

WATER SERVICES DIVISION

City of Flagstaff, Arizona



Introduction

The City of Flagstaff is the largest city and regional center of northern Arizona and is the seat of Coconino County. It has a population of about 72,000 and a hearty tourist season with its proximity to the Grand Canyon, Oak Creek Canyon, Meteor Crater, Arizona Snowbowl, and historic Route 66. The average annual rainfall is 23.14 inches, average annual snowfall is 77 inches, average high temperature is 60.8° F, and average low is 26.8° F.

Although Flagstaff became an incorporated town in 1894, the modern history really dates to 1876 when settlers passing through honored the nation's centennial by raising an American flag up a pine tree. Their "flag staff" became a landmark for those who followed, and eventually became the town's namesake. The western expansion of the railroad in the 1880s attracted merchants and saloonkeepers to set up shop for the railroad workers and lumbermen. Within a couple of years, Flagstaff was a thriving town of railroad, lumber and ranching industries. Early families such as the Riordans (lumber) and Babbitts (ranching) have descendants who still live and work in Flagstaff today. Since then, the Normal School would become Northern Arizona University. It is one of the state's three public universities with an enrollment of 30,000 students. Lowell Observatory was established in 1894 and was designated a National Historic Landmark in 1965. On October 24th, 2001, the City of Flagstaff became the World's First "International Dark Sky City", awarded by the International Dark Sky Association. Perhaps the most important development for Flagstaff is its growth as a strong tourism-based center and a center for athletes to do high altitude training. Hundreds of thousands of people now visit Flagstaff every year. They come to hike and camp in the pristine wilderness of the largest ponderosa pine forest in the world, visit our National Monuments and museums, the Grand Canyon and other local attractions.

The United States Environmental Protection Agency (EPA) approved the Industrial Waste Pretreatment Program for Flagstaff in 1993. The most recent local limits study for the City of Flagstaff was completed in 2015. This program currently oversees 1 CIU, 6 SIUs, and 2 NSCIUs. Industrial Pretreatment program also manages the FOG/small business program and the cross-connection program for the City of Flagstaff.

The City owns and operates the Wildcat Hill and Rio de Flag Water Reclamation Plants (WRP). The Wildcat Hill WRP is a rated 6 MGD and the Rio de Flag WRP is a 4 MGD plant. The treated effluent from these plants is reused in a city-wide reclaim distribution system and discharged to the Rio de Flag river for wetlands and recharge to the aquifer.

The Water Services mission is to professionally and cost-effectively provide water, wastewater, and stormwater services that meet the present and future environmental, health, and safety needs of the community.

NPDES Annual Report 2018 **Pretreatment Program**

Program Changes:

Administrative changes:

The Industrial Pretreatment Supervisor left for another position in the City, August 2018.

Enforcement Response Plan adopted into City Code, December 2018.

Training/Seminars:

Supervisor and inspectors attend various safety and technical trainings throughout the year. These include: Tri-State Seminar, IAPMO backflow repair and tester courses, FOG workshops, and City Risk Management safety training.

Year summary:

In the beginning of 2018, the City's regulatory compliance section initiated steps to redefine the enforcement response plan for Industrial pretreatment and Stormwater section. There were meeting with the significant industrial users and flyers sent to the other businesses in town. In October, the plan went before the City council for questions. In December, the final read was done at a council meeting and adopted into City Code. The final version can be found here:

<https://www.flagstaff.az.gov/DocumentCenter/View/59943/Final-Enforcement-Response-Plan?bidId=>

In the October of 2018, work began on setting up a database with SAMs IPP and City's collector app. This program will assist inspectors to more closely monitor the small businesses in town with interceptors. More work will be completed in 2019.

A local brewing company, Mother Road Brewery, recently expanded their brewing process to another facility. When the building permit/plans came to the attention of the pretreatment supervisor, a conversation was started regarding pretreatment facilities. Since May, the City and Mother Road Brewery have been partnering on ways to divert BOD/TSS from the collection system. This, in turn, started a bigger conversation about how the City deals with breweries. Flagstaff currently has 7 breweries and 1 meadery, and recently send out a questionnaire to better understand the facilities in town. In 2019, the City hopes to have a plan to permit or monitor breweries.

SenesTech, Inc is a business in town that manufactures a pesticide product. They were evaluated in 2017 as a non-significant categorical discharger. A permit was issued at the end of 2018 to keep them in compliance with the pretreatment program guidelines.

The pretreatment program will be working to identify potential industrial users in 2019.

POTW PRETREATMENT ANNUAL REPORT

CITY OF FLAGSTAFF, ARIZONA

NPDES Permit Holder: City of Flagstaff, Arizona

Period Covered by this Report: 01/01/2018 through 12/31/2018

Name of Wastewater Treatment Plant: Wildcat Hill & Rio de Flag WRP

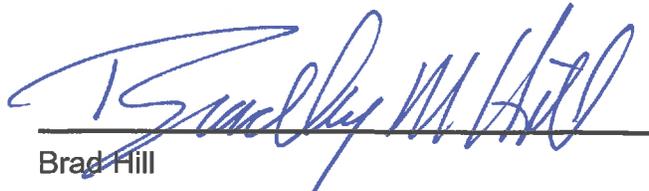
AZPDES Permit Number: Wildcat Hill WRP - AZ0020427
Rio de Flag WRP - AZ0023639

Person to Contact Concerning City of Phoenix Information Contained in the Report:

Jolene Hayes
Industrial Pretreatment Supervisor
211 W Aspen Ave
Flagstaff, Arizona 86001
928-213-2117

As required by 40 C.F.R. Section 122.22(b)(2):

I certify under penalty of law that all CITY OF FLAGSTAFF attachments contained in this document were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.



