



Public Works Department

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

Attachment to April 23, 2013 Council Agenda Memo

Pretreatment Program Public Comment Period (March 12 – April 12, 2013)

Summary of Questions/Comments Received

Public Questions/Comments & *City Responses*

Comment: I am very much in favor of the proposed pretreatment program. If the program is implemented, I would like to help with any public outreach component.

Response: *Thank you for your comments and interest in the City's Pretreatment Program. Outreach will not be limited to one-on-one meetings and informative pamphlets. Other forms of outreach such as booths at venues (e.g., Prescott Great Outdoors) and involvement of established community groups may be components of Prescott's program.*

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 Code/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](http://www.ebmud.com/sites/default/files/pdfs/Clean%20It%20Guide%202011%200.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.

Comment: 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 tell 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: *The City of Prescott has the responsibility to assure that the chemicals used at City facilities are approved by and meet EPA standards for use. For this reason the City has certified personnel. However, 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.*