CITY OF FORT DODGE
Engineering

January 28, 2026

Ben Hucka
Environmental Specialist Senior
Iowa Department of Natural Resources

RE: Pretreatment Program Annual Report, 2025 Reporting Year, City of Fort Dodge, Iowa

Dear Mr. Hucka:

Enclosed please find the Pretreatment Program Annual Report for Calendar Year 2025 for the City of Fort Dodge. Please feel free to call with any questions at 515-576-4551.

Respectfully,

Chad W. Schaeffer

Chad Schaeffer, P.E.
Chief Development Officer

CS/mb

Enclosure

Municipal Building | 819 1st Avenue South | Fort Dodge, IA 50501 | Phone: 515.576.3601 | Fax: 515.573.5097 | Email: engineering@fortdodgeiowa.org

# PRETREATMENT PROGRAM ANNUAL REPORT

## Calendar Year 2025

Reporting Period: January 1, 2025 through December 31, 2025

| | |
|---|---|
| **POTW Name:** | City of Fort Dodge |
| **POTW Address:** | Municipal Building 819 1st Avenue South |
| | Fort Dodge, IA 50501 |
| **POTW NPDES #:** | Iowa: 943303 |
| | EPA: IA0044849 |

**Pretreatment Coordinator:**

| | |
|---|---|
| **Name:** | Michelle Bemrich |
| **Title:** | Industrial Pretreatment Program Coordinator |
| **Phone:** | 515-227-8695 |
| **FAX:** | |
| **E-Mail:** | mbemrich@uswatercorp.net |

I have personally examined and am familiar with the information contained in this report and attachments. To the best of my knowledge and belief the information contained herein is true, accurate and complete. I am aware that significant penalties may be imposed for knowingly making false statements, including the possiblility of fine and/or imprisonment.

| | | | |
|---|---|---|---|
| **Signature** | Michelle Bemrich | **Date** | 1/28/2026 |

## PRETREATMENT PROGRAM SUMMARY
## Calendar Year 2025

| | | SIGNIFICANT INDUSTRIAL USERS | |
|---|---|---|---|
| Total No. of Significant Industrial Users | 9 | | |
| No. of Non-Categorical Industrial Users | 6 | | |
| No. of Categorical Industrial Users | 3 | | |
| No. of Non-Significant Categorical Industrial Users | 0 | | |
| No. of Middle-Tier Categorical Industrial Users | 0 | | |
| | | **Categorical** | **Noncategorical** |
| **Significant Industrial User Compliance** | | | |
| No. of SIU's submitting BMR's | | 0 | 0 |
| No. of SIU's submitting 90-day compliance reports | | 0 | 0 |
| No. of SIU's submitting periodic compliance reports | | 3 | 6 |
| No. of SIU's on compliance schedules | | 0 | 0 |
| No. of SIU's meeting compliance schedules | | 0 | 0 |
| No. of SIU's in significant noncompliance | | 0 | 0 |
| **Compliance Monitoring Program** | | | |
| No. of permits in effect | | 3 | 6 |
| No. of Sampling inspections conducted | | 0 | 0 |
| No. of facilities sampled | | 3 | 6 |
| No. of non-sampling inspections conducted | | 3 | 6 |
| No. of facilities inspected | | 3 | 6 |
| **Enforcement Actions** | | | |
| No. of Notices of Violation issued to SIU's | | 1 | 16 |
| No. of Administrative orders issued to SIU's | | 0 | 0 |
| No. of civil suits filed | | 0 | 0 |
| No. of criminal suits filed | | 0 | 0 |
| No. of significant violators published | | 0 | 0 |
| Total No. of enforcement actions taken | | 1 | 16 |
| Dollar amount of penalties collected | | 0 | 0 |

**Comments**

It was determined by the IPP Coordinator and the City of Fort Dodge to eliminate 1 Noncategorical SIU from the Pretreatment Program due to non-adversary impact at the POTW.

BHJ USA, Inc. restructured their manufacturing process, in January 2025, eliminating the processing of raw meat for pet food. They are now exclusively a facility that provides cold storage warehousing for raw pet food ingredients. After monitoring their wastewater during their corporate restructuring in 2025, it was determined there was no adverse impact on the Fort Dodge POTW and their Industrial User Wastewater Discharge Permit was not renewed.

## POTW INFORMATION

### POTW Interference/Upsets/Pass-Through

Describe any instances of interference, upsets or pass-through of pollutants at the POTW. Include the date(s) of the occurrence, duration, a brief description of what caused the condition, measures taken to prevent or mitigate environmental damage, actions against the party (if known) that caused the condition and measures taken to prevent a future occurrence.

2/27/2025 - Cracked 2" PVC supply line to the South Forcemain ARV on 16" forcemain coming from the AG Park. See attached documentation.

8/25/2025 - Forcemain break on the NW side of the intersection of Johnson Avenue and 200th St, West of Fort Dodge. See attached documentation.

### Local Program Changes

Did the city make any changes to its' local pretreatment program during the past year Yes ☐ No ☒

Explain:

Did the city update its' Industrial Waste Survey during the past year? Yes ☒ No ☐

Name(s) of new significant users and reason

None identified

Names(s) of users no longer significant and reason

BHJ USA Inc. was eliminated from the Industrial Program because previous data collected in 2025 indicated little to no impact at the Fort Dodge WWTP.

If a list of industrial users in significant noncompliance with pretreatment standards or requirements was published as required by 40 CFR 403.8(f)(2) **attach a copy of the published notice**.

# Bypasses and upsets, 5-day Written Report

**567 Iowa Administrative Code chapter 63.6(455B)**

**Facility Name:** City of Fort Dodge Sewage Treatment Plant **NPDES Permit No:** 9433003

## Why is this Required?

Pursuant to 567 IAC 63.6(3), the owner or operator of a treatment facility or collection system shall notify the DNR by telephone as soon as possible but not later **than 24 hours after the onset or discovery** of a bypass or upset due to a mechanical failure or acts beyond the control of the owner or operator, e.g., a wet weather event.

## To Notify the DNR

Contact the appropriate DNR Field Office **(If after normal business hours, call (515) 725-8694).** At a minimum, the Field Office will ask for the following information:

- ☐ Reason for the bypass
- ☐ Amount and duration of any rainfall event that contributed to the bypass;
- ☐ Date and time of onset or discovery of the bypass;
- ☐ Duration of the bypass;
- ☐ Estimated amount of untreated or partially treated sewage or wastewater discharged;
- ☐ Location of the bypass; and
- ☐ Name of any body of surface water affected by bypass.