Brad Hill

Water Services Director
City of Flagstaff

14 FEB 2019

Date

CITY OF FLAGSTAFF

SUMMARY OF PRETREATMENT PROGRAM EXPENDITURES

January 1, 2018 – December 31, 2018 – Total Pretreatment Expenditures \$ **444,093**

PRETREATMENT PROGRAM PERSONNEL

<u>Title</u>	<u>FTEs 2018</u>	<u>FTEs 2017</u>
Regulatory Compliance Manager	1.0	1.0
Pretreatment Supervisor	1.0	1.0
Pretreatment Inspectors	2.0	2.0

PRETREATMENT PROGRAM EXPENDITURES

Laboratory Services	\$ 30,000
Operating Supplies and Expenses	\$ 15,622
Pretreatment Fees	\$3,000
Training/workshops	\$4,700

PRETREATMENT EQUIPMENT INVENTORY

<u>Equipment Name</u>	<u>Purchased 2018</u>	<u>Total 2018</u>
pH Meter	0	2
Gas Detectors	0	3
Portable Auto-Sampler	0	3
Vehicles	0	2
Computers/Tablets	1	6
Flow Meters	0	3

COMPANY NAME AND ADDRESS		WRP	SIC CODE	Regulation
1	W.L. Gore & Associates Gore Woody Mountain Facilities P.O. Box 300 Flagstaff, AZ 86004	Rio de Flag/ Wildcat Hill	3842	City Code/ EPA 463
2	Nestle Purina Co. 4700 Nestle Purina Avenue Flagstaff, AZ 86004	Wildcat Hill	2047	City Code
3	Wis-Pak Bottling Company 4900 Railhead Ave. Flagstaff, AZ 86004	Wildcat Hill	2086	City Code
4	Flagstaff Medical Center 1200 N. Beaver St. P.O. Box 1268 Flagstaff, AZ 86002	Rio de Flag/ Wildcat Hill	8062	City Code
5	Northern Arizona University P.O. Box 4067 Flagstaff, AZ 86011	Rio de Flag/ Wildcat Hill	8221	City Code
6	Joy Cone Company 2843 West Shamrell Blvd Flagstaff, AZ 86001	Rio de Flag	2052	City Code
7	Mission Linen Industries 2450 E. Huntington Dr Flagstaff, AZ 86001	Wildcat Hill	7213/7218	City Code
Non-Significant Categorical Industrial User				
1	W.L. Gore & Associates Gore Medical West Facilities 1500 N Fourth St. Flagstaff, AZ 86004	Wildcat Hill	3842	City Code/ EPA 463
2	SenesTech Inc. 3140 N. Caden Court #1 Flagstaff, AZ 86004	Wildcat Hill	2879	City Code/ EPA 403

ADDITIONS

The following Significant Industrial Users were added in 2018:

None

DELETIONS

The following Significant Industrial Users have ceased operations in 2018:

SCA Tissue

RECLASSIFICATIONS

The following Significant Industrial Users have been reclassified in 2018:

None

NAME CHANGES

The following Significant Industrial Users changed their names in 2018:

None

Legend

SIU

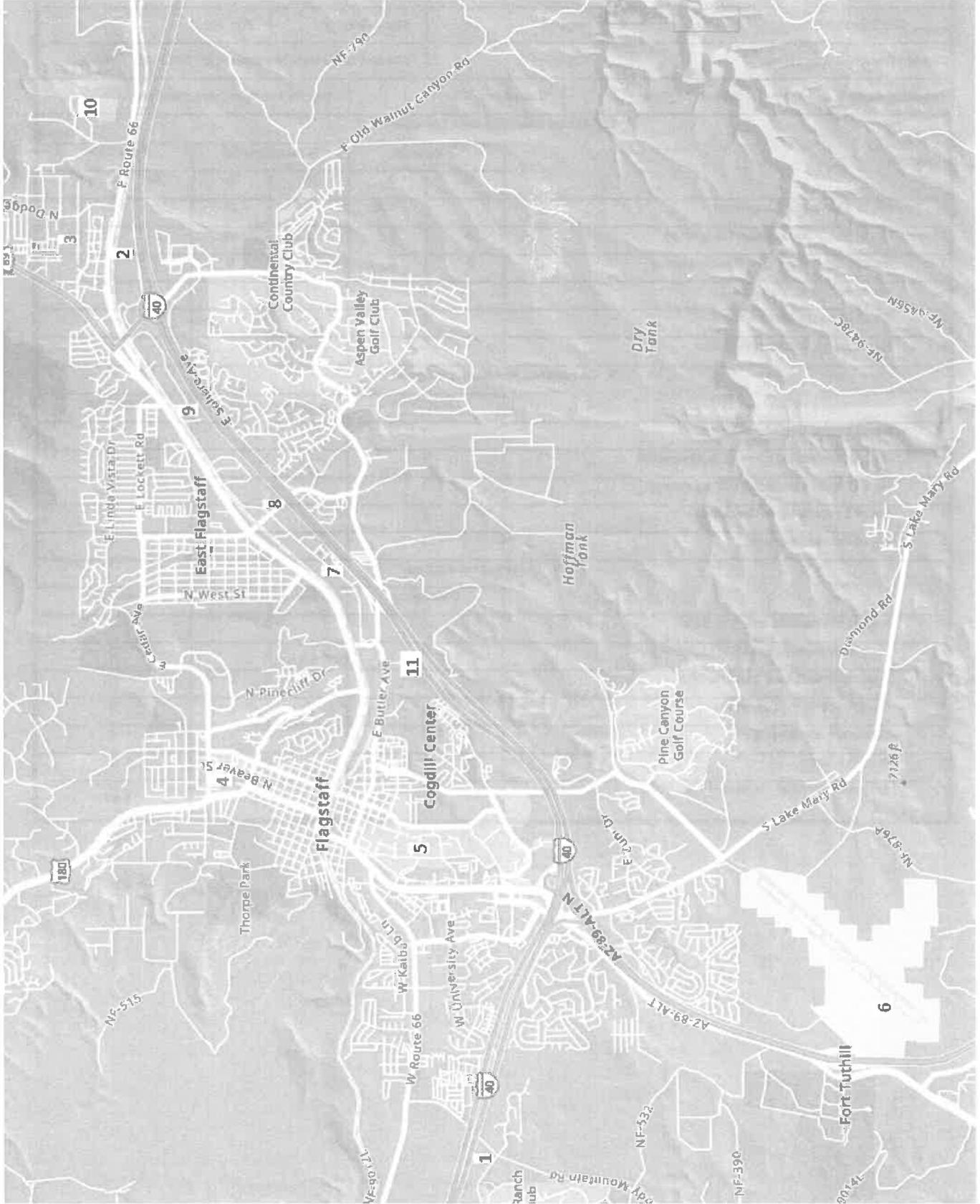
1. W.L. Gore & Assoc. (Woody Mtn)
2. Nestle Purina
3. Wis-Pak Bottling
4. Flagstaff Medical Center
5. Northern Arizona University
6. Joy Cone
7. Mission Linen

NSCIU

8. W.L. Gore & Assoc. (4th St)
9. SenesTech

Treatment Plants

10. Wildcat Hill WRP
11. Rio de Flag WRP



City of Flagstaff
PRETREATMENT PERFORMANCE SUMMARY
Rio de Flag Water Reclamation Facility

I. General Information							
Control Authority Name: City of Flagstaff			NPDES No: AZ0023639				
Address: 600 S Babbitt Dr.		City: Flagstaff		State: Arizona		ZIP: 86001	
Contact Person: Jolene Hayes				Contact Telephone Number: (928) 213-2117			
Reporting Period: January 1 – December 31, 2018			Categorical IUs: 1		Significant Non-Categorical IUs: 3		
II. Significant Industrial User Compliance							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	No. of SIUs in Full Compliance	1	100	1	25	2	50
2.	No. of SIUs in Inconsistent Compliance	0	0	2	50	2	50
3.	No. of SIUs in Significant Noncompliance	0	0	0	0	0	0
4.	No. of Parameter Violations	1		3		4	
5.	No. of Reporting Violations	0		0		0	
6.	No. of Permit Condition Violations	0		1		1	
III. Compliance Monitoring Program							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	No. of Control Documents Issued	1		3		4	
2.	No. of Nonsampling Inspections Conducted	1		3		4	
3.	No. of Facilities Inspected (Nonsampling)	1		3		4	
4.	No. of Sampling Visits Conducted	2		6		8	
5.	No. of Facilities Sampled	1		3		4	
IV. Enforcement Actions							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	Notices of Violations Issued to SIUs	0		0		0	
2.	Temporary Increase in IU Self Monitoring	0		0		0	
3.	Administrative Orders Issued to SIUs	0		0		0	
4.	Compliance Schedules Issued	0		0		0	
5.	Settlement Agreements	0		0		0	
6.	Warning Letters	0		2		2	
7.	Amount of Penalties Collected (Total Dollars / IUs Assessed)	\$ 0 / 0		\$ 0 / 0		\$ 0 / 0	

City of Flagstaff
PRETREATMENT PERFORMANCE SUMMARY
Wildcat Hill Water Reclamation Facility

