

City of Flagstaff

Compounds of Emerging Concern A Technical Solution to a Political Problem A Case Study

by

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City of Flagstaff Water Services
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Pacific Northwest WaterReuse Conference

Portland, Oregon

May 16-18, 2018





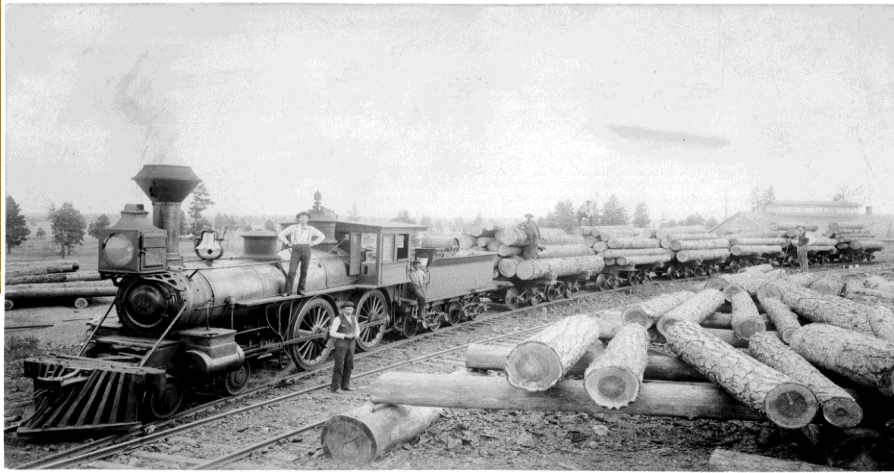
Founded 1882

Population – 75,000

Elevation – 7,000 feet

Surrounded by:
Coconino National Forest

Adjacent to:
Grand Canyon N.P.
Walnut Cyn N.M.
Wupatki N.M.
Sunset Crater N.M.



Northern AZ University



Objective

History of Flagstaff's use of reclaimed water
(e.g., irrigation, snowmaking)

Compounds of Emerging Concerns

Testing for Pharmaceuticals, Endocrine Disruptors, Antibiotic Resistance Genes/Bacteria