## Public Notice

After receiving the notification, the DNR will determine if a public notice is necessary. If the department determines that public notification is necessary, the owner or operator of the treatment facility or the collection system shall prepare a public notice.

## Follow-Up (You may use this form for your written report)

Within five (5) days of the bypass, a written report describing the bypass must be submitted to the appropriate DNR Field Office. **This form may be used for your written report as long as the following information is provided:**

☒ Reason for the bypass: Cracked 2" PVC supply line to the S FM air relief valve on 16" force main coming from the Ag Park.

☐ Was this precipitation induced ☐ Yes ☒ No

If Yes, amount and duration: Dry, sunny, and windy day after recent bitter cold snap.

☒ Date and time of onset or discovery of the bypass: Found by me @ 09:48 on 02-27-2025 on my way out to the Ag Park.

☒ Date and time bypass ended: S sewer FM was shut down at 10:25 by USW. Air relief isol 10:34 leak done. AR replaced 2/27

☒ Estimated amount of untreated or partially treated wastewater discharged: 5000 gal

☒ Did the bypassed wastewater enter a storm sewer: ☐ Yes ☒ No

☒ Location of the bypass (address/ditch/road/storm sewer/etc.): Parker Drive appx 720' W of S leg of Johnson Ave.

☒ Name of waterbody affected by the bypass: Entered Lizard Creek tributary just E of RR bridge over tributary.

☒ What is being done to prevent further bypasses? All 10 force main air-vacs & stations (20 air vacs) were replaced July 2022.

## Additional Information or Action May Be Required

Per 567 IAC 63.6(4), additional information may be required after a bypass occurs, including but not limited to:

- Additional monitoring, sampling, or analysis of the bypass or upset requested by the DNR;
- Temporary disinfection depending on the volume and duration of the bypass;
- Classification of the stream affected by the bypass;
- Cleanup of any debris and waste materials deposited in the area affected by the bypass, including but not limited to, lime application to the ground surface or disinfection of the area with chlorine solution.

**Signature:** [signature] **Date:** 02-27-2025

# Bypasses and Upsets, 5-Day Written Report

**567 Iowa Administrative Code Rule 63.6(455B)**

**Facility Name:** City of Fort Dodge STP **NPDES Permit No:** 9433003

## Why is this Required?

Pursuant to 567 IAC 63.6(3), the owner or operator of a treatment facility or collection system shall notify the DNR by telephone as soon as possible but not later **than 24 hours after the onset or discovery** of a bypass or upset due to a mechanical failure or acts beyond the control of the owner or operator, e.g., a wet weather event. Basement backups are reportable bypasses unless they are caused by problems with the building lateral or private sewer line.

Note: Requests for anticipated bypasses must be submitted to the DNR in accordance with Subrule 567 IAC 63.6(2).

## Notify the DNR

Contact the appropriate DNR Field Office during normal business hours to report the bypass or upset. **After hours, call the DNR Emergency Response line at 515-725-8694.**

Date reported: 8/25/25 Time reported: 1215 DNR staff member contacted: Shiela Bly

## Follow-Up Written Report

A written report must be submitted to the appropriate DNR Field Office **within five days** of the bypass. **This form may be used for your written report as long as the required information is provided.** Additional information or longer comments can be attached in a separate document.

Reason for the bypass: Forcemain Break

Was this precipitation induced? ☐ Yes ☒ No

If yes, rainfall amount: _____ Rainfall duration: _____

Date: 8/25/25 and time: 0521 of ☒ onset or ☐ discovery of the bypass:

Date: 8/25/25 and time: 0721 bypass ended

Estimated amount of untreated or partially treated wastewater discharged: ~35k - 40k gal

Location of the bypass (address/ditch/road/storm sewer/etc.): NW side of intersection of Johnson Ave and 200th St. West of Fort Dodge.

Did the bypassed wastewater enter a storm sewer or surface water body? ☐ Yes ☒ No

If yes, name of water body affected by the bypass: _____

What is being done to prevent further bypasses? The City and USW are continuing to follow existing procedures to identify and locate breaks via system alarms and physical inspections.

## Additional Information or Action Required

Per 567 IAC 63.6(4), additional information may be required after a bypass occurs, including but not limited to:

- Additional monitoring, sampling, or analysis of the bypass or upset;
- Public notice;
- Temporary disinfection;
- Cleanup of any debris and waste materials deposited in the area affected by the bypass.

Samples collected? ☐ None ☒ Bypass ☐ Water body upstream of bypass ☐ Water body downstream of bypass

Sampling results? ☒ None ☐ Attached ☐ Not yet received (Submit copies to the DNR Field Office once received.)

Public notice required? ☐ Yes ☒ No

If yes, public notice date(s): _____ Method(s) of distribution: _____

Disinfection of affected area? ☒ Not required ☐ Lime application ☐ Chlorine solution

**Signature:** Travis Pender Digitally signed by Travis Pender Date: 2025.08.28 15:25:55 -05'00' **Date:** _____

# 5-Day Bypass Report: City of Fort Dodge (NPDES 9433003)

Travis Pender

Thu 8/28/2025 3:31 PM

To:Klatt, Jeremy <jeremy.klatt@dnr.iowa.gov>;

Cc:Rich Fabbro <rfabbro@fortdodgeiowa.org>; Mark Winninger <mwinninger@uswatercorp.net>;

1 attachments (1 MB)

IDNR Bypass 5-day Report (N Ag LS Forcemain 082525).pdf;

Good Afternoon Jeremy,

Please find attached the 5-Day Bypass report for the recent forcemain break here in Fort Dodge.
The timing of the break is based on our system trends and associated alarms. The alarm set pts are based on a flow average over a 3-4min span. In this particular instance, following pump start-up the flow stayed higher than normal and set the alarm. The pervious pump start and run did not trend as high a flow. This combined with the relatively small release provides a level of confidence that the noted times are accurate.
The volume of the spill is based on the appearance of site conditions and clean-up volume. I simply used an estimated surface area from Goggle Maps and an average depth. I'm sure you noticed the same ditch and field area with liquid when onsite. This volume is in line with the City hauling ~36k gal on Monday w/ minimal water left on Tuesday. The additional hauled waste volumes on Tuesday were associated with the purposeful draining of pipe to perform repairs which was bermed and controlled. We can discuss this estimate if you feel it is incorrect.
I've added the local tile/intake maps we received from the county for reference (see below).
While we collected samples, primarily NH3, this was mainly to differentiate between various rain puddles in the area and confirm the main leak . As the spill was contained and ultimately cleaned up, the results were not logged by the lab and no "formal" results exist.

