



County of Erie

DANIEL CASTLE, AICP
COMMISSIONER

DEPARTMENT OF ENVIRONMENT & PLANNING
DIVISION OF SEWERAGE MANAGEMENT

JOSEPH FIEGL, P.E., BCEE
DEPUTY COMMISSIONER

August 26, 2026

Matt Riggi
Terminal Manager
Sweet Life, 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
Manufacturing Process and Sanitary Wastewater Evaluation

Dear Mr. Riggi,

The Erie County Division of Sewerage Management (ECDSM) was in receipt of your Manufacturing Process Report on July 27, 2026, pursuant to the Notice of Violation Letter issued by the Erie County Sewer District No. 6 Board of Managers (ECSD No. 6 BOM) on April 17, 2026. As a reminder, the requirements for the evaluation report as stated in the Notice of Violation Letter were, in part:

This report shall be at a minimum:

- *Provide a review of Sweet Life's manufacturing process.*
- *Identify all piping, drains, sewers, pumping stations, chemical dosing, and related infrastructure on the Sweet Life 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 Sweet Life's compliance with the Rules and Regulations.*
- *Include a schedule for implementation of recommendations.*

The ECDSM has reviewed the July 27, 2026 report and finds that it does not meet the minimal requirements as outlined in the Notice of Violation Letter and as agreed to at the April 14, 2026, compliance hearing you attended. The purpose of the evaluation was to identify all piping and drains that lead to the sanitary sewer, to assess the discharges conveyed through the identified points, and provide a schedule of corrections to bring Sweet Life's sanitary sewer discharge into compliance with the Rules and Regulations for Erie County Sewer Districts.

4/10/26

To assist Sweet Life LLC in completing the evaluation and moving towards compliance, the ECDSM has the following specific comments to statements and questions within the submitted report:

1. Cover letter, first paragraph: it is stated that the "... enclosed is a preliminary manufacturing process and sanitary wastewater evaluation ... provided voluntarily and in good faith to support a cooperative review with Erie County Sewer District No. 6." Please be advised that this was not voluntary action; rather, it was a required pursuit of a compliance order issued by the ECSD No. 6 Board of Managers due to violations of the Rules and Regulations for Erie County Sewer Districts. The compliance order required a complete evaluation report by the extended due date of July 27, 2026, not a preliminary report.
2. Cover letter, fifth paragraph: again, this was meant to be a complete evaluation report to address violations of Sections 501 and 503 of the Rules and Regulations for Erie County Sewer Districts. If additional information was required from ECSD No. 6, it should have been requested at the commencement of the engineering work. At this stage, Sweet Life LLC or its consulting engineering firm should submit a request under separate cover, noting the additional information that is required from ECSD No. 6 to complete this evaluation and meet the requirements of the compliance order.
3. Cover letter, sixth paragraph: the sampling and operational efforts should have occurred during the 104-day period provided to Sweet Life LLC to complete the evaluation report. Please be advised pursuant to the compliance order, Sweet Life LLC "shall have 30 days to revise the report to address the ECDSM's comments, again unless an extension is granted..." ECSD No. 6's concern is that Sweet Life LLC's intention is for a prolonged evaluation period, which is not in accordance with the compliance order. Sweet Life LLC's discharges have led to numerous constituent complaints, a State Pollutant Discharge Elimination System (SPDES) permit violation, and other adverse impacts to ECSD No. 6. Sweet Life LLC must implement improvements to ensure compliance with the Rules and Regulations for Erie County Sewer Districts.
4. Cover letter, last paragraph: please see previous comments. Be advised that Sweet Life LLC presently has a 'Zero Discharge Permit' and are to notify ECSD No. 6 immediately if a process discharge may result.
5. Manufacturing Process Report cover: this evaluation is to ensure compliance with all Rules and Regulations for Erie County Sewer Districts, not just Section 503.b. Please note that Sweet Life LLC's violations leading to the Compliance Order have included sections 501.d, 501.p, and 503.b.
6. Section 2, Executive Summary, third and fourth paragraphs: statements such as "broad operating range with relatively routine conditions interrupted by a limited number of high-strength events" and "The analytical profile is consistent with a food-processing wastewater stream dominated by biodegradable dissolved sugars and variable suspended solids" do not align with the zero-discharge permit for the facility. The evaluation report must identify improvements to bring Sweet Life LLC into compliance. Most of the items in the last sentence of this section ("source identification, separation of concentrated streams, flow measurement, loading calculations in pounds per day, operational documentation,") should have already been completed, with the "corrective actions" and a schedule for implementation identified in the report.

