# <u>Section 3 — Point Source Nutrient Reduction Technology Assessment</u> and Implementation Plan

## Section 3.1 Technology Assessment and Implementation Plan

#### **Establishing Effluent Limits**

The following describes the applicable federal and state laws and regulations pertaining to the establishment of effluent limits in NPDES permits. There are two bases for establishing effluent limits: technology and water quality. Technology-based limits establish the floor or minimum level of treatment a facility must provide. More stringent water quality-based limits must be imposed in permits when the technology-based limits will not assure compliance with state water quality standards.

#### **Technology-Based Limits for POTWs**

Technology-based limits for POTWs have been established by EPA in 40 §CFR 133 under authority of Section 304(d) of the Clean Water Act and represent the degree of reduction attainable through the application of secondary wastewater treatment technology. Technology-based effluent limits for a pollutant not covered by federal effluent standards may be imposed on a case-by-case basis (IAC 567-62.8(5)). Such limitation must be based on the effect of the pollutant in water and the feasibility and reasonableness of treating such pollutant.

Although continuously evolving, many nutrient removal technologies in wastewater treatment are already proven and well-established. Thus, nutrient removal for lowa's wastewater treatment facilities is technologically feasible. The primary mechanism IDNR will use in assessing the "reasonableness" of nutrient removal for individual facilities is the estimated costs for improvements and the ability of end users to afford those costs.

Affordability of wastewater treatment improvements is dependent upon a number of factors including capital costs, existing and projected debt service, and operation and maintenance costs. Without detailed financial information from a facility it is not possible to determine affordability. Screening criteria are available to indicate the likelihood that a project will be affordable with minimal information. EPA economic guidance (U.S. EPA 1995) and proposed rules to implement the new disadvantaged communities' law (455B.199B) suggest that if the ratio of projected total wastewater costs to a community's Median Household Income (MHI) is less than one percent, then a project is affordable barring very weak community economic indicators. If the ratio is greater than two percent then a project is not affordable unless economic indicators are strong. Projects resulting in a ratio between one and two percent may or may not be considered affordable dependent upon the strength of secondary economic indicators such as comparison of county MHI to statewide MHI, bond rating, etc.

Nutrient reduction costs are generally affordable for most of Iowa's major municipal facilities based on the ratio of estimated project cost to Median Household Income (MHI). These same facilities also have the largest design flows and, in general, the greatest point source nutrient contribution. If the communities served by major municipal facilities can afford a project cost/MHI ratio of 0.5%, the design flow treated by those facilities for which nutrient reduction is affordable is over 550 MGD, or roughly 86% of the total design flow for all major municipal facilities. This relationship is shown in Figure 3-1 below.

Affordability Threshold (Percent of MHI) vs. Estimated Number of Communities for which BNR would be Affordable & Associated **Cumulative Design Flow for Iowa Major Facilities** 100 700 90 **Number of Facilities Below Threshold** 600 80 500 70 60 400 50 300 40 30 200 20

Figure 3-1:

10

0

0.0%

#### Three Tiers of Nutrient Removal

1.0%

2.0%

# of Facilities

The three most commonly cited "tiers" of nutrient removal are Biological Nutrient Removal (BNR), Enhanced Nutrient Removal (ENR) and the Limit of Technology (LOT).

3.0%

Threshold Ratio (Estimated BNR Costs Expressed as Percent of MHI)

4.0%

■ ■ ■ Cumulative Design Flow

5.0%

Biological Nutrient Removal is commonly associated with sequenced combinations of aerobic, anoxic and anaerobic processes which facilitate biological denitrification via conversion of nitrate to nitrogen gas and "luxury" uptake of phosphorus by biomass with subsequent removal through wasting of sludge (biomass). Effluent limits achievable using BNR at wastewater treatment facilities that treat primarily domestic wastewater are 10 mg/L of total nitrogen (TN) and 1.0 mg/L of total phosphorus (TP).

Enhanced Nutrient Removal typically uses BNR with chemical precipitation and granular media filtration to achieve lower effluent nitrogen and phosphorus concentrations than can be achieved through BNR alone. ENR systems are capable of producing effluent with nitrogen and phosphorus values of about 6 mg/L of total nitrogen and 0.2 mg/L of total phosphorus (Falk et al. 2011).