If you would like any additional information please let me know.

Regards,

**Travis Pender**
Project Manager
City of Fort Dodge Water & Wastewater Treatment Facilities

USW
UTILITY GROUP
ter and Wastewater Utility Operations,
laintenance, Engineering, Construction

dba US Water Services Corporation
1801 Avenue O

Fort Dodge, IA 50501

Office WWTP (515) 955-4484
Office WTP (515) 576-6101
E-mail TPender@uswatercorp.net
Internet www.uswatercorp.com
***| Providing Innovative Solutions Encompassing the Water and Wastewater Industry |***

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# Bypasses and Upsets, 5-Day Written Report

**567 Iowa Administrative Code Rule 63.6(455B)**

**Facility Name:** City of Fort Dodge STP **NPDES Permit No:** 9433003

## Why is this Required?

Pursuant to 567 IAC 63.6(3), the owner or operator of a treatment facility or collection system shall notify the DNR by telephone as soon as possible but not later **than 24 hours after the onset or discovery** of a bypass or upset due to a mechanical failure or acts beyond the control of the owner or operator, e.g., a wet weather event. Basement backups are reportable bypasses unless they are caused by problems with the building lateral or private sewer line.

Note: Requests for anticipated bypasses must be submitted to the DNR in accordance with Subrule 567 IAC 63.6(2).

## Notify the DNR

Contact the appropriate DNR Field Office during normal business hours to report the bypass or upset. **After hours, call the DNR Emergency Response line at 515-725-8694**.

Date reported: 8/25/25 Time reported: 1215 DNR staff member contacted: Shiela Bly

## Follow-Up Written Report

A written report must be submitted to the appropriate DNR Field Office **within five days** of the bypass. **This form may be used for your written report as long as the required information is provided.** Additional information or longer comments can be attached in a separate document.

Reason for the bypass: Forcemain Break

Was this precipitation induced? ☐ Yes ☒ No

If yes, rainfall amount: _____ Rainfall duration: _____

Date: 8/25/25 and time: 0521 of ☒ onset or ☐ discovery of the bypass:

Date: 8/25/25 and time: 0721 bypass ended

Estimated amount of untreated or partially treated wastewater discharged: ~35k - 40k gal

Location of the bypass (address/ditch/road/storm sewer/etc.): NW side of intersection of Johnson Ave and 200th St. West of Fort Dodge.

Did the bypassed wastewater enter a storm sewer or surface water body? ☐ Yes ☒ No

If yes, name of water body affected by the bypass: _____

What is being done to prevent further bypasses? The City and USW are continuing to follow existing procedures to identify and locate breaks via system alarms and physical inspections.

## Additional Information or Action Required

Per 567 IAC 63.6(4), additional information may be required after a bypass occurs, including but not limited to:

- Additional monitoring, sampling, or analysis of the bypass or upset;
- Public notice;
- Temporary disinfection;
- Cleanup of any debris and waste materials deposited in the area affected by the bypass.

Samples collected? ☐ None ☒ Bypass ☐ Water body upstream of bypass ☐ Water body downstream of bypass

Sampling results? ☒ None ☐ Attached ☐ Not yet received (Submit copies to the DNR Field Office once received.)

Public notice required? ☐ Yes ☒ No

If yes, public notice date(s): _____ Method(s) of distribution: _____

Disinfection of affected area? ☒ Not required ☐ Lime application ☐ Chlorine solution

**Signature:** _____ **Date:** _____

**CATEGORICAL INDUSTRIAL USER**

| | |
|---|---|
| **Industry Name:** | **Argenta Medical Laboratories (AML Riverside)** |
| **Industry Address:** | **141 E. Riverside Drive, Fort Dodge, Iowa 50501** |
| **Industry SIC #:** | **2834-Pharmaceutical preparations** |
| **Applicable Category:** | **40 CFR 439-Subpart D-Mixing/Compounding** |
| **Max 30-day Avg flow:** | **14,790 GPD** |

CIU Type? CIU ☒ MTCIU ☐ NSCIU ☐

Is Industry Subject to Local Limits More Stringent Than Categorical? Yes ☒ No ☐

Is Industry Operating Under a Compliance Schedule? Yes ☐ No ☒
Scheduled Compliance Date: _____

Date of Last Periodic Compliance Report: 12/31/2025
Did Report Certify Compliance? Yes ☒ No ☐

Date Last Inspected: 10/24/2025
Did Inspection Showed Facility in Compliance? Yes ☒ No ☐

Date Last Sampled: 12/29/2025
Did Sample(s) Showed Facility in Compliance? Yes ☒ No ☐

Was This Industry Published For SNC? Yes ☐ No ☒

| **Semi-Annual Compliance Status** | **January-June** | **July-December** |
|---|---|---|
| Compliance (C) | | X |
| Infrequent Noncompliance (INC) | X | |
| Significant Noncompliance (SNC) | | |

**Reason(s) For Noncompliance (Check all that apply):**

Effluent Limits ☒ Monitoring Req's ☐ Reporting Req's ☐
Compliance Schedule ☐ Other (Describe) ☐

Argenta Medical Laboratories (AML Riverside) was in Infrequent Noncompliance (INC) for the first compliance monitoring period of 2025 and in Compliance (C) for the second compliance monitoring period of 2025.

Argenta Medical Laboratories (AML Riverside) publicly announced in 2025 that their everyday manufacturing of pharmaceutical products will be transferred to another facility in Kansas in 2026, with no tentative date of production cessation. The City of Fort Dodge will continue to monitor this facility until production has ended, at which time, the industry will be released from the Industrial Pretreatment Program.

4/30/2025 - Biochemical Oxygen Demand (BOD) 30-Day Average of 28 lb/day exceeded the permit limit of 25 lb/day.