7. Section 5: in general, all this information should be confirmed in the field. For example, in Section 5.1, do accidental releases stay in containment rather than sanitary drainage? In Section 5.2, does any wet cleaning occur and if yes, how often and where does it go? Section 5.5: what happens if condensate is of quality that does not permit it to be reused as process or makeup water? Section 5.10: What happens if recoverable sugar-bearing liquids are not suitable to be returned to production? In general, if equipment is cleaned, where does the rinse water go in all these process areas? Where do all drains terminate? Note – Sweet Life LLC’s consultant may identify other items to verify.
8. Section 6: shouldn’t Sweet Life LLC’s sodium hypochlorite feed system used for downstream odor control be noted in this table?
9. Section 7: there is no mention of truck wash in this section, or anywhere else in the report. How does that process play into this evaluation?
10. Section 8: the ECDSM agrees that “...discharge destinations should be confirmed against current field conditions...” Where do the Key Wastewater considerations on the table go?
11. Section 11, first paragraph: the report notes that “The refinery is intended to retain and reuse process water rather than routinely discharge it to the sanitary sewer” and “Other streams may reach the sanitary system only where specifically connected or approved, such as selected utility blowdown, water-treatment residuals, or maintenance drainage.” These are all theoretical or as designed type statements, but the reality is sugar or other high strength wastes are being discharged into the sanitary sewers. Be advised that Sweet Life LLC presently has a ‘Zero Discharge Permit’ and are to notify ECSD No. 6 immediately if a process discharge may result.
12. Section 11.2: the title of this section is “Preliminary Sanitary Flow and Points of Interest”. The compliance order required Sweet Life LLC to “Identify all piping, drains, sewers, pumping stations, chemical dosing, and related infrastructure on the Sweet Life property, noting the flow/routing and use.” The work should have already been completed prior to this report being submitted, not “Preliminary” items.
13. Section 13 and 19: the compliance order stated, “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.” This section presents a plan, rather than an evaluation.
14. Section 14: the sodium hypochlorite presently used by Sweet Life LLC for downstream odor control was implemented due to odor complaints from the City of Lackawanna and residents of ECSD No. 6. It was not part of Sweet Life LLC’s planned operational controls. How will this dosing be addressed by a remediation plan?
15. Section 20: the compliance order required Sweet Life LLC to detail “Recommend improvements that will ensure Sweet Life’s compliance with the Rules and Regulations” and “Include a schedule for implementation of recommendations.” These requirements must be satisfied in this report.

Sweet Life LLC's consultant, Golden Crescent Consulting (GCC), stated in the evaluation report additional actions must be completed to fully analyze the concerns ECSD No.6 raised. The ECDSM agrees. Per the consent order Sweet Life LLC has 30 days from the date of this letter to revise the evaluation and address ECDSM comments, which is September 25, 2026, unless an extension by the ECDSM is granted in writing. Please be advised that the compliance order requires the final report to be stamped by a licensed professional engineer in New York State.

Please note that the status of the final report will be presented to the ECSD No. 6 BOM at their October 7, 2026, Board meeting. At that time, deliberation on continued enforcement, including imposing the portion of the premium assessment held in abeyance, will be discussed.

The ECDSM remains available to discuss this letter or any questions Sweet Life LLC or GCC may have. I may be contacted at (716) 858-6267 or Garry.Pecak@erie.gov.

