



City of Flagstaff

Water Services Division



January 10, 2024

Trevor Baggio
Water Quality Division Director
Arizona Department of Environmental Quality
1110 W Washington Street
Phoenix, AZ 85007

Delivered via Electronic Mail

RE: Arizona Department of Environmental Quality Advanced Water Purification Technical Advisory Group Recommendations

Dear Mr. Baggio,

The City of Flagstaff Water Resources Team has some comments:

1. Why is ADEQ proposing 6 yr. permits for AWTFs? AZPDES permits are on a 5-year cycle, and APP permits are good for the life of the facility .
2. On page 10 (3. xii), we believe compliance and enforcement should not be more stringent than sanitary surveys or APP/AZPDES permit inspections. The verbiage that is used "robust inspection program", has us worried about what ADEQ intends on setting up for inspection guidelines.
3. We are uneasy about the ADEQ setting up action levels for Tier II chemicals. This goes back to how they plan to do their enforcement. Our APP permits have action levels and discharge levels, but ADEQ considers both to be violations when reporting. Will this be the same way?
4. On page 39, for the WRF operator requirements, there isn't an agreement that the operator on record must hold a Grade 4 in collections. What is the significance of that?
5. Enhanced Source Control:
 - a. An understanding of the position of ADEQ about trying to stop anything from polluting the treatment on the front end by having a more robust pretreatment program. In the NAMWUA meeting, Trevor admitted that the language they are proposing to try to specify what businesses aren't perfect. There are thoughts regarding "commercial/industrial" being as close as they can get, and then the municipalities will have to define it in code.
 - b. We believe they need to acknowledge that residential locations have always been a source of unknown pollutants, but a place enforcement has not been allowed. A

Water – Wastewater - Reclaimed Water - Stormwater

Administration Offices
2323 N Walgreens St. Suite 1
Flagstaff, Arizona 86004

City Hall
211 W. Aspen Ave.
Flagstaff, Arizona 86001



City of Flagstaff

Water Services Division



lot of people are conducting business from home these days. Does ADEQ propose to incorporate this into the source control regulations?

- c. An observation made is that there will be a significant number of public hurdles with enhanced source control. The business community already has issues with government control, and this will add more enforcement.

If you have questions or need additional information regarding support from the City of Flagstaff, please contact us.

Sincerely,

Shannon Jones
Water Services Director
City of Flagstaff
(928) 213-2405
Shannon.Jones@flagstaffaz.gov

Jolene Montoya
Regulatory Compliance Manager
City of Flagstaff
(928) 213-2117
Jolene.Montoya@flagstaffaz.gov

Water – Wastewater - Reclaimed Water - Stormwater

Administration Offices
2323 N Walgreens St. Suite 1
Flagstaff, Arizona 86004

City Hall
211 W. Aspen Ave.
Flagstaff, Arizona 86001