UNITED STATES
ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 Broadway
New York, NY 10007-1866

IN THE MATTER OF:

Newburg Egg Processing Corp.
17 Novogrodsky Road
Woodridge, New York 12789-5517
Respondent

Proceeding pursuant to Section 309(g) of the Clean Water Act, 33 U.S.C. § 1319(g)
EPA ICIS No. NYP009823

CONSENT AGREEMENT AND FINAL ORDER

Docket No. CWA-02-2023-3401

I. PRELIMINARY STATEMENT

WHEREAS, the Complainant in this proceeding, the Regional Administrator, Region 2, United States Environmental Protection Agency ("EPA" or "Complainant") and Respondent (collectively, "the Parties"), having agreed that settlement of this matter is in the public interest, and that entry of this Consent Agreement and Final Order ("CA/FO" or "Agreement") is the most appropriate means of resolving this matter;

WHEREAS, Respondent has separately agreed to install a PolyBlend Dry Polymer Feed System at the 17 Novogrodsky Road facility, as described in the attached document (Attachment A), and will install this system by December 31, 2023; and

WHEREAS, Respondent has separately agreed to provide to EPA no later than thirty (30) days after installation of the PolyBlend Dry Polymer Feed System a written summary of the installed project, including certification that it is in operation.

NOW, THEREFORE, before the taking of any testimony, upon the pleadings, without adjudication of any issue of fact or law, and upon consent and agreement of the Parties, it is hereby agreed and ordered as follows:

II. PROCEDURAL AND FACTUAL FINDINGS

1. The following Procedural and Factual Findings are made pursuant to the authority vested in the Administrator of the EPA by the Clean Water Act, 33 U.S.C. § 1251 *et. seq*. ("Act" or "CWA"). This authority has been duly delegated to the Regional Administrator of EPA Region 2, which authority has been duly re-delegated to the undersigned Director of Enforcement and Compliance Assurance Division, Region 2, EPA. EPA initiates this proceeding to achieve compliance with the Act pursuant to Section 309(g)(2)(B) of the Act, 33 U.S.C. § 1319(g)(2)(B) (Class II Administrative Penalties).

2. The parties agree to settlement of this cause of action before the filing of a complaint, and therefore this proceeding is simultaneously commenced and concluded by the issuance of a consent agreement and final order pursuant to Sections 22.18(b)(2) and (3) of the "Consolidated Rules of Practice Governing the Administrative Assessment of Civil Penalties, Issuance of Compliance or Corrective Action Orders, and the Revocation, Termination or Suspension of Permits" ("CROP"). 40 C.F.R. § 22.13(b).

3. This CA/FO alleges violations for failure to meet Pretreatment Standards promulgated pursuant to Section 307(b) of the Act, 33 U.S.C. § 1317(b), and enforceable pursuant to Section 307(d) of the Act, 33 U.S.C. § 1317(d), at Respondent's Egg Processing Facility located at 17 Novogrodsky Road, Woodridge, New York, operating under Standard Industrial Classification ("SIC") Code 2015 (Poultry Slaughtering and Processing: including—Eggs: canned, dehydrated, desiccated, frozen, and processed; and, Eggs: drying, freezing, and breaking). In failing to meet these standards, Respondent caused Pass Through and Interference of the Woodridge Wastewater Treatment Plant ("WWTP").

4. The purpose of pretreatment standards is "to prevent the discharge of any pollutant through treatment works… which are publicly owned, which pollutant interferes with, passes through, or otherwise is incompatible with such works." 33 U.S.C. § 1317(b)(1). Pursuant to Section 307(b) of the Act, 33 U.S.C. § 1317(b), EPA promulgated the pretreatment regulations found at 40 C.F.R. Part 403.

5. Process wastewater from the Respondent's egg processing operations, including tank and equipment washwater (both pre-treated and untreated at the time of violation), discharge to the Woodridge sanitary sewer system tributary to the Woodridge WWTP. The Woodridge WWTP is authorized to discharge into Sandburg Creek under State Pollutant Discharge Elimination System ("SPDES") Permit No NY0272817. New York's SPDES program has been approved by EPA for the control of surface wastewater discharges in accordance with Section 402 of the CWA, National Pollutant Discharge Elimination System ("NPDES") and 40 C.F.R. Part 123.