The term "Limit of Technology" (LOT) is generally associated with the lowest effluent concentrations that can be achieved using any treatment technology or suite of technologies. It is commonly referenced as an upper bound in nutrient removal performance. However, there is no consensus or regulatory definition establishing specific treatment requirements for the LOT. As such, effluent values associated with the LOT are debatable. Some have proposed statistical approaches that define the LOT as the minimum effluent concentrations that can be expected to be reliably met over a specific averaging period using widely available and proven treatment processes (Neethling et al. 2009, Bott et al. 2009). Commonly referenced thresholds for the LOT for BNR are 3 mg/L for total nitrogen and 0.1 mg/L for total phosphorus (U.S. EPA 2007, Jeyanayagam 2005). Lower effluent values are possible using tertiary chemical addition & filtration,

100

6.0%

advanced effluent membrane filtration, ion exchange and/or adsorption processes but may not be practical.

#### **Technology Based Limits for Industries**

Technology-based limits for industrial discharges are established by federal effluent guidelines adopted in 40 CFR subchapter N, under the authority of CWA Sections 304 and 306, and are adopted in the state of lowa by reference in IAC 567-62.4. Where EPA has not promulgated a federal standard for a particular industrial category, technology-based limits must be developed on a case-by-case basis at the time of permit issuance (CWA section 402(a)(1)(B) and IAC 567-62.6(3)(a)). In developing case-by-case technology-based limits for industries, the limits must conform to 40 CFR Part 125 Subpart A – Criteria and Standards for Imposing Technology-Based Treatment Requirements.

EPA has promulgated federal effluent guidelines for 57 classes of industries but, with few exceptions, such effluent standards do not establish technology-based requirements for total nitrogen or total phosphorus. Where there are promulgated federal guidelines for TN or TP, the NPDES permit will contain effluent limits consistent with those guidelines.

Data on the amounts of nitrogen and phosphorus discharged by industries is not readily available but likely varies significantly based on the type of industry. For example, process wastewater discharged by a meat processing facility will likely contain significantly higher nutrient concentrations than the discharge from a steam electric power plant. Most industries do not operate biological wastewater treatment plants because the nature of their wastewater makes biological treatment infeasible so requiring all industries to install BNR is not reasonable. All major industries and minor industries with existing biological treatment systems will be required to collect data on the source, concentration and mass of total nitrogen and total phosphorus in their effluent and to evaluate alternatives for reducing the amounts of both pollutants in their discharge. IDNR will use the results of these evaluations to establish case-by-case technology-based effluent limits in NPDES permits except in cases where the industry is subject to a federal effluent standard for total nitrogen or total phosphorus. The nitrogen and phosphorus effluent limits for industries and for POTWs with significant industrial loads will be determined consistent with 40 CFR Part 125 Subpart A and IAC 567-62.8(5).

#### **Water Quality-Based Limits**

The second basis for establishing NPDES permit limits is through state water quality standards; this is the "water quality-based" process. NPDES permits must contain requirements as needed for discharges to meet water quality standards (IAC 567-62.8(2)). Where implementation of technology-based limits for a wastewater treatment plant (WWTP) will not assure compliance with the water quality standards, permits must specify more stringent water quality-based effluent limits. While lowa has not yet adopted numeric standards for total nitrogen or total phosphorus from which water quality-based effluent limits can be derived, permits must still contain necessary requirements to assure compliance with (1) narrative "free-from" water quality criteria in the lowa Water Quality Standards that are applicable to all surface waters at all places and at all times (IAC 567-61.3(2)) and with (2) lowa's antidegradation policy (IAC 567-61.2(2)).

When a facility proposes to discharge a new or increased amount of any pollutant, an antidegradation "alternatives analysis" must be performed. The alternatives analysis must consider non-degrading and less degrading alternatives to the increased discharge, and the facility must implement the least-degrading alternative that is practicable, affordable and cost efficient. Iowa's antidegradation policy applies on a pollutant-by-pollutant basis, meaning that the alternatives analysis must consider each pollutant that will be discharged in an increased amount. These pollutants would include any new or increased discharge of total nitrogen or total phosphorus.

#### **Total Maximum Daily Loads**

A total maximum daily load (TMDL) is a calculation that determines the maximum amount of a pollutant that can enter a stream or lake from different sources and still allow the stream or lake to meet the lowa water quality standards. The IDNR is required by the CWA to determine the TMDL for all waters identified on the state's CWA Section 303(d) impaired waters list. These TMDL calculations must be reviewed and approved by EPA. One part of the TMDL calculation is the point source wasteload allocation (WLA), which may be used to calculate water quality-based effluent limitations to include in an NPDES permit. When determining the appropriate point source WLA to be used in the TMDL calculation, the IDNR will consider this point source nutrient strategy as the basis for setting the WLA for point sources. The IDNR will not impose effluent limitations in NPDES permits that require load reductions beyond the reductions achieved by implementation of this strategy unless it is determined necessary to allow the stream or lake to meet lowa water quality standards.

