



December 1, 2023

Trevor Baggione

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

Dear Mr. Baggione,

As the two largest water and wastewater reclamation utilities in Southern Arizona, Tucson Water and Pima County Wastewater Reclamation Department respectfully submit the following comments regarding the Advanced Water Purification Proposed Program issued on November 2, 2023.

Tucson Water, an enterprise funded department of the City of Tucson, and Pima County Wastewater Reclamation, an enterprise funded department of Pima County, jointly serve more than 750,000 people in the largest metropolitan area of southern Arizona. For decades, the value of water to southern Arizona can be witnessed in the discharges to the Santa Cruz River from the two large metropolitan wastewater facilities operated by Pima County Wastewater Reclamation that creates a riparian habitat corridor as well as recharges the aquifer through managed aquifer recharge. In addition, for 40 years, Tucson Water has been utilizing reclaimed water for turf irrigation of schools, parks, and golf courses surrounding the metropolitan area in one of the nation's largest non-potable water systems to use a drop of water more than once.

Tucson Water and Pima County Regional Wastewater Reclamation Department appreciates the opportunity to comment on the Arizona Department of Environmental Quality (ADEQ) Advanced Water Purification (AWP) Technical Advisory Group (TAG) recommendations (July 2023) that were further refined in the Proposed Program Roadmap (November 2023). The Roadmap thoroughly covers the technical guidelines for moving Arizona forward, to directly serve safe, reliable, local water through AWP. However, we encourage ADEQ to review and consider our joint-response comments when developing the proposed AWP Rule.

Please accept the following comments from our agencies as consideration points to assist further discussions to the eventual rule making process.

General Comments

Advanced Water Purification as a drinking water source is new to the State of Arizona. The guidelines prepared by the Technical Advisory Group and subsequent Roadmap are well organized for utilities to assess a treatment system that is appropriate for their community. Implementation of AWP, a technology-based treatment process, will require small and large utilities to invest in staff training as well

as to support all aspects of permitting and operational process. The documents are acronym heavy, which made it challenging to review the TAG document. We appreciate that the Roadmap provides a complete list of acronyms and a list of definitions.

AWP should be attainable for all communities in equitable coordination at the state level. The cost for utilities to implement an AWP program, for the benefit of developing a safe local water resource is a high price tag. Section 3 (*Program Description*) of the Roadmap outlines the new AWP program administration requirements, costs, and funding (3 viii). The cost for ADEQ to implement a new program to regulate AWP will be covered by fees paid by utilities. These fees could become an economic burden for smaller utilities, to the extent that implementation of AWP will not be feasible. We suggest that ADEQ include a sliding cost scale or other finance methods such as partnership with Water Infrastructure Funding Agency to ease the regulatory burden on utilities. The goal to develop reasonable affordable safe local water supplies, should always be in the forefront when developing fee schedules.

Specific Comments

The Roadmap provides guidelines that potentially will be revised once the rulemaking process finalizes Arizona requirements by the end the Winter of 2024. Specific comments provided below are based on practical implementation of AWP, with emphasis on protection of public health from a joint utility perspective.

Project Advisory Committee

Section 3 vii explains that a project advisory committee (PAC) might be established to perform technical review of proposed AWP projects and provide recommendations to ADEQ. If a PAC is established, we recommend that regional PAC be formed to evaluate proposed projects. It is fundamental to include local knowledge when reviewing permit applications. Whereas a local PAC will have a better understanding of permittees water reclamation facility and local water quality risk. This will save time, ensure a thorough review, and generate applicable recommendations for the Arizona Department of Environmental Quality consideration.

Enhanced Source Control

Section 3.2. of the Roadmap outlines steps for categorizing industrial and/or commercial discharges within the sewershed with a 3-year reevaluation period. Categorizing the influent wastewater with a full spread analysis would be less complicated and provide the same inventory results. Tracking every new sewershed discharger is not practical or affordable for most utilities. We agree with utilizing technology to detect chemical peaks and having established response procedures. However, the list of potential environmental pollutant classes used in commercial and industrial processes is generally well known. Permitting a treatment train that will remove all hazardous pollutants and biologicals demonstrated during performance monitoring is reasonable for protection of human health.

Chemical Removal Standards

Section 3.1.2 - Tier II chemical selection is well defined in the Roadmap as a comprehensive review of the sewershed, contributing industries, and identification of constituent(s) of concern (COCs). Likewise, Figure 9, the Method to Establish Tier 2 Chemicals is clearly established in the flowchart steps, is further identified in conjunction with the Enhanced Source Control Program, and is described in detail in Appendix A.


However, throughout the entire text of the Roadmap document it is sometimes not clear and/or appears to contradict who the responsible parties are for Tier 2: AWP Specific Contaminants. That is, the various acronyms are not consistently used, and therefore, the responsibilities are not clearly understood. Please ensure the proposed AWP Rule is fully vetted for consistent acronym use.

Summary

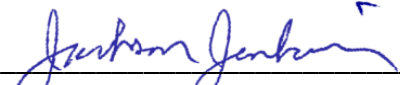
Looking to the future, both agencies see the benefit of the State of Arizona having defined rules for the creation of Advanced Water Purification facilities for the reuse of water within a community.

Tucson Water and Pima County Regional Wastewater Reclamation Department are looking forward to working with ADEQ on the future AWP in Arizona.

Cordially,



John Kmiec, Director
Tucson Water Department



Jackson Jenkins, Director
Pima County Regional Wastewater Reclamation
Department