	189	428	2,631
10/28/2023	1.019	7.43	7.43		196	652	154	327	1,633
10/29/2023	0.778	7.21	7.21		67	173	46	90	734
10/30/2023	0.971	6.98	6.97		739	810	201	406	2,301
10/31/2023	1.038	7.36	7.35		431	780	236	436	2,092
Average	**0.897**			**81**	**635**	**1,199**	**310**	**524**	**2,739**
Maximum	**1.196**	**8.26**		**120**	**3,073**	**4,988**	**795**	**1,215**	**9,172**
Minimum	**0.119**		**6.26**	**33**	**16**	**72**	**2**	**35**	**169**

Month	Outfall 001 Wastewater Monthly Sample Results (lb/day)[a,b]															
	Total Flow		pH (s.u.)*		Oil & Grease[c]		CBOD		COD		Ammonia		TKN		COD	
	Max.	Avg.	Max.	Min.	Max.	Avg.	Max.	Avg.	Max.	Avg.	Max.	Avg.	Max.	Avg.	Max.	Avg.
Nov-22	1.178	0.946	7.92	6.83	< 44	< 44	1,915	632	2,939	1,272	622	324	1,166	573	5,922	2,847
Dec-22	1.135	0.892	7.99	6.95	120	120	2,729	658	2,543	1,083	758	355	1,088	564	7,464	2,812
Jan-23	1.143	0.878	8.20	6.75	< 33	< 33	3,073	1,223	4,988	1,954	795	523	1,215	808	9,172	4,485
Feb-23	1.115	0.860	8.00	7.05	116	116	2,368	1,077	2,813	1,529	604	385	897	640	6,520	3,570
Mar-23	1.123	0.912	8.18	7.40	93	93	1,059	445	1,499	841	643	391	843	594	3,899	2,254
Apr-23	1.196	0.887	8.02	6.78	91	91	1,547	618	2,149	1,024	538	307	750	509	4,272	2,428
May-23	1.154	0.981	8.26	6.67	61	61	1,208	342	1,638	855	557	239	897	480	4,056	2,106
Jun-23	1.070	0.816	8.05	6.95	80	80	1,213	538	2,180	1,172	701	318	873	466	4,523	2,411
Jul-23	1.075	0.838	8.05	6.59	52	52	1,380	421	3,186	1,210	581	250	888	431	5,576	2,284
Aug-23	1.161	0.942	7.91	6.49	113	113	1,767	635	3,424	1,182	426	183	969	370	5,294	2,646
Sep-23	1.157	0.936	7.82	6.69	< 47	< 47	2,635	499	2,706	1,244	614	266	926	470	6,227	2,709
Oct-23	1.126	0.877	7.93	6.26	117	117	1,842	563	2,556	1,048	503	190	736	388	5,517	2,376

lb/day = Pounds per Day; MGD = Million Gallons per Day; s.u. = Standard Units; CBOD = Carbonaceous Biochemical Oxygen Demand

TSS = Total Suspended Solids; TKN = Total Kjeldahl Nitrogen; COD = Chemical Oxygen Demand; IWP = Industrial Wastewater Pretreatment