## **Monitoring in NPDES Permits**

The Iowa Administrative Code (567 IAC 63.3(1), Table II) specifies the minimum monitoring requirements that must be included in NPDES permits issued to POTWs and industries with continuous discharge wastewater treatment plants that treat organic waste. These requirements include final effluent monitoring for total nitrogen and total phosphorus using 24-hr composite samples with the sampling frequency determined by the size (design Population Equivalent - PE) of the treatment works. The sampling frequency is once every 3 months for plants with a design PE of 3,001 to 15,000 and once every 2 months for larger plants. Permits issued since 2009 to POTW's and to industries with biological treatment plants have specified these minimum requirements. At present there are seven NPDES permits (6 for POTWs, 1 for an industrial WWTP) issued to major wastewater treatment facilities in Iowa that require either total nitrogen or total phosphorus monitoring or both. The IDNR will continue to specify total nitrogen and total phosphorus monitoring in permits issued to continuous dischargers with biological treatment including both POTWs and industries. Facilities are strongly encouraged to begin monitoring programs for TP and TN prior to NPDES permit reissuance to better assess current nutrient loading and removal capabilities that are possible with their existing treatment systems.

The minimum monitoring frequencies for total nitrogen and total phosphorus for industries that do not discharge an organic waste will be determined using the rule-referenced *Supporting Document For Permit Monitoring Frequency Determination*, August 2008 but will not be less frequent than once per quarter.

IDNR will identify the appropriate total nitrogen and total phosphorus lab testing methods for wastewater and ambient stream water quality to ensure consistent data and allow for accurate accounting of removal of nutrients from wastewater treatment plants. These lab methods may be specified in NPDES permits with total nitrogen and total phosphorus testing requirements.

#### **Construction Schedules**

Permits can contain construction schedules for installing or modifying facilities to remove nutrients. Two possibilities exist for specifying technology-based limits and schedules, permittees will be given the opportunity to select which option they prefer: (1) the NPDES permit will include a schedule for installing or modifying facilities to reduce nutrients. Following construction completion and an optimization and performance evaluation period, final limits will be added to the NPDES permit or, (2) final limits will be included in the NPDES permit and a consent administrative order will be issued concurrently that would establish the schedule for installing or modifying facilities to remove nutrients to comply with permit limits.

#### **Implementation Plan**

All major wastewater treatment facilities and minor industrial facilities that already treat process wastewater using biological treatment will be required to evaluate the economic and technical feasibility for installing BNR. It is expected that most major municipal wastewater treatment facilities (>1 MGD AWW

Flow) can economically meet technology-based TN limits of 10 mg/L and TP limits of 1 mg/L on an annual average basis with BNR technology. Technology-based nutrient limits for industrial facilities and municipal facilities that have significant industrial loads will be developed on a case-by-case basis due to the differing amounts of nutrients present in these wastewaters. Nutrient reduction will be required for major industries where it is found by IDNR to be feasible, reasonable and cost effective using the procedures specified in 40 CFR Part 125 Subpart A.

Permit limits for TN and TP will be expressed as an **annual average**. Since biological treatment processes are more efficient at reducing nutrients at higher water temperatures, higher quality wastewater effluent is typically produced in the spring, summer, and fall than in the winter. Thus, while properly designed and operated biological treatment systems may not be capable of meeting TN and TP limits of 10 mg/L and 1 mg/L respectively during winter months, data averaged for the year should yield results at or below these limits.

The basis for implementation of this approach is that the technology-based effluent limits for a pollutant not covered by federal effluent standards may be imposed on a case-by-case basis (IAC 567-62.8(5)). Such limitation must be based on the <u>effect of the pollutant in water</u> and the <u>feasibility and reasonableness of treating such pollutant</u>.

If a permitted discharger installs nutrient reduction processes and technology-based TN and TP limits are included in the NPDES permit, then it is the position of the IDNR that the TN and TP discharge limits will not be made more restrictive for a period of at least 10 years after the completion of the nutrient reduction process construction. Iowa Code section 455B.173(3C) establishes the moratorium on more restrictive limits for municipal dischargers. For non-municipal discharges, this prohibition can be enforced through the permitting process or as a part of the adoption of any future nutrient limitation. An evaluation of the nutrient removal performance and future optimization will be submitted to IDNR once facilities are constructed and have operated for a period of five years.

