

	Water Quality Division Substantive Policy	ADEQ
		Page 1 of 5
	Aquifer Protection Permits - Type 4 General Permit Requirements for Onsite Wastewater Treatment Facilities Servicing Recreational Vehicles and Recreational Vehicle Parks.	Policy No. 3003.2022
		Effective: 2/6/2023

This Substantive Policy statement is advisory only. A substantive policy statement does not include internal procedural documents that only affect the internal procedures of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules made in accordance with the Arizona Administrative Procedure Act. If you believe that this substantive policy statement does impose additional requirements or penalties on regulated parties, you may petition the agency under Arizona Revised Statutes section 41-1033 for a review of the statement.

1.0 **Purpose**

Pursuant to A.R.S. § 41-1001(22), "substantive policy statement" means a written expression which informs the general public of an agency's current approach to, or opinion of, the requirements of the federal or state constitution, federal or state statute, administrative rule or regulation, or final judgment of a court of competent jurisdiction, including, where appropriate, the agency's current practice, procedure or method of action based upon that approach or opinion. The clarification provided in this substantive policy statement has been determined by ADEQ to meet applicable state and federal law and, therefore, ADEQ provides this substantive policy to assist persons in interpreting rules pertinent to ADEQ. Notwithstanding this substantive policy statement, ADEQ may consider alternative approaches to comply with applicable law.

This policy will assist onsite wastewater treatment facility (OWTF) responsible parties, their agents, ADEQ delegated local agencies and others by clarifying the requirements in the Aquifer Protection Permits (APP), General Permits.

Arizona Administrative Code (A.A.C.) R18-9-A309(A)(7)(d) requires operators of OWTFs to make sure a sewage flow that does not meet the numerical levels for typical sewage is adequately pretreated to meet the numerical levels before entry into an OWTF. Furthermore, A.A.C. R18-9-A309(A)(7)(g) requires operators of OWTFs to make sure OWTF activities do not adversely affect operation.

Wastewater in the holding tanks of Recreational Vehicles (RVs) generally exceeds the numerical limits as defined in "typical sewage" (A.A.C. R18-9-101(46)), i.e., "High Strength Wastewater," and sometimes contains certain detrimental bio-inhibitors for odor control, such as formaldehyde.

When an RV discharges High Strength Wastewater or wastewater containing bio-inhibitors for odor control to an OWTF without pretreatment, such activities will adversely affect OWTF operation and violates A.A.C. Chapter 9, Article 3 rules.

ADEQ has received questions on this issue from delegated authorities and the regulated community. High Strength Wastewater and bio-inhibiting odor controls impact not only the operation of an OWTF, but also the facility's design. This policy addresses the prohibition of discharging High Strength Wastewater and certain detrimental bio-inhibitors into an OWTF unless adequately pretreated.

2.0 Definitions

A.A.C. – Means Arizona Administrative Code.

Aquifer Protection Permits (APP) – Means a regulatory program in the state of Arizona authorized by the state legislature under Title 49, Chapter 2, Article 3.

A.R.S. – Means Arizona Revised Statutes.

Full-Service Connection – Means water and sewer connection at an RV Park (when an RV is connected to a Full-Service Connection, the RV use is not constrained by either the freshwater tank or the RV holding tank capacities).

High Strength Wastewater – Means wastewater that has characteristics above those listed for “typical sewage” in A.A.C. R18-9-101(46).

Onsite Wastewater Treatment Facility (OWTF) – Means a facility as defined in A.A.C. R18-9-101(31).

Pretreatment – Means the treatment of High Strength Wastewater prior to its discharge into an OWTF. For the purposes of this policy, pretreatment must lower the numerical levels of Total Suspended Solids (TSS), five-day biochemical oxygen demand (BOD₅) and total nitrogen to meet the definition of Typical Sewage. Also, for purposes of this policy, pretreatment must remove bio-inhibitors from RV wastewater prior to discharge into an OWTF.

Recreational Vehicle (RV) – Means a vehicle designated for temporary living quarters for camping, travelling, or recreational use. It may have its own motor, or be mounted on or pulled by another vehicle.

RV Holding Tank – Means a container that stores sewage in a Recreational Vehicle.

RV Park – Means a tract of land upon which two or more recreational vehicle sites are located, established, or maintained for occupancy by recreational vehicles of the general public as temporary living quarters for recreation or vacation purposes by campers, vacationers, or travelers.

Sewage – Refers to the definition of the same name in A.A.C. R18-9-101(39).

Sewage Vault – Means a facility that receives sewage without discharge into the native soil (see A.A.C. R18-9-E314).

Typical Sewage – Refers to the definition of the same name in A.A.C. R18-9-101(46).

Wastewater – Means sewage as defined in A.A.C. R18-9-101(39).

Wastewater Treatment Plant – Refers to the definition of the same name in A.A.C. R18-5-101.

