

# Pretreatment Code Changes

2022





# Pretreatment Code Changes

## Need:

- Change 3 pieces of code to match EPA 40 CFR 403



## Why:

- PG Environmental (agent of ADEQ) completed a Pretreatment Program Audit on June 7<sup>th</sup>, 2022.
- Found industrial discharge permit language and sewer use ordinances (SUO) not consistent with EPA language.



# Who will this affect?

- Current and future industries that hold COF Industrial Discharge Permits





# What are the changes:

## 7-02-001-0010: Industrial Self-Monitoring

### Current:

- The industrial user, or the City if they so choose, shall repeat the sampling within thirty (30) days of becoming aware of the violation, or more often if it is determined to be necessary by the City.

### Proposed:

- The industrial user, or the City if they so choose, shall repeat the sampling and analysis and submit the results of the repeat analysis within thirty (30) days after becoming aware of the violation, or more often if it is determined to be necessary by the City.



# What are the changes:

## 7-02-001-0010: Industrial Self-Monitoring

### **Current:**

- All records of sampling, analysis and flows must be kept by the industrial user and the City for at least three (3) years. All records must be available to the City upon request.

### **Proposed:**

#### Addition:

- This period of retention shall be extended during the course of any unresolved litigation regarding the Industrial User or POTW or when requested by the State Director or the EPA Regional Administrator.



# What are the changes:

## 7-02-001-0012: Signatory Requirements

### Current:

- The manager of one (1) or more manufacturing, production, or operation facilities employing more than two hundred fifty (250) persons or having gross annual sales or expenditures exceeding twenty-five million dollars (\$25,000,000.00) (in second quarter one thousand nine hundred eighty dollars (\$1,980.00)), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

### Proposed:

- The manager of one (1) or more manufacturing, production, or operation facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.

# What is Next?

- 30-day Public outreach plan
  - Water Commission meeting – Sept. 15<sup>th</sup>
  - Permitted industry specific letter with option of meeting
  - Information on Water Services website
- First read before Council – Nov. 1st



# Questions?