Creative Political & Technical solution

City Manager's Advisory Panel
City being proactive

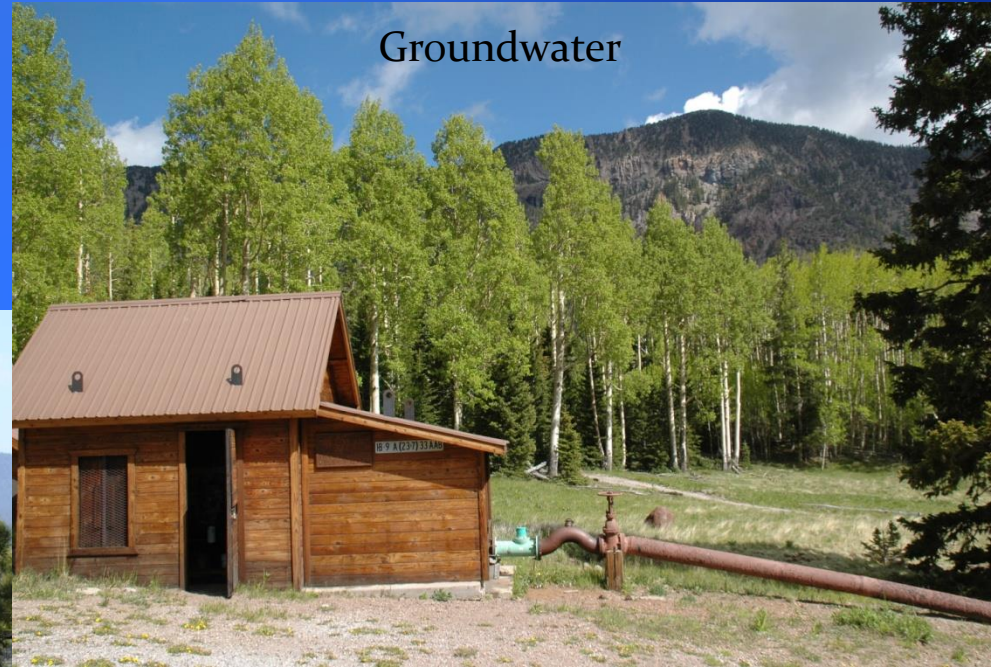
University Research Activities

City participation & sampling

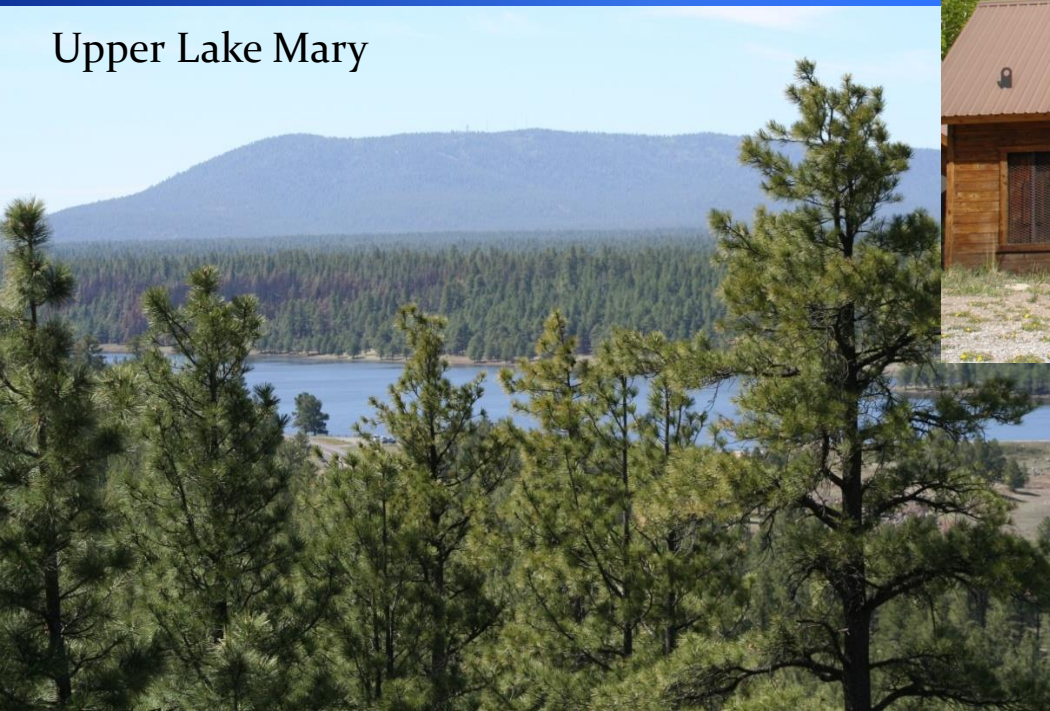


80% of Flagstaff's drinking water supply comes from the national forest

Groundwater

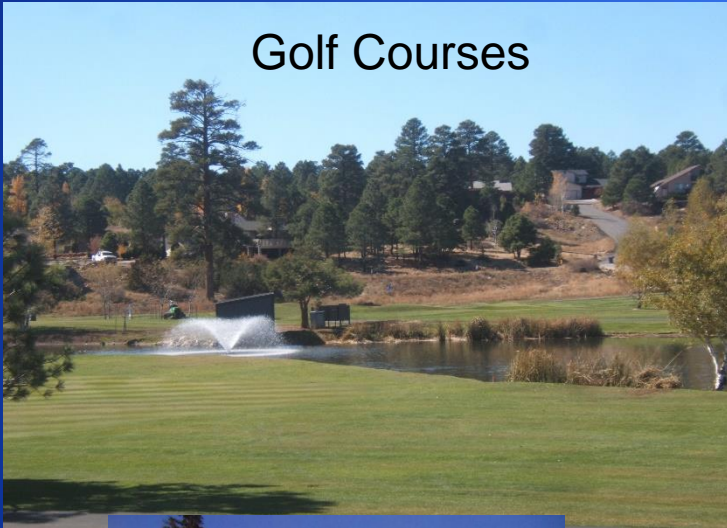


Upper Lake Mary



20% of Flagstaff's total water supply comes from direct delivered Reclaimed Water

Golf Courses



NORTHERN
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Ornamental Lakes



Snowmaking



Riparian Habitat



Industry



HISTORY

1973 City started directly delivering reclaimed water to Continental Country Club Golf Course



Wildcat Hill Water Reclamation Plant

6 MGD Trickling Filter Plant.
Class B Reclaimed Water
Quality.

In 2009, upgraded to a
Integrated Fixed Film Activated
Sludge (IFAS) System. Class A+
reclaimed water quality
(denitrification)