6. The Woodridge WWTP is a Publicly Owned Treatment Works ("POTW") within the meaning of 40 CFR § 403.3(q).

7. Sandburg Creek flows into Rondout Creek, which flows into the Hudson River and ultimately the Atlantic Ocean, all waters of the United States within the meaning of Section 502(14) of the Act, 33 U.S.C. § 1362(14).

8. The general prohibitions in 40 C.F.R. § 403.5(a) include a prohibition on a discharge by an industrial user that causes, in whole or part, "Pass Through" or "Interference," defined at 40 C.F.R. §§ 403.3(p) and (k) respectively.

9. The term "industrial user" or "user" means a source of indirect discharge, 40 C.F.R. § 403.3(j), and the term "indirect discharge" means the "introduction of pollutants into a POTW from any non-domestic source regulated under Section 307(b), (c), or (d) of the Act." 40 C.F.R. § 403.3(i).

10. "Pass Through" is a discharge of pollutants which "exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation)." 40 C.F.R. § 403.3(p).

11. "Interference" is defined as a discharge of pollutants, which alone or in conjunction with other sources, inhibits or disrupts the treatment processes or operations of a POTW, and which therefore is a cause of a violation of any requirement of a POTW's NPDES permit. 40 C.F.R. § 403.3(k).

12. Respondent, by introducing pollutants, as defined under Section 502(12) of the Act, 33 U.S.C. § 1362(12), into a POTW, the Woodridge WWTP, from a regulated non-domestic source, indirectly discharges into the Woodridge WWTP. 40 C.F.R. § 403.3(i). As a source of indirect discharge, Respondent is an industrial user pursuant to 40 C.F.R. § 403.3(j).

13. This CA/FO alleges that Respondent caused Pass Through and Interference of the Woodridge WWTP by discharging both improperly pre-treated and untreated wastewater to the Woodridge WWTP during several months between January 2018 and June 2021, as documented in Attachment B. See 33 U.S.C. § 1317; 40 C.F.R. § 403.5. This CA/FO alleges that Respondent, an industrial user of the Woodridge WWTP, caused the Woodridge WWTP to discharge pollutants in excess of its SPDES permit limits in violation of Sections 301 and 402 of the Act. See 33 U.S.C. §1311(a); 33 U.S.C. §1342. This CA/FO alleges that Respondent's indirect discharge caused, or in conjunction with other sources caused, the Woodridge WWTP to violate its permit limits for monthly average of Nitrogen and Ammonia ("NH3"), daily maximum Five Day Biochemical Oxygen Demand ("BOD5"), and monthly average Phosphorus ("P"), at various times in the stated period, as well as a violation of its pH effluent limit.

14. EPA has jurisdiction over the subject matter of this action, pursuant to Section 309 of the Act, 33 U.S.C. §1319, and over the Respondent.

III. CONSENT AGREEMENT

1. The Paragraphs above are re-alleged and incorporated herein by reference.

2. EPA and Respondent agree that it is in the public interest to resolve the issues alleged in this Consent Agreement without further litigation and the expense and effort that litigation entails.

3. Based upon the foregoing, and pursuant to Section 309(g) of the Act, 33 U.S.C. § 1319(g), and the CROP, it is hereby agreed by and between EPA and Respondent, and Respondent voluntarily and knowingly agrees as follows:

IV. SETTLEMENT TERMS

1. For the purpose of this proceeding, Respondent admits the jurisdictional allegations of this CA/FO and neither admits nor denies the factual allegations contained herein.

2. Respondent waives its right to contest the allegations at a judicial or administrative hearing, or to appeal this CA/FO.

3. Respondent consents to the payment of the civil penalty as stated below.

V. PAYMENT OF CIVIL PENALTY

1. Respondent shall pay a civil penalty in the amount of one hundred thousand dollars **($100,000),** made payable to the "Treasurer of the United States of America," in accordance with the following schedule, that includes the required interest.

