

Permitted Industry Code Changes

Industrial Pretreatment



Summary of 7-02 changes

- 0008: Standards for discharge
- 0010: Industrial self-monitoring
- 0050: Industrial user permits
- General language clean-up





What Are Local Limits?

0008 Standards for discharge:

- Local Limits are maximum discharge limits of pollutants that Industrial Users are allowed to discharge to our sewer system
- Limits are derived to prevent a “pass thru” of a contaminant that can cause our plant to be out of compliance with our regulatory permits



- Also prevent interference with plant operations



Why are we proposing new Limits?

- EPA recommends every 5 years
- We renewed the Wildcat and Rio AZPDES permit in 2020
- Local Limit study approved by ADEQ in December 2020





Who Does This Impact?

Permitted Industrial Users

- Permitted Industrial Users
 - WL Gore (Woody Mountain)
 - FMC
 - NAU
 - Nestle Purina
 - Mission Linen
 - Joy Cone
 - WL Gore (4th Street)



Flagstaff
Medical Center
Northern Arizona Healthcare



Mission
Linen Supply

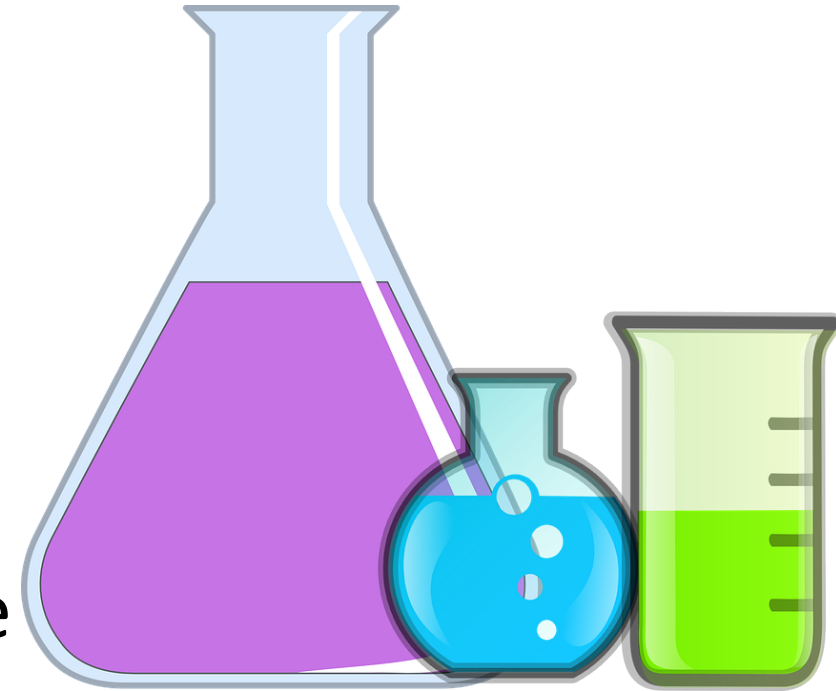
♦ 1930 ♦ 90 YEARS ♦ 2020 ♦





What Changes are we Proposing?

- More stringent limit for Arsenic
- Loosened limits for Copper, Lead, Zinc & Bromide
- Removes:
 - Silver
 - Benzene
 - Methylene Chloride
 - Bis(2-ethylhexyl) phthalate (BEHP)
 - Moved Aldrin to prohibited substance code





What Changes are we Proposing?

- Separate Total Nitrogen into constituents:
 - Ammonia
 - TKN
 - Nitrate/Nitrite
- Set new limits for BOD/TSS
 - Pounds per day limit instead of concentration
 - Conflicting limits in code due to specific sewer rates
- Remove interim and BMP language in current local limits





What Changes are we Proposing?

0010: Industrial Self-monitoring

- Sampling
 - Change sampling quarter requirement from 2nd & 4th to 1st & 3rd.
 - With Council approval – implement 3rd Q '21.
 - Separate grab & composite sample requirement language.





Public Outreach



90-day Public outreach plan:

- Water commission meeting (Nov.)
- Permitted industries specific letter/emails/meeting
- Public comment meeting - virtually
- Information on Water Services website and in newspaper
- Notice in January water bills





Public Outreach



Permitted industries meeting:

- Representatives from all permittees except one
- Short presentation on proposed changes
- Concern about fee increases – none presently
- Modified one limit after discussion
- Clarified language in a couple of sections
- Upcoming rate study discussion
- Concerns w/BOD & TSS – changes to ERP



Questions?