Kindest regards,



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. Sweet Life
C. Scozzaro
K. Kaminski / C. Horne / D. Hojnacki
W. Strzeszynski



September 25, 2026

Garry Pecak, P.E.
Secretary, ECSD No. 6 Board of Managers
Erie County Department of Environment and Planning
Division of Sewerage Management
95 Franklin Street, Room 1034
Buffalo, New York 14202

Re: Sweet Life LLC, ECSD6 Notice of Violation Related to High-Strength Waste Discharges Enforcement Hearing Recommendations - Manufacturing Process and Sanitary Wastewater Evaluation - Corrective Action Work Plan/Summary Response Report

Dear Mr. Pecak,

In response to both the Erie County Division of Sewerage Management ("ECDSM") April 17, 2026 Notice of Violation ("NOV") and the subsequent August 26, 2026 comment letter, Sweet Life LLC ("Sweet Life") provides the following responses and descriptions of corrective actions which address the specific comments identified by ECDSM regarding Sweet Life's July 27, 2026 Manufacturing Process and Sanitary Wastewater Evaluation. This summary response functionally represents a Corrective Action Work Plan ("Work Plan") which incorporates information presented in Sweet Life's process evaluation, and identifies the additional field verification, documentation, corrective action implementation, and verification required to complete the evaluation. All remaining corrective actions will generally reflect the following information and associated tasks:

Summary Response Report: September 25, 2026

Item 1. "Cover letter, first paragraph: it is stated that the "... enclosed is a preliminary manufacturing process and sanitary wastewater evaluation ... provided voluntarily and in good faith to support a cooperative review with Erie County Sewer District No. 6." Please be advised that this was not voluntary action; rather, it was a required pursuit of a compliance order issued by the ECSD No. 6 Board of Managers due to violations of the Rules and Regulations for Erie County Sewer Districts. The compliance order required a complete evaluation report by the extended due date of July 27, 2026, not a preliminary report."

Corrective Action 1. Sweet Life acknowledges ECDSM's clarification.

Item 2. "Cover letter, fifth paragraph: again, this was meant to be a complete evaluation report to address violations of Sections 501 and 503 of the Rules and Regulations for Erie County Sewer Districts. If additional information was required from ECSD No. 6, it should have been requested at the commencement of the engineering work. At this stage, Sweet Life LLC or its consulting engineering firm should submit a request under separate cover, noting the additional information that is required from ECSD No. 6 to complete this evaluation and meet the requirements of the compliance order"

Corrective Action 2.

Sweet Life is not currently knowingly discharging any contaminated process wastewater to ECSD.

Completed / Existing Information:

- Sweet Life is currently operating in accordance with Zero Discharge Permit.
- Sweet Life is to notify ECSD No 6 whenever a process discharge occurs.
- Sweet Life acknowledges process errors resulting in discharges April 2026. This event was caused by a seal in a valve that had deteriorated. The line was completely removed as of June 2026 from the system to prevent this from happening again .

Item 3. “Cover letter, sixth paragraph: the sampling and operational efforts should have occurred during the 104-day period provided to Sweet Life LLC to complete the evaluation report. Please be advised pursuant to the compliance order, Sweet Life LLC "shall have 30 days to revise the report to address the ECDSM's comments, again unless an extension is granted... " ECSD No. 6's concern is that Sweet Life LLC's intention is for a prolonged evaluation period, which is not in accordance with the compliance order. Sweet Life LLC's discharges have led to numerous constituent complaints, a State Pollutant Discharge Elimination System (SPDES) permit violation, and other adverse impacts to ECSD No.6. Sweet Life LLC must implement improvements to ensure compliance with the Rules and Regulations for Erie County Sewer Districts”