Payment Number	Days from Effective Date	Payment Amount with Interest
1	**30**	**$5,555.56**
2	**60**	**$5,712.97**
3	**90**	**$5,629.63**
4	**120**	**$5,625.00**
5	**150**	**$5,620.37**
6	**180**	**$5,615.75**
7	**210**	**$5,611.12**
8	**240**	**$5,606.49**
9	**270**	**$5,601.86**
10	**300**	**$5,597.23**
11	**330**	**$5,592.60**
12	**360**	**$5,587.97**
13	**390**	**$5,583.34**
14	**420**	**$5,578.71**
15	**450**	**$5,574.08**
16	**480**	**$5,569.45**
17	**510**	**$5,564.82**
18	**540**	**$5,560.11**
Total		**$100,787.06**

2. Payments can be made by debit/credit card, check, or electronically. Electronic payments fall into two categories: wires and Automated Clearinghouse (ACH). Wires are same day and more costly. ACH is the next day or any future scheduled day and is less expensive. Please note that wires and ACH payments must be conducted through the sender's bank. The checks (cashier's or certified checks only) shall be identified with a notation of the name and docket number of this case, set forth in the caption on the first page of this document. Payment methods are described below:

Type of Payment	Payment Information	
Debit and Credit Card Payments	**https://www.pay.gov/paygov/**	
Checks from U.S. Banks **Finance Center Contacts:** **Craig Steffen** **(513-487-2091)**	**U.S. Postal Service**	**UPS, Federal Express, or Overnight Mail**
	US Environmental Protection Agency **Fines and Penalties** **Cincinnati Finance Center** **PO Box 979077** **St. Louis, MO 63197-9000**	**U.S. Bank** **Government Lockbox** **979077 US EPA Fines & Penalties** **1005 Convention Plaza** **SL-MO-C2-GL** **St. Louis, MO 63101** **314-418-1028**
Checks drawn on foreign banks with no USA branches (any currency)	**Cincinnati Finance** **US EPA, MS-NWD** **26 W ML King Drive** **Cincinnati, OH 45268-0001**	
Wire Transfers (any currency) **Details on format and content of wire transfer –** **www.epa.gov/ocfo/finservices/required_info.htm**	**Federal Reserve Bank of New York** **ABA: 021030004** **Account Number: 68010727** **SWIFT address: FRNYUS33** **33 Liberty Street** **New York, NY 10045** **Field Tag 4200 of the Fedwire message should read:** **"D 68010727 Environmental Protection Agency"**	
ACH - Automated Clearinghouse for receiving US currency Finance Center Contacts: **John Schmid** **(202-874-7026)** **REX (Remittance Express)** **1-866-234-5681**	**US Treasury REX / Cashlink ACH Receiver** **ABA: 051036706** **Account Number: 310006, Environmental Protection Agency** **CTX Format Transaction Code 22 – checking** **Physical location of US Treasury facility:** **5700 Rivertech Court** **Riverdale, MD 20737**	

ONLINE PAYMENT:

There is now an On-Line Payment Option, available through the Department of Treasury. This payment option can be accessed from the information below: WWW.PAY.GOV. Enter “sfo 1.1” in the search field. Open form and complete required fields.

Respondent shall also send copies of this payment via email to each of the following:

Douglas McKenna, Chief
Water Compliance Branch
Enforcement and Compliance Assurance Division
U.S. EPA, Region 2
290 Broadway, 21st Floor
New York, New York 10007-1866
Mckenna.Douglas@epa.gov

And

Regional Hearing Clerk
U.S. Environmental Protection Agency, Region 2
290 Broadway, 17th Floor
New York, New York 10007-1866
Maples.Karen@epa.gov

3. The payment must be received at one of the above addresses on or before the dates set out in the table above (the "due date") and based on the effective date of this CA/FO, as defined below.

4. Failure to pay the penalty in full according to the above provisions will result in referral of this matter to the United States Department of Justice or the United States Department of the Treasury for Collection.

5. Further, if the payment is not received on or before the applicable due date, interest will be assessed at the annual rate established by the Secretary of Treasury pursuant to the Debt Collection Act, 31 U.S.C. § 3717, on the overdue amount from the due date through the date of payment. In addition, a late payment handling charge of $15.00 will be assessed for each 30-day period (or any portion thereof) following the due date in which the balance remains unpaid. A 6% per annum penalty also will be applied on any principal amount not paid within 90 days of the due date.

