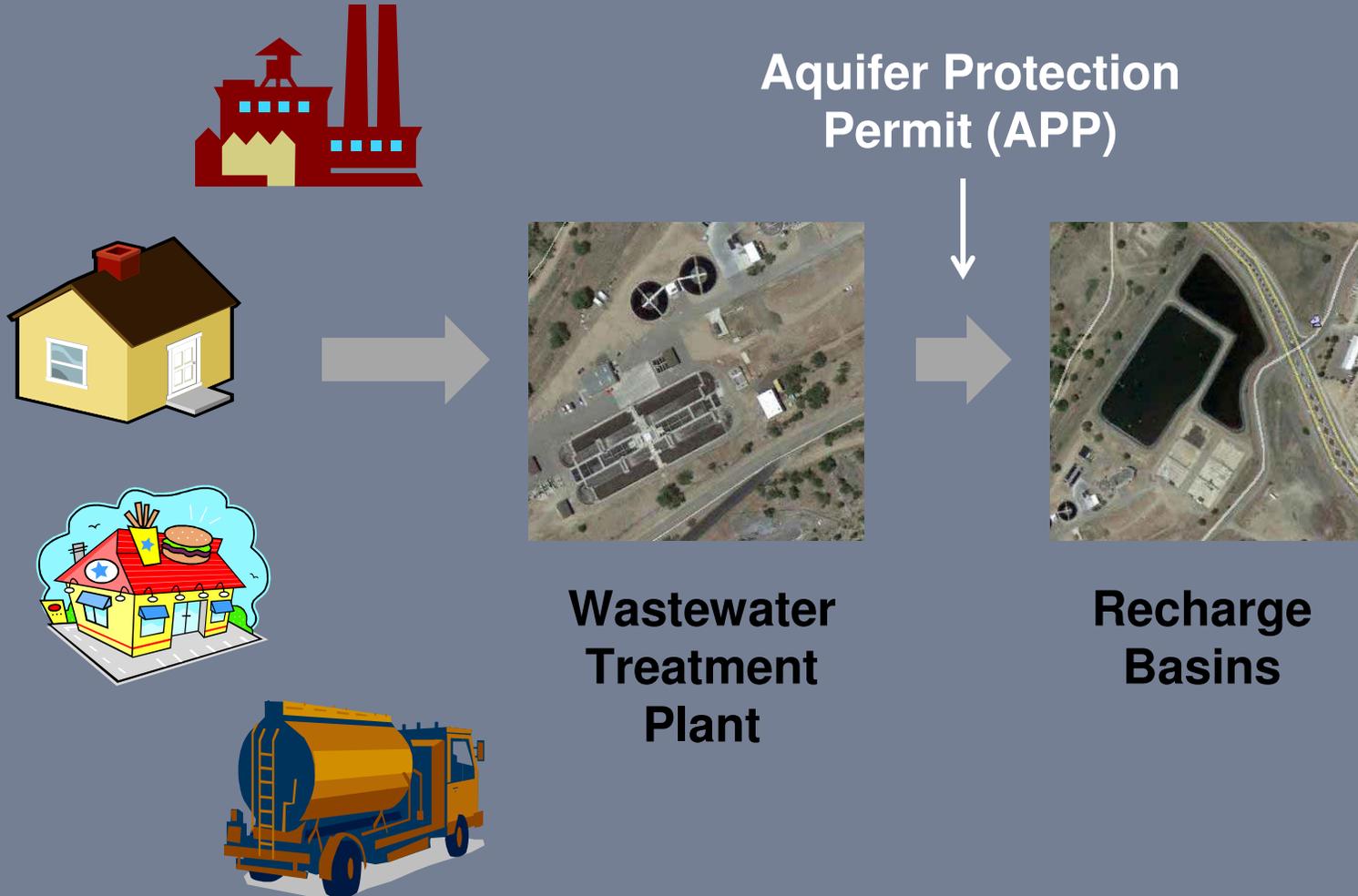


# Pretreatment Program

- Why is this needed?
- What is involved?
- How does it effect industries?

