

EXHIBIT B

SCOPE OF SERVICES

Phase 1 - Review Historical Data

Task 1 Review Historical Plant Data. Existing plant operational and laboratory data will be reviewed to identify potential pollutants of concern. This task will start with a project initiation meeting between the team and the Town. During this meeting, project procedures and policies will be discussed and finalized. Copies (either electronic or paper) of the following information will be available for the team:

1. Copies of existing NPDES permits
2. Most recent Town Sewer Ordinance or Code.
3. Audit/Reports on the Pretreatment program.
4. Plant operational information - flow and quality by unit process. (To be collected during monitoring program)
5. Plant conventional, metal and toxic organic data by unit process, including priority pollutant scans of the influent and effluent for the treatment plant. All data submitted in electronic (Microsoft Excel Format). (to be collected during monitoring program)
6. Residuals data for the wastewater treatment plant. All data submitted in electronic (Microsoft Excel Format) for past 2 years.
7. Coordination information for any special agreements.
8. Industrial monitoring data (water quality and flow) for past two years
9. Updated Portions of Master Planning Documents regarding future industrial growth in the area.
10. Domestic sector monitoring data for all pollutants of concern.(to be collected during monitoring program)

Task 2. Review Industrial User Information. Information from industrial users must be assessed to effectively determine the impacts of any local limit. A critical piece of information for the local limits study is effluent flow from industrial users. Effluent flow is one of the parameters that may be used to allocate the allowable industrial load to the industrial users. Existing industrial users will be identified by the Town and a simple drive by survey will be conducted to confirm industrial users. The Town has one permitted discharging "Categorical Industrial User (CIU) , and anticipates that another will soon be added. Modeling will examine limits based on flow from the existing and future condition. Technically based local limits are applied to industrial users. The other users of concern, as defined by ADEQ, are labeled "non-domestic Users / Dischargers. The Town has over 70 food service establishments (FSE) but they are not permitted. These users will not be examined as part of this Study. Communities develop programs to address discharges from these types of facilities independent of the industrial pretreatment program.

Task 3. Develop Pollutants of Concern . For this study it is assumed that the pollutants of concern will be based on the various pollutants listed in the APP and AZPDES permits. This initial list includes total kjeldahl nitrogen, nitrate-nitrate nitrogen, ammonia, total suspended solids, BOD₅, fluoride, total phosphorus, oil and grease, total dissolved solids, pH, total arsenic, total cadmium, total chromium, chromium 6+, total copper, total cyanide, total lead, total nickel, total zinc, total mercury, total silver, molybdenum and selenium. Additionally it is recommended that a workshop be held to discuss the final list of POC before monitoring occurs.

Phase 2 - Monitoring Activity

It is assumed that the Town will provide all equipment and staff to collect the monitoring data that is identified. The Town's existing contract laboratory will be used for all the analytical analysis. It is anticipated that only the domestic sector will be monitored and that existing historical data at the plant will be used to determine removal efficiencies. Sampling program will run 7 days as described in USEPA 2004 Guidance on the Development of Local Limits. It is anticipated that composite sampling will be required at 4 locations (2 domestic, influent, and effluent) and 1 grab sampling location for biosolids (final product before disposal)

Phase 3 - Calculation of Limits for Industrial Dischargers

Task 1. Data Summary. Historical data submitted under Phase I, will be analyzed to determine the respective pollutant loadings. Inconsistencies in the data will be reported to Town. Pollutant loading will be determined by source. Data will be summarized so that it can be easily entered into a Headworks model for the calculation of local limits. All data for the local limits calculation will be collected during this phase of the project. Activities necessary for the development of the mass balance with industries will be coordinated.

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Task 2. Develop Headworks Loading and Local Limit. A computer model will be used to establish the maximum allowable headworks load for identified POCs.

This analysis will consist of the following:

1. The plant will be examined in accordance with EPA/state guidance.
2. Develop a list of specific limiting factors for each pollutant of concern.
3. Determination of applicable environmental criteria from which local limits will be derived. These criteria include water quality standards; Discharge permit requirements, and residual disposal requirements. Removal efficiencies must be determined for each major treatment process using actual sampling data.
4. Identify causes of possible inconsistencies between the measured plant loads and industrial/commercial/domestic loads.
5. Calculation of allowable headworks loadings and concentrations from environmental criteria and POC removal by treatment process..
6. Selection of the lowest (the most restrictive) of the allowable headworks loadings and concentrations. This value is called the critical headworks loading or concentration. Headworks loading will be determined using water quality standards established by the State, inhibition data from the literature, and residual requirements established in the Town's permit requirements.
7. Determination of allowable industrial concentrations from critical headworks loads by accounting for contributions from domestic sources and the application of a safety factor.
8. Selection of appropriate limits based on treatability and protection of the environment

Limits will be based on the uniform concentration allocation method. Existing information will be used to determine the capacity of the treatment plant to remove conventional pollutants .

Phase 4 - Integration with Pretreatment Program

Task 1. Preparation of Local Limits Reports. A report will be prepared documenting the headworks analysis and the allocation methods used in the development of the local limits and the capacity analysis for conventional pollutants. The Report will include the following:

1. Executive Summary
2. Overview of project
3. Recommendations
4. Supporting documents
5. Justification for establishing or not establishing limits for identified POCs

One (1) copy of a draft report with one electronic (.pdf) will be submitted to the Town for review and comment . Review comments will be incorporated and one hard copy and one electronic copy of the final report will be submitted to the Town.

Phase 5 - Presentations, Meetings, Correspondence

Task 1. Review Meetings . Conduct weekly telephone meetings for information transfer and conduct periodic briefings to inform Town staff of the project status. The Team will be responsible for recording and preparing meeting minutes for transmittal to the Town.

Task 2. Implementation. Sixteen hours of time will be allocated to assist the Town in the implementation of the new limits. This would be in the preparation of presentations for staff at potential meetings. Cost for two meetings have been included within the scope. **One presentation to the Town Council by Black & Veatch has also been included.** Additional meetings with public interest groups, industrial work groups, ADEQ and EPA are not included in this scope.