#### **Implementation Plan Details**

Technology-based nutrient requirements will be specified in municipal and industrial NPDES permits for major facilities, and minor industrial facilities with existing biological treatment systems, at the next permit renewal. NPDES permits will be amended or reissued to include effluent limits for TN and TP according to the following: 1) BNR already installed; 2) BNR not installed and no capacity increases are planned; 3) BNR not installed and capacity increases are planned:

#### Category 1) BNR already installed

- a) Installed and Operating: If BNR is installed at a given plant and operating, then the NPDES permit will specify technology based limits (no more stringent than 10 mg/l TN; 1 mg/l TP) and will require influent and effluent monitoring for both parameters.
- b) Installed and NOT Operating: If BNR is installed at a given plant and NOT operating, then the NPDES permit will require the BNR facilities to be operated. Final limits for TN and TP (no more stringent than 10 mg/l TN; 1 mg/l TP) will be incorporated into the NPDES permit at the end of a one year process optimization and performance evaluation. The NPDES permit will require influent and effluent monitoring for both parameters according to 567 IAC Chapter 63.

#### Category 2) BNR not installed and no capacity increases are planned

If BNR is not installed and no increases in treatment facility design capacity are planned, then the renewed NPDES permit will include a requirement for the facility to submit a report with the results of a study, within two years of reissuance of the NPDES permit, evaluating the costs and feasibility of installing BNR at a given wastewater treatment facility. The report will also include a proposed schedule for when BNR will be installed at a given wastewater treatment facility. The negotiated schedule will be incorporated into the NPDES permit or administrative consent order. The TN and

TP discharge limits will be determined at the end of a one year process optimization and performance evaluation following the BNR process startup. The performance evaluation will include the determination of technologically achievable TN and TP concentrations. The NPDES permit will be amended to include the TN and TP limits as determined from the performance evaluation. The permit limits will be no more stringent than 10 mg/L TN and 1 mg/L TP. The NPDES permit will require influent and effluent monitoring for both parameters according to 567 IAC Chapter 63.

#### Category 3) BNR not installed and capacity increases are planned

If BNR is not installed and increases in treatment capacity are planned, then the evaluation of installing nutrient removal will be conducted as a part of the construction permitting process through current antidegradation procedures. Nutrient removal will be encouraged at this stage. If nutrient removal is not included with the plant expansion, then the NPDES permit will be written using the procedure in Category 2 above. If nutrient removal is included in the plant expansion, then the NPDES permit will be amended after a one year optimization and performance evaluation following BNR process startup, similar to the Category 2 procedures. The permit limits will be no more stringent than 10 mg/L TN and 1 mg/L TP. The NPDES permit will require influent and effluent monitoring for both parameters according to 567 IAC Chapter 63.

For an industrial wastewater facility with nutrient discharges but **no** biological treatment, a schedule will be incorporated into the next permit. The schedule will require the industry to assess the feasibility, reasonableness and cost of nutrient reductions. If nutrient reduction is found to be feasible, reasonable, and affordable, the permit will be revised to incorporate technology-based effluent limits based on the assessment.

## **Section 3.2 - Cost Estimates**

	Estimated C	osts for BNR I	mprovement	s for Muncipal	Majors (Target	: Effluent TN = :	10 mg/L, Ta 	rget Effluer	nt TP = 1 mg/L)	
		D C SIB ! !	Combined Annual Average	Total Capital		Total Present Worth Cost	· ota.	\$/1,000 gallons	Weighted Monthly	Weighted %
Treatment Type	Facilities	(MGD)	Flow <sup>1</sup> (MGD)	Cost (\$M)	(\$M)	(\$M) <sup>2</sup>	Cost (\$M)	Treated <sup>3</sup>	Cost/Household⁴	of MHI⁴
Activated Sludge	56	533	355	348	25	686	51	0.39	7.75	0.189
Fixed Film	37	101	67	430	7	524	39	1.59	25.83	0.73%
Aerated Lagoon	9	11	8	110	3	147	11	3.92	85.16	2.13%
Totals	102	645	430	887	35	1,358	101	0.64	11.85 <sup>5</sup>	0.29%

- 1. Average annual flow estimated as 2/3 of design AWW flow.
- 2. Present worth values calculated using discount rate of 4.125% and a 20-year design life.
- 3. Based on annual average flow.
- 4. % of MHI for BNR improvements only. Estimates weighted by number of households.
- 5. Aggregate value weighted by number of households.

