



Public Works Department

433 N. Virginia Street
Prescott AZ 86301
928-777-1130

**Pretreatment Program Stakeholder's Meeting
March 7, 2013, 6:00 p.m.
City Council Chambers**

Meeting Notes – not intended to be verbatim

City Staff

Mark Nietupski
Joel Berman
Scott Gregorio
Jeremy Reynolds
Teresa Ogle
Craig Dotseth
Marla Miller, ARCADIS

Stakeholders

John Nielson
Francisco Garcia
Arleen Lebens
Darrell Buntin
John & Shannon Skurja
Michael Stanger
Ryan Moosmahl
Jim Knaup
Alan Miner
Stephen Schuehler

Stakeholders

John Bissott
Vince Gilford
Clydene Vargas
Brice Smith
John Phillips
Amanda Richardson
Joel Bump
J. Knochel

[Note: The Stakeholder Meeting was recorded in order to capture stakeholder questions and comments. Due to recording difficulties, some of the questions and responses presented in these meeting minutes are paraphrased. In some cases, responses to the questions have been expanded for clarification. If questions were inadvertently omitted, please submit the question to jeremy.reynolds@prescott-az.gov and the question will be addressed as part of the 30-day public comment period.]

Mark Nietupski welcomed the group and went over the timeline for the program and discussed the upcoming public meetings. The intent is that this will be a very interactive process with the public.

Marla Miller, ARCADIS, discussed why the treatment program is needed and elements involved. The elements that have been completed include updating the sewer use ordinance (City Code Ch 2-1), developing enforcement response plan (ERP), and updating local limits. The sewer use ordinance establishes the legal authority of City to implement and enforce pretreatment program. The ERP enables fair and consistent enforcement procedures, from verbal warnings to severing

line, along with fines. The local limits consists of calculating how much of a pollutant can be received at treatment plant and still meet the APP permit limit.

Joseph Knochel: Who decides limits?

Marla: Limits are scientifically based on City specific wastewater characteristics. Limits will be specified in the discharge permits. Marla explained that only Significant Industrial Users (SIU's) have permits right now.

Darrell Buntin: Does the City have a problem? And with what pollutant?

Marla: Yes, there is an issue with fluoride.

Darrell Buntin: From toothpaste?

Marla: No, the source is from a significant industrial user.

Marla explained that the program would be focusing on SIU's first. Postcards have been sent out with a link to an on-line Industrial Waste Survey. The survey includes questions about characteristics of discharge, nature and volume of wastewater discharged. This information will be used to identify commercial and industrial dischargers. The postcard has a link to the City's pretreatment web page. The web page also has upcoming key dates for the pretreatment program implementation.

Marla defined Significant Industrial Users as those who are subject to categorical pretreatment standards, discharge > 25,000 gallons per day, contribute 5% or more of hydraulic or organic capacity of the treatment plant, or are designated by the City based on potential to impact the treatment plant.

John Phillips: What criteria would the City use to designate an SIU? This criteria for designating an SIU seems arbitrary. What happens several years from now when new people are involved with the pretreatment program?

Marla: This highlights the need to have procedures within the pretreatment program well documented so decisions and logic don't get lost down the road. For example, the rationale for limits (e.g., from categorical pretreatment standard or local limit) will be documented in the discharge permits.

Marla described different types of businesses considered commercial dischargers and showed examples of fats, oils, and grease (FOG) issues.

Darrell Buntin: What are the grease balls made of? Cooking oil, automotive?

Scott Gregorio: Most likely cooking grease.

Marla went over Best Management Practices, which include installing and maintaining grease interceptors/traps, training of employees, dry wiping dishes and pans before washing, recycling used oils and solvents, and preventing leaks and spills from entering floor drains.

The next step in the process will be to compile data collected from Industrial Waste Surveys, and identify SIU's. Then work with SIU's to development permits and compliance schedules. The City will perform a cost benefit analysis of the pretreatment program.

Following these steps, the impact from commercial dischargers will be assessed. Outreach and education/information will be developed for industrial and commercial dischargers. The need for general permits for some commercial dischargers will be assessed.

On March 12, 2013 there will be a public hearing at the City Council meeting which will start the 30 day public comment period. Key dates are:

March 12, 2013 Public Hearing, City Council Meeting
March 12, 2013 30-day comment period begins
April 23, 2013 City Council Presentation
April 30, 2103 City Council Adoption
June 1, 2013 ADEQ Approval
June 1, 2013 30-day comment period begins

Permitting of significant industrial dischargers should begin in the summer, 2013.

John Phillips: What if we do not agree with what you come up with? I don't know how much I'm putting into the Wastewater Treatment Plant.

