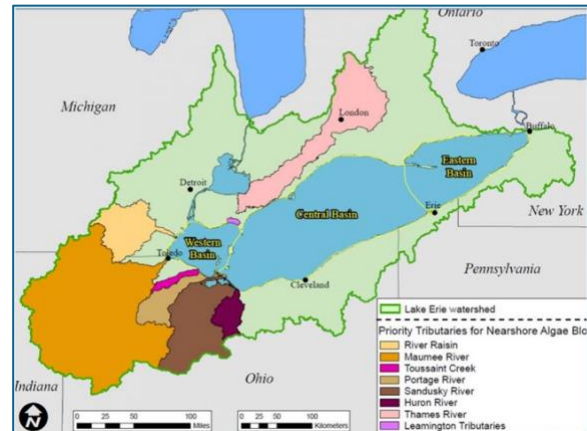


Meat and Poultry Processing

LAKE ERIE BASIN

The [Lake Erie Basin](#)¹ drains 30,140 square miles of Ohio, Indiana, Michigan, New York, Pennsylvania, and Ontario. Lake Erie, the shallowest of the five Great Lakes, provides drinking water to [11 million people](#).² Western Lake Erie, with a watershed covering [almost 6 million acres](#),³ is the warmest, shallowest, and most biologically productive part of the Great Lakes, and it is often a water quality trend indicator for all the Great Lakes.



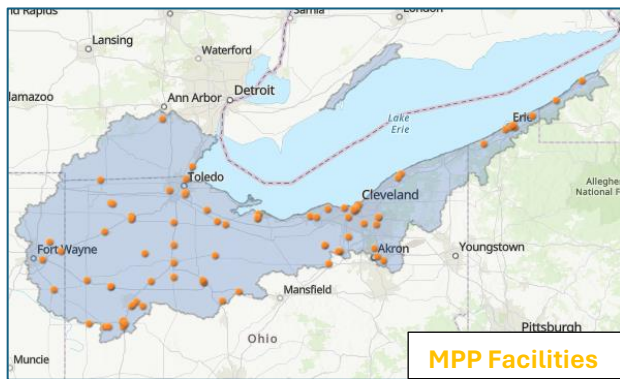
Lake Erie became the poster child for the benefits of the 1972 Clean Water Act – going from extensive Harmful Algal Blooms (“HABs”) into the early 1980’s to almost no harmful algae at the turn of the century. The [Great Lakes Water Quality Agreement](#)⁴ (“GLWQA”) set phosphorus reduction targets in the 1972 agreement, which were ultimately [deemed successful](#),⁵ and by the 1990’s, the HABs were nearly non-existent. Unfortunately, that progress was lost due to increasing nutrient and other pollutant loading from point and nonpoint sources in the basin with the result being annual, massive HABs that can generally cover 300 to over 700 square miles of Lake Erie each summer.



According to the [National Oceanic and Atmospheric Administration](#)⁶ (“NOAA”), “Western Lake Erie has been plagued by an increase of HABs intensity over the past decade. These blooms consist of cyanobacteria or blue-green algae, which are capable of producing toxins that pose a risk to human and animal health, foul coastlines, and impact communities and businesses that depend on the lake.” In 2014, for example, over 500,000 people in Toledo, Ohio were told not to drink the treated water due to the presence of an algal toxin, microcystin, in the public water supply’s intake from an [enormous harmful algae bloom](#)⁷ in Lake Erie. Because of this, the 2012 [GLWQA Annex 4](#)⁸ established new phosphorus loading reduction targets in 2016, which have yet to be met.

For example, Annex 4 established a 40% load reduction target for Total Phosphorus entering the Central and Western Lake Erie Basins, a 40% reduction in spring Total and Soluble Reactive Phosphorus loads to numerous specific watersheds, and plans for the adoption of a [0.5 mg/l Total Phosphorus limit](#)⁹ on municipal wastewater treatment plants discharging more than 1 MGD into the Lake Ontario and Lake Erie Basins.

Meat and Poultry Products (“MPP”) facilities are a major source of inadequately controlled, and [largely unmentioned](#),¹⁰ nutrients and other water pollutants in the Lake Erie Basin, impacting rivers, lakes, and streams throughout the watershed in addition to Lake Erie itself.



EPA has identified at least 85 potential MPP facilities that are either discharging waste directly or indirectly through municipal wastewater treatment plants (“WWTPs”), or are deemed “non-discharging,” in the Lake Erie Basin, but often little information is publicly available about these facilities. See Appendix 1. The Lake Erie Basin is also impacted by pollution from a large number

of Animal Feeding Operations (“AFOs”), contributing to the pollution load from this industry. For example, an [analysis](#)¹¹ of the Western Lake Erie Basin identified more than 2,500 AFOs housing roughly 400,000 cows, 1.8 million hogs, and nearly 24 million chickens and turkeys in the basin, and a [2019 report](#)¹² documented how largely unregulated AFO pollution in the Maumee River watershed helps to fuel Lake Erie’s HABs.

The [Maumee Watershed Nutrient TMDL](#)¹³ establishes Individual [NPDES Wasteload Allocations](#)¹⁴ (“WLAs”) on Total Phosphorus for at least three directly discharging MPP facilities and 11 WWTPs that are either known or suspected to be receiving waste discharges from MPP facilities. The TMDL does not address the other pollutants typically discharged by MPP facilities. It is notable that at least 12 of the 39 total point source dischargers that received WLAs are either a directly discharging MPP facility or a WWTP that may be receiving MPP wastewater, highlighted in yellow on Table A4.5 (below) from the TMDL. Table A4.5 shows these facilities and their substantial existing spring total phosphorus loading to the Maumee watershed from 2017-2021. In 2021, directly discharging MPP facilities contributed the following spring loads of Total Phosphorus to the Maumee River – Campbell Soup Supply (3.5 metric tons), Cooper Farms Cooked Meats (0.10 metric tons), and G.A. Wintzer and Son Co. (1.4 metric tons). This underscores the need for more stringent Effluent Limitation Guidelines (“ELGs”) to reduce pollution discharges from MPP facilities.

Table A4.5. Existing loads for NPDES permits in the grouped load category.