Estimated Costs for BNR Improvements for all Industries with Biological Treatment (Target Effluent TN = 10 mg/L,  Target Effluent TP = 1 mg/L)								
		Combined Design Flow	Total Capital	Total Annual O&M Cost	Total Present Worth Cost	Total Annual	\$/1,000 gallons	
Treatment Type	# of Facilities	(MGD)	Cost (\$M)	(\$M)	(\$M)1	Cost (\$M)	Treated <sup>2</sup>	
Activated Sludge	20	44.2	29.3	2.0	56.1	4.2	0.26	
Fixed Film	1	0.6	2.7	0.04	3.3	0.2	1.06	
Aerated Lagoon	7	5.8	86.5	2.20	116.0	8.6	4.05	
	•		•	•				
Totals	28	50.7	118.5	4.2	175.5	13.1	0.71	

- 1. Present worth values calculated using discount rate of 4.125% and a 20-year design life.
- 2. Based on design flow.

Estimated Costs for BNR Improvements for Major Municipals + all Industries with Biological Treatment (Target Effluent TN = 10 mg/L, Target Effluent TP = 1 mg/L)								
Treatment Type	# of Facilities	Combined Flow (MGD) <sup>2</sup>	Total Capital	Total Annual	Total Present	Total Annual Cost (\$M)	\$/1,000 gallons Treated <sup>2</sup>	
Activated Sludge	76	` '	377.3		742.5	55.2	0.38	
Fixed Film	38	67.8	432.3	7.1	527.5	39.2	1.59	
Aerated Lagoon	16	13.5	196.3	5.0	263.1	19.6	3.98	
Totals	130	480.8	1.005.8	39.2	1.533.1	114.1	0.65	

- 1. Present worth values calculated using discount rate of 4.125% and a 20-year design life.
- 2. Based on design flow for industries + estimated average annual flow for municipals.

# **Section 3.3 - List of Affected Facilities**

# Major Municipalities (> 1.0 MGD):

	NPDES	FACILITY NAME	TREATMENT TYPE	2010
	NO.			POPULATION
1	2503001	ADEL CITY OF STP	AERATED LAGOON	3,682
2	5502001	ALGONA CITY OF STP	TRICKLING FILTER	5,560
3	8503001	AMES WATER POLLUTION CONTROL FACILITY	TRICKLING FILTER	58,965
4	5307001	ANAMOSA CITY OF STP	TRICKLING FILTER	5,533
5	7709001	ANKENY CITY OF STP	ACTIVATED SLUDGE	45,582
6	1509001	ATLANTIC CITY OF STP	TRICKLING FILTER	7,112
7	2613001	BLOOMFIELD CITY OF STP (MAIN)	AERATED LAGOON	2,640
8	819001	BOONE CITY OF STP	ACTIVATED SLUDGE	12,661
9	4103001	BRITT CITY OF STP	TRICKLING FILTER	2,069
10	2909001	BURLINGTON CITY OF STP	ACTIVATED SLUDGE	25,663
11	9113001	CARLISLE CITY OF STP	AERATED LAGOON	3,876
12	1415001	CARROLL, CITY OF STP	ACTIVATED SLUDGE	10,103
13	709001	CEDAR FALLS CITY OF STP	TRICKLING FILTER	39,260
14	5715001	CEDAR RAPIDS CITY OF STP	ACTIVATED SLUDGE	126,326
15	407003	CENTERVILLE CITY OF STP (EAST)	ROTATING BIOLOGICAL CONTACTOR	5,528
16	5903001	CHARITON CITY OF STP	OXIDATION DITCH	4,321
17	3405001	CHARLES CITY, CITY OF STP	TRICKLING FILTER	7,652
18	1811002	CHEROKEE CITY OF STP	ACTIVATED SLUDGE	5,253
19	7329001	CLARINDA CITY OF STP	TRICKLING FILTER	5,572
20	1716901	CLEAR LAKE SANITARY DISTRICT	SEQUENCING BATCH REACTOR	
21	2326001	CLINTON CITY OF STP	ACTIVATED SLUDGE	26,885
22	5208001	CORALVILLE CITY OF STP	SEQUENCING BATCH REACTOR	18,907
23	7820001	COUNCIL BLUFFS CITY OF STP	TRICKLING FILTER	62,230
24	4515001	CRESCO CITY OF STP	ACTIVATED SLUDGE	3,868
25	8816001	CRESTON CITY OF STP	TRICKLING FILTER	7,834
26	8222003	DAVENPORT CITY OF STP	ACTIVATED SLUDGE	99,685
27	9630001	DECORAH CITY OF STP	ACTIVATED SLUDGE	8,127
28	2424001	DENISON MUNICIPAL UTILITIES-STP	ACTIVATED SLUDGE	8,298
29	7727001	DES MOINES METROPOLITAN WRF	ACTIVATED SLUDGE	203,483
30	2330001	DEWITT CITY OF STP	OXIDATION DITCH	5,322
31	3126001	DUBUQUE CITY OF STP	ACTIVATED SLUDGE	57,637
32	9926001	Eagle Grove, City of STP	ROTATING BIOLOGICAL CONTACTOR	3,583
33	4236001	ELDORA CITY OF STP	SEQUENCING BATCH REACTOR	2,732
34	7428002	EMMETSBURG CITY OF STP	ROTATING BIOLOGICAL CONTACTOR	3,904
35	3218002	ESTHERVILLE CITY OF STP	TRICKLING FILTER	6,360
36	723001	EVANSDALE CITY OF STP	ACTIVATED SLUDGE	4,751
37	5131001	FAIRFIELD CITY OF STP	OXIDATION DITCH	9,464
38	9525001	FOREST CITY, CITY OF STP	ROTATING BIOLOGICAL CONTACTOR	4,151
39	9433003	FORT DODGE CITY OF STP	ACTIVATED SLUDGE	25,206
40	5625001	FORT MADISON CITY OF STP	ACTIVATED SLUDGE	11,051
41	4130002	GARNER CITY OF STP	AERATED LAGOON	3,129
42	6525001	GMU WASTEWATER TREATMENT FACILITY	ROTATING BIOLOGICAL CONTACTOR	5,269
43	140001	GREENFIELD CITY OF STP	TRICKLING FILTER	1,982