I. General Information							
Control Authority Name: City of Flagstaff			NPDES No: AZ0020427				
Address: 2800 N El Paso Flagstaff Rd		City: Flagstaff		State: Arizona		ZIP: 86004	
Contact Person: Jolene Hayes			Contact Telephone Number: (928) 213-2117				
Reporting Period: January 1 – December 31, 2018		Categorical IUs: 1		Significant Non-Categorical IUs: 5			
II. Significant Industrial User Compliance							
		Categorical		Non-categorical		Total SIUs	
		No	%	No	%	No	%
1.	No. of SIUs in Full Compliance	1	100	1	20	2	33
2.	No. of SIUs in Inconsistent Compliance	0	0	4	80	4	67
3.	No. of SIUs in Significant Noncompliance	0	0	0	0	0	0
4.	No. of Parameter Violations	0		10		10	
5.	No. of Reporting Violations	0		0		0	
6.	No. of Permit Condition Violations	0		1		1	
III. Compliance Monitoring Program							
		Categorical		Non-categorical		Total SIUs	
1.	No. of Control Documents Issued	1		5		6	
2.	No. of Nonsampling Inspections Conducted	1		5		6	
3.	No. of Facilities Inspected (Nonsampling)	1		5		6	
4.	No. of Sampling Visits Conducted	2		10		12	
5.	No. of Facilities Sampled	1		5		6	
IV. Enforcement Actions							
		Categorical		Non-categorical		Total SIUs	
1.	Notices of Violations Issued to SIUs	0		0		0	
2.	Temporary Increase in IU Self Monitoring	0		0		0	
3.	Administrative Orders Issued to SIUs	0		0		0	
4.	Compliance Schedules Issued	0		0		0	
5.	Settlement Agreements	0		0		0	
6.	Warning Letters	0		3		3	
7.	Amount of Penalties Collected (Total Dollars / IUs Assessed)	\$ 0 / 0		\$ 0 / 0		\$ 0 / 0	

Upset, Interference, and Pass Through

Rio de Flag Water Reclamation Plant
Wildcat Hill Water Reclamation Plant

The following is a discussion of Upset, Interference, or Pass-Through incidents, if any, which City of Flagstaff know or suspect, were caused by nondomestic users of the POTW system during the year ending December 31, 2018. If any incidents occurred, the reasons why, the corrective actions taken, and the nondomestic user(s) or industry sector(s) responsible are provided.

Additionally, a review of the applicable pollutant limits to determine whether any additional limitations, or changes to existing requirements may be necessary to prevent Interference, Pass Through or noncompliance with sludge disposal requirements is provided.

This information is required under Part V Section B.4.b of the AZPDES Permit.

Analytical results of effluent samples obtained during 2018 at the Rio de Flag and Wildcat Hill Water Reclamation Plants (WRP) were compared against the federal definitions of Upset, Interference, and Pass Through.

The definition for **Upset** is found at 40 CFR 122.41(n):

"Upset" means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

The definition for **Interference** is found at 40 CFR 403.3(i):

The term "interference" means a Discharge which, alone or in conjunction with a discharge or discharges from other sources, both:

- 1) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and*
- 2) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including Title II, more commonly referred to as the Resource Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to Subtitle D or the SWDA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.*

The definition for **Pass-Through** is found at 40 CFR 403.3(n):

The term "Pass-Through" means a Discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).

Rio de Flag WRP

Based upon these definitions, there were no violations due to incidents of upset, interference, or pass-through that were attributable to nondomestic users of the POTW at the Rio de Flag Water Reclamation Plant (WRP) during 2018.

Wildcat Hill WRP

Based upon these definitions, there were no violations due to incidents of upset, interference, or pass-through that were attributable to nondomestic users of the POTW at the Wildcat Hill Water Reclamation Plant (WRP) during 2018.

**City of Flagstaff
Significant Industrial User Compliance Status Report**

Name: W.L. Gore & Associates – Woody Mountain Campus		Report Period: 1-1-18 to 12-31-18	
Service Address 4000 W. Kiltie Lane, Flagstaff, AZ 86005		Mailing Address: SAME	
Categorical User: YES	40 CFR – 463: (SIC) 3842/ (NAICS) 339113		BMR Submitted: Yes
TTO Certificate Date Submitted: N/A		Permit Effective: 8/23/16	Permit Expires: 8/22/21
Sampling Location Verified: 10/25/2018		RCRA Notice: None	
Slug Load Control Plan Evaluation Date: 10/25/2018			

Gore- Woody Mountain

	1 st Quarter (Jan 1 – Mar 31)	2 nd Quarter (Apr 1 – Jun 30)	3 rd Quarter (Jul 1 – Sep 30)	4 th Quarter (Oct 1 – Dec 31)
Number of Inspections	0	0	0	1
Number of City Sampling Days	1	0	1	0
Number of IU Sampling Days	0	1	0	1
Number of Parameter Violations	0	1	0	0
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	0	0	0	0
Compliance Status	C	C	C	C
Evaluated as of:	*	*	*	January 2019

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance
If company is in I or S, then the following table applies:

Gore – Woody Mountain

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
2 nd	Local limits	4/13/2018	Composite	City	IU	Copper	0.25 ppm/ 0.15 ppm Resample 0.11 ppm	2

Gore – Woody Mountain

	1 st Quarter (Jan 1 – Mar 31)	2 nd Quarter (Apr 1 – Jun 30)	3 rd Quarter (Jul 1 – Sep 30)	4 th Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	A

Enforcement Status Codes

- | | | |
|--|--------------------------------------|--|
| A – No enforcement action | F – Civil litigation | K – Compliance Schedule |
| B – Warning letter | G – Settlement agreement | L – Disconnection from sewer |
| C – Notice of Violation (NOV) | H – Assessment of monetary penalties | M – Published in newspaper as SNC |
| D – Administrative Order (AO) | I – Restriction of flow | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation | |

*Due to changes in staff, data was not evaluated on a quarterly basis and compliance notifications were not sent out.

