



City of Prescott
Pretreatment Program

Chapter 8: Resources

July 2013



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Acronyms

ADEQ	Arizona Department of Environmental Quality
CFR	Code of Federal Regulations
City	City of Prescott
FSF	Food Service Facility
IWDP	Industrial Wastewater Discharge Permit
IWS	Industrial Waste Survey
PPE	Personal Protective Equipment
SIU	Significant Industrial User
VSF	Vehicle Service Facility
USEPA	United States Environmental Protection Agency
WWTP	Wastewater Treatment Plant



8. Resources

Consistent with Title 40 Code of Federal Regulations (CFR) Part 403.8(f)(3), the City of Prescott (City) is responsible for securing sufficient resources and qualified personnel to carry out the authorities and procedures of the Pretreatment Program. The USEPA 1983 Guidance Manual for POTW Pretreatment Program Development states that to properly implement a pretreatment program, the following elements are needed:

- A workable organization to integrate elements of the program
- A staff of appropriate size and training to carry out program requirements
- The necessary equipment and supplies for monitoring and other program needs
- Adequate funding to support the program

This chapter of the Pretreatment Program addresses the resource requirements for implementing a successful Pretreatment Program.

8.1 Background

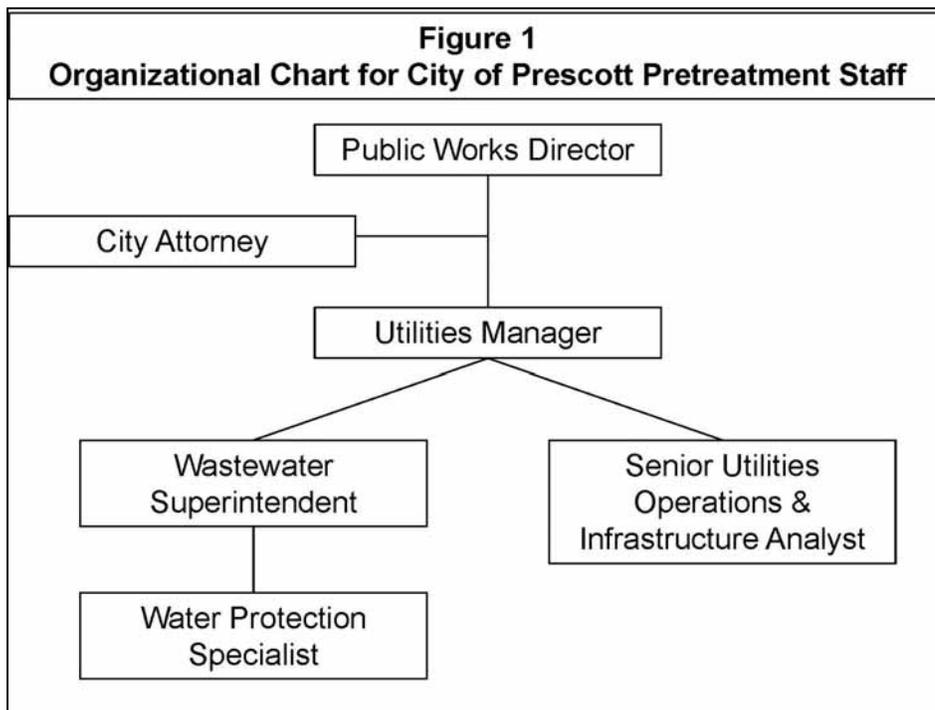
As of April 2013, there are six industrial dischargers (Pure Wafer, Sturm, Ruger & Company, Inc, Ester-C, Sun Fashion Design, Fortner Aerospace, and Prescott Brewing Company) that may be classified as Significant Industrial Users (SIUs) and permitted by the City. There are several other industrial and commercial dischargers that may benefit from general discharge permits or specified Best Management Practices (BMPs). The primary focus of the Pretreatment Program staff is working with industrial and commercial dischargers, including Food Services Facilities (FSFs) and Vehicle Services Facilities (VSFs), as shown in Table 1.

Industry Type	Example Facilities
Food Services Facilities (FSFs)	Restaurants
	Schools with Cafeterias
	Food Counters
Vehicle Service Facilities (VSFs)	Automotive Repair Shops
	Car Washes
	Tire Centers

As the City grows and attracts additional industrial dischargers, the Pretreatment Program resources will need to expand to accommodate the additional responsibilities of permitting Industrial Users, conducting compliance monitoring, and implementing enforcement actions.

8.2 Staffing

The Pretreatment Program is part of the City's Public Works Department. An initial organization chart is presented in Figure 1.



The primary members of the Pretreatment Program staff are:

- Public Works Director
- Utilities Manager
- Wastewater Superintendent
- Senior Utilities Operations and Infrastructure Analyst
- Water Protection Specialist
- In-house Laboratory Staff

Additional technical and administrative support is provided by the City Attorney and other Public Works Department staff. A number of local environmental engineering consultants have worked with the City in the past and are familiar with the City's treatment facilities and Pretreatment Program. The City has a state certified onsite laboratory at the Sundog Wastewater Treatment Plant (WWTP) that performs several water quality methods. The lab technician at the Sundog WWTP laboratory also acts as technical resources for the pretreatment staff. Samples requiring additional analytical parameters are subcontracted to a licensed State of Arizona environmental laboratory.