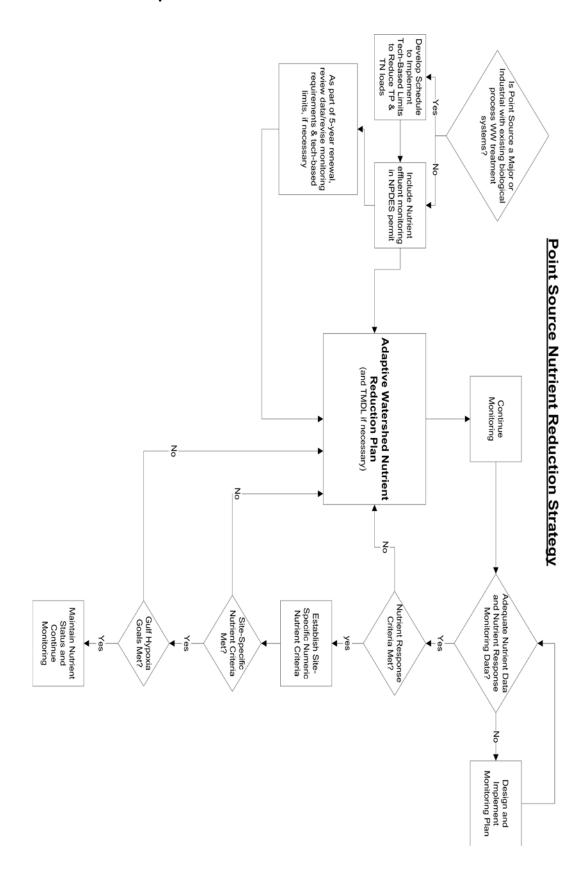
44	7736001	Grimes, City of STP	ACTIVATED SLUDGE	8,264
45	7930001	Grinnell, City of STP	TRICKLING FILTER	9,218
46	3833001	GRUNDY CENTER CITY OF STP	SEQUENCING BATCH REACTOR	2,706
47	8335002	HARLAN CITY OF STP	ROTATING BIOLOGICAL CONTACTOR	5,106
48	4641001	HUMBOLDT CITY OF STP	ACTIVATED SLUDGE	4,690
49	1037001	INDEPENDENCE CITY OF STP	TRICKLING FILTER	5,966
50	9133001	INDIANOLA CITY OF STP (NORTH)	ACTIVATED SLUDGE	14,782
51	5225001	Iowa City, City of (North) STP	TRICKLING FILTER	
52	5225002	Iowa City, City of (South) STP	ACTIVATED SLUDGE	67,862
53	4260001	IOWA FALLS CITY OF STP	TRICKLING FILTER	5,238
54	3050901	IOWA GREAT LAKES SANITARY DISTRICT STP	ACTIVATED SLUDGE	
55	1044002	JESUP, CITY OF STP (SOUTH)	AERATED LAGOON	2,520
56	5640001	KEOKUK CITY OF STP	ACTIVATED SLUDGE	10,780
57	6342001	KNOXVILLE CITY OF STP	TRICKLING FILTER	7,313
58	7540001	LEMARS CITY OF STP	ACTIVATED SLUDGE	9,826
59	4950001	MAQUOKETA CITY OF STP	ACTIVATED SLUDGE	6,141
60	6469001	MARSHALLTOWN CITY OF	SEQUENCING BATCH REACTOR	27,552
61	1750001	MASON CITY, CITY OF STP	ACTIVATED SLUDGE	28,079
62	6352001	MELCHER-DALLAS CITY OF STP	AERATED LAGOON	1,288
63	7751001	MITCHELLVILLE CITY OF STP	SEQUENCING BATCH REACTOR	2,254
64	7950001	MONTEZUMA CITY OF STP	AERATED LAGOON	1,462
65	5343001	MONTICELLO CITY OF STP	TRICKLING FILTER	3,796
66	4453001	MOUNT PLEASANT CITY OF STP (MAIN)	SEQUENCING BATCH REACTOR	8,668
67	5758001	MOUNT VERNON CITY OF STP	ACTIVATED SLUDGE	4,506