6. In addition, pursuant to Section 309(g)(9) of the Act, 33 U.S.C. § 1319(g)(9), if payment is not received by the due date, a quarterly nonpayment penalty will be imposed for each calendar quarter during which such nonpayment persists. The quarterly nonpayment penalty is 20% of the aggregate amount of penalties and quarterly nonpayment penalties which are unpaid as of the beginning of such quarter. You also may be required to pay attorneys' fees and costs for collection proceedings in connection with nonpayment.

7. The penalty to be paid is a civil penalty assessed by the EPA and shall not be deductible from Respondent's federal or State of New York taxes.

VI. OTHER TERMS AND CONDITIONS

1. The provisions of this CA/FO shall be binding upon Respondent, its officers, directors, agents, authorized representatives and successors or assigns, including, but not limited to, subsequent

purchasers. No transfer of ownership or operation shall relieve Respondent of its obligation to comply with this CA/FO.

2. Except for the specific violations resolved herein, nothing in this agreement shall be construed as prohibiting, altering, or in any way limiting the ability of EPA to seek any other remedies or sanctions available by virtue of Respondent's violation of this agreement .

3. This CA/FO shall not relieve Respondent of its obligation to comply with all applicable provisions of federal, state or local law, nor shall it be construed to be a ruling on, or determination of, any issue related to any federal, state or local permit.

4. This CA/FO constitutes a settlement by EPA of all claims for civil penalties pursuant to the Act for the violations by the Respondent alleged herein. Nothing in this CA/FO is intended to, nor shall be construed to, operate in any way to resolve any criminal liability of the Respondent. Except with respect to the specific violations resolved herein, compliance with this CA/FO shall not be a defense to any actions subsequently commenced pursuant to Federal laws and regulations administered by EPA, and it is the responsibility of Respondent to comply with such laws and regulations.

5. Each undersigned representative of the Parties to this CA/FO certifies that he or she is fully authorized by the party represented to enter into the terms and conditions of this CA/FO to execute and legally bind that party to it.

6. Upon execution by the parties, this Agreement shall be subject to a public comment period of not less than thirty (30) days, pursuant to Section 309(g)(4)(A) of the Act, 33 U.S.C. § 1319(g)(4)(A) and 40 C.F.R. § 22.45. EPA may modify or withdraw its consent to this Agreement if comments received disclose facts or considerations indicating that the Agreement is inappropriate, improper, or inadequate.

7. If comments received during the public comment period do not require modification or withdrawal by EPA from this Agreement, the parties agree to submit this Agreement to the Regional Judicial Officer ten (10) days after closure of the public comment period, with a request that it be incorporated into a Final Order.

8. This Agreement, upon incorporation into a final order by the Regional Judicial Officer, and full satisfaction by the parties, shall be a complete, full, and final settlement of the civil penalty owed for violations alleged in this Agreement.

9. Each party shall bear its own costs and attorneys' fees in connection with the action resolved by this CA/FO.

10. Respondent consents to service upon it by delivery of a copy of this Agreement by an EPA employee other than the Regional Hearing Clerk.

For Respondent, Newburg Egg:

BY: _____ DATE: 3/30/2023
Moses Goldstein, CEO, Newburg Egg

For Complainant, United States Environmental Protection Agency:

BY: Anderson,Kate Digitally signed by Anderson,Kate Date: 2023.04.04 10:37:05 -04'00' DATE: 04/04/2023

For DORE LAPOSTA
Director, Enforcement and Compliance Assurance Division
United States Environmental Protection Agency, Region 2
290 Broadway
New York, NY 10007

VII. FINAL ORDER

The Regional Judicial Officer for the United States Environmental Protection Agency ("EPA"), Region 2, has been delegated the authority by the Regional Administrator of the EPA, Region 2, to approve this Consent Agreement and Final Order. Pursuant to 40 C.F.R. §§ 22.13(b) and 22.18(b)(2) and (3) of EPA's Consolidated Rules of Practice, the foregoing Consent Agreement, resolving the above matter, is hereby approved and incorporated by reference into this Final Order. Respondent is hereby **ORDERED** to comply with all of the terms of the Agreement; the effective date of this Order is the date of filing with the Regional Hearing Clerk for EPA Region 2.