As the City begins to permit industrial dischargers, it will need to re-evaluate the necessary resources to maintain the program pursuant to CFR 403.8(f)(3). Such resources include dedicated staffing and a program budget adequate to maintain the program efficiently and effectively.

The level of effort required to conduct the following activities will determine staffing requirements:

- Maintaining the Industrial Waste Survey (IWS)
- Interacting with the Arizona Department of Environmental Quality (ADEQ) and the US Environmental Protection Agency (USEPA)
- Performing site inspections and collecting wastewater samples as part of the oversight compliance monitoring
- Managing Pretreatment Program information (e.g., permit applications and compliance reports) and data
- Developing, reviewing, and issuing Industrial Wastewater Discharge Permits (IWDPs)
- Responding to pretreatment program needs and questions from industrial dischargers and new incoming industries
- Reviewing building permits for pretreatment facility requirements
- Enforcement actions

Currently, the primary responsibilities of the Pretreatment Program staff include the following:

Water Protection Specialist

- Review monitoring results, identify discharge violations, and recommend appropriate enforcement actions
- Perform Compliance Inspections and prepare inspection reports
- Develop and oversee compliance monitoring schedules
- Manage permitting process; including review of IWDP applications, drafting IWDPs, and coordination with Industrial Users
- Draft Notice of Violations (NOVs)
- Track Industrial User's response to NOVs, Compliance Meetings, and Compliance Schedules
- Review Industrial User's response letters to ensure the responses adequately address compliance issues and make recommendations to the Utilities Manager if responses are deemed inadequate
- Assist in the preparation and running of Compliance Meetings
- Review Industrial User compliance history reports and prepare compliance reports
- Communicate and coordinate with other agencies and municipalities
- Conduct outreach and educational activities with Industrial Users
- Draft informal notices of compliance and NOVs for review and issuance by the Utilities Manager
- Participate in Show Cause Hearings and Compliance Hearings, as deemed necessary by the Utilities Manager

Wastewater Superintendent

- Review compliance inspection reports
- Assist the Water Protection Specialist in development of compliance monitoring schedules
- Review violations, NOVs, and Wastewater Discharge Permits
- Act as technical resource for the Water Protection Specialist

Utilities Manager

- Review violations and make final determination on the required level of enforcement
- Review the Water Protection Specialist's recommendations concerning Industrial User's response to NOVs
- Review and issue notices of compliance and NOVs
- Conduct Compliance Meetings and Show Cause Hearings
- Issue Compliance Schedules
- Prepare Administrative Orders for approval by Public Works Director
- Review assessed penalties for noncompliance prior to approval by Public Works Director
- Initiate termination of service or revocation of discharge permit, when deemed necessary
- Recommend legal action to Public Works Director and City Attorney when required

Public Works Director

- Provide consistency of enforcement procedures within the pretreatment program
- Approve issuance of IWDPs
- Approve formal enforcement actions, as appropriate
- Attend Show Cause Hearings as necessary
- Approve assessment of administrative penalties and Administrative Orders
- Approve termination of water and wastewater services
- Implement enforcement responsibilities in City Code

City Attorney

- Provide City staff with legal and regulatory assistance
- Advise City staff during enforcement matters, as required
- Consult with the Public Works Director and the Utilities Manager on Administrative Actions
- Communicate with attorneys from other agencies or municipalities
- Review Administrative Orders issued by the Public Works Director
- Attend Show Cause Hearings as necessary
- Manage civil litigation and criminal trials on behalf of the City

8.3 Resources

Resources needed for the Pretreatment Program include office equipment (computers, laptops, wireless cards and service, desks, phone system, server storage space, filing cabinets, bookshelves); training and professional development for staff (certification classes and exams, professional memberships, technical publications and manuals); material for public outreach and education; and sampling equipment. The City owns the following equipment to support the Pretreatment Program:

- Confined space entry equipment (e.g., air monitor, ventilation blower, safety harness, retrieval tripod, and self-retracting shock absorbing lanyard)
- Multi-gas meter for oxygen, carbon monoxide, hydrogen sulfide, and methane
- Traffic safety equipment (e.g., signs, barricades, lighting, traffic cones, and arrow board)
- Water quality parameter probes
- Flow meters
- Personal protective equipment (PPE) (e.g., safety boots, reflective vests, safety glasses, hard hats, hearing protection, gloves)
- Hand tools (e.g. ratchet, sockets, screwdrivers)

Additional equipment that may be required (purchased or rented) for wastewater monitoring includes:

- Sample coolers

- Automated portable sampling equipment (e.g. ISCO, Hach) and associated accessories required such as tubing, batteries, connectors, strainers, manhole mounting brackets, etc.
- Phosphate-free detergent (e.g. Alconox or equivalent), 5-gallon plastic buckets, and scrub brushes for decontamination
- Sampling equipment (e.g., disposable bailer, Wheaton grab samplers, or swing samplers)
- Graduated cylinders
- Dedicated pretreatment vehicles to prevent cross-contamination of vehicles used for water or other more sanitary functions