Permit #	Facility Name	Total phosphorus spring load (metric tons)						
		2008	WLA	2017	2018	2019	2020	2021
2PF00000	Toledo Bay View Park	28.6	27.9	18.1	15.1	23.8	21.8	19.6
2PK00000	Lucas Co WRRF	3.9	4.8	6.7	5.5	6.3	5.4	6.3
2PE00000	Lima WWTP	2.1	4.0	2.9	5.0	3.3	3.0	2.4
2PD00008	Findlay WPCF	4.4	3.2	4.8	5.5	5.3	5.5	5.4
2PD00002	Perrysburg WWTP	1.6	2.0	1.2	1.2	1.6	1.7	2.1
2PD00013	Defiance WWTP	1.6	1.5	1.4	0.66	0.86	0.91	2.3
2PD00006	Van Wert WWTP	0.82	1.0	0.91	0.74	1.7	0.69	0.81
2PD00019	Wapakoneta WWTP	1.1	1.0	0.26	0.31	0.28	1.7	1.3
2PD00029	Delphos WWTP	0.04	1.0	0.64	0.10	0.04	0.02	0.10
2PD00018	Bryan WWTP	0.41	0.79	0.40	0.23	0.34	0.49	0.26
2PD00026	St Marys City WWTP	0.39	0.77	0.23	0.28	0.47	0.44	0.22
2PD00028	Ottawa WWTP	0.23	0.77	0.28	0.15	0.15	0.07	0.16
2PD00000	Napoleon WWTP	0.55	0.64	0.70	0.56	0.54	0.29	0.31
2PD00017	Archbold WWTP	0.56	0.64	0.28	0.42	0.39	0.34	0.55
2PB00050	Ada WWTP	0.79	0.51	0.15	0.29	0.20	0.31	0.14
2PK00002	Shawnee No 2 WWTP	0.79	0.51	1.1	0.66	0.87	0.78	0.69
2PC00005	Bluffton WWTP	0.05	0.49	0.03	0.07	0.10	0.09	0.11
2PB00040	Leipsic WWTP	0.70	0.38	0.29	0.35	0.40	0.21	0.24
2PD00016	Wauseon WWTP	0.24	0.38	0.26	0.18	0.22	0.17	0.16
2PH00007	American-Bath WWTP	0.69	0.38	0.59	0.39	0.62	0.52	0.50
2PH00006	American No 2 WWTP	0.31	0.31	0.08	0.15	0.16	0.21	0.24
2PD00003	Montpelier WWTP	1.0	0.26	0.96	0.98	0.23	0.14	0.11
2PB00025	Swanton WRRF	0.80	0.64	0.23	0.10	0.28	0.46	0.18
2PB00042	Hicksville WWTP	0.96	0.40	0.50	0.34	0.76	0.62	0.24
2PB00034	New Bremen WWTP	0.85	0.38	1.5	1.3	1.6	0.73	0.58
2PC00004	Columbus Grove WWTP	1.1	0.35	0.60	0.61	0.58	0.64	0.73
2PB00048	Cridersville WWTP	0.80	0.34	0.43	0.25	0.28	0.34	0.20
2PB00003	Delta WWTP	0.76	0.31	0.70	0.67	0.55	0.99	0.51
2PB00046	Elida WWTP	0.65	0.21	0.86	0.89	0.91	0.99	0.39
2PD00027	Paulding WWTP	0.87	0.55	1.0	0.66	1.1	0.84	1.4
2IF00004	PCS Nitrogen Ohio LP	1.5	1.8	2.0	1.4	0.86	0.74	0.86
2IG00001	Lima Refinery	0.46	0.6	0.55	0.51	0.15	0.24	0.02
2IH00021	Campbell Soup Supply	3.5	2.6	1.8	0.95	2.7	3.5	3.5
2IH00110	Cooper Farms Cooked Meats	0.78	0.12	0.29	0.12	0.11	0.12	0.10
2IK00002	G.A. Wintzer and Son Co	0.17	0.11	0.57	0.94	0.98	0.52	1.4
2IW00010	McDowell/Bowling Green	0.00	0.29	0.27	0.27	0.25	0.26	0.24
2IW00070	Delta WTP	0.00	0.18	0.15	0.16	0.13	0.13	0.15
2IW00190	Napoleon WTP	0.00	0.14	0.001	0.07	0.11	0.13	0.13
NA	Allowance for future growth	-	1.4	-	-	-	-	-

Indirect Discharging Facilities:

Based on a map of indirectly discharging MPP facilities produced by EPA as part of the current ELG rulemaking and an electronic dataset from EPA, it appears that many of the facilities in the Lake Erie Basin are indirect dischargers through municipal WWTPs. Due to the nature of permitting for these facilities under the federal Clean Water Act and state/local laws, access to monitoring and permitting records is often limited. EPA has not established national pretreatment standards for indirectly discharging MPP facilities and, as a result, they are known to be significant contributors of pollutants to the nation’s waters and impose significant economic and environmental burdens on communities and WWTPs.

Approved Municipal Pretreatment Programs:

In Ohio, many municipalities have been [approved](#)¹⁵ to implement the pretreatment program and issue permits directly under their local requirements. For example, the following municipalities have approved pretreatment programs, likely MPP facilities without individual industrial wastewater NPDES permits in their boundaries, and authorization to issue permits to significant industrial dischargers to their systems: Wapakoneta - 2PD00019 (4 MPP facilities), Sandusky - 2PF00001 (4 MPP facilities), and Lima 2PE00000 (4 MPP facilities). Permitting and discharge monitoring records for the MPP facilities in those cities are not available online from ECHO or Ohio EPA, however, one example – an approved program in Delphos, Ohio – demonstrates the impacts that the lack of national pretreatment standards can have on wastewater treatment systems, communities, and water quality.

[Delphos WWTP](#) – This municipal wastewater treatment system serves a population of roughly 7,000 people in the Western Lake Erie Basin. Delphos WWTP has an average design flow of 3.83 MGD and discharges effluent into Jennings Creek, which is impaired by Ammonia, Nutrients, Organic Enrichment, Pathogens, and Sediment. Jennings Creek is a tributary to the Auglaize River, which in turn flows into the Maumee River – a major tributary of Lake Erie. The [NPDES permit](#)¹⁶ for Delphos WWTP does not have any limits on TKN, Nitrate-Nitrite, Metals, or Chlorides and it is authorized to discharge significant amounts of Total Phosphorus (weekly loading – 22 kg/day and weekly concentration – 1.5 mg/l).



There are at least three potential MPP facilities in Delphos, but one of those MPP facilities is a significant industrial user permitted under Delphos' approved pretreatment program – Lakeview Farms. According to the city, [high organic loading](#)¹⁷ attributed to the food processing flows coming from three industries located in Delphos results in waste equivalent to more than 50,000 people and the need for a facility that can handle wastewater loading from a [population equivalent of 70,000](#).¹⁸ Lakeview Farms is the source of [the majority of the flow](#)¹⁹ to one of Delphos WWTP's Lift Stations – Ricker Street Lift Station, which is the Lift Station that handles the majority of the town's industrial wastewater flow.

Multiple problems, including solids buildup and hydraulic flow problems, have caused the facility to not be able to function at its original design capacity and to violate the effluent limitations in its NPDES permit, resulting in the town and its citizens having to incur costs associated with [expensive treatment plant upgrades](#).²⁰ According to [ECHO](#), those NPDES effluent limit violations are continuing with exceedances in 11 of the last 12 quarters for one

or more of the following parameters: BOD, E. coli, Ammonia-N, D.O., Total Phosphorus, and Toxicity. Despite this reality, as of August of 2023, Lakeview Farms was reportedly [asking](#)²¹ Delphos to provide additional sewer infrastructure, which requires additional funding from the town, to support the company’s \$24-35 million plant expansion and an “express sewer” for a new plant called Rode’s Meats.