68	7048001	MUSCATINE CITY OF STP	ACTIVATED SLUDGE	22,886
69	8562001	NEVADA CITY OF STP	TRICKLING FILTER	6,798
70	1970001	NEW HAMPTON CITY OF STP	TRICKLING FILTER	3,571
71	5059002	NEWTON CITY OF STP	ACTIVATED SLUDGE	15,254
72	5252001	NORTH LIBERTY CITY OF STP	SEQUENCING BATCH REACTOR	13,374
73	3353001	OELWEIN CITY OF STP	ACTIVATED SLUDGE	6,415
74	8474001	ORANGE CITY CITY OF STP	AERATED LAGOON	6,004
75	2038002	OSCEOLA CITY OF STP	TRICKLING FILTER	4,929
76	6273001	OSKALOOSA CITY OF STP (NORTHEAST)	TRICKLING FILTER	
77	6273002	OSKALOOSA CITY OF STP (SOUTHWEST)	ACTIVATED SLUDGE	11,463
78	9083001	OTTUMWA CITY OF STP	ACTIVATED SLUDGE	25,023
79	6368006	PELLA CITY OF STP	ACTIVATED SLUDGE	10,352
80	2561001	PERRY CITY OF STP	ACTIVATED SLUDGE	7,702
81	6950001	RED OAK CITY OF STP	TRICKLING FILTER	5,742
82	1376001	ROCKWELL CITY, CITY OF STP	TRICKLING FILTER	1,709
83	7170001	SHELDON CITY OF STP	ROTATING BIOLOGICAL CONTACTOR	5,188
84	3659001	SHENANDOAH CITY OF STP	TRICKLING FILTER	5,150
85	8486002	SIOUX CENTER CITY OF STP	TRICKLING FILTER	7,048
86	9778001	SIOUX CITY CITY OF STP	ACTIVATED SLUDGE	82,684
87	2171004	Spencer, City of STP	ROTATING BIOLOGICAL CONTACTOR	11,233
88	1178001	STORM LAKE CITY OF STP	ACTIVATED SLUDGE	10,600
89	8670002	TAMA CITY OF STP	ACTIVATED SLUDGE	2,877
90	1689001	TIPTON CITY OF STP (WEST)	AERATED LAGOON	3,221
91	8676001	TOLEDO CITY OF STP	ACTIVATED SLUDGE	2,341
92	688001	VINTON CITY OF STP	ACTIVATED SLUDGE	5,257