ENFORCEMENT SUMMARY AND COMMENTS

Company Name: W.L. Gore & Associates - Woody Mtn. Campus

Process Flow: 47,000 gpd

General Information and type of wastewater treatment

Gore Woody Mountain Campus conducts Plastics, Molding, and Forming and is a categorical discharger as listed in US Environmental Protection Agency (EPA) Effluent Guidelines and Pretreatment Standards Title 40 Code of Federal Regulations (CFR) Part 463. The Gore Woody Mountain Campus is sampled twice a year by the City of Flagstaff Industrial Waste Program, and twice a year by Gore staff. The Gore Woody Mountain Campus SIC is 3842: Orthopedic, Prosthetic, and Surgical Appliances and Supplies. The Gore Woody Mountain Campus NAICS code is 339113: Surgical Appliance and Supplies Manufacturing. All the wastewater from the Gore Woody Mountain Campus facilities can be sampled from one manhole near the intersection of Kiltie Lane and Woody Mountain Road. This manhole services all Gore Woody Mountain Campus facilities, exclusively, with no other dischargers utilizing the sewer line.

First Quarter

On 1/30/18, the City of Flagstaff sampled the IU with no violations.

Second Quarter

On 4/13/18, the IU sampled, and results came back with elevated copper. Gore did an internal review and found that the source was a faulty anode in a boiler providing domestic hot water in one of the buildings. The anode was replaced, and the IU discharge was tested on 5/5/18 with results below the limit. On 5/25/18, the IU upsized the flume and sewer line tying into the City manhole. It was thought that the 6" sewer line was causing back-ups and agitation in the flow affecting the flow and pH metering equipment.

Third Quarter

On 8/14/18, the City of Flagstaff sampled the IU with no violations

Fourth Quarter

On 10/15/18, the IU sampled with no violations. On 10/25/18, the City of Flagstaff completed an annual inspection of the IU.

To be published for this year in newspaper for Significant Non-Compliance? Yes **X** No

Penalties this reporting Year: Assessed **\$ 0.00** Collected **\$ 0.00**

**City of Flagstaff
Significant Industrial User Compliance Status Report**

Name: Nestle-Purina Petcare Company		Report Period: 1-1-18 to 12-31-18	
Service Address: 4700 E. Nestle Purina Drive, Flagstaff, AZ 86004		Mailing Address: SAME	
Categorical User: NO		40 CFR 403	BMR Submitted: YES
TTO Certificate Date Submitted: N/A		Permit Effective: 1/22/2018	Permit Expires: 1/1/2023
Sampling Location Verified: 12/3/18		RCRA Notice: None	
Slug Load Control Plan Evaluation Date: 12/3/18			

Nestle-Purina

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Number of Inspections	0	0	0	1
Number of City Sampling Days	12	8	1	0
Number of IU Sampling Days	10	11	8	6
Number of Parameter Violations	3	4	0	2
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	0	0	0	0
Compliance Status	I	I	C	I
Evaluated as of:	*	*	*	January 2019

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance
If company is in I or S, then the following table applies:

Nestle-Purina

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
1 st	Local limits	1/11/2018	Grab	City	City	Bromide	1.2 ppm/ 0.05 ppm	1
1 st	Local limits	2/21/2018	Grab	City	City	HEM (Oil & Grease)	251 ppm/ 152 ppm	1
1 st	Local limits	2/6/2018 2/7/2018 2/9/2018 2/21/2018	Composite	City	IU	Total Nitrogen	225 ppm/ 173 ppm 192 ppm 208 ppm 197 ppm	4
2 nd	Local limits	4/24/2018 4/27/2018 5/1/2018 5/31/2018	Grab	City	City IU	HEM (Oil & Grease)	508 ppm/ 173 ppm 469 ppm 325 ppm 550 ppm	4
2 nd	Local limits	5/31/2018	Composite	City	IU	Copper	0.19 ppm/ 0.15 ppm	1
2 nd	Local limits	5/31/2018	Composite	City	IU	Bromide	2.6 ppm/ 0.05 ppm	1
2 nd	Local limits	5/31/2018	Composite	City	IU	Total Nitrogen	245 ppm/ 173 ppm	1
4 th	Local limits	12/18/2018	Composite	City	IU	Bromide	1.2 ppm/ 0.05 ppm	1
4 th	Local limits	12/18/2018	Composite	City	IU	Copper	0.2 ppm/ 0.15 ppm	1

Nestle-Purina

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	B

Enforcement Status Codes

- | | | |
|--|--------------------------------------|--|
| A – No enforcement action | F – Civil litigation | K – Compliance Schedule |
| B – Warning letter | G – Settlement agreement | L – Disconnection from sewer |
| C – Notice of Violation (NOV) | H – Assessment of monetary penalties | M – Published in newspaper as SNC |
| D – Administrative Order (AO) | I – Restriction of flow | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation | |

*Due to changes in staff, data was not evaluated on a quarterly basis and compliance notifications were not sent out.