Corrective Action 3. As indicated above in Corrective Action 2, Sweet Life is not currently knowingly discharging any significant amount of contaminated process wastewater to ECSD6. The fact that Sweet Life has received a New York State Department of Environmental Conservation (“NYSDEC”) State Pollutant Discharge Elimination System (“SPDES”) permit violation is not related to this Erie County NOV, and has been addressed to the current satisfaction of the NYSDEC. Also, Sweet Life has not been informed of any local resident complaints or other adverse impacts since February 7th, 2025 (20 months). The ECDSM’s comment above that “ECSD No. 6's concern is that Sweet Life LLC's intention is for a prolonged evaluation period, which is not in accordance with the compliance order” is disingenuous at best, especially based upon various incorrect information and assertions presented in this comment letter from the County. To date, Sweet Life has taken the following corrective actions;

Completed / Existing Information:

- All interior pipes to sewer were removed by February 2026 leaving only the following Sanitary Sewer Discharge to the force main at Port of Buffalo;
 - SSD1 – Laboratory Sink
 - SSD2 – Hand Wash Sink (Refinery)
 - SSD3 – Boiler Room Drain (Zero Discharge Permit)
 - SSD4 – Truck Wash Bay
 - SSD5 – Cooling Tower (Zero Discharge Permit)
 - SSD6 – Manhole Cover 1 (2303 Hamburg Turnpike)
 - SSD7 – Manhole Cover 2 (2303 Hamburg Turnpike)
 - SSD8 – Restroom (Office)
 - SSD9 – Office Sink
 - SSD10 – Lift Station
- Condensate water is now added to Pre-coat and Raw Melting Operations - June 4, 2026
- Condensate water added to Raw Filter pressure cleaning - June 6, 2026
- Condensate water added to Ion Exchange Column rinse - June 7, 2026

- Condensate water added to Dust Scrubber and C Sugar Melt - June 12, 2026
 - 90% of all condensate process water is recovered and reused in the refining process-post the above June 2026 corrective actions.
- Reinforced employee training on preventing unauthorized sugar discharges to the sanitary sewer system - August 5, 2026
- Truck wash bay wash cycle¹ - visual verification inspection prior to truck wash – September 16, 2026.

Additional/Ongoing Controls:

- Sweet Life continues to evaluate process modifications and recovery options to address the remaining approximately 10% of condensate process water not currently recovered or consumed within the refining process.
- Sweet Life will install a dedicated flow meter on the condensate system to continuously measure and monitor condensate flow. This monitoring will provide additional support to early detection and corrective response before a process failure could contribute to an unintended discharge to the sanitary sewer system.
- Sweet Life will implement an automated valve-position monitoring and alarm system within the truck bay wash cycle. The control system will continuously verify that each valve is in the proper position during the automated wash sequence. Any deviation between the proper valve position will initiate an alarm.

Item 4. “Cover letter, last paragraph: please see previous comments. Be advised that Sweet Life LLC presently has a 'Zero Discharge Permit' and are to notify ECSD No. 6 immediately if a process discharge may result.”

Corrective Action 4. Acknowledged. Sweet Life is not currently knowingly discharging any significant volume of contaminated process wastewater to ECSD No. 6.

Existing Information:

- Sweet Life is currently operating on a Zero Discharge Permit.
- Sweet Life is aware of the need to immediately notify ECSD No. 6, whenever a process event occurs.
- Sweet Life has established a procedure for any incidental release as an emergency action plan element, to include notification, and authorized designee.

Item 5. “Manufacturing Process Report cover: this evaluation is to ensure compliance with all Rules and Regulations for Erie County Sewer Districts, not just Section 503.b. Please note that Sweet Life LLC's violations leading to the Compliance Order have included sections 501.d, 501.p, and 503. b.”

Corrective Action 5.

Sweet Life is not currently knowingly discharging any significant volume of contaminated process wastewater to ECSD No. 6. Sweet Life recognizes the requirement² 501 which was not explicitly stated in the original ECSD No. 6 NOV February 11, 2025.