Summarize enforcement actions taken to resolve instances of noncompliance (e.g. No. of NOV's mailed, Dollar amount of penalties collected, etc.):

4/30/2025 - Biochemical Oxygen Demand (BOD) 30-Day Average of 28 lb/day exceeded the permit limit of 25 lb/day.
-One (1) Notice of Violation (NOV) was issued in a letter dated 5/8/2025.

**SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USER**

**Industry Name:** **BHJ USA, Inc.**
**Industry Address:** **2472 170th St., Fort Dodge, Iowa 50501**
**Industry SIC #:** **4222-Refrigerated Warehouse and Storage**
**Max 30-day Avg flow:** **18,610 GPD**

**Reason For Significance (Check all that apply)**

Process Flow >25,000 gpd ☒ Potential for Impact on POTW ☒

Total Flow >5% of POTW Capacity Hydraulic ☐ Organic ☐

Is Industry Operating Under a Compliance Schedule? Yes ☐ No ☒
Scheduled Compliance Date: _____

Date of Last Periodic Compliance Report: 12/31/2025
Did Report Certify Compliance? Yes ☐ No ☒

Date Last Inspected: 11/5/2025
Did Inspection Showed Facility in Compliance? Yes ☒ No ☐

Date Last Sampled: 12/24/2025
Did Sample(s) Showed Facility in Compliance? Yes ☒ No ☐

Was This Industry Published For SNC? Yes ☐ No ☒

| **Semi-Annual Compliance Status** | **January-June** | **July-December** |
|---|---|---|
| Compliance (C) | | |
| Infrequent Noncompliance (INC) | X | X |
| Significant Noncompliance (SNC) | | |

**Reason(s) For Noncompliance (Check all that apply):**

Effluent Limits ☒ Monitoring Req's ☐ Reporting Req's ☐
Compliance Schedule ☐ Other (Describe) ☐

BHJ was in Infrequent Noncompliance (INC) for the first and second semi-annual compliance monitoring periods of 2025.

BHJ's status as a Significant Industrial User was reviewed and the decision was made to remove the facility from the Industrial Pretreatment Program by not renewing the Industrial User Wastewater Discharge Permit for the effective period of 1/1/2026 through 12/31/2030.

1/24/2025 - Fats, Oils, and Greases (FOG) Daily Maximum of 229 mg/L exceeded the permit limit of 200 mg/L.
10/22/2025 - Fats, Oils, and Greases (FOG) Daily Maximum of 740 mg/L exceeded the permit limit of 200 mg/L.
10-31-2025 - Fats, Oils, and Greases (FOG) 30-Day Average of 233 mg/L exceeded the permit limit of 150 mg/L.

Summarize enforcement actions taken to resolve instances of noncompliance (e.g. No. of NOV's mailed, Dollar amount of penalties collected, SNC Published, etc.):

1/24/2025 - Fats, Oils, and Greases (FOG) Daily Maximum of 229 mg/L exceeded the permit limit of 200 mg/L.
-One (1) Notice of Violation (NOV) was issued in a letter dated 2/7/2025.
10/22/2025 - Fats, Oils, and Greases (FOG) Daily Maximum of 740 mg/L exceeded the permit limit of 200 mg/L.
10-31-2025 - Fats, Oils, and Greases (FOG) 30-Day Average of 233 mg/L exceeded the permit limit of 150 mg/L
-Two (2) Notices of Violations (NOV's) were issued in a letter dated 11/13/2025.

# REMOVAL AS SIU FACT SHEET

| A. INDUSTRIAL USER INFORMATION | |
|---|---|
| Name of facility | BHJ USA, Inc. |
| Facility location address | 2472 170th Street |
| City, State, ZIP Code | Fort Dodge, IA 50501 |
| Contact person's name | Dr.Billie L. Johnson |
| Telephone number | 531-389-9507 |
| Email | Bjohnson@bhjusa.com |

| IU Permit Number | Permit Exp. Date: | IU Classification(s): | NAICS Code(s) |
|---|---|---|---|
| NCSIU-2021-06 | 12/31/2025 | 4222-Refrigerated Warehouse/Storage | 493120 |

**B. OBJECTIVE**

BHJ USA was founded in 1969 with the primary objective of sourcing and processing raw materials from Danish slaughterhouses and fish producers for the food and pet food industries. During the 1970's, BHJ expanded into meat trading activities, manufacturing of functional animal proteins for food, processing lines for the meat processing industry, and transport services. BHJ USA, Inc. was classified as a Significant Industrial User (SIU) and became a part of the IPP Program after the acquisition of a pet food plant in Fort Dodge in 2011.

According to the Permit Application for Wastewater Discharge for BHJ USA, Inc., submitted to USW in 2021, they state the nature of operation as "Preparation of meat products for use as pet food ingredients".

In January 2025, BHJ restructured its operations from a meat processing facility with approximately 50 employees to a storage-only operation described as ‘storage of meat products for use as pet food ingredients’ on the 2025 Wastewater Permit Application. As a result of this restructuring, the workforce was reduced from about 50 employees to 9 by November 2025, when the annual wastewater inspection was conducted.

USW was informed of this corporate restructure in January 2025 and continued to sample, record, and monitor wastewater data on behalf of the company with the intention to re-evalute if BHJ would need to renew their Wastewater Discharge Permit for the next 5 years.

**C. RATIONALE FOR REMOVING SIU STATUS**

The decision to remove BHJ from the City of Fort Dodge’s Significant Industrial User (SIU) classification was based on the following findings:

1. Discharge Volume and Regulatory Definitions

Monitoring conducted by USW in 2025 confirmed that BHJ’s wastewater discharge no longer meets the SIU criteria outlined in City Code or Section 307 of the Clean Water Act. The facility’s average process flow was 15,440 gpd, significantly below the 25,000 gpd SIU threshold. Although BHJ exceeded 25,000 gpd on 12 days in 2025, the average amount above the threshold was only about 5,000 gallons.

2. Contribution to WWTP Capacity
BHJ's discharge did not approach the 5% threshold of the WWTP's dry-weather hydraulic or organic capacity. The 2025 maximum flow of 40,200 gpd was well under 5% of the treatment plant's 8.4 MGD ADW capacity. The highest recorded BOD (521 lbs/day) and TSS (246 lbs/day) loads were also far below 5% of the plant's respective capacities (27,164 lbs/day BOD and 21,621 lbs/day TSS). The maximum ammonia loading, 15.34 lbs/day, converts to a TKN loading of 12.63 lbs/day—again, substantially below the 5% threshold.