[ECHO](#) data show that Delphos WWTP is contributing significant loading of multiple pollutants to Jennings Creek, including BOD (689,435 lbs./yr. – 2023), Total Nitrogen (24,206 lbs./yr. – 2023), TDS (1,871,303 lbs./yr. – 2023), and TSS (808,109 lbs./yr. - 2023).

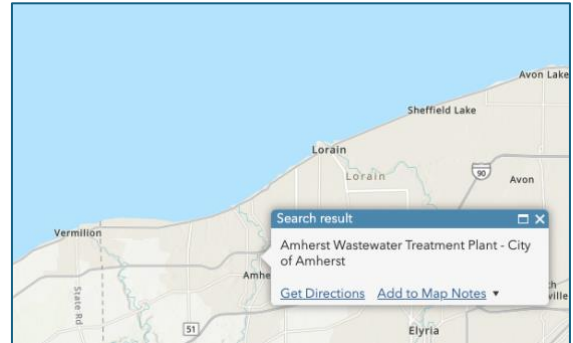
DMR and TRI Multi-Year Loading Report								
DELPHOS WWTP								
DELPHOS, OH, 45833								
FRS ID: 110039778005								
NPDES ID(s): OH0024929								
TRI ID(s): None								
Discharges to Chemical Groups by Pounds (lb)								
Units: <input checked="" type="radio"/> Pounds <input type="radio"/> TWPE								
Chemical Group ↑	2020 DMR (lb/yr) ↓	2020 TRI (lb/yr) ↓	2021 DMR (lb/yr) ↓	2021 TRI (lb/yr) ↓	2022 DMR (lb/yr) ↓	2022 TRI (lb/yr) ↓	2023 DMR (lb/yr) ↓	
▶ AMMONIA	223	--	158	--	1,731	--	342	
▶ BIS(2-ETHYLHEXYL) PHTHALATE	0	--	0	--	0	--	0	
▶ BOD, carbonaceous, 05 day, 20 C	426,390	N/A	582,947	N/A	793,612	N/A	689,435	
▶ CADMIUM AND CADMIUM COMPOUNDS	0	--	0	--	0	--	0	
▶ CHROMIUM AND CHROMIUM COMPOUNDS	0	--	0	--	0	--	0	
▶ COPPER AND COPPER COMPOUNDS	0	--	2.13	--	21.53	--	0	
▶ CYANIDE AND CYANIDE COMPOUNDS	0	--	0	--	0	--	0	
▶ LEAD AND LEAD COMPOUNDS	0	--	0	--	0	--	0	
▶ MERCURY AND MERCURY COMPOUNDS	0.0051	--	0.0035	--	0.0045	--	0.0009	
▶ NICKEL AND NICKEL COMPOUNDS	0	--	0	--	0	--	0	
▶ NITRATE COMPOUNDS	22,932	--	30,369	--	19,730	--	24,206	
▶ Nitrogen	22,932	N/A	30,369	N/A	19,730	N/A	24,206	
▶ Oil and grease	0	N/A	0	N/A	1,356	N/A	2,490	
▶ PHOSPHATE	160	N/A	378	N/A	143	N/A	825	
▶ Phosphorus	357	N/A	1,053	N/A	295	N/A	1,188	
▶ SILVER AND SILVER COMPOUNDS	0	--	0	--	0	--	0	
▶ Solids, total dissolved	2,170,706	N/A	1,815,978	N/A	1,787,934	N/A	1,871,031	
▶ Solids, total suspended	524,647	N/A	501,397	N/A	355,488	N/A	808,109	
▶ ZINC AND ZINC COMPOUNDS	53.54	--	62.39	--	54.63	--	66.8	

Ohio EPA-Issued Pretreatment Permits:

In other municipalities, Ohio EPA [retains authority](#)²² to issue significant industrial user [permits](#)²³ to MPP and other industrial facilities that discharge into municipal WWTPs. Records relating to the discharges from MPP facilities into these WWTPs are also limited,

however, it is clear from the available records for several locations that the significant industrial user permits and NPDES permits are not adequately controlling pollution from these facilities. For example:

Amherst WPCCC – This municipal wastewater treatment [system](#)²⁴ serves a population of 12,393 in the City of Amherst and a portion of Amherst Township. Amherst WPCCC has an average design flow of 3.5 MGD and discharges effluent into Lower Beaver Creek, which is impaired by Pathogens and other causes. Lower Beaver Creek is located in the Central Lake Erie Basin and flows into Lake Erie.



Amherst WPCCC has one significant industrial user under the pretreatment program, an MPP facility – [AdvancePierre Foods, Inc.](#),²⁵ a wholly-owned [subsidiary of Tyson Foods](#). According to [ECHO](#), AdvancePierre Foods is located in an area with 6 EJ Indexes greater than the 80 percentile within one mile of the facility, including wastewater discharges at 84. The pretreatment permit for this facility authorizes a flow rate of 50,000 GPD and it does not contain any concentration or loading limits on Ammonia-N, Pathogens, Total Nitrogen, TKN, Nitrate-Nitrite, Metals, or Chlorides. The permit does not contain a concentration limit on Total Phosphorus, and it authorizes the facility to discharge high loads of Total Phosphorus (14.2 kg/day), TSS (756.6 kg/day), and CBOD (936.2 kg/day) into Amherst WPCCC.

The [NPDES permit](#)²⁶ for Amherst WPCCC does not have any limits on TKN, Nitrate-Nitrite, most Metals, or Chlorides, and it authorizes the discharge of high amounts of Total Phosphorus (weekly loading – 19.9 kg/day and weekly concentration – 1.5 mg/l). According to [ECHO](#), in the last 12 quarters, this plant has violated its permit limits for BOD (10/01/23 – 12/31/23 47%), D.O. (07/01/23 – 9/30/23 23%), and TSS (10/01/23 – 12/31/23 56%).

Given the lack of protective limits in the WPCCC’s NPDES permit and AdvancePierre Food’s pretreatment permit, it is not surprising that [ECHO](#) data show that Amherst WPCCC is contributing significant loads of several pollutants associated with MPP facilities to Lower Beaver Creek, including Nitrogen (58,826 lbs./yr. – 2022), Phosphorus (4,670 lbs./yr. – 2022) and TDS (4,036,899 lbs./yr.– 2022), which then flows a short distance into Lake Erie.

