



Public Works Department

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Pretreatment Program Public Hearing Week Ending March 22, 2013

Questions & Responses

Question: I applaud the City's efforts to continue to bring pre-treatment best practices to commercial businesses. Years ago I was the Finance Director for a wastewater utility in the Portland area and we realized that it is always cheaper to treat point pollution at the source. Education is the first step. Then develop a rate structure that encourages businesses to adopt best practices. Monitoring for pollutants of individual businesses will encourage compliance and can be used to apply costs to the source (e.g. excessive BOD, metals, waste flows etc.). Once pollutants are in the City system, removal is much more difficult, expensive and potentially harmful to the collection and treatment systems.

Response: Your perspective mirrors that of the City with respect to education. One-on-one meetings, informative pamphlets and other forms of outreach will be key components of Prescott's program. The City has, and will continue to monitor pollutants within the City's sewer collection system to target outreach efforts in an efficient and economical manner.

The rate structure will be determined through a separate rate study that will analyze capital, maintenance, and operations needs of the systems (costs), as well as revenue from water sales and wastewater charges. The pretreatment program is not intended to be an economic engine, rather it will provide necessary program funding to benefit the entire community through clean drinking water, a healthier environment and efficient utility operations.

Question: Mayor Kuykendall (from 3-12-2013 meeting): Sooner than later we should be communicating with the County because the County also levies fees on grease traps, interceptors etc. If we have two governmental agencies trying to do the same thing and we end up with a fee from the City, that just won't fly. There is a lot of work to be done in that area, and I'm surprised that we don't already have the County involved already at this point. I think they are a key player.

They are responsible in Yavapai County for the health portion of restaurants. If they aren't backing off, we're going to have a hard time latching on.

Mark Nietupski (from 3-12-2013 meeting): We will initiate that conversation.

Response: Yavapai County has two separate departments that have some involvement with regard to food service facilities (FSFs) and Fat Oil and Grease (FOG): Yavapai County Development Services (YCDS) and Yavapai County Community Health Services (YCCHS). Neither department is involved with operational inspections for grease traps (GTs) or grease interceptors (GIs) for proper maintenance; and neither department issues an operating permit for GTs or GIs.

Yavapai County Development Services (YCDS)

Yavapai County is delegated by ADEQ to require and inspect GTs on FSFs that discharge wastewater to onsite treatment systems (e.g. septic systems) and not to Publicly Owned Treatment Works (POTW). This requirement is county wide regardless of whether the FSF is located in incorporated or unincorporated areas. These requirements and inspections would not intersect with the City's Wastewater Pretreatment Program as the City will be engaging only those users that discharge to the City's POTW.

The Senior Plans Examiner reviews FSF projects that are in unincorporated areas but connect to a POTW. YCDS requires a GI for all new FSFs, and for ground up remodels. Yavapai County requires a qualified registrant's certification on the plumbing plans with a sizing calculation for the GT or GI.

YCDS issues a permit for GI installation that is for 1) properties within the City that connect to an onsite treatment system or 2) properties outside the City that connect to either an onsite treatment system or a POTW. The cost of a permit for a GT is included in the overall permit fee which is based on evaluations in the same manner the City evaluates permit fees. YCDS does not inspect GIs or GTs after approval of the initial installation.

Yavapai County Community Health Services (YCCHS)

YCCHS is specifically dedicated to inspecting the sanitary conditions of FSFs. YCCHS has a different perspective with regard to GIs and GTs. They are only interested in ways that GIs and GTs impact public health. They have a written policy for GTs within the Yavapai County Health Code 4-1-106 that outlines criteria for the *physical* location of a GT at an FSF. YCCHS requires all FSFs to obtain an operating permit to serve food to the public. YCCHS staff members inspect restaurants annually for public health issues. The only concern YCCHS has with GIs or GTs is that they are not overflowing and causing health or vector issues (roaches, mosquitoes). YCCHS inspectors will only initiate a GI or GT inspection if there is a complaint of overflowing, vector issues, or odor. FSF projects are reviewed by YCCHS for GT

placement, and if no GT is included in plan they send approval to construct rejection letters to the City's building department.

YCCHS issues operational permits for FSFs based on the cost of inspecting and permitting the FSF. Inspection frequency is determined by factors including: size of FSF, number of meals served, number of customers, types of processes performed in food preparation, and health risks associated with operation of the FSF. Permit fees range from \$161 to \$345 annually.

It should be noted that Yavapai County does not have jurisdiction on the Yavapai Apache Indian Reservation, but it was remarked that the Tribe has its own Public Health staff.

Summary

In conclusion there is very little room for City of Prescott's Pretreatment Program and Yavapai County procedures to come into conflict or overlap. The County only issues permit fees for GIs and GTs when the FSF is located in the County or on an onsite treatment system within the City. There is ability for coordination with regard to sizing criteria and requirements. This is easily facilitated as the County and City both use the International Plumbing Code; and would only require a policy that the City require a qualified registrants certification on all plumbing plans with sizing calculations for GTs and GIs for plan approval. The only time permit fees could overlap for GTs or GIs would be when the City issues a building permit for a property that is within City limits but doesn't discharge to the POTW (these charges originate from the building department, not the Pretreatment Program), or when an FSF in the county is connected to the City's POTW. Under the Pretreatment Program the City will be the only entity that inspects GIs or GTs for proper maintenance and for Best Management Practice (BMP) implementation. Yavapai County does not have a policy for addressing FOG discharges to the POTW from existing FSFs.

Question: My question concerns the run-off water that's laced with pesticides/herbicides from both residences and businesses. I know the companies pushing the use of those products tells the public they're safe to use and won't harm the environment. Some 40 years back, while I was volunteering with an ambulance service up in CO, I was called to a crop duster crash. Subsequent to being seriously poisoned by that incident, I attended a hazmat seminar, and learned about those substances. And what I learned is that they're NOT safe, even in small amounts. Most are cumulative in the bodies of humans and other animals. So I'm wondering how the city is handling the run-off that contains those substances, so that it doesn't contaminate our water supply.

Response: As with most public agencies the City does not have the means or methods in place to control or treat stormwater runoff that may contain pesticides/herbicides that may be applied by residents and businesses. There

are no existing, or proposed regulations within the pretreatment program, that address or require such attention.