3. FOG Trends Following Operational Changes
After BHJ's transition to a cold-storage operation, FOG concentrations decreased markedly. The average FOG concentration declined from 157.16 mg/L in 2024 to 54.46 mg/L in 2025, while the Daily Maximum dropped from 1,350 mg/L to 740 mg/L, indicating a significant improvement within one year.

**D. FINAL DETERMINATION**

USW and the City of Fort Dodge have made the determination that BHJ USA, Inc. does not meet the definition or intent of a "Significant Industrial User" and recommends removal from the Industrial Pretreatment Program.

**E. FOLLOW UP**

USW and the City of Fort Dodge recommend reviewing the facility every five-year cycle of the Industrial Waste Survey to determine if its process status has changed. This should include review of water usage data from the City water billing department.

# PERMIT CLOSURE

December 10, 2025

Dr.Billie L. Johnson
Food Safety/Regulatory Compliance Manager
BHJ USA, LLC
2472 170th Street
Fort Dodge, IA 50501

RE: Closure of Fort Dodge Wastewater Industrial Use Discharge Permit No. NCSIU-2021-06, BHJ USA, Inc.

To Whom it May Concern:

The Industrial User Wastewater Discharge Permit for BHJ, USA, Inc. (Permit No. NCSIU-2021-06) has been closed following site inspections, sampling, and confirmation that the facility's restructuring has changed its operations from meat processing to cold storage only. The findings confirm this facility is not presently deemed to be a Significant Industrial User as defined in City of Fort Dodge Municipal Code Chapter 13.24.010. As a result, monitoring (in this case by the City of Fort Dodge) and reporting are not currently required, and the permit is hereby closed. It should be noted this status is based off information known at the time of this evaluation. If additional information comes to light that indicates the Significant Industrial User status may be appropriate, this information will be reviewed, and a new Industrial User Discharge Permit could be enacted.

You have the right to appeal this decision to close the permit by filing a written notice of appeal and request for administrative hearing with the director of this department within 30 days of this action. If you do not file an appeal, this decision will be considered final at the end of the appeal period.

If you have any questions concerning this letter or the permit closure, please contact me at 515-227-8695 or mbemrich@uswatercorp.net.

Respectfully,

Michelle Bemrich

Michelle Bemrich
IPP Coordinator, USW Utility Group

cc: City of Fort Dodge
Travis Pender, Project Manager, USW Utility Group

Enclosure(s)

# INDUSTRIAL USER WASTEWATER DISCHARGE PERMIT AMENDMENT

CITY OF FORT DODGE, IOWA

| **Name / Address of Permittee** | **Location of Facility** |
|---|---|
| BHJ USA, Inc. | BHJ USA, Inc. |
| 2472 170th Street | 2472 170th Street |
| Fort Dodge, IA 50501 | Fort Dodge, IA 50501 |

**Permit Number:** NCSIU-2021-06

**Issue Date:** January 1, 2021

**Closure Date:** January 1, 2025

Pursuant to the authority of City of Fort Dodge Municipal Code Section **Chapter 13.24.250 Wastewater contribution permits** (Ord. 1863 § 30, 1994), the Director for the City of Fort Dodge has issued the above-referenced Permit. Pursuant to the same authority, the Director hereby closes said permit as set forth below:

> The Industrial Use Discharge Permit for BHJ USA Inc. has been closed based on information obtained from site inspections, sampling, and confirmation that the facility's restructuring has changed its operations from meat processing to cold storage only. The findings confirm this facility is not presently deemed to be a Significant Industrial User as defined in City of Fort Dodge Municipal Code Chapter 13.24.010. As a result, monitoring (in this case by the City of Fort Dodge) and reporting are not currently required, and the permit is hereby closed. It should be noted this status is based off information known at the time of this evaluation. If additional information comes to light that indicates the Significant Industrial User status may be appropriate, this information will be reviewed, and a new Industrial Use Discharge Permit could be enacted.

We recommend that copies of this decision be distributed to all persons who have received a copy of the permit, and that the original of this decision be attached to the original permit in your files. This decision may be appealed by filing a written notice of appeal and request for administrative hearing with the Director. This should be done within sixty (60) days of this action.

If you have any questions, please contact Michelle Bemrich at 515-227-8695 or mbemrich@uswatercorp.net or David Fierke at 515-573-7144 or dfierke@fortdodgeiowa.org.

Respectfully:

By:  Date: 1/12/2026

David Fierke, City Manager, City of Fort Dodge, IA

**CATEGORICAL INDUSTRIAL USER**

| | |
|---|---|
| **Industry Name:** | **Cargill Fort Dodge** |
| **Industry Address:** | **1950 Harvest Road, Fort Dodge, Iowa 50501** |
| **Industry SIC #:** | **2046-Wet Corn Milling** |
| **Applicable Category:** | **40 CFR 406.15 Subpart A** |
| **Max 30-day Avg flow:** | **2,644,000 GPD** |

CIU Type? CIU ☒ MTCIU ☐ NSCIU ☐

Is Industry Subject to Local Limits More Stringent Than Categorical? Yes ☒ No ☐

Is Industry Operating Under a Compliance Schedule? Yes ☐ No ☒
Scheduled Compliance Date: _____

Date of Last Periodic Compliance Report: 12/31/2025
Did Report Certify Compliance? Yes ☐ No ☒

Date Last Inspected: 11/24/2025
Did Inspection Showed Facility in Compliance? Yes ☒ No ☐

Date Last Sampled: 12/31/2025
Did Sample(s) Showed Facility in Compliance? Yes ☒ No ☐

Was This Industry Published For SNC? Yes ☐ No ☒

| **Semi-Annual Compliance Status** | **January-June** | **July-December** |
|---|---|---|
| Compliance (C) | | |
| Infrequent Noncompliance (INC) | X | X |
| Significant Noncompliance (SNC) | | |

**Reason(s) For Noncompliance (Check all that apply):**

Effluent Limits ☒ Monitoring Req's ☐ Reporting Req's ☐
Compliance Schedule ☐ Other (Describe) ☐

Cargill Fort Dodge was in Infrequent Noncompliance (INC) for the first and second Compliance monitoring periods for 2025.