¹ An automated wash cycle runs for 8 minutes to clean inside the truck and hoses and then pumped into refining process. Automated Valve switches to an additional 7 minute rinse cycle, after the initial wash, and discharged in to sanitary sewer as zero discharge.

² Any noxious or malodorous liquids, gas, or solids which either singly or by interaction with other substance or waste is sufficient to create public nuisance, cause acute worker health, or safety problems or is sufficient to prevent entry into sewers for maintenance and repair.

Completed / Existing Information:

- ³The preliminary report already contains sections addressing process description, raw materials, utility systems, wastewater generation, analytical results, pretreatment, pollutants, spill response, environmental controls, waste management, and recommended actions.
- Sweet Life is currently operating on a Zero Discharge Permit.
- Sweet Life acknowledges ECSD No. 6 must be notified whenever a process discharge occurs.
- Sodium Hypochlorite is used to treat process water at the lift station to maintain compliance in response to ECSD No. 6 NOV notice from February 11, 2025; as previously addressed with NOV response communication March 3, 2025 response to ECSD No. 6⁴.

Item 6. "Section 2, Executive Summary, third and fourth paragraphs: statements such as "broad operating range with relatively routine conditions interrupted by a limited number of high-strength events" and "The analytical profile is consistent with a food-processing wastewater stream dominated by biodegradable dissolved sugars and variable suspended solids" do not align with the zero discharge permit for the facility. The evaluation report must identify improvements to bring Sweet Life LLC into compliance. Most of the items in the last sentence of this section ("source identification, separation of concentrated streams, flow measurement, loading calculations in pounds per day, operational documentation,") should have already been completed, with the "corrective actions" and a schedule for implementation identified in the report."

Corrective Action 6. See Corrective Action 3 above; all tasks were completed to maintain compliance with Sweet Life's Zero Discharge Permit.

Item 7. Section 5: ECDSM requests in general, all this information should be confirmed in the field. For example, in Section 5.1, do accidental releases stay in containment rather than sanitary drainage? In Section 5.2, does any wet cleaning occur and if yes, how often and where does it go? Section 5.5: what happens if condensate is of quality that does not permit it to be reused as process or makeup water? Section 5.10: What happens if recoverable sugar-bearing liquids are not suitable to be returned to production? In general, if equipment is cleaned, where does the rinse water go in all these process areas? Where do all drains terminate? Note- Sweet Life LLC's consultant may identify other items to verify.

Corrective Action 7. Sweet Life field-verified each process-area statement in Section 5 (See response below);

Completed / Existing Information:

Section 5.1, do accidental releases stay in containment rather than sanitary drainage? *Yes, accidental releases stay in containment rather than sanitary drainage. It is a closed loop system inside the refinery.*

Section 5.2, does any wet cleaning occur and if yes, how often and where does it go? *Yes, wet cleaning occurs in two parts, 1 is inside the process and 2 occurs during truck washing.*

1. *Process wet cleaning happens routinely and regularly throughout the refinery and remains in the closed loop system.*

³ See Section 5 Process Flow Description items 5.1-5.11; of *Sweet Life Preliminary Report 7/27/2026*.

⁴ Sewer Authority Response – March 3, 2025.

2. *Truck Washing – multiple times per day – variable. Visible inspection occurs to ensure residual and substantially empty prior to washing operation commencement. If deemed empty the First 8-minute wash cycle is diverted into the closed loop refining system via a automatic valve. Remaining rinse cycle 7-minute rinse is discharged into the sanitary system as in compliance material with zero discharge at SSD4 with historical testing that indicates as zero discharge. Sweet Life position is clear that rinse water containing any residual material is captured in the closed loop system as that material is valuable and recoverable, post rinse water has been historically tested and verified material composition as zero discharge condition.*

Section 5.5: what happens if condensate is of quality that does not permit it to be reused as process or makeup water? *Approximately 90% of condensate is reused in the process and the remaining approximate 10% is discharged in compliance with zero discharge limits.*

