



Public Works Department

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Pretreatment Program Public Hearing Week Ending March 29, 2013

Questions & Responses

Question: The updated City Code Ch 2-1 mentions general permits and there has been some discussion during the stakeholder meetings about permitting commercial users (like restaurants)? Would this apply to all restaurants? When would something like this begin and what would be the potential costs to business owners?

Response: The updated Sewer Use Ordinance (City Code Ch 2-1), which has been provided to the public and City Council, does include a reserved section for General Permits (2-1-65-6). However, before the City can begin to issue permits to commercial users, that section would have to be developed, added to the Ordinance, and go through City Council review again. The updated Ordinance does include prohibited discharges sections (2-1-38 and 2-1-39) that apply to commercial users (or anyone discharging to the sewer) but these sections are in place under the current Ordinance.

The current schedule for implementing the pretreatment program would focus first on permitting Significant Industrial Users (SIUs). It is anticipated that this process could take up to one year to complete. After the Industrial Wastewater Discharge Permit is issued to the SIU, a compliance schedule will be developed between the SIU and the City to establish a timeframe for the SIU to come into compliance. This compliance schedule may take several months to a year depending on pretreatment requirements.

Before evaluating the option of permitting commercial users, the City will conduct educational outreach to groups of commercial users, emphasizing Best Management Practices (BMPs). BMPs can include training of employees, “dry wiping” pots/dishes, and recycling oils.

The City is currently developing a cost benefit analysis which will broadly define potential benefit outcomes that may occur with implementation of a pretreatment program. Due to individual user site specific conditions and

potential needs, which are unknown at this time, it is not possible to predict individual user costs. The cost benefit analysis will illustrate potential cost savings in wastewater operations and maintenance that may be realized and other benefits that will result.

Comment: I support the adoption of Sewer Use Ordinance (City Code Ch 2-1) and the implementation of Prescott's Pretreatment Program.

This program will have important benefits to the city and its citizens. It will make the sewage treatment process more efficient, thereby reducing the operating cost for repairing the sewage plants and sewer lines. It will also protect our aquifer by creating higher quality effluent for recharge. Because costs are ultimately passed on to the citizens, we all will benefit from these reduced costs – both now and in the future when we will see the benefits of having protected our aquifer.

The Public Works Department has done an excellent job of informing businesses about the Pretreatment Program. It might be helpful to place an informative article in the Courier so that citizens will have more information about it and the opportunity to comment.

Why a Pretreatment Program is Important: By clearly outlining the requirements and then fair and consistent enforcement procedures the city will help businesses come into compliance and reward those who do a good job. The studies and outreach planned in "Next Steps" will enable the city to efficiently address local situations. The cost benefit analysis should help decision-makers be more comfortable with the program. Because pretreatment programs have been required at many cities in the country, we can build on what others have learned and done. Prescott now has two breweries. I found the attached report (<http://www.birkocorp.com/brewery/white-papers/wastewater/>) on cost savings very educational: "Wastewater in the Brewery – Are You Sending Money Down the Drain?"

Significant Industrial Users: The analysis of the contribution of these facilities is comprehensive and interesting but not very large. This is good news, but could there be others? I wonder whether the city identifies facilities by studying EPCRA Section 313 Toxic Release Inventory (TRI) reports that require certain manufacturing facilities to submit an annual toxic chemical release report? The law applies to facilities that have 10 or more employees and manufacture, process, or use specified chemicals in amounts and release or transfer listed toxic chemicals to various facilities and environmental media, including water.

Commercial Discharges: Helping local businesses and other facilities develop pollution prevention plans and recommending best management practices will benefit the operations of businesses and other facilities as much as it will help the city protect its sewage system. There are pollutant discharges for which technology is available to recycle, reuse or prevent the discharge altogether. Car washes, dry cleaners, hospitals, care facilities, medical laboratories. Even schools and colleges should be included. I cite the example of the Rhode Island program:
http://www.ccri.edu/safety/sewage_pretreatment.html.

Household Dischargers: Our sewage system would also benefit from an educational program for all citizens. There are many things that should not put down the drain – including fats, oils, and grease. I am sure city staff knows all this but I was shocked to learn what a serious problem FOG can be:

“When FOG is poured down a drain, it can clog pipes and cause sewer system overflows. Most people don’t realize the problems they are causing for themselves and their city when they pour fats, oils, and grease down the drain. Often people think that by running hot water down the drain with the grease, it will stay liquid and flow easily through the pipes. What these people don’t realize is that once FOG reaches the pipes, it cools down rapidly and gels. The FOG then catches on roots and imperfections in pipes, blocking the flow of sewage. Once the sewer lines are blocked, raw sewage can back up into homes and businesses or flow out of manhole covers onto city streets. FOG that doesn’t deposit in the collection system makes its way to the wastewater treatment plant. There, the FOG causes a specific type of fat-loving bacteria to grow uncontrollably, forming mats that look like foam rubber, which can only be removed manually. Also, some of the FOG can roll along through the pipes and form a ball (consisting of grease, fecal matter, tissue, and other debris) that travels to the treatment plant. Because fats, oils, and grease are lighter than water, these balls can float through the treatment plant and out to the receiving waters without being disinfected, unless treatment plant staff removes them manually. Fecal matter can contain disease-causing organisms such as bacteria, viruses, fungi, protozoans, and parasitic worms. These pathogens can cause hepatitis, typhoid fever, cholera, dysentery, polio, and more. Some bacteria, such as *Salmonella typhi* (typhoid fever) and cholera are extremely invasive on contact with the body, regardless of a person’s age or state of health. Wastewater treatment usually helps to control these diseases. However, when the fecal matter gets inside a ball of FOG, the ultraviolet light or chlorine can’t penetrate it, so it moves through the system without treatment.”

Source: <https://fortress.wa.gov/ecy/publications/publications/0810038.pdf>

If people have not adopted good habits and practices, they need to learn about them. Some cities provide guidance to household dischargers, particularly

with regard to reducing FOG contamination. I was very impressed with the program of the East Bay Municipal Utility District because it provides pollution prevention information related to the many things that people put down the drain: <http://www.ebmud.com/water-and-wastewater/pollution-prevention/residential-pollution-prevention>

Some pollutants in household products are not effectively treated by sewage plants and because they can end up in sewage effluent, it is important to help citizens understand that they have a role in reducing this pollution. Prescott could develop something like their household cleaning guide: http://www.ebmud.com/sites/default/files/pdfs/Clean_It_Guide_2011_0.pdf

Biodiesel: I understand that the City is considering making it easier for used cooking oil to be made into biodiesel. This is a very good idea. This program seems to be very comprehensive: http://www.columbiasc.net/depts/public_relations/downloads/City%20Steps%20to%20Success%20Southern%20Fried%202.pdf

Response: Thank you for your comments and interest in the City's Pretreatment Program. As you allude to, one-on-one meetings, informative pamphlets and other forms of outreach will be key components of Prescott's program. The City is exploring how this type of outreach is performed in other areas of the country including your citation of the East Bay Municipal Utility District.

The City will be utilizing the Industrial Waste Survey (IWS) to identify facilities that may be subject to pretreatment requirements. The City also initiates contact with new users during the Pre Application Conference (PAC) to determine if they may be subject to pretreatment requirements based on their Standard Industrial Classification (SIC) codes.