3.0 Policy Statement

- 3.1 For the purposes of A.A.C. R18-9-A309(A)(7)(d), sewage collected in RV holding tanks while not hooked up to a Full-Service Connection is considered High Strength Wastewater, and is not Typical Sewage.
- 3.2 For the purposes of R18-9-A309(A)(7)(d) and R18-9-A309(A)(7)(g), the activity of releasing High Strength Wastewater from an RV holding tank to a collection system destined for an OWTF is considered an activity that has an adverse effect to the operation of the facility.
- 3.3 For the purposes of A.A.C. R18-9-A309(A)(7)(g), holding tanks prior to hooking up to a Full-Service Connection likely contain bio-inhibitor odor control additives, which, by their very nature, inhibit the biological processes that break down waste.
- 3.4 For the purposes of A.A.C. R18-9-A309(A)(7)(g), the activity of adding bio-inhibitors from an RV holding tank to a collection system destined for an OWTF is considered an activity that has an adverse effect to the operation of the facility.
- 3.5 For the purposes of A.A.C. R18-9-A309(A)(7)(d), High Strength Wastewater derived from an RV must be pretreated before hooking up to a collection system that is destined for an OWTF.
- 3.6 For the purposes of A.A.C. R18-9-A309(A)(7), sewage from an RV that did not arrive at an RV Park with sewage and / or bio-inhibitor odor control additives in its holding tanks and that subsequently hooks up to a Full-Service Connection is considered Typical Sewage.
- 3.7 For the purposes of A.A.C. R18-9-E314, the contents of Sewage Vaults containing High Strength Wastewater must be either:
 - 3.7.1 Deposited in a Wastewater Treatment Plant capable of treating the constituents of the High Strength Wastewater, or
 - 3.7.2 Pretreated in order to produce wastewater that meets the characteristics of Typical Sewage before being deposited in an OWTF.
- 3.8 For the purposes of A.A.C. R18-9-A309(A)(7), sewage containing either of the following must be pretreated before depositing into an OWTF:
 - 3.8.1 High Strength Wastewater, or
 - 3.8.2 Chemicals (such as bio-inhibitor odor control additives) that adversely affect the operation of an OWTF.
- 3.9 For the purposes of A.A.C. R18-9-A309(A)(7) and R18-9-A309(A)(7)(d), the contents of incidental and infrequent discharges from an RV holding tank to an OWTF at the owner's residence is considered typical sewage. This includes

incidental and infrequent discharges from an RV holding tank into an OWTF via an RV port.

4.0 Authority

A.R.S. § 49-104(a)(1) provides authority for ADEQ to formulate policies, plans and programs to implement Title 49 to protect the environment. A.R.S. § 49-245 provides authority for ADEQ to promulgate rules for general APP.

5.0 Audience

General Public

ADEQ Water Quality Permitting and Inspection Staff

ADEQ Management

Onsite Wastewater Treatment Facility Responsible Parties and their Agents

ADEQ Delegated Authorities or Local Agencies

6.0 Policy Steward

ADEQ Water Quality Division Director

7.0 Communication & Training

This policy will be noticed in accordance with A.R.S. § 41-1091. ADEQ will make this policy available on the Agency's policy website and the Agency's delegation website. ADEQ will distribute the policy to Delegated Authorities and Local Agencies. ADEQ staff is available for training, clarification and discussion.

8.0 Annual Policy Review

This policy will be reviewed annually during the Agency Annual Policy Review and will be revised or withdrawn as necessary at that time.

9.0 Additional Documents

Charles A. Brown, K. E. (1984). Treatability of Recreational Vehicle Wastewater in Septic Systems at Highway Rest Areas. Transportation Research Record.

City of Malibu. (2018). Local Agency Management Program For Onsite Wastewater Treatment Systems City of Malibu, California.

Glenn County Health and Human Services Agency. (2018). Onsite wastewater treatment systems regulations.

Hindin, E. (1994). Toxicity of additives used to control odors in recreational vehicle wastewater. Pullman, Washington: Washington State Department of Transportation.

Howard, S. C. (1988). The effect of three holding tank chemicals on anaerobic wastewater treatment. Blacksburg, Virginia.

Imperial County. (2016). Chapter 8.80. Onsite Wastewater treatment system.

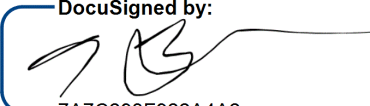

Kern County Public Health Department. (2017). Local Agency Management Program For Onsite Wastewater Treatment Systems Kern County, California.

Santa Clara County. (2014). Local Agency Management Program For Onsite Wastewater Treatment Systems Santa Clara County, California.

Thomas, W. (1995). Effects of recreational vehicle wastes on the treatability of domestic wastewater. Florida Water Resources Journal, 34-35.

US EPA. (1999). Alert for RV, Boat and Mobile home owners and park operators about safe wastewater disposal. Region 9 Groundwater.

10.0 Approval

Title	Name	Signature	Date
Affected Executive Leadership Team Member	Trevor Baggione	DocuSigned by:  7A7C293F922A4A2...	11/7/2022
Administrative Counsel, as to form	Edwin Slade	DocuSigned by:  C19ECEB333B7458...	11/7/2022

11.0 Historical Note

N/A.