# Why?



# Why?

- Wastewater Treatment Plants designed to remove domestic pollutants

**Organics**  
BOD<sub>5</sub>, COD

**Solids**  
Total Suspended  
Solids (TSS)

**Nutrients**  
Ammonia, Phosphorus

- Other pollutants controlled by local limits or categorical standards

# Why?

---

- Exceedances of APP permit limits are reported to ADEQ
- ADEQ's enforcement options for permit violations
  - Notice of Violation (NOV)
  - Consent Order
  - Fines up to \$25,000/day/violation

# What?

---

City's Pretreatment Program will:

- Control discharges into sewer system
- Prevent sewer overflows
- Protect wastewater treatment plants
- Maintain high effluent and biosolids quality
- Protect the public, City workers, and the environment

# What?

---

## Pretreatment Program Status

- Updated Sewer Use Ordinance to establish legal authority for implementing pretreatment program
- Developed Enforcement Response Plan (ERP)
- Updated 2011 Local Limits Report
- Conducting Industrial Waste Survey (IWS)

# What?

---

## Sewer Use Ordinance (City Code Ch 2-1)

- Establishes responsibility and authority of Public Works Director
- Includes prohibited discharges
- Sets up permitting program
- Describes enforcement options for noncompliance

# What?

---

## Enforcement Response Plan (ERP)

- Establishes fair and consistent enforcement procedures
- Ensures enforcement responses are appropriate to nature/severity of violation
- Describes mechanism to review industrial user responses
- Contains enforcement options and potential fines

# What?

---

## Local Limits Update

- Evaluates max pollutant loading that can be received at treatment plant and still meet APP permit limits
- Calculates local limits that are site-specific and technically-based (different from Categorical Limits)
- Applies only to Significant Industrial Users (SIUs) as “controlled sources”

# What?

---

## Industrial Waste Survey (IWS)

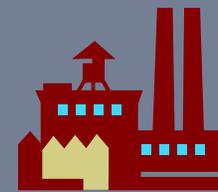
- Mailed out postcards with link to on-line survey
- Includes questions on operations, chemicals used, past sampling, and wastewater flows
- Used to assess nature/volume of wastewater discharged and identify commercial & industrial dischargers

# What?

---

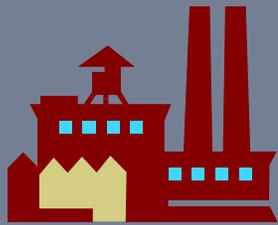
## SIUs (per 40 CFR 403.3)

- Subject to Categorical Pretreatment Standards
- Discharge 25,000 gpd
- Contribute 5% or more of hydraulic or organic capacity of treatment plant
- Designated by City based on potential to impact treatment plant



# What?

Influent Loading = Amount removed by treatment plant + Effluent Loading



Recharge

Allowable  
Headworks  
Loading  
(AHL)



Amount removed  
by treatment plant



APP  
Permit  
Limit

# What?



# What?

$$\begin{array}{c} \text{Allowable} \\ \text{Industrial} \\ \text{Load} \end{array} = \text{AHL} - \begin{array}{c} \text{Residential/} \\ \text{Domestic Load} \\ \\ \text{Commercial Users} \\ \text{Load} \\ \\ \text{Waste Hauler Load} \\ \\ \text{Safety Factors +} \\ \text{Growth Allocation} \end{array}$$

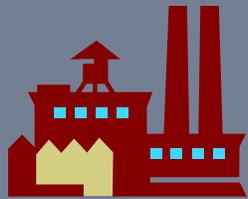


=

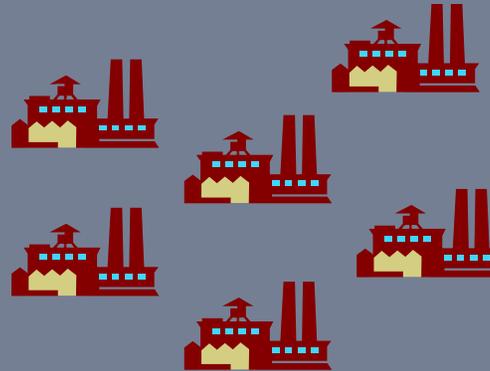
AHL —



# What?



Allowable  
Industrial Load



Industrial Discharger Permit Limits,  
aka Local Limits

$$\text{Local Limit} = \frac{\text{Allowable Industrial Load (lb/day)}}{\text{Total of Industrial Flows (mgd)}}$$

# What?

% Industrial Flow/  
Influent

Pure Wafer  
Sturm Ruger  
Ester C  
Sun Fashion  
PBC Microbrewery\*

18%



**Airport WRP**

Fortner

0.01%



**Sundog WWTP**

# How?

---

## Effect on Industrial Dischargers

- Industrial Wastewater Discharge Permits
- Sampling and Reporting Requirements
- Site Inspections
- Best Management Practices
- Pretreatment Requirements

# Next Steps

---

- Compile data from Industrial Waste Survey (IWS) currently in progress
- Identify potential SIUs
- Work with SIUs to develop permits and compliance schedules
- Develop wastewater monitoring procedures and schedule

# Pretreatment Contact

---

City of Prescott

Utilities Operations – Water Protection

Jeremy Reynolds – Water Protection Specialist

(928)777-1615

[jeremy.reynolds@prescott-az.gov](mailto:jeremy.reynolds@prescott-az.gov)

<http://www.cityofprescott.net/services/water/protection.php>