RV Holding Tank Waste and Bio-inhibitor Discharges into Onsite Wastewater Treatment Facilities (OWTFs)

February 9, 2021
Stakeholder Meeting

Meeting Purpose
Obtain input on rule clarification regarding how RV Parks may dispose of holding tank waste and use of bio-inhibitors

Today’s Agenda
Overview of Applicable Rules
ADEX Analysis
Input from Stakeholders

Online Tools
Muted
Not Recording
Using Poll Everywhere for Input

Feedback During Webinar
Go to Web Browser:
(Computer or Phone)
- Enter the URL below:
  https://PollEv.com/theresagunn114
- Keep open during meeting
Please select the option below that best describes you. (Select Only One)

- Government Employee
- RV Park or Campground Owner
- Registered Sanitarian
- Engineer, Designer, Installer
- Pumper
- Product Manufacturer
- Tribal Nation
- Other

How do RV Parks in Arizona typically dispose of the RV holding tank waste when the RV comes into the park?

Stakeholder Request:
Clarify how RV holding tank waste may be disposed

Type 1.09 Permit
Type 4 Permit

Current Rule
Type 1.09 Permit
R18-9-B301(I)
- Up to 20,000 gallons
- Approved prior to 2001
- Operation
  - No contribution to violation of water quality standard
  - Only treats typical sewage
  - No hazardous waste/substances from commercial operations
  - No nuisance condition

Current Rule
Type 4 Permit
R18-9-A309(A)(7)
- If wastewater flow is not typical sewage, pretreatment is required
- No nuisance or unsanitary condition or cause/contribute to water quality standard violation
- No activities at the site that adversely affects the treatment operation

Analysis
- RVs not connected to water produce high strength waste, which by rule ≠ typical sewage. (R18-9-101(46))
- RV waste is generally 7-8 times more concentrated than typical sewage

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Analysis
- RV waste is generally 7-8 times more concentrated than typical sewage
Potential Options

▪ Hook-up to a sewer system
▪ Sewage Vault and Haul
▪ Pretreatment

Pre-Treatment Options

Larger disposal area (1.9x)
Increase residence time
Aeration/air stripping

Do you have any additional information regarding ADEQ's analysis of RV holding tank waste?

If ADEQ was to prohibit RV holding tank waste from being discharged to an onsite wastewater treatment facility, what would be the impact?

Bio-Inhibitors (Odor Control)

Stakeholder Request: Clarify if bio-inhibitors may be used in holding tanks

Bio Inhibitors (Odor Control)

Some inhibit biological processes that break down wastes
Discharging likely to "adversely impact" an onsite facility's ability to function
May also bolster high strength waste

(Use without water hookup)
Potential Options

- Hook-up to a sewer system
- Sewage Vault and Haul
- Pretreatment

Bio-Inhibitors

ADEQ has limited information to make a determination of environmental and economic impacts.

What updated information do you have regarding bio-inhibitors? Any studies or data?

If ADEQ was to restrict bio-inhibitor use in an RV holding tank that is dumped into the onsite wastewater treatment facility what would be the impact?

Please list any other issues related to RV Park onsite wastewater treatment systems.

NEXT STEPS

ADEQ will utilize your comments to inform changes needed to the existing rule.

Provide Additional Comment Online
https://www.surveymonkey.com/r/RVWaste
Deadline: Feb 23

Draft Rule Language: Tentative May 2021