Section 5.10: What happens if recoverable sugar-bearing liquids are not suitable to be returned to production? *All material that is not reprocessed is stored in additional vessels and removed offsite by a 3rd party contractor.*

- In general, if equipment is cleaned, where does the rinse water go in all these process areas? *All rinse water from cleaning operations including the truck is returned to the process for recovery.*
- Where do all drains terminate? *All Sanitary drains terminate at the force main entry at the Port of Buffalo downstream from Sweet Life's lift station.*

Item 8. “Section 6: shouldn't Sweet Life LLC's sodium hypochlorite feed system used for downstream odor control be noted in this table?”

Corrective Action 8. Sweet Life Acknowledges sodium hypochlorite as an odor control and is used in accordance to maintain compliance in response to NOV notice from February 11, 2025; as previously addressed with NOV response communication March 3, 2025 response to ECSD No. 6⁵.

Item 9. “Section 7: there is no mention of truck wash in this section, or anywhere else in the report. How does that process play into this evaluation?”

Corrective Action 9. Acknowledged. As stated above in this summary report “Truck Washing – multiple times per day – variable. Visible inspection occurs to ensure residual and substantially empty prior to washing operation commencement. If deemed empty the First 8-minute wash cycle is diverted into the closed loop refining system via a automatic valve. Remaining rinse cycle 7-minute rinse is discharged into the sanitary system as in compliance material with zero discharge at SSD4

⁵ Sewer Authority Response – March 3, 2025.

with historical testing that indicates as zero discharge. Sweet Life position is clear that rinse water containing any residual material is captured in the closed loop system as that material is valuable and recoverable, post-rinse water has been historically tested and verified material composition as zero discharge condition.

Item 10. "Section 8: the ECDSM agrees that"...discharge destinations should be confirmed against current field conditions... " Where do the Key Wastewater considerations on the table go?"

Corrective Action 10. The following information is presented about key wastewater considerations;

Completed / Existing Information:

• SSD1 – Laboratory Sink	Zero Discharge Condition
• SSD2 – Hand Wash Sink (Refinery)	Zero Discharge Condition
• SSD3 – Boiler Room Drain (Zero Discharge Permit)	Zero Discharge Condition
• SSD4 – Truck Wash Bay	Zero Discharge Condition
• SSD5 – Cooling Tower (Zero Discharge Permit)	Zero Discharge Condition
• SSD6 – Manhole Cover 1 (2303 Hamburg Turnpike)	Zero Discharge Condition
• SSD7 – Manhole Cover 2 (2303 Hamburg Turnpike)	Zero Discharge Condition
• SSD8 – Restroom (Office)	Zero Discharge Condition
• SSD9 – Office Sink	Zero Discharge Condition
• SSD10 – Lift Station	Zero Discharge Condition

Key Considerations

- Boiler system – Closed loop system.
- Boiler Blowdown – Not Closed loop - discharged in compliance with Zero Discharge Permit
- Condensate – 90% Closed loop system, remaining 10% discharged in compliance with Zero Discharge Permit as previously described in this summary report.
- Cooling-tower discharged in compliance with Zero Discharge Permit.
- Compressor condensate - Not discharged to sanitary system.
- Water-treatment backwash / Wet Cleaning – Closed loop system.
- Melters, batch pans, boilers, surface condensers, cooling towers, compressor systems, condensate collection, sweet-water storage, and process return pathways. As described either captured in closed loop system or discharged in compliance with Zero Discharge Permit.

Item 11. "Section 11, first paragraph: the report notes that "The refinery is intended to retain and reuse process water rather than routinely discharge it to the sanitary sewer" and "Other streams may reach the sanitary system only where specifically connected or approved, such as selected utility blowdown, water-treatment residuals, or maintenance drainage." These are all theoretical or as-designed type statements, but the reality is sugar or other high strength wastes are being discharged into the sanitary sewers. Be advised that Sweet Life LLC presently has a 'Zero Discharge Permit' and are to notify ECSD No. 6 immediately if a process discharge may result."