DMR and TRI Multi-Year Loading Report

AMHERST WPCC
AMHERST, OH, 44001

FRS ID: 110000735269

NPDES ID(s): OH0021628

TRI ID(s): None

Discharges to Chemical Groups by Pounds (lb)

Units: Pounds TWPE

Chemical Group ↑	2020 DMR (lb/yr) ↓	2020 TRI (lb/yr) ↓	2021 DMR (lb/yr) ↓	2021 TRI (lb/yr) ↓	2022 DMR (lb/yr) ↓	2022 TRI (lb/yr) ↓	2023 DMR (lb/yr) ↓
▶ AMMONIA	1,128	--	1,996	--	1,584	--	3,170
▶ BOD, carbonaceous, 05 day, 20 C	37,655	N/A	4,674	N/A	3,390	N/A	6,715
▶ CADMIUM AND CADMIUM COMPOUNDS	2.59	--	0	--	0	--	0
▶ CHROMIUM AND CHROMIUM COMPOUNDS	0	--	0	--	0	--	0
▶ COPPER AND COPPER COMPOUNDS	20.34	--	6.32	--	9.22	--	8.38
▶ CYANIDE AND CYANIDE COMPOUNDS	0	--	0	--	0	--	0.0094
▶ LEAD AND LEAD COMPOUNDS	0	--	0	--	0	--	0
▶ MERCURY AND MERCURY COMPOUNDS	0.0015	--	0.0004	--	0.001	--	0.0044
▶ NICKEL AND NICKEL COMPOUNDS	0	--	0	--	0	--	0
▶ NITRATE COMPOUNDS	47,160	--	40,124	--	50,121	--	32,487
▶ Nitrogen	47,160	N/A	40,124	N/A	58,826	N/A	38,118
▶ Oil and grease	0	N/A	0	N/A	0	N/A	0
▶ PHOSPHATE	4,687	N/A	4,444	N/A	3,441	N/A	2,950
▶ Phosphorus	5,600	N/A	4,855	N/A	4,670	N/A	3,953
▶ Solids, total dissolved	4,639,065	N/A	4,438,246	N/A	4,036,899	N/A	3,739,924
▶ Solids, total suspended	47,130	N/A	16,234	N/A	9,569	N/A	16,583
▶ Total Kjeldahl Nitrogen	47,160	N/A	40,124	N/A	58,826	N/A	38,118
▶ ZINC AND ZINC COMPOUNDS	248	--	249	--	206	--	185

N/A - Chemical is not covered by the [TRI Program](#)

[North Baltimore WWTP](#) - This municipal wastewater treatment system serves a village of roughly 4,200 people in Southern Wood County. North Baltimore WWTP has an average design flow of 0.80 MGD and discharges effluent into Rocky Ford Creek, which is impaired by Pathogens and sediment. Rocky Ford Creek flows into the Portage River, which is a [priority watershed](#) for Phosphorus reductions under the GLWQA and a major tributary to Lake Erie in the Western Lake Erie Basin. North Baltimore has at least one MPP facility that



is a permitted significant industrial user under the pretreatment program – [National Beef](#).²⁷ The pretreatment permit for this facility contains no concentration or loading limits for any pollutant, besides a limit on pH. As a result, there are no limits in National Beef’s permit on TSS, Total Phosphorus, Oil and Grease, CBOD, Nitrogen or Nitrogen Compounds, Ammonia-N, Metals, Chlorides, Pathogens, or any other parameter typically associated with MPP facilities.

The [NPDES permit](#)²⁸ for North Baltimore WWTP lacks any concentration or load limits on TKN, Total Nitrogen, Nitrate-Nitrite, Phosphorus, most Metals, and Chlorides. According to [ECHO](#), the plant reports significant loadings of multiple pollutants to Rocky Ford Creek, including Nitrogen (20,939 lbs./yr. – 2023) and Total Dissolved Solids (820,223 lbs./yr. – 2023).

DMR and TRI Multi-Year Loading Report
NORTH BALTIMORE WWTP
NORTH BALTIMORE, OH, 45872
FRS ID: 110012138677
NPDES ID(s): OH0020117, OH0041637
TRI ID(s): None

Discharges to Chemical Groups by Pounds (lb)

Units: Pounds TWPE

Chemical Group	2020 DMR (lb/yr)	2020 TRI (lb/yr)	2021 DMR (lb/yr)	2021 TRI (lb/yr)	2022 DMR (lb/yr)	2022 TRI (lb/yr)	2023 DMR (lb/yr)
AMMONIA	1,041	--	1,537	--	1,114	--	1,711
BOD, carbonaceous, 05 day, 20 C	4,096	N/A	4,027	N/A	3,894	N/A	3,692
BROMODICHLOROMETHANE	0	--	0.118	--	0.126	--	0
BROMOMETHANE	0	--	0	--	0	--	0
CADMIUM AND CADMIUM COMPOUNDS	0	--	0	--	0	--	0
CHLOROMETHANE	0	--	0	--	0	--	0
CHROMIUM AND CHROMIUM COMPOUNDS	0	--	0.851	--	2.14	--	0
COPPER AND COPPER COMPOUNDS	11.69	--	7.86	--	8.67	--	0
DIBROMOCHLOROMETHANE	0	N/A	0.04	N/A	0.0442	N/A	0
DICHLOROMETHANE	0	--	0	--	0	--	0
LEAD AND LEAD COMPOUNDS	0	--	0	--	0	--	0
MERCURY AND MERCURY COMPOUNDS	0.0002	--	0.0007	--	0.0006	--	0
NICKEL AND NICKEL COMPOUNDS	0	--	5.75	--	12.2	--	0
NITRATE COMPOUNDS	22,175	--	22,848	--	21,073	--	20,939
Nitrogen	22,175	N/A	22,848	N/A	21,073	N/A	20,939
Oil and grease	0	N/A	359	N/A	0	N/A	722
Phosphorus	953	N/A	1,172	N/A	1,017	N/A	1,051
Solids, total dissolved	963,090	N/A	1,004,167	N/A	979,818	N/A	820,223
Solids, total suspended	5,895	N/A	6,256	N/A	5,627	N/A	5,107
Total Residual Chlorine	0	N/A	0	N/A	0	N/A	0
TRIBROMOMETHANE	0	--	0	--	0	--	0
TRICHLOROMETHANE	0	--	0.492	--	0.486	--	0.24
Trihalomethane, tot.	0.497	N/A	--	N/A	--	N/A	--
ZINC AND ZINC COMPOUNDS	38.82	--	39.8	--	30.69	--	21.48