7/17/2025 - Zinc Daily Maximum of 3.390 lb/day exceeded the permit limit of 1.800 lb/day.
10/1/2025 - Zinc Daily Maximum of 3.000 lb/day exceeded the permit limit of 1.800 lb/day.
10/9/2025 - Zinc Daily Maximum of 2.562 lb/day exceeded the permit limit of 1.800 lb/day.

Summarize enforcement actions taken to resolve instances of noncompliance (e.g. No. of NOV's mailed, Dollar amount of penalties collected, etc.):

7/17/2025 - Zinc Daily Maximum of 3.390 lb/day exceeded the permit limit of 1.800 lb/day.
-An internal review identified a Zinc monitoring result that exceeded the monitoring threshold but was not recognized at the time of the initial review. Zinc was a monitor-only parameter under the Fort Dodge WWTP's NPDES Permit and was not subject to enforceable effluent limitations. Review of treatment plant operations confirmed no adverse impacts to the Fort Dodge WWTP, therefore, no violation notification letter was issued.
10/1/2025 - Zinc Daily Maximum of 3.000 lb/day exceeded the permit limit of 1.800 lb/day.
-An internal review identified a Zinc monitoring result that exceeded the monitoring threshold but was not recognized at the time of the initial review. Zinc was a monitor-only parameter under the Fort Dodge WWTP's

NPDES Permit and was not subject to enforceable effluent limitations. Review of treatment plant operations confirmed no adverse impacts to the Fort Dodge WWTP, therefore, no violation notification letter was issued. It was also confirmed that zinc was removed on the new NPDES permit submitted to the Fort Dodge WWTP for initial review before the new effective date of 1/1/2026.
10/9/2025 - Zinc Daily Maximum of 2.562 lb/day exceeded the permit limit of 1.800 lb/day.
-An internal review identified a Zinc monitoring result that exceeded the monitoring threshold but was not recognized at the time of the initial review. Zinc is a monitor-only parameter under the Fort Dodge WWTP's NPDES Permit and is not subject to enforceable effluent limitations. Review of treatment plant operations confirmed no adverse impacts to the Fort Dodge WWTP, therefore, no violation notification letter was issued. It was also confirmed that zinc was removed on the new NPDES permit submitted to the Fort Dodge WWTP for initial review before the new effective date of 1/1/2026.

**SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USER**

**Industry Name:** **CJ BioAmerica, Inc.**
**Industry Address:** **1946 Harvest Avenue, Fort Dodge, Iowa 50501**
**Industry SIC #:** **2048-Production of Amino Acids**
**Max 30-day Avg flow:** **1,713,000 GPD**

**Reason For Significance (Check all that apply)**

Process Flow >25,000 gpd ☒ Potential for Impact on POTW ☒

Total Flow >5% of POTW Capacity Hydraulic ☒ Organic ☒

Is Industry Operating Under a Compliance Schedule? Yes ☐ No ☒
Scheduled Compliance Date: _____

Date of Last Periodic Compliance Report: 12/31/2025
Did Report Certify Compliance? Yes ☐ No ☒

Date Last Inspected: 10/29/2025
Did Inspection Showed Facility in Compliance? Yes ☒ No ☐

Date Last Sampled: 12/31/2025
Did Sample(s) Showed Facility in Compliance? Yes ☒ No ☐

Was This Industry Published For SNC? Yes ☐ No ☒

| **Semi-Annual Compliance Status** | **January-June** | **July-December** |
|---|---|---|
| Compliance (C) | | |
| Infrequent Noncompliance (INC) | X | X |
| Significant Noncompliance (SNC) | | |

**Reason(s) For Noncompliance (Check all that apply):**

Effluent Limits ☒ Monitoring Req's ☐ Reporting Req's ☐
Compliance Schedule ☐ Other (Describe) ☐

CJ BioAmerica, Inc. was in Infrequent Noncompliance (INC) for the first and second semi-annual compliance monitoring periods of 2025.

3/10/2025 - Biochemical Oxygen Demand (BOD) Daily Maximum of 13,264 lb/day exceeded the temporary permit variance of 12,440 lb/day.
3/31/2025 - Biochemical Oxygen Demand (BOD) Daily Maximum of 11,170 lb/day exceeded the permit limit of 10,440 lb/day.
9/11/2025 - TKN Daily Maximum of 4,320 lb/day exceeded the permit limit of 4,280 lb/day.
12/9/2025 - TKN Daily Maximum of 5,049 lb/day exceeded the permit limit of 4,280 lb/day.
12/9/2025 - Biochemical Oxygen Demand (BOD) Daily Maximum of 22,029 lb/day exceeded the permit limit of 10,440 lb/day.

Summarize enforcement actions taken to resolve instances of noncompliance (e.g. No. of NOV's mailed, Dollar amount of penalties collected, SNC Published, etc.):

3/10/2025 - Biochemical Oxygen Demand (BOD) Daily Maximum of 13,264 lb/day exceeded the temporary permit variance of 12,440 lb/day.
- One (1) Notice of Violation (NOV) was issued in a letter dated 3/19/2025.
3/31/2025 - Biochemical Oxygen Demand (BOD) Daily Maximum of 11,170 lb/day exceeded the permit limit of 10,440 lb/day.
- One (1) Notice of Violation (NOV) was issued in a letter dated 4/8/2025.
9/11/2025 - TKN Daily Maximum of 4,320 lb/day exceeded the permit limit of 4,280 lb/day.
- One (1) Notice of Violation (NOV) was issued in a letter dated 9/30/2025.
12/9/2025 - TKN Daily Maximum of 5,049 lb/day exceeded the permit limit of 4,280 lb/day.
12/9/2025 - Biochemical Oxygen Demand (BOD) Daily Maximum of 22,029 lb/day exceeded the permit limit of 10,440 lb/day.
- Two (2) Notices of Violation (NOV's) were issued in a letter dated 12/23/2025.