Corrective Action 11. Sweet Life rebuts the 3rd sentence in Item 11 as noted that "the reality is sugar or other high-strength wastes are being discharged into the sanitary sewers." Sweet Life is currently not knowingly discharging any significant volume of contaminated wastewater to ECSD No. 6.

Item 12. "Section 11.2: the title of this section is "Preliminary Sanitary Flow and Points of interest". The compliance order required Sweet Life LLC to "Identify all piping, drains, sewers, pumping stations, chemical dosing, and related infrastructure on the Sweet Life property, noting the flow/routing and use." The work should have already been completed prior to this report being submitted, not "Preliminary" items.

Corrective Action 12. Sweet Life map attached identifies all known piping, floor drains, trenches, sumps, manholes, lift stations, chemical-dosing points, utility discharges, flow direction, use, and the final ECSD No. 6 force main at of buffalo discharge point.⁶

Item 13. "Section 13 and 19: the compliance order stated, "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." This section presents a plan, rather than an evaluation."

Corrective Action 13. See attached Sweet Life recently completed voluntary in-process analytical sampling/analysis results⁷.

Item 14. "Section 14: the sodium hypochlorite presently used by Sweet Life LLC for downstream odor control was implemented due to odor complaints from the City of Lackawanna and residents of ECSD No. 6. It was not part of Sweet Life LLC's planned operational controls. How will this dosing be addressed by a remediation plan?"

Corrective Action 14. Sweet Life acknowledges the dosing of sodium hypochlorite. As described under Item 8 above, sodium hypochlorite will continue in accordance with the NOV from February 2025, communications.

Item 15. "Section 20: the compliance order required Sweet Life LLC to detail "Recommend improvements that will ensure Sweet Life's compliance with the Rules and Regulations" and "Include a schedule for implementation of recommendations." These requirements must be satisfied in this report."

Corrective Action 15. To date, Sweet Life has added a schedule for implementation or recommendations:

- All interior pipes to sewer were removed - February 2026 leaving only the following Sanitary Sewer Discharge to the force main at port of buffalo;
 - SSD1 – Laboratory Sink
 - SSD2 – Hand Wash Sink (Refinery)
 - SSD3 – Boiler Room Drain (Zero Discharge Permit)
 - SSD4 – Truck Wash Bay
 - SSD5 – Cooling Tower (Zero Discharge Permit)
 - SSD6 – Manhole Cover 1 (2303 Hamburg Turnpike)
 - SSD7 – Manhole Cover 2 (2303 Hamburg Turnpike)
 - SSD8 – Restroom (Office)
 - SSD9 – Office Sink
 - SSD10 – Lift Station

⁶ See *Sanitary Flow and Points of Interest Map – Attachment 1*.

⁷ See Table 2 - *Analytical Sampling from May 7, 2026; Attachment 2*.

- Condensate water is now added to Pre-coat and Raw Melting Operations - June 4, 2026
- Condensate water added to Raw Filter pressure cleaning - June 6, 2026
- Condensate water added to Ion Exchange Column rinse - June 7, 2026
- Condensate water added to Dust Scrubber and C Sugar Melt - June 12, 2026
 - 90% of all condensate process water is recovered and reused in the refining process- post June 2026 above corrective actions.
- Reinforced employee training on preventing unauthorized sugar discharges to the sanitary sewer system - August 5, 2026
- Sweet Life continues to evaluate process modifications and recovery options to address the remaining approximately 10% of condensate process water not currently recovered or consumed within the refining process.
- Sweet Life will install a dedicated flow meter on the condensate system to continuously measure and monitor condensate flow. This monitoring will provide additional support to early detection and corrective response before a process failure could contribute to an unintended discharge to the sanitary sewer system.
- Sweet Life will implement an automated valve-position monitoring and alarm system within the truck bay wash cycle. The control system will continuously verify that each valve is in the proper position during the automated wash sequence. Any deviation between the proper valve position will initiate an alarm.
- Sweet Life has established a procedure for any incidental release as an emergency action plan element, to include notification, and authorized designee.
- Sodium Hypochlorite is used to treat process water at the lift station to maintain compliance in response to NOV notice from February 11, 2025; as previously addressed with NOV response communication March 3, 2025 response to ECSD No. 6⁸.