ENFORCEMENT SUMMARY AND COMMENTS

Company Name: Nestle Purina Petcare Company

Process Flow: 10,000 gpd

General Information and type of wastewater treatment

Nestlé-Purina Pet Care Company is a dry pet food manufacturer. Purina receives whole and ground grain products, meal by-products, fish, chicken, turkey, beef, and lamb slurries. Purina mixes the ingredients, cook, extrude, and dry the product for packaging. The products are then warehoused for distribution. This facility produces pet food under the SIC 2047 and NAICS 311111.

First Quarter

On 1/11/18, the City of Flagstaff sampled the IU and results came back with elevated levels of Bromide and Oil & Grease. The IU also did extra sampling that month for Total Nitrogen. There were multiple hits during the month of February.

Second Quarter

On 4/13/18, the IU sampled, and results came back with elevated levels of Bromide, Copper, Total Nitrogen, and Oil & Grease.

Third Quarter

On 8/7/18, the City of Flagstaff sampled the IU with no violations. In July, Nestle Purina installed a screw press to remove solids. The facility is removing approximately two 10-yard dumpsters of material each day.

Fourth Quarter

On 12/3/18, the City of Flagstaff completed an annual inspection of the IU. On 12/18/18, the IU sampled, and results came back with elevated levels of Bromide and Copper. A warning letter for parameter violations was sent on 1/22/19 with a 30-day response time for a report.

To be published for this year in newspaper for Significant Non-Compliance? Yes **X** No

Penalties this reporting Year: Assessed **\$ 0.00** Collected **\$ 0.00**

**City of Flagstaff
Significant Industrial User Compliance Status Report**

Name: Flagstaff Medical Center		Report Period: 1-1-18 to 12-31-18	
Service Address: 1200 North Beaver Street Flagstaff, Arizona 86001		Mailing Address: SAME	
Categorical User: NO	40 CFR 403		BMR Submitted: YES
TTO Certificate Date Submitted: N/A		Permit Effective: 1/2/19	Permit Expires: 1/2/24
Sampling Location Verified: 10/18/18		RCRA Notice: None	
Slug Load Control Plan Evaluation Date: 10/18/2018			

FMC

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Number of Inspections	0	0	1	0
Number of City Sampling Days	1	0	1	0
Number of IU Sampling Days	0	1	0	1
Number of Parameter Violations	0	0	1	0
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	0	0	0	1
Compliance Status	C	C	I	I
Evaluated as of:	*	*	*	January 2019

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance
If company is in I or S, then the following table applies:

FMC

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
3 rd	Local limits	8/8/2018	Composite	City	City	Selenium	0.022ppm / 0.015 ppm	1

FMC

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	B

Enforcement Status Codes

- | | | |
|--|--------------------------------------|--|
| A – No enforcement action | F – Civil litigation | K – Compliance Schedule |
| B – Warning letter | G – Settlement agreement | L – Disconnection from sewer |
| C – Notice of Violation (NOV) | H – Assessment of monetary penalties | M – Published in newspaper as SNC |
| D – Administrative Order (AO) | I – Restriction of flow | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation | |

*Due to changes in staff, data was not evaluated on a quarterly basis and compliance notifications were not sent out

ENFORCEMENT SUMMARY AND COMMENTS

Company Name: Flagstaff Medical Center

Process Flow: 77,000 gpd

General Information and type of wastewater treatment

Flagstaff Medical Center ("FMC") is a local full-care hospital with less than 1,000 beds. FMC has a control manhole with a Parshall flume, an acid neutralization tank for laboratory waste, a grease interceptor for the commissary, a lint interceptor for laundry facilities, ultrasonic flow measuring and continuous pH monitoring. FMC's conventional pollutant loading is primarily of a domestic nature, from the patients who are hospitalized.

First Quarter

On 2/8/18, the City of Flagstaff sampled the IU with no violations.

Second Quarter

On 5/30/18, the IU sampled with no violations.

Third Quarter

On 8/8/18, the City of Flagstaff sampled the IU with elevated levels of Selenium.

Fourth Quarter

On 10/18/18, the City of Flagstaff completed an annual inspection of the IU. On 11/7/18, the IU sampled, and results were incomplete. A warning letter was sent on 1/22/19 for missed sample parameters as part of the permit. A 15-day response time was given.

To be published for this year in newspaper for Significant Non-Compliance? Yes **X** No

Penalties this reporting Year: Assessed **\$ 0.00** Collected **\$ 0.00**

**City of Flagstaff
Significant Industrial User Compliance Status Report**

Name: Wis-Pak Bottling Company		Report Period: 1-1-18 to 12-31-18	
Service Address: 4900 E. Railhead Ave, Flagstaff, Arizona 86004		Mailing Address: SAME	
Categorical User: NO	40 CFR 403		BMR Submitted: Yes
TTO Certificate Date Submitted: N/A		Permit Effective: 1/22/18	Permit Expires: 1/21/2023
Sampling Location Verified: 6/14/18		RCRA Notice: No	
Slug Load Control Plan Evaluation Date: 6/14/18			

Wis-Pak

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Number of Inspections	0	1	0	0
Number of City Sampling Days	1	0	1	0
Number of IU Sampling Days	6	6	7	6
Number of Parameter Violations	0	0	1	0
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	0	0	0	0
Compliance Status	C	C	I	C
Evaluated as of:	*	*	*	January 2019