DIRECT DISCHARGERS

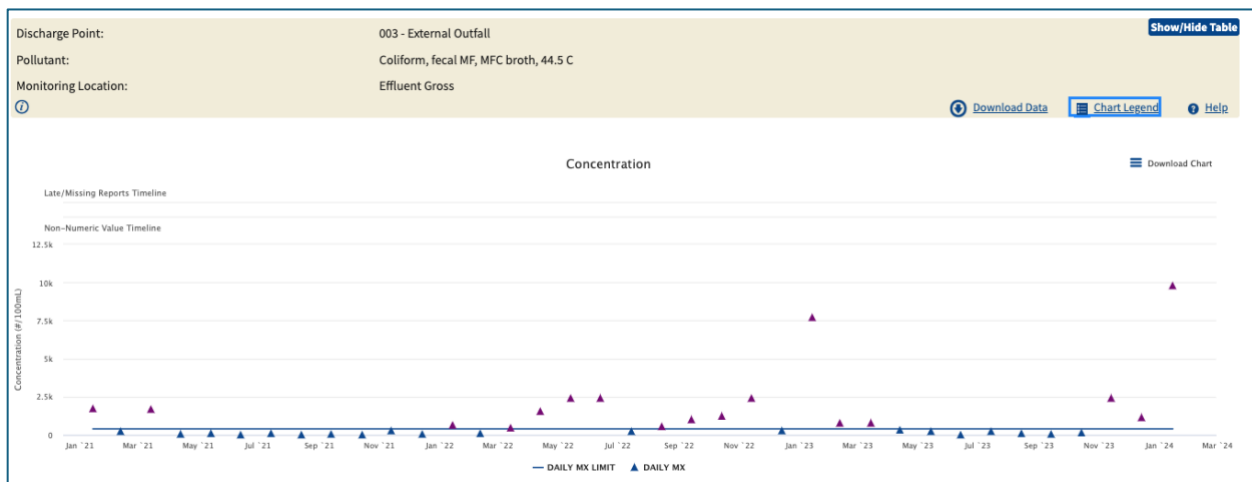
[G. A. Wintzer & Son Company](#), (“G.A. Wintzer”) is a Rendering and Byproduct Processing facility located in Wapakoneta, OH. The facility discharges effluent to Pusheta Creek and an unnamed tributary of Pusheta Creek, which is impaired by unknown causes and Pathogens, in the Western Lake Erie Basin. Pusheta Creek is a tributary to the Auglaize River, which in turn flows into the Maumee River – a major tributary to Lake Erie. The Auglaize River below Pusheta Creek to above Jennings Creek is subject to an EPA



approved TMDL for Ammonia, Phosphorus, Pathogens, and Sediment, according to [Ohio’s 2020 Integrated Water Quality Monitoring and Assessment Report](#).²⁹

The [NPDES permit](#)³⁰ for G.A. Wintzer authorizes the facility to discharge Total Nitrogen from 3 Outfalls, each with design flows of 0.25 MGD, at a very high concentration of 194 mg/l and high load of 184 kg/day. The permit does not contain any limits on Total Phosphorus, TKN, Nitrate-Nitrite, Chlorides, or most Metals.

In addition to the lack of adequately protective NPDES effluent limits, the G.A. Wintzer facility has been identified as being in Significant Noncompliance with its NPDES permit for 7 of the last 13 quarters and in violation of its NPDES permit for 4 other of those 13 quarters. For example, with regard to Fecal Coliform, a number of exceedances are reported on [ECHO](#):



According to [ECHO](#), G.A. Wintzer is contributing significant loading of pollutants to Pusheta Creek, including Nitrogen (116,342 lbs./yr. – 2023) and TDS (1,367,529 lbs./yr. – 2023).

DMR and TRI Multi-Year Loading Report

G. A. WINTZER & SON COMPANY
WAPAKONETA, OH, 45895

FRS ID: 110001630496

NPDES ID(s): OH0002593

TRI ID(s): None

Discharges to Chemical Groups by Pounds (lb)

Units: Pounds TWPE

Chemical Group ↑	2020 DMR (lb/yr) ↓	2020 TRI (lb/yr) ↓	2021 DMR (lb/yr) ↓	2021 TRI (lb/yr) ↓	2022 DMR (lb/yr) ↓	2022 TRI (lb/yr) ↓	2023 DMR (lb/yr) ↓
▶ AMMONIA	423	--	46.98	--	61.63	--	159
▶ BOD, 5-day, 20 deg. C	603	N/A	993	N/A	4,179	N/A	4,173
▶ BOD, carbonaceous, 05 day, 20 C	670	N/A	333	N/A	1,005	N/A	--
▶ CADMIUM AND CADMIUM COMPOUNDS	0	--	0	--	0	--	0
▶ Chemical oxygen demand (COD)	--	N/A	--	N/A	3,688	N/A	4,647
▶ CHROMIUM AND CHROMIUM COMPOUNDS	0	--	0.0029	--	0	--	0
▶ COPPER AND COPPER COMPOUNDS	3.02	--	0	--	0	--	0
▶ CYANIDE AND CYANIDE COMPOUNDS	0	--	0	--	0	--	0
▶ LEAD AND LEAD COMPOUNDS	0	--	0	--	0	--	0
▶ NICKEL AND NICKEL COMPOUNDS	0	--	0	--	2.26	--	0
▶ NITRATE COMPOUNDS	--	--	--	--	36,355	--	55,976
▶ Nitrogen	--	N/A	--	N/A	85,125	N/A	116,342
▶ Oil and grease	0	N/A	0	N/A	0	N/A	0
▶ Phosphorus	3,123	N/A	6,778	N/A	5,400	N/A	5,439
▶ Residue, tot fltrble (dried at 105 C)	1,230,256	N/A	1,036,544	N/A	791,417	N/A	--
▶ Solids, total dissolved	--	N/A	--	N/A	1,335,378	N/A	1,367,529
▶ Solids, total suspended	6,265	N/A	5,717	N/A	13,304	N/A	9,626
▶ Total Kjeldahl Nitrogen	--	N/A	--	N/A	85,125	N/A	116,342
▶ ZINC AND ZINC COMPOUNDS	7.85	--	3.52	--	12.44	--	5.43

N/A - Chemical is not covered by the TRI Program

[Cooper Farms Cooked Meats](#) is a Poultry Slaughtering and Processing facility located in Van Wert, OH. The facility discharges effluent into Lower Town Creek, which is impaired by Pathogens and is listed as a High Priority for TMDL development on [Ohio's 2020 Integrated Water Quality Monitoring and Assessment Report](#).³¹ Lower Town Creek is a tributary of the Lower Auglaize River in the Maumee watershed and is [impacted](#)³² by excess Nitrogen and Phosphorus downstream from Cooper Farms Cooked Meats and other NPDES dischargers.



The [NPDES Permit](#)³³ for Cooper Farms does not contain any concentration or load limits on Total Phosphorus, TKN, Chlorides, or Metals and contains a very high maximum concentration limit for Total Nitrogen (400 mg/l) without any load limit. Due to the lack of adequately protective permit limits, [ECHO](#) shows high loadings of multiple pollutants including Nitrogen (38,310 lbs./yr. – 2023) and Total Filterable Residue (4,942,781 lbs./yr. – 2023).

