



## County of Erie

DANIEL CASTLE, AICP  
COMMISSIONER

DEPARTMENT OF ENVIRONMENT & PLANNING  
DIVISION OF SEWERAGE MANAGEMENT

JOSEPH FIEGL, P.E., BCEE  
DEPUTY COMMISSIONER

April 17, 2026

**VIA U.S. MAIL AND CERTIFIED MAIL**

Matt Riggi  
Terminal Manager  
SweetLife, LLC  
2303 Hamburg Tpke.  
Lackawanna, New York 14218

RE: Enforcement Hearing Recommendations  
Erie County Sewer District No. 6  
Notice of Violation Related to High-Strength Waste Discharges

Dear Mr. Riggi,

A Notice of Violation of the Rules and Regulations for Erie County Sewer Districts (Rules and Regulations) was issued to SweetLife, LLC (SweetLife) on March 13, 2026. This Notice of Violation also included an official Notice of Hearing to discuss SweetLife's compliance with Article V, Section 501.p and Section 503.b of the Rules and Regulations:

*Section 501 (Prohibited Discharges): No Person shall discharge or cause to be discharged, either directly or indirectly to the Sewerage System, any pollutant, substance or Wastewater which causes or could cause Interference, Pass Through, be incompatible with the Sewerage System or sewerage treatment plant, limit sludge disposal options of a Sewage Treatment Plant or damages, inhibits or disrupts the operation or performance of the Sewerage System or the Sewage Treatment Plant. Without limiting the generality of the foregoing, the following substances and Wastewaters are specifically prohibited from discharge to the District Sewerage System:*

*p.: Any pollutant, including oxygen-demanding pollutants such as Biochemical Oxygen Demand (BOD), released in a discharge at a Flow Rate and/or pollutant concentration which will cause Interference.*

*Section 503 (Discharge of Abnormal (Surchargeable) Strength Sewage): No Person shall discharge or cause to be discharged to the public Sewerage System Wastewater or Other Wastes containing or causing in excess of the following:*

*b.: Abnormal concentrations of BOD, which are defined as concentrations exceeding 250 mg/l*

The referenced hearing was held on April 14, 2026 following the procedures outlined in Article XI, Section 1103 of the Rules and Regulations. The Erie County Sewer District (ECSD) No. 6 Board of Managers conducted the hearing. After a review of the Notice of Violation letter and the evidence presented during the hearing, including testimony you provided on behalf of SweetLife, the ECSD No. 6 Board of Managers determined SweetLife violated Sections 501 and 503 of the Rules and Regulations. Furthermore, because of SweetLife's past compliance history, the continuing nature of the high-waste strength discharges, and in consideration of the impact of these violations, the ECSD No. 6 Board of Managers determined that a compliance order be issued, and penalties be assessed.

### Compliance Order

Due to expectations that SweetLife will have ongoing issues complying with Section 503.b of the Rules and Regulations, the ECSD No. 6 Board of Managers hereby orders that SweetLife retain the services of a licensed professional engineer registered in New York State to complete an engineering evaluation and issue a report.

This report shall at a minimum:

- Provide a review of SweetLife's manufacturing process.
- Identify all piping, drains, sewers, pumping stations, chemical dosing, and related infrastructure on the SweetLife property, noting the flow/routing and use. Dye testing and other evaluation methods may be required.
- Using the analysis of routing of various infrastructures, evaluate all current and potential sources of wastewater to the ECSD No. 6 sanitary sewer system, complete an analysis of the composition of these sources, and provide an assessment of the impact these sources may have on compliance with the Rules and Regulations. Laboratory testing may be required.
- Recommend improvements that will ensure SweetLife's compliance with the Rules and Regulations.
- Include a schedule for implementation of recommendations.

The evaluation shall consider the recent violations of Sections 501.p and 503.b of the Rules and Regulations, as well as past violations of Section 501.d of the Rules and Regulations related to malodorous discharges.

The evaluation report shall be submitted to the Erie County Division of Sewerage Management (DSM) within 90 days of the hearing, or July 13, 2026, unless an extension is granted by the DSM in writing. The DSM will issue written comments on the report, after which the engineer retained by SweetLife shall have 30 days to revise the report to address the DSM's comments, again unless an extension is granted by the DSM in writing. The final report shall be stamped by a licensed professional engineer in New York State. The schedule for implementation of recommendations included in the evaluation report, once approved by the DSM, shall become enforceable.

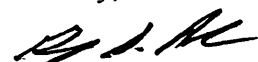
### Penalties

Article XI, Section 1104 of the Rules and Regulations notes violations of Article V will be subject to a premium assessment not to exceed a maximum of ten thousand dollars (\$10,000) for each violation. Each day a violation exists constitutes a separate violation. In response to the nature and duration of the violations, the magnitude of impact of the violations, SweetLife's past violation record, and the financial impact to ECSD No. 6, at the conclusion of the hearing the ECSD No. 6 Board of Managers approved a penalty in the form of a premium assessment in a tiered approach up to a maximum amount of \$10,000.00. The immediate premium assessment will be \$2,500.00, which will be added to SweetLife's 2027 County property tax bill. The remaining \$7,500.00 shall be in abeyance but will be assessed if SweetLife does not follow the compliance order, including the enforceable schedule in the evaluation report.

SweetLife's compliance with the Rules and Regulations and this compliance order will be closely monitored by the Board of Managers. Per Article XI, Section 1103 of the Rules and Regulations, if future violations occur, SweetLife should expect further enforcement actions.

If you have any questions, please contact me at (716) 858-6267.

Sincerely,



Garry Pecak, P.E.  
Secretary, ECSD No. 6 Board of Managers

cc: **ECSD No. 6 Board of Managers**  
J. Fiegl / B. Pfalzer / 6.2.4.SweetLife  
C. Scozzaro  
K. Kaminski / C. Horne / D. Hojnacki  
W. Strzeszynski