SO ORDERED THIS 18th **DAY OF** May **, 2023.**

HELEN FERRARA Digitally signed by HELEN FERRARA Date: 2023.05.18 15:42:10 -04'00'

Helen Ferrara
Regional Judicial Officer
United States Environmental Protection Agency, Region 2

PolyBlend® Dry Polymer Feed System Model DP500

The PolyBlend® DP500 System is a member of the family of reliable dry polymer feed systems for use in water and wastewater applications. The DP500 is an integrated equipment package capable of automatically preparing a homogeneous polymer solution.

The DP500 consists of the DD4 dry polymer disperser, a fiberglass mix tank, and a gravity fed fiberglass hold tank.

The DP500 is specifically designed to provide uniform mixing. Dry polymer and water are initially mixed in the DD4 polymer disperser exposing the solution to a high shear agitation via mechanical mixing. The high shear agitation ensures proper activation of the polymer and prevents unwanted agglomerations. After brief exposure, the solution exits the high shear mixer and flows into the mix tank.

The second stage mix is a longer, low shear mix. The rotating impeller in the secondary mix tank is a unique "hollow-wing" design and covers over half the width of the tank. The low shear mixing continuously and uniformly moves the solution vertically and horizontally resulting in no agglomerations or broken polymer chains.

When a low level is sensed in the hold tank, a valve is automatically opened and the prepared solution is gravity fed into the holding tank. From the holding tank, the homogenous polymer solution can be transferred to the process with an optional feed pump skid.

Key Benefits

- Consistent and reliable performance
- Fiberglass mix and hold tanks
- Reduced polymer consumption
- Fully automated operation
- Operator interface controls
- Improved safety features
- Easy to operate

Specifications

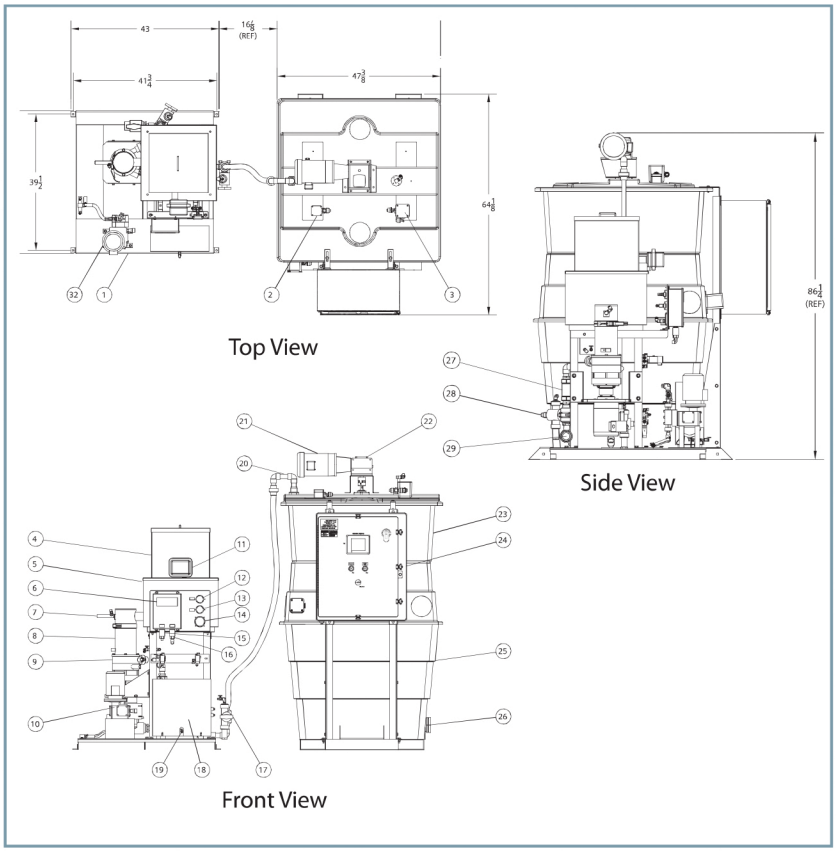
Electrical	208VAC/ 50-60 Hz/ 1 Ph 240VAC/ 50-60 Hz/ 1 Ph 240VAC/ 50-60 Hz/ 3 Ph 480VAC/ 50-60 Hz/ 3 Ph 575VAC/ 50-60 Hz/ 3 Ph
Water Supply	75.7-113.6 LPM (20-30 GPM)
Tank Size	605.7 L (160 USG)
*Polymer Feed	Up to 9.1 kg (20 lbs)/hr dry polymer based on a 0.75% solution and two batches per hour
Control Panel	NEMA® 4X PLC based with color touch screen