In regard to the April 17th, 2026 NOV;

NOV Item 1. “Provide a review of Sweet Life’s manufacturing process.”

Corrective Action 1. ⁹Sweet Life’s manufacturing process

NOV Item 2. “Identify all piping, drains, sewers, pumping stations, chemical dosing, and related infrastructure on the Sweet Life property, noting the flow/routing and use. Dye testing and other evaluation methods may be required.”

Corrective Action 2. See Summary Response Report above Item 10.

NOV Item 3. “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.”

⁸ Sewer Authority Response M. Riggi – March 3, 2025.

⁹ See Section 5 Process Flow Description items 5.1-5.11; of Sweet Life Preliminary Report 7/27/2026

Corrective Action 3. See Summary Response Report Item 13.

NOV Item 4. “Recommend improvements that will ensure Sweet Life's compliance with the Rules and Regulations.”

Corrective Action 4. See “Summary Response Report” above.

NOV Item 5. “Include a schedule for implementation of recommendations.”

Corrective Action 5. See Item 15 of Summary Response Report.

Sweet Life will use this summary report as the corrective-action tracking framework for the revised evaluation. Where the investigation identifies an actual or potential process discharge to the sanitary sewer, Sweet Life will implement immediate source control and follow the applicable ECSD No. 6 notification requirements.

If you have any questions or comments regarding this summary report, please contact me directly. Thank you for your cooperation in this matter.

Very truly yours,

Sweet Life LLC

Matthew Riggi
Terminal Manager



cc: K Hartog (GCC)
M. Hanna (EA)
J. Schenne, PE

Table 2 Analytical Sampling

SUCRO Wastewater - BOD Sampling Results

Pace Analytical Report L2627554 | Sample Results

Sample ID	Lab ID	Collection Date	Collection Time	Parameter	BOD Result (mg/L)	Reporting Limit (mg/L)	Dilution Factor
SBD-B1	L2627554-01	05/07/26	8:57 AM	BOD, 5-Day	19	5.0	2.5
SBD-B2	L2627554-02	05/07/26	8:55 AM	BOD, 5-Day	20	2.0	1
SBD-B3	L2627554-03	05/07/26	9:00 AM	BOD, 5-Day	17	2.0	1
CONDENSATE	L2627554-04	05/07/26	9:05 AM	BOD, 5-Day	570	60	30
BBD-B1	L2627554-05	05/07/26	9:30 AM	BOD, 5-Day	25	5.0	2.5
BBD-B2	L2627554-06	05/07/26	9:40 AM	BOD, 5-Day	22	5.0	2.5
BBD-B3	L2627554-07	05/07/26	9:22 AM	BOD, 5-Day	19	2.0	1

Sample location: 02303 Hamburg Turnpike

Matrix: Water

Analytical method: Standard Methods 5210B - BOD, 5-Day

The May 7, 2026 condensate sample measured 570 mg/L BOD and was collected prior to implementation of the condensate-recovery improvements. Beginning June 4, 2026, condensate was progressively redirected for reuse in pre-coat, raw melting, filter cleaning, ion exchange rinsing, dust scrubber operation, and C-sugar melting. These improvements currently recover approximately 90% of the condensate stream. Assuming comparable condensate quality, this reduces the potential BOD mass loading to the sanitary sewer by approximately 90%, although the BOD concentration of any remaining condensate discharge may not decrease proportionally. Confirmation sampling should be used to establish the current concentration and actual post-corrective-action loading.

Attachment 1- Sanitary Flow and Points of Interest