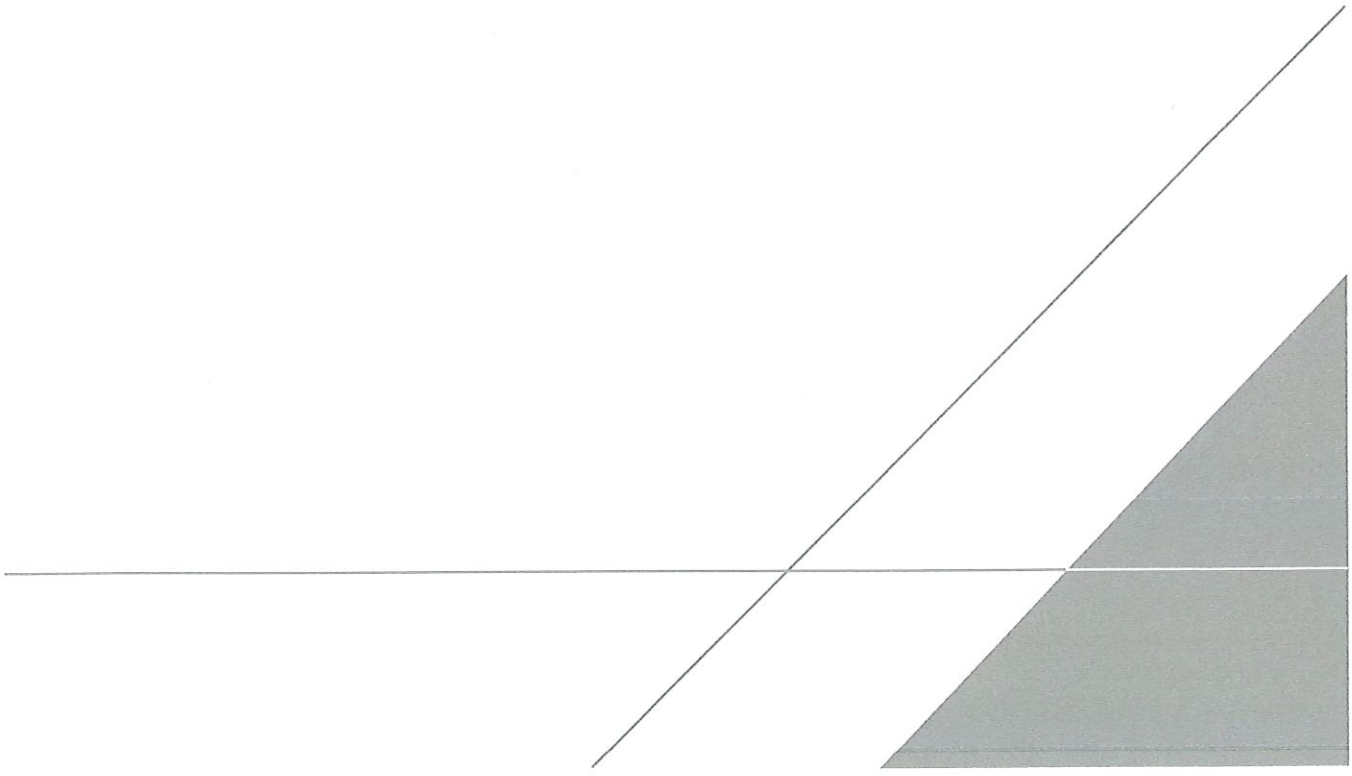
[a] Monitoring requirments and frequency reflect the requirements in the facility's IWP Permit (No. INP000047), issued September 1, 2019 and expiring August 31, 2024.

[b] All samples reported here are 24-hour composite samples except for pH and oil & grease, which are grab samples.

[c] Oil and grease is only monitored monthly. All other parameters are monitored daily.

Attachment E

Potentially Affected Persons
(State Form 49456)



I. Identification of Potentially Affected Persons

Please list here any and all persons whom you have reason to believe have a substantial or proprietary interest in this matter, or could otherwise be considered to be potentially affected under the law. Failure to notify any person who is later determined to be potentially affected could result in voiding our decision on procedural grounds. To ensure conformance with AOPA and to avoid reversal of a decision, please list all such parties. The letter attached to this form will further explain the requirements under the AOPA. Attach additional names and addresses on a separate sheet of paper, as needed. Please indicate below the type of action you are requesting.

Name: Indiana Bureau of Motor Vehicles		Name: Carrol County True Value
Street address: 1291 North Bradford Avenue		Street address: 1273 North Alco Way
City/State/ZIP code: Delphi, IN 46923		City/State/ZIP code: Delphi, IN 46923
Name: Wabash Valley Hospital		Name: Carroll County Cooperative Extension Agency
Street address: 1265 North Bradford Street		Street address: RR 4
City/State/ZIP code: Delphi, IN 46923		City/State/ZIP code: Delphi, IN 46923
Name: Hon. Mayor Anita Werling		Name: County Commissioner Steve Pearson
Street address: 201 South Union Street		Street address: 466 East Cumberland Street
City/State/ZIP code: Delphi, IN 46923		City/State/ZIP code: Camden, IN 46917
Name: County Commissioner Loren Hylton		Name: County Commissioner William Brown
Street address: 5390 East 750 North		Street address: PO Box 291
City/State/ZIP code: Logansport, IN 46947		City/State/ZIP code: Cutler, IN 46920
Name: Deer Creek Township Trustee Morgan Anderson		Name: City Council President Spencer Kingery
Street address: 3921 West 600 North		Street address: 1004 South Washington Street
City/State/ZIP code: Delphi, IN 46923		City/State/ZIP code: Delphi, IN 46923
Name: Shell Quick Pantry		Name: H&R Block
Street address: 1245 North Commercial Drive		Street address: 1173 Commercial Drive, Suite B
City/State/ZIP code: Delphi, IN 46923		City/State/ZIP code: Delphi, IN 46923
Name: Richard VanSickle		Name: Carroll Manor
Street address: 225 North State Road 25		Street address: 6409 West 100 North
City/State/ZIP code: Delphi, IN 46923		City/State/ZIP code: Delphi, IN 46923
Name:		Name:
Street address:		Street address:
City/State/ZIP code:		City/State/ZIP code:
Name:		Name:
Street address:		Street address:
City/State/ZIP code:		City/State/ZIP code:
Name:		Name:
Street address:		Street address:
City/State/ZIP code:		City/State/ZIP code:

II. Please complete this form by signing the following statement.

I certify to the best of my knowledge I have listed all potentially affected parties, as defined by IC 4-21.5.		
Signature: Aaron Molskness		
Printed name: Aaron Molskness		Date: 02-29-2024
Facility name: Indiana Packers Corporation		
Facility address: 6755 West 100 North		
Facility city: Delphi	Facility state: Indiana	ZIP code: 46923

III. Type of Action (check one)

- ☐ NPDES Permit-327 IAC 5
- ☒ Pretreatment Permit -327 IAC 5
- ☐ Construction Permit-327 IAC 3

A $50.00 fee is required for a New permit, a Renewal or a Modification; if this is a renewal or modification request, include NPDES permit No. on check and return to:
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Cashiers Office – Mail Code 50-10C
100 North Senate Avenue
Indianapolis, IN 46204-2251

If No Fee Is Required (Fee has previously been paid), Return To:
INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
Office of Water Quality – Mail Code 65-42
Room N1255
Permits Branch
100 North Senate Avenue
Indianapolis, Indiana 46204-2251

Attachment F

Description of Wastewater Discharges

36. Attachment – Part F: Wastewater discharge(s) to sanitary or combined sewers

a. N/A

b. N/A

c. N/A

d. Pretreatment Discharge – The production process is conducted as five (5) major processes and three (3) secondary/support processes. Only the discharge from the major processes is included in this discharge quantity.

   Major Processes:

   1) The "Kill" process includes stunning, washing, de-hairing, carcass preparation, rinsing, and inspection.

   2) The "Chill" process is next and is performed to firm the product to allow for more precise processing. Drain in the Chill floor drain into the facility's pretreatment plant.

   3) After chill, the next step is processing the carcass into specific cuts, curing, and then packaging.

   4) The rendering process produces fats, greases, blood and bone meals, and other related products.

   5) The last major process or step is cleaning and sanitizing of the product processing areas, utilizing hot water and sanitizing chemicals. Floor drains in the process area, shipping docks, boiler room, and engine room (ammonia refrigeration) are connected and flow to the facility's pretreatment plant before ultimate discharge through Outfall 001 to the Delphi POTW.

e. Boiler Blowdown – One of the secondary/support processes are the boilers. Boilers in the boiler building produce steam for the rendering process and hot water for various other processes throughout the facility. Drains in the boiler building Drains in the boiler building are connected and flow to the facility's pretreatment plant, before ultimate discharge through Outfall 001 to the Delphi POTW.

f. Non-contact Cooling Water – The facility has fourteen (14) condensers in the engine room with all drains connected and flowing to the facility's pretreatment.

g. Sanitary Water – Sanitary water includes the various restrooms in the facility, showers in employee locker rooms, and water used during food preparation and cleaning in the facility's cafeteria. Water from the cafeteria flows through a 7,000-gallon grease trap with the effluent flowing through Outfall 001 to the Delphi POTW.

h. Other – The final two secondary/support processes are ammonia refrigeration and laundry.

   1) Ammonia Refrigeration – The facility has two (2) engine rooms with all drains connected and flowing to the facility's pretreatment plant, before ultimate discharge through Outfall 001 to the Delphi POTW.

   2) Laundry – The facility's laundry washes and dries gloves. Water from the laundry drains directly to the sanitary sewer system.

Attachment G

Plant Diagram

INDIANA PACKERS CORPORATION
DELPHI
INDIANA

GENERAL FACILITY LAYOUT
UNDERGROUND PIPING

PROCESSED WASTE
CITY WATER
WELL WATER
SANITARY SEWER
FIRE MAIN