*Note: Consult the manufacturer with regards to dosing amount and your application.

Wallace & Tiernan® ChemFeed

Attachment A

General Layout



Key	Description
1	Support Frame and Base
2	Mix Tank Level Assembly, Conductivity Probes, High Low and Ref.
3	Mix Tank Overflow Switch Assembly
4	Hopper, 0.07 cu/m(2.5 cu/ft)
5	Volumetric Feeder
6	Junction Box, Interconnections, NEMA 4X
7	Pneumatic Cylinder, Isolation Plunger Actuator
8	Wetting Bowl
9	Wetting Impeller Housing
10	Motor, Impeller, 1 HP, 3450 RPM, TENV
11	Hopper Low Level Switch
12	Pressure Gauge Compressed Air
13	Pressure Gauge Water
14	Differential Pressure Switch/Gauge
15	Pressure Switch, Static Supply Water
16	Pressure Switch, Static Supply Air
17	Solution Discharge, Pneumatic Ball Valve
18	Condensation Drain, Air Compressor, 12.7 mm (1/2") FNPT
19	Air Compressor with Tank and Cover (Optional)
20	Solution Inlet, Mix Tank
21	Motor Tank Mixer, 1-1/2 HP, 1725 RPM, TEFC
22	Speed Reducer, Worm Gear, 15:1
23	Mix Tank, 605.7 L (160 Working Gallons)
24	System Control Panel, NEMA 4X
25	Hold Tank, 605.7 L (160 Working Gallons)
26	Tank Discharge, 50.8 mm (2") FNPT
27	Automatic Flow Control Valve, 75.7 L (20 GPM)
28	Water Inlet Valve, Pneumatic Ball Valve 25.4 mm (1")
29	Water Inlet Valve, Manual Ball Valve 38.1 mm (1-1/2")
30	Hold Tank Overflow Switch*
31	Hold Tank Level Switch, High, Low*
32	Diaphramg Pump, Emulsion Polymer (Optional)
*	Not Shown

Available Options

- Diaphragm metering pump
- Progressive cavity metering pump
- SS gear metering pump
- Batch tanks / single or tandem
- Integral compressor
- 0.07 m^3 (2.5 ft^3) hopper
- 0.57 m^3 (20 ft^3) hopper
- Bulk bag frame
- Bulk bag frame with hoist
- Bag dump hopper
- Low powder level indication
- Over-sized feeder screw auger
- Supply water pressure reducing valve
- Final feed pumps
- Final feed post dilution
- Large hold tanks
- Transfer pumps

Wallace & Tiernan® ChemFeed

UGSI ChemFeed, Inc.
1901 West Garden Road
Vineland, NJ 08360
Toll Free: 855-669-3845
Local: 856-896-2160
Fax: 856-457-5920
Email: info@wtchemfeed.com
Website: www.wtchemfeed.com

Literature No.: ST.350.450.D50.IE.PS.0912
Subject to change without prior notice.