DMR and TRI Multi-Year Loading Report

COOPER FARMS COOKED MEATS VAN WERT
VAN WERT, OH, 45891

FRS ID: 110006263729

NPDES ID(s): OH0132772

TRI ID(s): 4589WWHPCR6793U

Discharges to Chemical Groups by Pounds (lb)

Units: Pounds TWPE

Chemical Group ↑	2020 DMR (lb/yr) ↓	2020 TRI (lb/yr) ↓	2021 DMR (lb/yr) ↓	2021 TRI (lb/yr) ↓	2022 DMR (lb/yr) ↓	2022 TRI (lb/yr) ↓	2023 DMR (lb/yr) ↓
▶ AMMONIA	14,434	0	30,391	--	26,136	--	39,424
▶ BOD, 5-day, 20 deg. C	--	N/A	--	N/A	--	N/A	0
▶ BOD, carbonaceous, 05 day, 20 C	13,925	N/A	16,587	N/A	17,219	N/A	13,045
▶ Nitrogen	17,473	N/A	26,714	N/A	31,600	N/A	38,310
▶ Oil and grease	0	N/A	403	N/A	0	N/A	0
▶ Oxidants, total residual	0	N/A	0	N/A	0	N/A	0
▶ Phosphorus	656	N/A	1,115	N/A	665	N/A	839
▶ Residue, tot filtrble (dried at 105 C)	2,177,592	N/A	3,821,652	N/A	4,194,567	N/A	4,942,781
▶ Solids, total suspended	25,961	N/A	31,702	N/A	42,871	N/A	30,509
▶ Total Residual Chlorine	0	N/A	0	N/A	0	N/A	0

N/A - Chemical is not covered by the [TRI Program](#)
 --- Pollutant or chemical was not reported in DMR or TRI for the reporting year
 0 - Zero discharge reported

[Download Discharges to Chemical Groups](#)

Campbell Soup Supply Company

(“Campbell”) is a heat process and canned food facility located in Napoleon, OH. The facility discharges effluent into the Maumee River and unnamed tributaries of the Maumee River, which is impaired for algal growth, Nutrients, and Pathogens. The [NPDES permit](#)³⁴ for Campbell contains effluent limitations for 6 Outfalls. Under the permit, interim effluent limitations will be in place for 36 months after March 1, 2022, for Outfall 001 (10 MGD) – where process



wastewater is discharged directly into the Maumee River. The permit does not contain concentration or loading limits on Ammonia-N (during Winter), TKN, Nitrate-Nitrite, Total Nitrogen, Chlorides, or many Metals, with the exception of Outfall 099 (canmaking), and, for Outfall 001, it allows Campbell to contribute high concentrations (1.5 mg/l maximum) and loading (56.8 kg/day) of Total Phosphorus to the Maumee River.

In addition to the lack of adequately protective effluent limits in the facility’s NPDES permit, according to [ECHO](#), the Campbell facility has been identified as being in Significant Noncompliance with its NPDES permit for a wide range of parameters in 12 of the last 13 quarters and in violation of its NPDES permit for the most recent of those quarters.

On March 20, 2024, Campbell was [sued](#)³⁵ in federal district court by Environment America and Lake Erie Waterkeeper for its ongoing violations of the federal Clean Water Act, including violations of its NPDES permit limits for CBOD, E. coli, Phosphorus, Nitrogen, TSS, and Oil and Grease, and for violations of the permit’s requirement to maintain D.O. above specified levels. Campbell was also [sued](#) by the U.S. Department of Justice in the same court on March 20, 2024, for years of Clean Water Act violations, which the United States alleges are due to Campbell’s wastewater treatment plant not being “designed to handle the wastewater generated by current operations.”

According to [ECHO](#), Campbell is contributing significant loading of multiple pollutants to the Maumee River, including Ammonia-N (26,643 lbs./yr. – 2023), BOD (537,781 lbs./yr. – 2023), Nitrogen (36,570 lbs./yr. – 2023), Phosphorus (18,756 lbs./yr. – 2023), TDS (9,093,590 lbs./yr. – 2023), and TSS (570,808 lbs./yr. – 2023). In fact, Campbell is one of the largest NPDES-permitted sources of phosphorus loading in the Western Lake Erie Basin.

DMR and TRI Multi-Year Loading Report

CAMPBELL SOUP PLANT
 NAPOLEON, OH, 43545

FRS ID: 110006108942

NPDES ID(s): OH0003298

TRI ID(s): 43545CMPBLEASTM

Discharges to Chemical Groups by Pounds (lb)

Units: Pounds TWPE

Chemical Group	2020 DMR (lb/yr)	2020 TRI (lb/yr)	2021 DMR (lb/yr)	2021 TRI (lb/yr)	2022 DMR (lb/yr)	2022 TRI (lb/yr)	2023 DMR (lb/yr)
▶ ALUMINUM	11,831	N/A	4,457	N/A	1,245	N/A	2,458
▶ AMMONIA	20,511	--	21,603	--	22,373	--	26,643
▶ BOD, carbonaceous, 05 day, 20 C	488,812	N/A	689,132	N/A	825,934	N/A	537,781
▶ BROMOMETHANE	--	--	--	--	0	--	0
▶ CHROMIUM AND CHROMIUM COMPOUNDS	0.0985	--	51.02	--	7.46	--	9.38
▶ COPPER AND COPPER COMPOUNDS	--	--	--	--	69.67	--	96.93
▶ CYANIDE AND CYANIDE COMPOUNDS	0	--	0	--	0.0064	--	0.0489
▶ DICHLOROPHENOXYACETIC ACID, 2,4-	0	--	0	--	0	--	0
▶ FLUORIDE	3,726	N/A	3,763	N/A	4,446	N/A	3,843
▶ LEAD AND LEAD COMPOUNDS	--	19	--	--	--	18.09	--
▶ NITRATE COMPOUNDS	12,942	19,123	45,521	--	12,304	--	36,570
▶ Nitrogen	12,942	N/A	45,521	N/A	12,304	N/A	36,570
▶ Oil and grease	565	N/A	103,987	N/A	63,918	N/A	44,486
▶ Oxidants, total residual	0	N/A	0	N/A	0	N/A	0
▶ Phosphorus	21,280	N/A	21,643	N/A	22,894	N/A	18,756
▶ Solids, total dissolved	10,134,153	N/A	11,018,315	N/A	9,183,760	N/A	9,093,590
▶ Solids, total suspended	494,800	N/A	746,483	N/A	761,554	N/A	570,808
▶ STRONTIUM	12,348	N/A	10,146	N/A	--	N/A	--
▶ Total Residual Chlorine	25.29	N/A	51.13	N/A	4,375	N/A	0
▶ ZINC AND ZINC COMPOUNDS	1,883	--	878	--	850	--	1,708

CONCLUSION

EPA states that MPP facilities are one of the largest industrial sources of nutrient pollution in the nation's waters. In many watersheds in the U.S., including Lake Erie, governments and communities are struggling to reduce nutrients inputs to reduce HABs and other harmful impacts. EPA can help to get much needed nutrient discharge reductions for U.S. waters by finalizing strong nutrient ELGs for direct and indirect discharging MPP facilities. This is also essential for supporting WWTPs that are bearing the costs associated with MPP wasteloads and for reducing costs and impacts to the Environmental Justice communities.