**CATEGORICAL INDUSTRIAL USER**

| | |
|---|---|
| **Industry Name:** | **Elanco US Inc.** |
| **Industry Address:** | **800 5th Street, Fort Dodge, Iowa 50501** |
| **Industry SIC #:** | **2836-Biological Products (no diagnostic substances)** |
| **Applicable Category:** | **40 CFR 439-Subpart A-Fermentation Products** |
| **Max 30-day Avg flow:** | **456,870 GPD** |

CIU Type? CIU ☒ MTCIU ☐ NSCIU ☐

Is Industry Subject to Local Limits More Stringent Than Categorical? Yes ☒ No ☐

Is Industry Operating Under a Compliance Schedule? Yes ☐ No ☒
Scheduled Compliance Date: _____

Date of Last Periodic Compliance Report: 12/31/2025
Did Report Certify Compliance? Yes ☒ No ☐

Date Last Inspected: 11/12/2025
Did Inspection Showed Facility in Compliance? Yes ☒ No ☐

Date Last Sampled: 12/31/2025
Did Sample(s) Showed Facility in Compliance? Yes ☒ No ☐

Was This Industry Published For SNC? Yes ☐ No ☒

| **Semi-Annual Compliance Status** | **January-June** | **July-December** |
|---|---|---|
| Compliance (C) | X | X |
| Infrequent Noncompliance (INC) | | |
| Significant Noncompliance (SNC) | | |

**Reason(s) For Noncompliance (Check all that apply):**

Effluent Limits ☐ Monitoring Req's ☐ Reporting Req's ☐
Compliance Schedule ☐ Other (Describe) ☐

Elanco US Inc. was in Compliance (C) for the first and second semi-annual compliance monitoring periods of 2025.

Summarize enforcement actions taken to resolve instances of noncompliance (e.g. No. of NOV's mailed, Dollar amount of penalties collected, etc.):

NA

**SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USER**

| | |
|---|---|
| **Industry Name:** | **Fort Dodge Correctional Facility** |
| **Industry Address:** | **1550 L Street, Fort Dodge, Iowa 50501** |
| **Industry SIC #:** | **9223-Correctional Institutions** |
| **Max 30-day Avg flow:** | **162,038 GPD** |

**Reason For Significance (Check all that apply)**

Process Flow >25,000 gpd ☒ Potential for Impact on POTW ☒

Total Flow >5% of POTW Capacity Hydraulic ☐ Organic ☒

Is Industry Operating Under a Compliance Schedule? Yes ☐ No ☒
Scheduled Compliance Date: _____

Date of Last Periodic Compliance Report: 12/31/2025
Did Report Certify Compliance? Yes ☒ No ☐

Date Last Inspected: 10/23/2025
Did Inspection Showed Facility in Compliance? Yes ☒ No ☐

Date Last Sampled: 12/29/2025
Did Sample(s) Showed Facility in Compliance? Yes ☒ No ☐

Was This Industry Published For SNC? Yes ☐ No ☒

| **Semi-Annual Compliance Status** | **January-June** | **July-December** |
|---|---|---|
| Compliance (C) | X | X |
| Infrequent Noncompliance (INC) | | |
| Significant Noncompliance (SNC) | | |

**Reason(s) For Noncompliance (Check all that apply):**

Effluent Limits ☐ Monitoring Req's ☐ Reporting Req's ☐
Compliance Schedule ☐ Other (Describe) ☐

The Fort Dodge Correctional Facility was in Compliance (C) for the first and second semi-annual compliance monitoring periods of 2025.

Summarize enforcement actions taken to resolve instances of noncompliance (e.g. No. of NOV's mailed, Dollar amount of penalties collected, SNC Published, etc.):

NA

**SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USER**

| | |
|---|---|
| **Industry Name:** | **NCIRSWA (North Central Iowa Regional Solid Waste Agency)** |
| **Industry Address:** | **2150 South 22nd Street, Fort Dodge, Iowa 50501** |
| **Industry SIC #:** | **4953-Refuse Systems** |
| **Max 30-day Avg flow:** | **13,403 GPD** |

**Reason For Significance (Check all that apply)**

Process Flow >25,000 gpd ☐ Potential for Impact on POTW ☒

Total Flow >5% of POTW Capacity Hydraulic ☐ Organic ☐

Is Industry Operating Under a Compliance Schedule? Yes ☐ No ☒
Scheduled Compliance Date: _____

Date of Last Periodic Compliance Report: 12/31/2025
Did Report Certify Compliance? Yes ☐ No ☒

Date Last Inspected: 7/28/2025
Did Inspection Showed Facility in Compliance? Yes ☒ No ☐

Date Last Sampled: 12/2/2025
Did Sample(s) Showed Facility in Compliance? Yes ☒ No ☐

Was This Industry Published For SNC? Yes ☐ No ☒

| **Semi-Annual Compliance Status** | **January-June** | **July-December** |
|---|---|---|
| Compliance (C) | | |
| Infrequent Noncompliance (INC) | X | X |
| Significant Noncompliance (SNC) | | |

**Reason(s) For Noncompliance (Check all that apply):**

Effluent Limits ☒ Monitoring Req's ☐ Reporting Req's ☐
Compliance Schedule ☐ Other (Describe) ☐

NCIRSWA was in Infrequent Noncompliance (INC) for the first and second semi-annual monitoring periods of 2025.

3/31/2025 - Flow 30-Day Average result of 0.01273 MGD exceeded the permit limit of 0.00936 MGD.
4/30/2025 - Flow 30-Day Average result of 0.01240 MGD exceeded the permit limit of 0.00936 MGD.
4/30/2025 - Biochemical Oxygen Demand (BOD) 30-day Average result of 94.4 lb/day exceeded the permit limit of 50.0 lb/day.

NCIRSWA serves as the municipal landfill for the City of Fort Dodge and Webster County. In 2025, the landfill opened a new 7-acre refuse cell located in the northeast corner of the property. Following the opening of the new cell, increased wastewater flow rates were observed, which resulted in Notices of Violation issued in March and April 2025. Upon review, the landfill supervisor and the IPP Coordinator determined that the increased flows were directly influenced by the newly opened cell and weather-related conditions. The landfill was therefore placed in a monitor-only status for flow until renewal of its Industrial User Wastewater Discharge Permit, which expired on December 31, 2025. Flow data collected from April through December 2025 demonstrated that precipitation events significantly impacted pump run times. Based on this data, the IPP Coordinator adjusted the flow limits in the renewed permit to reflect actual operating conditions.