ATTACHMENT B - Table of Pass Through/Interference Violations at the Woodridge WWTP (NY0272817) Caused by Newburg Egg 40 CFR 403.5

	Newburgh Egg Final Effluent Composite				Newburgh Egg Raw Water-1 Day Later		Woodridge WWTP Effluent Exceedances					
Month	Ammonia (mg/L)	BOD-5 (mg/L)	TSS (mg/L)	TKN (as N) mg/L	BOD-5	TSS	**Monitoring Period Date**	**Parameter Description**	**DMR Value Unit**	**Type 1 = Daily Max, 30 =Mthly**	**Limit Value**	**DMR Value**
Newburg Egg IU Permit Limits Finalized in Nov. 2021		380	210	45	380	210						
1/10/18	10.9	504	419				Jan-18	BOD, 5-day, 20 deg. C	kg/d	1	15.0	24.0
1/18/2018	12.8	418	515	72.8	8,330	830	Jan-18	BOD, 5-day, 20 deg. C	mg/L	1	5	9
1/24/2018	26.9	519	618				Jan-18	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	4.3
1/31/2018	11.8	463	396		11,500	735						
2/15/2018	9.2	300	330		10,800	310	Feb-18	BOD, 5-day, 20 deg. C	kg/d	1	15.0	24.9
2/21/2018	3.6	251	318		10,400	176	Feb-18	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	2.4
2/28/2018	0.7	46	223	9.3	7,140	592	Feb-18	BOD, 5-day, 20 deg. C	mg/L	1	5	6
3/16/2018	0.8	278	152		4,950	217	Mar-18	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	4.9
3/20/2018	3.4	237	233		4,050	404						
3/28/2018	4.5	196	127		8,480	750						
4/3/2018	5.9	343	179		5,780	132	Apr-18	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	4.9
4/12/2018	3.3	102	237	23.2	6,070	566						
4/17/2018	4.2	146	105		13,600	536						
4/25/2018	15.0	192	587		4,650	323						
5/2/2018	7.4	287	220		7,350	178	May-18	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	7.28
5/8/2018	18.5	542	431		5,850	427						
5/16/2018	14.3	395	225	34.0	8,480	530						
5/23/2018	6.4	360	224		7,500	1,210						
5/30/2018	7.6	327	104		13,500	450						
12/20/2018	7.56	661	268	77	5,100	1,510	Dec-18	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	3.55
1/3/2019	7.56	164	84	30	7,050	1,350						
1/10/2019	6.58	632	107	61	10,600	1,470	Jan-19	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	3.5
1/17/2019	4.42	227	51	32	12,300	330						
1/31/2019	1.96	262	186	24	7,650	224						
2/7/2019	2.8	405	204	50	6,150	1,010	Feb-19	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	3.67
2/14/2019	1.12	220	71	22	4,350	510						
2/20/2019	2.52	337	142	34	6,900	640						

ATTACHMENT B - Table of Pass Through/Interference Violations at the Woodridge WWTP (NY0272817) Caused by Newburg Egg 40 CFR 403.5