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance
If company is in I or S, then the following table applies:

Wis-Pak

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
3 rd	Local limits	8/7/2018	Grab	City	City	Bromide	0.75 ppm/ 0.05 ppm	1

Wis-Pak

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	A

Enforcement Status Codes

- | | | |
|--|--------------------------------------|--|
| A – No enforcement action | F – Civil litigation | K – Compliance Schedule |
| B – Warning letter | G – Settlement agreement | L – Disconnection from sewer |
| C – Notice of Violation (NOV) | H – Assessment of monetary penalties | M – Published in newspaper as SNC |
| D – Administrative Order (AO) | I – Restriction of flow | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation | |

*Due to changes in staff, data was not evaluated on a quarterly basis and compliance notifications were not sent out.

ENFORCEMENT SUMMARY AND COMMENTS

Company Name: Wis-Pak Bottling Company

Process Flow: 30,000 - 80,000 gpd

General Information and type of wastewater treatment

Wis-Pak Bottling Company is a beverage bottling company. Wis-Pak bottles soft drink from high fructose corn sweeteners, food dyes, water, flavorings and carbon dioxide. It packages the product, store in onsite warehouses and distribute it for resale. This facility falls under the SIC 2086 and NAICS 312111 for soft drink manufacturing. Its pretreatment facility includes a DAF system that uses urea to bring down the BOD levels.

First Quarter

On 1/9/18, the City of Flagstaff sampled the IU with no violations.

Second Quarter

On 5/9/18, the IU sampled with no violations. On 6/14/18, the City of Flagstaff completed an annual inspection of the IU.

Third Quarter

On 8/7/18, the City of Flagstaff sampled the IU with elevated levels of Bromide.

Fourth Quarter

On 9/26/18, the IU sampled with no violations.

To be published for this year in newspaper for Significant Non-Compliance? Yes **X** No
 Penalties this reporting Year: Assessed **\$ 0.00** Collected **\$ 0.00**

**City of Flagstaff
Significant Industrial User Compliance Status Report**

Name: Northern Arizona University		Report Period: 1-1-18 to 12-31-18	
Service Address: PO Box 4067, Flagstaff, Arizona 86011		Mailing Address: SAME	
Categorical User: NO	40 CFR 403		BMR Submitted: Yes
TTO Certificate Date Submitted: N/A		Permit Effective: 9/28/2018	Permit Expires: 9/27/2023
Sampling Location Verified: 6/28/18		RCRA Notice: No	
Slug Load Control Plan Evaluation Date: 6/28/2018			

NAU

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Number of Inspections	0	1	0	0
Number of City Sampling Days	5	0	5	0
Number of IU Sampling Days	0	5	0	5
Number of Parameter Violations	1	0	0	1
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	0	0	0	0
Compliance Status	I	C	C	I
Evaluated as of:	*	*	*	January 2019

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance
If company is in I or S, then the following table applies:

NAU

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
1 st	Local limits	1/25/2018	Grab	City	City	Cyanide	0.29 ppm/ 0.24 ppm	1 (ARD)
4 th	Local limits	12/5/2018		City	IU	Cyanide	0.359 ppm/ 0.24ppm	1 (ARD)

NAU

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	B

Enforcement Status Codes

- | | | |
|--|--------------------------------------|--|
| A – No enforcement action | F – Civil litigation | K – Compliance Schedule |
| B – Warning letter | G – Settlement agreement | L – Disconnection from sewer |
| C – Notice of Violation (NOV) | H – Assessment of monetary penalties | M – Published in newspaper as SNC |
| D – Administrative Order (AO) | I – Restriction of flow | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation | |

*Due to changes in staff, data was not evaluated on a quarterly basis and compliance notifications were not sent out.

ENFORCEMENT SUMMARY AND COMMENTS

Company Name: Northern Arizona University

Process Flow: 400,000 gpd

General Information and type of wastewater treatment

Northern Arizona University has thirteen discharge points on campus to the two outfalls which dump into the POTW collection system. Discharge points of concern are monitored through several permitted outfalls. The primary outfalls are: Biology Bldg. Outfall #001, Wettaw Bldg. Outfall #002, Science Lab Facility (SLF) Outfall #003, Science Health Bldg. (SHB) Outfall #004, and ARD Bldg. Outfall #005.

First Quarter

During 1/16/18 - 2/1/18, the City of Flagstaff sampled the IU. The ARD location had elevated levels of Cyanide.

Second Quarter

During 6/11-14/18, the IU sampled with no violations. On 6/28/18, the City of Flagstaff completed an annual inspection of the IU.

Third Quarter

During 7/25/18 - 8/1/18, the City of Flagstaff sampled the IU with no violations.

Fourth Quarter

During 11/14/18 - 12/4/18, the IU sampled and the ARD location came back with high levels of Cyanide. A warning letter was sent out 1/28/18 for parameter violation. NAU resampled for Cyanide on 1/25/18.