93	7085001	WALCOTT CITY OF STP (SOUTH)	ACTIVATED SLUDGE	1,629
94	9271001	WASHINGTON CITY OF STP	TRICKLING FILTER	7,266
95	790001	WATERLOO CITY OF STP	ACTIVATED SLUDGE	68,406
96	2573001	WAUKEE CITY OF STP	ACTIVATED SLUDGE	13,790
97	398001	WAUKON CITY OF STP	TRICKLING FILTER	3,897
98	990001	WAVERLY CITY OF STP	TRICKLING FILTER	9,874
99	4063001	WEBSTER CITY, CITY OF STP	ROTATING BIOLOGICAL CONTACTOR	8,070
100	2985001	WEST BURLINGTON CITY OF STP	ACTIVATED SLUDGE	2,968
101	7073001	WEST LIBERTY CITY OF STP	ACTIVATED SLUDGE	3,736
102	6171001	WINTERSET CITY OF STP	TRICKLING FILTER	5,190

# Industries with biological treatment for process waste:

	NPDES		
	NO.	FACILITY NAME	TREATMENT TYPE
1	2326101	ARCHER DANIELS MIDLAND CORN PROCESSING	ACTIVATED SLUDGE
2	6800100	CARGILL, INC.	ACTIVATED SLUDGE
3	7048101	GRAIN PROCESSING CORP.	ACTIVATED SLUDGE
4	5800100	TYSON FRESH MEATS, INC COLUMBUS JUNCTION	ACTIVATED SLUDGE
5	2500100	TYSON FRESH MEATS, INC PERRY	ACTIVATED SLUDGE
6	2900900	IOWA ARMY AMMUNITION PLANT	TRICKLING FILTER
7	7000102	MONSANTO COMPANY	ACTIVATED SLUDGE
8	5640101	ROQUETTE AMERICA, INC.	ACTIVATED SLUDGE
9	8670100	TAMA PAPERBOARD	ACTIVATED SLUDGE
10	2326112	EQUISTAR CHEMICALS, LP	ACTIVATED SLUDGE
11	0375102	AGRI STAR MEAT AND POULTRY LLC	ACTIVATED SLUDGE
12	9083101	CARGILL MEAT SOLUTIONS CORPORATION	OXIDATION DITCH
13	8670101	IOWA PREMIUM BEEF	AERATED LAGOON
14	1178105	TYSON FRESH MEATS, INC STORM LAKE	ACTIVATED SLUDGE
15	7856100	OAKLAND FOODS, L.L.C.	SEQUENCING BATCH REACTOR
16	5600105	PINNACLE FOODS GROUP LLC	ACTIVATED SLUDGE
17	8748102	MICHAEL FOODS, INC.	ACTIVATED SLUDGE
18	9500102	REMBRANDT ENTERPRISES, INC THOMPSON	AERATED LAGOON
19	8400120	AGROPUR INC.	SEQUENCING BATCH REACTOR
20	3621100	MANILDRA MILLING CORPORATION	ACTIVATED SLUDGE
21	9700101	GELITA USA, INC.	AERATED LAGOON
22	6800113	AJINOMOTO HEARTLAND LLC	ACTIVATED SLUDGE
23	2200100	SWISS VALLEY FARMS	ACTIVATED SLUDGE
24	2500103	NORTHERN NATURAL GAS CO – REDFIELD	AERATED LAGOON
25	3300100	ASSOCIATED MILK PRODUCERS	AERATED LAGOON
26	3405100	CAMBREX	ACTIVATED SLUDGE
27	3900103	GUTHRIE CENTER EGG FARM	AERATED LAGOON
28	5200104	TWIN COUNTY DAIRY, INC.	AERATED LAGOON

**Section 3.4 – Conceptual Flow Chart** 



### 3.5 References

Falk, M.W., Neethling, J.B., Reardon D.J. 2011. Striking the Balance Between Nutrient Removal in Wastewater Treatment and Sustainability. Table 3-1 for Level 3 Treatment Objective, 2011.

Jeyanayagam, S. True Confessions of the Biological Removal Process. Florida Water Resources Journal: January 2005.

Neethling, J.B., D. Stensel, D. Parker, C. Bott, S. Murthy, A. Pramanik, and D. Clark. 2009. What is the Limit of Technology (LOT)? A Rational and Quantitative Approach. Presented at WEFTEC, 2009.

U.S. EPA. 2007. Biological Nutrient Removal Processes and Costs. United States Environmental Protection Agency, Office of Water. EPA 823-R-07-002.

U.S. EPA. 1995. Interim Economic Guidance for Water Quality Standards Workbook. United States Environmental Protection Agency, Office of Water. EPA 832-B-95-002, March 1995.