	Newburgh Egg Final Effluent Composite				Newburgh Egg Raw Water-1 Day Later		Woodridge WWTP Effluent Exceedances					
Month	Ammonia (mg/L)	BOD-5 (mg/L)	TSS (mg/L)	TKN (as N) mg/L	BOD-5	TSS						
Newburg Egg IU Permit Limits Finalized in Nov. 2021		380	210	45	380	210	**Monitoring Period Date**	**Parameter Description**	**DMR Value Unit**	**Type 1 = Daily Max, 30 =Mthly**	**Limit Value**	**DMR Value**
2/28/2019	1.9	262	110	37	5,390	1,090						
3/7/2019	2.8	223	120	27	11,300	1,540						
3/13/2019	3.42	438	192	39	3,750	870	Mar-19	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	3.45
3/21/2019	2.94	248	166	28	7,730	347						
3/28/2019	7.11	681	222	76	8,050	200						
4/11/2019	5.04	306	78	40	9,250	273	Apr-19	BOD, 5-day, 20 deg. C	kg/d	1	15.0	16.8
4/17/2019	14.4	1170	1310	120	9,250	200	Apr-19	BOD, 5-day, 20 deg. C	mg/L	1	5	7
4/24/2019	6.3	630	457	92	12,900	720	Apr-19	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	5.7
12/10/2019	7.00	872	237	67	11,400	172	Dec-19	BOD, 5-day, 20 deg. C	kg/d	1	15.0	38.6
							Dec-19	BOD, 5-day, 20 deg. C	mg/L	1	5	19.6
							Dec-19	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	6.2
eed Jan 2020 data							Jan-20	BOD, 5-day, 20 deg. C	mg/L	1	5	28.2
							Jan-20	BOD, 5-day, 20 deg. C	kg/d	1	15.0	35.4
							Jan-20	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	6.9
2/11/2020	6.86	464	123	42	6,300	316	Feb-20	BOD, 5-day, 20 deg. C	mg/L	1	5	7.5
2/18/2020	8.54	47	50	52	5,230	208	Feb-20	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	8.2
3/10/2020	5.32	390	49	23	4,650	233	Mar-20	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	9
3/24/2020	6.16	626	56	49	7,170	440						
4/20/2020	9.1	366	149	40	5,870	510	Apr-20	Phosphorus, total (as P)	mg/L	30	0.5	6.175
4/28/2020	7.14	569	86.7	32.0	7,500	258	Apr-20	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	6.5
							May-20	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	8.2
9/22/2020	12.5	524	184	39.0	5,330	410	Sep-20	BOD, 5-day, 20 deg. C	mg/L	1	5	10.2
9/28/2020	8.12	574	262	46	9,950	260	Sep-20	BOD, 5-day, 20 deg. C	kg/d	1	15.0	19.4
							Sep-20	Solids, total suspended	mg/L	1	10	13
12/8/2020	10.9	1330	300	27	10,100	300	Dec-20	BOD, 5-day, 20 deg. C	mg/L	1	5	6.6
							Dec-20	pH	SU		8.5	9.1

ATTACHMENT B - Table of Pass Through/Interference Violations at the Woodridge WWTP (NY0272817) Caused by Newburg Egg 40 CFR 403.5

	Newburgh Egg Final Effluent Composite				Newburgh Egg Raw Water-1 Day Later		Woodridge WWTP Effluent Exceedances					
Month	Ammonia (mg/L)	BOD-5 (mg/L)	TSS (mg/L)	TKN (as N) mg/L)	BOD-5	TSS	Monitoring Period Date	Parameter Description	DMR Value Unit	Type 1 = Daily Max, 30 =Mthly	Limit Value	DMR Value
Newburg Egg IU Permit Limits Finalized in Nov. 2021		380	210	45	380	210						
From January to May 2021, monthly averages not individual dates and Carbonaceous BOD5 analysis was done instead of BOD5							Dec-20	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	5.14
		CBOD5										
January-21	8.4	275.0	153.0	27.0			Jan-21	BOD, 5-day, 20 deg. C	mg/L	1	5	12.1
							Jan-21	BOD, 5-day, 20 deg. C	kg/d	1	15.0	17.1
							Jan-21	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	9
February-21	8.5	606.7	192.0	64.7			Feb-21	BOD, 5-day, 20 deg. C	mg/L	1	5	5.07
							Feb-21	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	10.6
March-21	6.8	657.8	155.5	23.9			Mar-21	BOD, 5-day, 20 deg. C	mg/L	1	5	11.4
							Mar-21	BOD, 5-day, 20 deg. C	kg/d	1	15.0	25.4
							Mar-21	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	9.2
April-21	7.8	594.5	236.5	59.8			Apr-21	BOD, 5-day, 20 deg. C	mg/L	1	5	12.2
							Apr-21	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	8.1
							Apr-21	Solids, suspended percent removal	%	30	85	82
May-21	8.6	570.0	256.6	54.6			May-21	BOD, 5-day, 20 deg. C	mg/L	1	5	16.2
							May-21	BOD, 5-day, 20 deg. C	kg/d	1	15.0	23.1
					Newburg Egg Effluent Phosphorus Mthly Avg. mg/L		May-21	Nitrogen, ammonia, total (as NH3)	mg/L	30	2.2	2.6
Jun-21	10.0	604.3	293.2	61.6	3.8		Jun-21	Phosphorus, total (as P)	mg/L	30	0.5	0.6

This Pink shading indicates the days/concentrations that exceed the limits in Newburg Egg's Nov. 2021 IU Permit Limit

Total Pass Thru/Interference Exceedances at Woodridge WWTP	773