To be published for this year in newspaper for Significant Non-Compliance? Yes No

Penalties this reporting Year: Assessed \$ 0.00 Collected \$ 0.00

**City of Flagstaff
Significant Industrial User Compliance Status Report**

Name: Joy Cone Company		Report Period: 1-1-18 to 12-31-18	
Service Address: 2843 West Shamrell Boulevard, Flagstaff, AZ 86001		Mailing Address: SAME	
Categorical User: NO	40 CFR 403.1		BMR Submitted: Yes
TTO Certificate Date Submitted: N/A		Permit Effective: 1/22/2018	Permit Expires: 1/22/2023
Sampling Location Verified: 5/23/2018		RCRA Notice: No	
Slug Load Control Plan Evaluation Date: 5/23/2018			

Joy Cone

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Number of Inspections	0	1	0	0
Number of City Sampling Days	1	0	1	0
Number of IU Sampling Days	6	6	6	6
Number of Parameter Violations	0	0	0	0
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	1	0	0	0
Compliance Status	C	C	C	C
Evaluated as of:	*	*	*	January 2019

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance
If company is in I or S, then the following table applies:

Joy Cone

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	A

Enforcement Status Codes

- | | | |
|--|--------------------------------------|--|
| A – No enforcement action | F – Civil litigation | K – Compliance Schedule |
| B – Warning letter | G – Settlement agreement | L – Disconnection from sewer |
| C – Notice of Violation (NOV) | H – Assessment of monetary penalties | M – Published in newspaper as SNC |
| D – Administrative Order (AO) | I – Restriction of flow | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation | |

*Due to changes in staff, data was not evaluated on a quarterly basis and compliance notifications were not sent out.

ENFORCEMENT SUMMARY AND COMMENTS

Company Name: Joy Cone Company

Process Flow: 2,000 gpd

General Information and type of wastewater treatment

Joy Cone is an ice cream cone manufacturer. They bake, package, and distribute ice cream cones for resale. The product consists mainly of flour, tapioca flour, sugar and water. Joy Cone practices water conservation and will batch waste during production hours. This facility falls under the SIC 2052 and NAICS 311821 – cookie and cracker manufacturing. Joy Cone batch wastes 1-3 times during a production day. This facility uses a vault to collect process wastes before sending to a rotary drum to remove solids.

First Quarter

On 1/24/18, the City of Flagstaff sampled the IU with no violations.

Second Quarter

On 5/23/18, the City of Flagstaff completed an annual inspection of the IU. On 5/23/18, the IU sampled with no violations.

Third Quarter

On 8/15/18, the City of Flagstaff sampled the IU with no violations.

Fourth Quarter

On 11/29/18, the IU sampled with no violations.

To be published for this year in newspaper for Significant Non-Compliance? Yes No
 Penalties this reporting Year: Assessed \$ 0.00 Collected \$ 0.00

**City of Flagstaff
Significant Industrial User Compliance Status Report**

Name: Mission Linen		Report Period: 1-1-18 to 12-31-18	
Service Address 2450 E. Huntington, Flagstaff, Arizona 86004		Mailing Address: P.O. Box 2936, Flagstaff, AZ 86004-2936	
Categorical User: NO	40 CFR 403		BMR Submitted: 1/1/13
TTO Certificate Date Submitted: N/A		Permit Effective: 1/22/2018	Permit Expires: 1/21/2023
Sampling Location Verified: 5/22/2018		RCRA Notice: None	
Slug Load Control Plan Evaluation Date: 5/22/2018			

Mission Linen

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Number of Inspections	0	1	0	0
Number of City Sampling Days	1	0	1	0
Number of IU Sampling Days	5	6	5	5
Number of Parameter Violations	2	0	0	0
Number of Inspection Violations	0	0	0	0
Number of Reporting Violations	0	0	0	0
Number of Permit Cond. Violations	0	0	0	0
Compliance Status	I	C	C	C
Evaluated as of:	*	*	*	January 2019

COMPLIANCE CODES: C = Compliance I = Inconsistent Compliance S = Significant Non-Compliance
If company is in I or S, then the following table applies:

Mission Linen

Quarter	Type of Violation	Date of Violation	Sample Composite or Grab	Limit Federal or City	Monitoring City or IU	Parameter	Value/ Limit	Number of Measurements per Quarter
1 st	Local limits	2/15/2018	Composite	City	City	Copper	0.23 ppm/ 0.15 ppm	1
1 st	Local limits	2/15/2018	Grab	City	City	HEM (Oil & Grease)	555 ppm/ 152 ppm	1

Mission Linen

	1st Quarter (Jan 1 – Mar 31)	2nd Quarter (Apr 1 – Jun 30)	3rd Quarter (Jul 1 – Sep 30)	4th Quarter (Oct 1 – Dec 31)
Enforcement Status:	A	A	A	A

Enforcement Status Codes

- | | | |
|--|--------------------------------------|--|
| A – No enforcement action | F – Civil litigation | K – Compliance Schedule |
| B – Warning letter | G – Settlement agreement | L – Disconnection from sewer |
| C – Notice of Violation (NOV) | H – Assessment of monetary penalties | M – Published in newspaper as SNC |
| D – Administrative Order (AO) | I – Restriction of flow | N – Automatic increase in IU self-monitoring |
| E – Administrative fines/civil penalties | J – Permit Revocation | |

*Due to changes in staff, data was not evaluated on a quarterly basis and compliance notifications were not sent out.

