



ARCADIS U.S., Inc.
4646 East Van Buren Street
Suite 400
Phoenix
Arizona 85008-6945
Tel 602 241 1770
Fax 602 231 0131
www.arcadis-us.com

Mr. Joel Berman
City of Prescott – Public Works Department
433 North Virginia Street
Prescott, AZ 86301

Re: Response to Comments from
February 21, 2013 Pretreatment Program Stakeholder Meeting

Dear Mr. Berman:

The following has been prepared to address comments from industrial users during the February 21, 2013 Pretreatment Stakeholder Meeting. Industry representatives that were present during the meeting included:

Date:
February 26, 2013

- Rich David and Jean Van Metre (Ruger)
- Jerry Winters, Robert Cornell, and Jeff Whitlock (Pure Wafer)
- Chris Panos (Ester C)
- Joe Witek and Brian Nelson (Sun Fashion Design)
- John Nielsen and Roxanne Nielsen (Prescott Brewery Company)

Contact:
Marla Miller

For ease of reference, questions and comments that arose during the meeting (C) have been italicized followed by our response (R).

Email:
marla.miller@arcadis-us.com

City Code Chapter 2-1

Our ref:
5133006.0000

C1. Section 2-1-39(L) prohibits discharge of "Any water or wastewater having an average daily flow of greater than two and one-half percent (2.5%) of the treatment capacity of the Wastewater Treatment Plant to which it is discharged, unless specifically authorized by the Public Works Director." There was concern that some of the industrial user's flow rates are greater than 2.5 percent of the permitted Airport WRF flow of 2.2 mgd (Pure Wafer's flow rate for 8/2011 to 8/2012 was approximately 0.16 mgd).

R1. The prohibition was for treatment capacity rather than hydraulic capacity. For the Airport WRF, the annual average design capacities are: BOD₅ 2,340 lb/day, TSS 3,190 lb/day, and TKN 697 lb/day. Based on the 8/2011 to 8/2012 data, industrial users were not over the 2.5 percent of treatment capacity.

C2. Section 2-1-46-1(C) states "The Public Works Director may require any Person discharging into the POTW to install and maintain, on their property and at their expense, a suitable storage and flow-control

facility to ensure equalization of flow. A Wastewater Discharge Permit may be issued solely for flow equalization." What is involved with storage facility and when would storage facility be required?

R2. The purpose of the storage and flow-control facility would be to regulate wastewater flows by minimizing slug or batch flows. The need for a storage and flow-control facility would be dependent on the volume and frequency of the industrial user wastewater discharge. If required, a storage tank equipped with flow control device would hold peak flows and allow discharge consistent flow rates (recommended tank volume would be 1.5 times the maximum daily volume).

C3. Section 2-1-46-2 describes contents of Accidental Discharge / Slug Discharge Control Plans. Is there a specific template required for these plans?

R3. We will work with the City to design a template for industries to use for generating the Accidental Discharge / Slug Discharge Control Plans.

C4. Section 2-1-48(B) states "...The methods of sampling and analyses must be in accordance with the latest edition of standard methods and/or the applicable EPA categorical standards. The laboratory must be certified by the Arizona Department of Health Services (ADHS)." Does this preclude the use of onsite measurements, such as in-line pH meters?

R4. It is not the City's intention to prevent the use of onsite measurements, such as in-line pH meters, as long as the equipment is properly calibrated. Equipment and calibration requirements would be included in the industrial wastewater discharge permit. The following sentence will be included in Sections 2-1-48(B) and 2-1-48(I) "Analyses using on onsite equipment, such as in-line pH meters, will be acceptable at the discretion of the Public Works Director."

C5. Section 2-1-48(F) states "The Industrial User will be financially responsible for any sampling and analysis done by the City that is not routine as provided for in this Chapter." Explain non-routine sampling?

R5. Routine sampling and analyses, as required by the industrial wastewater discharge permit, will be performed (and paid) by the industrial user. Non-routine sampling by the City that would also be at the industrial user's expense would include sampling after becoming aware of violation or in response to a complaint. This also applies to Section 2-1-68-1(H).

C6. Section 2-1-67 Reporting Requirements for Baseline Monitoring and 90-Day Compliance Reports – how many days of sampling are required for these reports?

R6. The Baseline Monitoring Report and 90-Day Compliance Report are required for Categorical Industrial Users and the number of samples depends on the required parameters specified for the applicable categorical pretreatment standard. For parameters that are collected as grab samples (e.g.,

pH, cyanide), a minimum of four samples are recommended. For parameters collected as a composite sample, a minimum of one 24-hour composite is recommended.

C7. Sections 2-1-65-3, 2-1-65-4, 2-1-65-8, 2-1-66-1, 2-1-66-7, and 2-1-67-2 describe schedules for permitting and compliance reports that appear to be conflicting (or at least are confusing).

R7. There are timetables associated with applying and issuing industrial wastewater discharge permits and with reporting requirements. The following summarizes the key schedule requirements:

Permit Application

- New Connections: File application 30 days before discharging
- Existing Connection: File application within 30 days of Ordinance adoption; after 30 days of Ordinance adoption, do not continue to discharge unless have obtained permit or have been granted extension form Public Works Director

Permit Issuance/Transfer

- Within 60 days after receiving completed permit application, Public Works Director will send written notice to industrial user regarding decision to issue permit or not
- Within 20 days after publication of notice of final permit issuance, anyone can petition Public Works Director to reconsider terms and conditions of permit
- Within 30 days, if Public Works Director fails to act on request for consideration, it will be deemed denied
- For expiring permits, industrial user needs to submit completed permit application 30 days prior to the permit expiration date
- For transferring permit to new owner/operator, industrial user needs to notify Public Works Director at least 60 days in advance

Reporting

- Baseline Monitoring Reports (to be submitted by categorical industrial users, one time only)
 - New Source: Submit 90 days prior to discharge
 - Existing Source: Submit 180 days after effective date of categorical pretreatment standard or final administrative decision on category determination (whichever is later)
- Compliance Schedule Progress Reports
 - Compliance schedule will contain milestone dates for specific actions leading to compliance; time between the milestone dates should not exceed 9 months
 - Progress reports to Public Works Director should be submitted within 14 days after milestone date (i.e., should be less than 9 months between compliance schedule progress reports)
- Compliance Report with Categorical Pretreatment Standards (acts as follow-up to Baseline Monitoring Report)
 - New Source: Submit within 90 days after beginning to discharge