Summarize enforcement actions taken to resolve instances of noncompliance (e.g. No. of NOV's mailed, Dollar amount of penalties collected, SNC Published, etc.):

3/31/2025 - Flow 30-Day Average result of 0.01273 MGD exceeded the permit limit of 0.00936 MGD.
- One (1) Notice of Violation (NOV) was issued in a letter dated 4/8/2025.

4/30/2025 - Flow 30-Day Average result of 0.01240 MGD exceeded the permit limit of 0.00936 MGD.
4/30/2025 - Biochemical Oxygen Demand (BOD) 30-day Average result of 94.4 lb/day exceeded the permit limit of 50.0 lb/day.
- Two (2) Notices of Violations were issued in a letter dated 5/8/2025.

**SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USER**

**Industry Name:** **Nestle Purina Petcare**
**Industry Address:** **2400 5th Avenue South, Fort Dodge, Iowa 50501**
**Industry SIC #:** **2047-Dog and Cat Food**
**Max 30-day Avg flow:** **110,000 GPD**

**Reason For Significance (Check all that apply)**

Process Flow >25,000 gpd ☒ Potential for Impact on POTW ☒

Total Flow >5% of POTW Capacity Hydraulic ☐ Organic ☐

Is Industry Operating Under a Compliance Schedule? Yes ☐ No ☒
Scheduled Compliance Date: _____

Date of Last Periodic Compliance Report: 12/31/2025
Did Report Certify Compliance? Yes ☐ No ☒

Date Last Inspected: 10/29/2025
Did Inspection Showed Facility in Compliance? Yes ☒ No ☐

Date Last Sampled: 12/17/2025
Did Sample(s) Showed Facility in Compliance? Yes ☒ No ☐

Was This Industry Published For SNC? Yes ☐ No ☒

| **Semi-Annual Compliance Status** | **January-June** | **July-December** |
|---|---|---|
| Compliance (C) | X | |
| Infrequent Noncompliance (INC) | | X |
| Significant Noncompliance (SNC) | | |

**Reason(s) For Noncompliance (Check all that apply):**

Effluent Limits ☒ Monitoring Req's ☐ Reporting Req's ☐
Compliance Schedule ☐ Other (Describe) ☐

Nestle Purina Petcare was Compliant (C) for the first compliance monitoring period of 2025 and was in Infrequent Noncompliance for the second compliance monitoring period of 2025.

7/8/2025 - pH Minimum result of 5.17 SU was less than the minimum permit limit of 5.5 SU.
9/2/2025 - pH Minimum result of 5.25 SU was less than the minimum permit limit of 5.5 SU.
9/17/2025 - Flow rate of 0.2400 MGD exceeded the Daily Maximum permit limit of 0.1750 MGD.
9/18/2025 - Flow rate of 0.1840 MGD exceeded the Daily Maximum permit limit of 0.1750 MGD.
9/30/2025 - Flow rate of 0.1240 MGD exceeded the 30-Day Average permit limit of 0.1170 MGD.
10/31/2025 - Flow rate of 0.1200 MGD exceeded the 30-Day Average permit limit of 0.1170 MGD

Summarize enforcement actions taken to resolve instances of noncompliance (e.g. No. of NOV's mailed, Dollar amount of penalties collected, SNC Published, etc.):

7/8/2025 - pH Minimum result of 5.17 SU was less than the minimum permit limit of 5.5 SU.
- One (1) Notice of Violation (NOV) was issued in a letter dated 7/11/2025.
9/2/2025 - pH Minimum result of 5.25 SU was less than the minimum permit limit of 5.5 SU.
- No Notice of Violation (NOV) was issued. The wastewater technician was informed that Nestle was in a factory shutdown and he collected a grab sample a day before the start-up. The grab sample taken was not a true representation of normal process wastewater which would normally be collected if in full production.

9/17/2025 - Flow rate of 0.2400 MGD exceeded the Daily Maximum permit limit of 0.1750 MGD.
9/18/2025 - Flow rate of 0.1840 MGD exceeded the Daily Maximum permit limit of 0.1750 MGD.
-Two (2) Notices of Violations (NOV's) were issued in a letter dated 9/30/2025.

9/30/2025 - Flow rate of 0.1240 MGD exceeded the 30-Day Average permit limit of 0.1170 MGD.
- One (1) Notice of Violation (NOV) was issued in a letter dated 10/7/2025.
10/31/2025 - Flow rate of 0.1200 MGD exceeded the 30-Day Average permit limit of 0.1170 MGD.
- One (1) Notice of Violation was issued in a letter dated 11/13/2025.

**SIGNIFICANT NON-CATEGORICAL INDUSTRIAL USER**

| | |
|---|---|
| **Industry Name:** | **Unity Point Health-TRMC** |
| **Industry Address:** | **802 Kenyon Road, Fort Dodge, Iowa 50501** |
| **Industry SIC #:** | **NA** |
| **Max 30-day Avg flow:** | **36,338 GPD** |

**Reason For Significance (Check all that apply)**

Process Flow >25,000 gpd ☐ Potential for Impact on POTW ☒

Total Flow >5% of POTW Capacity Hydraulic ☐ Organic ☐

Is Industry Operating Under a Compliance Schedule? Yes ☐ No ☒
Scheduled Compliance Date: _____

Date of Last Periodic Compliance Report: 12/31/2025
Did Report Certify Compliance? Yes ☒ No ☐

Date Last Inspected: 12/2/2025
Did Inspection Showed Facility in Compliance? Yes ☒ No ☐

Date Last Sampled: 12/22/2025
Did Sample(s) Showed Facility in Compliance? Yes ☒ No ☐

Was This Industry Published For SNC? Yes ☐ No ☒

| **Semi-Annual Compliance Status** | **January-June** | **July-December** |
|---|---|---|
| Compliance (C) | X | X |
| Infrequent Noncompliance (INC) | | |
| Significant Noncompliance (SNC) | | |

**Reason(s) For Noncompliance (Check all that apply):**

Effluent Limits ☐ Monitoring Req's ☐ Reporting Req's ☐
Compliance Schedule ☐ Other (Describe) ☐

Unity Point was in Compliance (C) for both the first and second semi-annual Compliance monitoring periods of 2025.

Summarize enforcement actions taken to resolve instances of noncompliance (e.g. No. of NOV's mailed, Dollar amount of penalties collected, SNC Published, etc.):

NA