Appendix I - List of Potential MPP Facilities from EPA Data (Direct, Indirect, and “Non-Discharging”)

Facility Name	Latitude	Longitude
A to Z Portion Control Meats, Inc.	40.89475	-83.89013
AdvancePierre Foods, Inc.	41.41823	-82.19797
American Soy Products, Inc.	42.18816	-83.76461
Americold Logistics, LLC	41.41241	-84.09869
Athens Foods, Inc.	41.40523	-81.7876
AVF Holding LLC	41.16386	-81.51838
Beef Jerky Unlimited	41.80842	-83.44745
BEF Foods, Inc.	40.69689	-84.09563
Better Baked Foods of Erie, LLC	42.1196	-80.01968
Better Baked Foods, LLC	42.21115	-79.8309
Brinkman Turkey Farms, Inc.	40.93094	-83.65067
Buckhead Meat Midwest Inc.	41.60402	-83.52805
Campbell Soup Supply Company	41.39772	-84.10293
Carle's Bratwurst, Inc.	40.8109	-82.9604
Classic Delight, Inc.	40.52669	-84.38614
Conagra Brands, Inc.	41.52086	-84.31809
CONCERTED MANUF. OF NEVADA OH	40.73506	-83.12847
Cooper Hatchery, Inc.	40.90499	-84.57198
Custom Culinary, Inc	41.4768	-82.00504
Decko Products, Inc.	41.43568	-82.74431
Decko Products, Inc.	41.43717	-82.74255
Diversified Warehouse Solutions LLC	40.85497	-84.31937
Erie Bone Broth, LLC	41.50818	-81.6776
Exel Inc. dba HLS Supply Chain (USA)	41.04306	-83.64302
E-Z Shop Kitchen, Inc.	41.34975	-83.10201
Frozen Specialties, Inc.	41.51583	-84.2978
G. A. WINTZER & SON COMPANY	40.52939	-84.19075
G.A. Wintzer & Son Co.	40.57086	-84.19654
Gor-May Enterprises, Inc	41.48455	-81.72829
Grabill Country Meats #1, Inc.	41.20777	-84.96875
H P SCHMITT PACKING CO INC	40.83333	-84.91667

Hillsdale County Meats	41.7052	-84.42651
Hydrofresh HPP	40.85489	-84.31935
Integrated Marketing Technologies, Inc.	41.2504	-81.79071
Interstate Cold Storage, Inc.	41.07193	-85.0399
Interstate Cold Storage, Inc.	41.4137	-84.09574
J. H. Routh Packing Co	41.3986	-82.7596
J.E.S. Foods, Inc.	40.55822	-84.54496
J.H. Routh Packing Co.	41.39896	-82.75988
Jones-Hamilton Co.	41.59285	-83.52644
Just Mike's Jerky Company	41.13623	-81.87873
Kah and Company Incorporated	40.57805	-84.1804
KALMBACH FEEDS INC	40.88999	-83.32994
KALMBACH MOLASSES	40.88691	-83.32633
Keller Packaging of Napoleon	41.38974	-84.09582
Keystone Meats Inc.	40.73109	-84.03808
KTF Protein Solutions Inc.	40.52812	-84.34415
Lakeview Farms	40.85602	-84.32249
Magnus International Group	41.75636	-81.23123
McDonald Meats Inc.	41.99215	-80.34826
MEDINA MEATS	41.18498	-82.03911
Medina Meats Inc	41.18473	-82.03817
More Than Gourmet	41.05953	-81.41565
More Than Gourmet	41.09634	-81.48753
National Beef Ohio, LLC	41.18536	-83.64616
Nestle Prepared Foods Company	41.40486	-81.46728
Nestle Professional	41.47569	-81.69833
NESTLE PURINA PETCARE COMPANY	42.49005	-79.30625
Nestle R&D Center Inc.	41.40947	-81.47112
North American Cold Storage, Inc.	41.1372	-84.84391
Olson Commercial Cold Storage	41.28997	-84.38454
Petrition	41.04075	-82.00437
Pinata Foods, Inc.	41.45628	-81.72866
Pioneer Packing Company, Inc.	41.36379	-83.64501
Progressive Food Products	41.10303	-83.20365

PSD PARTNERS LLC - MPK COMPLEX	40.90444	-83.33778
RF Acquisition Corp.	40.55193	-84.16469
Root's Poultry, Inc.	41.37652	-83.18489
Rudolph Foods Company, Inc.	40.6954	-83.98179
Sandridge Food Corporation	41.13826	-81.90135
Shaker Valley Foods, Inc	41.46451	-81.73322
Sharpy's Food Systems, LLC.	41.35374	-81.49382
Signature Sauces	41.36205	-81.6301
Smith Provision Company, Inc	42.10224	-80.11678
Spagel Brothers Inc.	42.11777	-80.06081
Speciality Steak Service	42.13853	-80.04236
Stanley's Market Brands LLC	41.71106	-83.51835
Stino Da Napoli	41.4832	-81.83395
Symrise Inc.	41.40742	-82.12878
Tanks Meats, Inc.	41.46719	-83.29798
The Honey Baked Ham Company, LLC	41.61916	-83.68828
THE IAMS CO	41.12382	-83.9577
The Original Crunch Roll Factory, LLC	42.33122	-79.57973
Weaver Meats Inc	41.72265	-81.26023
Wright Distribution Center, Inc.	40.7022	-84.08534

END NOTES

¹ Lake Erie Waterkeeper, *Lake Erie Facts*, available at: <https://www.lakeeriewaterkeeper.org/lake-erie-facts.html>.

² U.S. EPA, *Lake Erie*, at: <https://www.epa.gov/greatlakes/lake-erie#:~:text=About%20one%2Dthird%20of%20the,eleven%20million%20of%20these%20inhabitants>.

³ U.S. EPA, *Urban Waters and the Western Lake Erie Basin near Toledo (Ohio)*, available at: [https://www.epa.gov/urbanwaterspartners/urban-waters-and-western-lake-erie-basin-near-toledo-ohio#:~:text=Western%20Lake%20Erie%20Basin%20\(WLEB,water%20source%20for%20the%20WLEB](https://www.epa.gov/urbanwaterspartners/urban-waters-and-western-lake-erie-basin-near-toledo-ohio#:~:text=Western%20Lake%20Erie%20Basin%20(WLEB,water%20source%20for%20the%20WLEB).

⁴ U.S. EPA, *Great Lakes Water Quality Agreement*, available at: <https://www.epa.gov/glwqa>.

⁵ International Joint Commission, *Great Lakes Water Quality Agreement Turns 50*, (Feb. 8, 2022), available at: <https://www.ijc.org/en/great-lakes-water-quality-agreement-turns-50#:~:text=The%201972%20agreement%20focused%20on,communities%20to%20limit%20phosphorus%20input>. **Exhibit 1**

⁶ NOAA, *Lake Erie Harmful Algal Bloom Forecast*, available at: <https://coastalscience.noaa.gov/science-areas/habs/hab-forecasts/lake-erie/#:~:text=Western%20Lake%20Erie%20has%20been,that%20depend%20on%20the%20lake>. **Exhibit 2**

⁷ U.S. EPA, *Photos of Lakes Before and After Algal Blooms*, available at: <https://www.epa.gov/nutrientpollution/photos-lakes-and-after-algal-blooms#:~:text=Lake%20Erie%2C%20Ohio,-Photo%3A%20U.S.%20EPA&text=In%202014%2C%20a%20toxic%20algal,contact%20with%20their%20tap%20water>.