Marla: One way of estimating wastewater discharged is to assume 90% of water used is discharged. The City may assess commercial users based on relative risk (e.g., presence of deep fryers). On the Industrial Waste Survey, if you don't know flows, simply enter "don't know". The 30-day public comment period is the vehicle for expressing concerns and getting additional questions answered. After ADEQ approves the City's pretreatment program, there will be a 2nd 30-day public comment period.

John Phillips: What will the fee structure be for general permits?

Marla: No details yet. Focus will be first on permitting SIUs, then assessing commercial users. The City is still reviewing potential fee structure.

Mark: Fees will be vetted through the public process. Fees will need to be adopted through City Council. We are just getting started. And just to be clear, the City is mandated by ADEQ to adopt this process. The ordinance will need to be approved by the EPA and ADEQ.

John Phillips: You are setting up an arbitrary list of what a hazardous substance is. I don't know what the rules are. You designated the SIU's.

Marla: Prohibited pollutants are based on EPA guidelines. The list of substances prohibited from being discharged in the sewer and the local limits are included in the sewer use ordinance. The criteria for identifying significant industrial users is also directly from the EPA.

John Phillips: I do not want this process to be punitive.

Marla: The City intends to work with both industrial and commercial dischargers on this program. ADEQ is working with the City on this process.

Darrell Buntin: Everyone could be causing your problem with fats, oils and grease.

Mark: That is why a public outreach program is important.

Marla: We have to determine who is contributing the most right now (through the industrial waste survey).

John Phillips: If we comply and there is still a problem, then what? Will we have to install expensive equipment? What percentage of the problem are we?

Marla: This is part of the reason for conducting the Industrial Waste Survey. The City will gain better understanding of who is discharging wastewater and how much. Right now, it is difficult to comment on what equipment would be required for industries and commercial users because we are still in the early phase of understanding who is discharging what kind of wastewater and what kind of equipment is currently in use. For example, there may be some restaurants that need to look into installing some kind of grease removal device (like trap or interceptor) but we first need to assess potential pollutant contributions from restaurants and if pretreatment devices or best management practices are required. Costs for grease removal devices (from 2011) average \$2,800 (<30 gallon/min) to \$5,500 (>30 – 50 gallon/min) and installation ranged from \$500 to \$2,000 (installation costs will be dependent on space available and other factors).

Jim Knaup: There should be a diversion program for used motor oil, brake fluid.

Marla: Public education and outreach will address these concerns.

Joe Knochel: What if we don't meet your criteria? Will you help business owners get rid of waste?

Marla: Yes, the City is evaluating this. An example could be that maybe the City gives a discount on your sewer bill if restaurants install and maintain grease traps/interceptors.

John Phillips: What if we don't have property behind the restaurant for grease interceptor? Current code requires anyone with a dishwasher to have an interceptor.

Marla: We are working to evaluate options. We know restaurants will have issues. Additional discussion with the Building Department is needed to verify requirements for dishwasher with interceptor.

John Phillips: Fryers are not the problem. Grease comes off pots and pans.

Marla: That's where Best Management Practices (BMP's) will be important – wiping pots and pans. The Industrial Waste Survey will give us a better idea of what appliance restaurants have and what kind of practices for dealing with grease are in place.

Al Miner: Are you going to follow ADEQ guidelines?

Marla: Yes, both EPA and ADEQ guidelines.

Al Miner: Will you be using minimum Maricopa standards?

Marla: ADEQ has published pretreatment guidelines that City is following. Prescott's program will be slightly different from other cities (e.g. Phoenix) because we are just in the beginning phases

and have a limited number of industrial users. Phoenix has a mature program with more industrial users.

Al Miner: How long will the phase-in take?

Marla: It will take almost a year to permit the SIU's and it is anticipated that permitting SIUs may begin during summer 2013.

Mark: Once you start the process, some phases can take up to 9 months (based on compliance schedules). The City will work with you if you are making a true effort to come into compliance.

Question: Isn't there a way to improve or optimize the wastewater treatment plants so they can treat fluoride?

Marla: The problem is that fluoride is not effectively removed by the treatment plants as currently designed. Basically the fluoride levels are the same going in as coming out – pass through. It would be a substantial cost to have the treatment plants be able to treat non-domestic pollutants and not necessarily fair to pass those costs onto residential users.

Question: Can we recreate our own recharge basins? Can we sell our own wastewater?

Mark: If you have City water service, you must be hooked to sewer.

Marla: APP permit is based on aquifer water quality standards and those limits are not flexible.

Mark: There will be another presentation April 23, 2013.