⁸ U.S. EPA, *Recommended Binational Phosphorus Targets*, available at: <https://www.epa.gov/glwqa/recommended-binational-phosphorus-targets>.

⁹ International Joint Commission, *Annex - 4 Nutrients*, available at: <https://ijc.org/en/who/mission/glwqa/annex4>. **Exhibit 3**

¹⁰ U.S. EPA et al., *U.S. Action Plan for Lake Erie*, (Feb. 2018), available at: https://www.epa.gov/sites/default/files/2018-03/documents/us_dap_final_march_1.pdf.

¹¹ Environmental Working Group, *EWG analysis: In the Western Lake Erie Basin, newly identified animal feeding operation hot spots produce excess manure, threatening waterways and human health*, (July 28, 2022), available at: <https://www.ewg.org/research/ewg-analysis-western-lake-erie-basin-newly-identified-animal-feeding-operation-hot-spots>. **Exhibit 4**

¹² Environmental Working Group, *Manure From Unregulated Factory Farms Fuels Lake Erie's Toxic Algae Blooms*, (Apr. 9, 2019), available at: <https://www.ewg.org/news-insights/news/manure-unregulated-factory-farms-fuels-lake-eries-toxic-algae-blooms>. **Exhibit 5**

¹³ Ohio EPA, *Maumee River Watershed*, available at: <https://epa.ohio.gov/divisions-and-offices/surface-water/reports-data/maumee-river-watershed>.

¹⁴ Ohio EPA, *Maumee River TMDL Appendix 4. Individual NPDES Wasteload Allocations*, available at: <https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/tmdl/MaumeeNutrient/Appendix-4-Individual-NPDES-Wasteload-Allocations-Final.pdf>. **Exhibit 6**

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- ¹⁵ Ohio EPA, *List of Approve Pretreatment Programs*, available at: https://epa.ohio.gov/static/Portals/35/pretreatment/Approved_Program_Contacts.xlsx. **Exhibit 7**
- ¹⁶ Ohio EPA, *NPDES Permit City of Delphos 2PD00029*TD*, App. No: OH0024929 (Feb. 1, 2024), available at: <https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/doc/2PD00029.pdf>. **Exhibit 8**
- ¹⁷ Kim Riddell, *Wastewater Superintendent City of Delphos, Start-Up and Operations of the City of Delphos MBR / ThermAer ATAD Wastewater Treatment Facility* (2009), available at: https://thermalprocess.com/wp-content/uploads/2022/04/Thermal-Process-Systems_White-Paper_Riddell.pdf. **Exhibit 9**
- ¹⁸ City of Delphos, *Wastewater Overview*, available at: <https://cityofdelphos.com/sites/default/files/Wastewater%20Overview.pdf>. **Exhibit 10**
- ¹⁹ City of Delphos, *2021 Annual Report*, available at: <https://www.cityofdelphos.com/sites/default/files/2021%20Annual%20Report.pdf>. **Exhibit 11**
- ²⁰ Ohio EPA, *Limited Environmental Review and Finding of No Significant Impact, City of Delphos – Allen and Van Wert counties WWTP MBR Buildout*, Loan number – CS390309-0019, (June 16, 2021), available at: <https://www.cityofdelphos.com/sites/default/files/6381%20WWTP%20MBR%20FNSI%20and%20LER.pdf>. **Exhibit 12**
- ²¹ The Delphos Herald, *Lakeview Farms asks for better communication on project*, (Aug. 9, 2023), available at: https://www.delphosherald.com/news/community/lakeview-farms-asks-for-better-communication-on-project/article_f36f5e7e-36f3-11ee-9ada-17485811d132.html. **Exhibit 13**
- ²² Ohio EPA, *Indirect Discharge Permit Program*, (Apr. 2018), available at: <https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/pretreatment/IDP-FS.pdf>. **Exhibit 14**
- ²³ Ohio EPA, *Indirect Discharge Permit List*, available at: <https://epa.ohio.gov/divisions-and-offices/surface-water/permitting/indirect-discharge-permits>.
- ²⁴ Ohio EPA, *City of Amherst NPDES Fact Sheet*, (Aug. 31, 2020), available at: <https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/doc/3PD00001.fs.pdf>. **Exhibit 15**
- ²⁵ Ohio EPA, *AdvancePierre Foods, Inc. Indirect Discharge Permit 3DP00046*DP*, App. No. OHP000237 (Mar. 1, 2021), available at: <https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/doc/3DP00046.pdf>. **Exhibit 16**
- ²⁶ Ohio EPA, *City of Amherst WPCC NPDES Permit 3PD00001*ND*, App. No. OH0021628 (Feb. 1, 2021), available at: <https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/doc/3PD00001.pdf>. **Exhibit 17**
- ²⁷ Ohio EPA, *Indirect Discharge Permit for National Beef, LLC 2DP00087*CP*, App. No. OHP000250 (Oct. 1, 2021), available at: <https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/doc/2DP00087.pdf>. **Exhibit 18**
- ²⁸ Ohio EPA, *NDPES Permit for Village of North Baltimore 2PB00033*LD*, App. No. OH0020117 (Sept. 1, 2019), available at: <https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/doc/2PB00033.pdf>. **Exhibit 19**
- ²⁹ Ohio EPA, *2020 Integrated Water Quality Monitoring and Assessment Report – Section J – Excerpt* (May 2020), available at:

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Exhibit 20

³⁰ Ohio EPA, *NPDES Permit for G.A. Wintzer and Son Company 2IK00002*KD*, App. No. OH0002593 (Mar. 1, 2022), available at:

<https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/doc/2IK00002.pdf>. **Exhibit 21**

³¹ **Exhibit 20**, *supra* endnote 29.

³² Ohio EPA, *Biological and Water Quality Study of Lower Auglaize River Tributaries* – Excerpt (Nov. 17, 2016), available at:

<https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/documents/2014%20Lower%20Auglaize%20River%20Tributaries%20TSD.pdf>. **Exhibit 22**

³³ Ohio EPA, *NPDES Permit for Cooper Hatchery Inc. for Cooper Farms Cooked Meats 2IH00110*GD*, App. No. OH0132772 (Mar. 1, 2023), available at:

<https://dam.assets.ohio.gov/image/upload/epa.ohio.gov/Portals/35/permits/doc/2IH00110.pdf>. **Exhibit 23**

³⁴ Ohio EPA, *NPDES Permit for Campbell Soup Supply Company, LLC 2IH00021*KD*, App. No. OH0003298 (Mar. 1, 2022), available at:

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³⁵ Complaint, *Environment America, D/B/A Environment Ohio, and Lake Erie Waterkeeper v. Campbell Soup Supply Company L.L.C.*, Case No. 3:24-cv-00515 (N.D. Ohio filed Mar. 20, 2024), available at:

<https://publicinterestnetwork.org/wp-content/uploads/2024/03/Complaint-EnvOHvsCampbellSoup-March2024.pdf>. **Exhibit 25**