HISTORY

1993 City expanded its direct delivery of reclaimed water with the construction of its 2nd water reclamation plant

4 MGD Bardenpho Process Class A+ reclaimed water quality (denitrification)



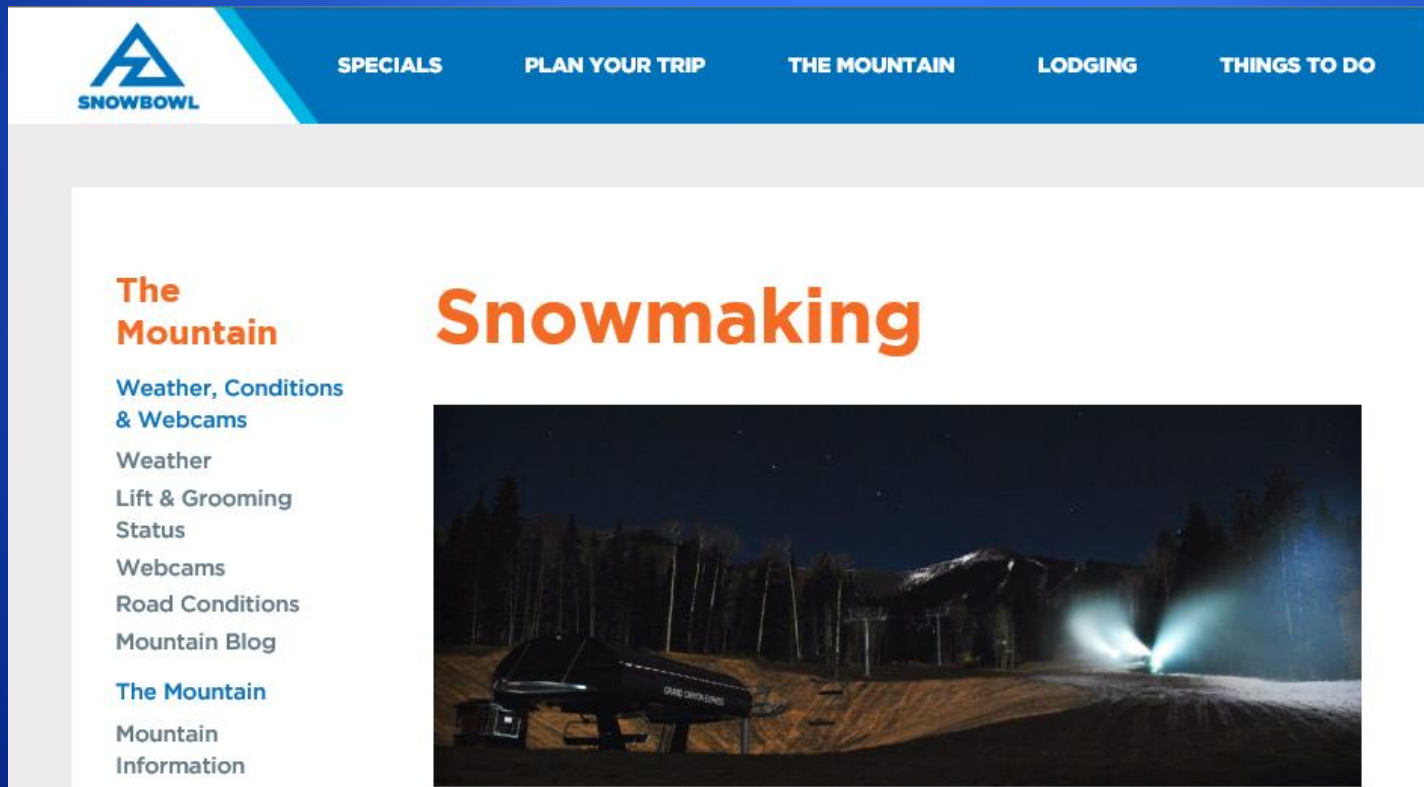
Francis Short Pond
reclaimed water

Today, directly deliver a total of
~2,000 Acre-feet/year
or 1.8 MGD annually



HISTORY

2002 City Council signed an Agreement with the Arizona Snowbowl to directly deliver 552 AF/ski season (or up to 2.25 MGD) of reclaimed water for snowmaking between November through February



HISTORY

- 2002/2006 City contracted with USGS & Northern Az University Sampling groundwater & reclaimed water for Compounds of Emerging Concern (CECs) and early studies on endocrine disruption on local Mosquitofish & frogs
- 2005 Navajo Nation sued Arizona Snowbowl contending making snow on the San Francisco Peaks violated religious freedoms of the tribes



HISTORY

I started working for
Flagstaff in 2007

2002/2006 City contracted with USGS & Northern Az University Sampling groundwater & reclaimed water for Compounds of Emerging Concern (CECs) and early studies on endocrine disruption on local Mosquitofish & frogs

2009 City and Az Game & Fish sign Agreement for minimum deliveries for sustaining riparian habitat



HISTORY

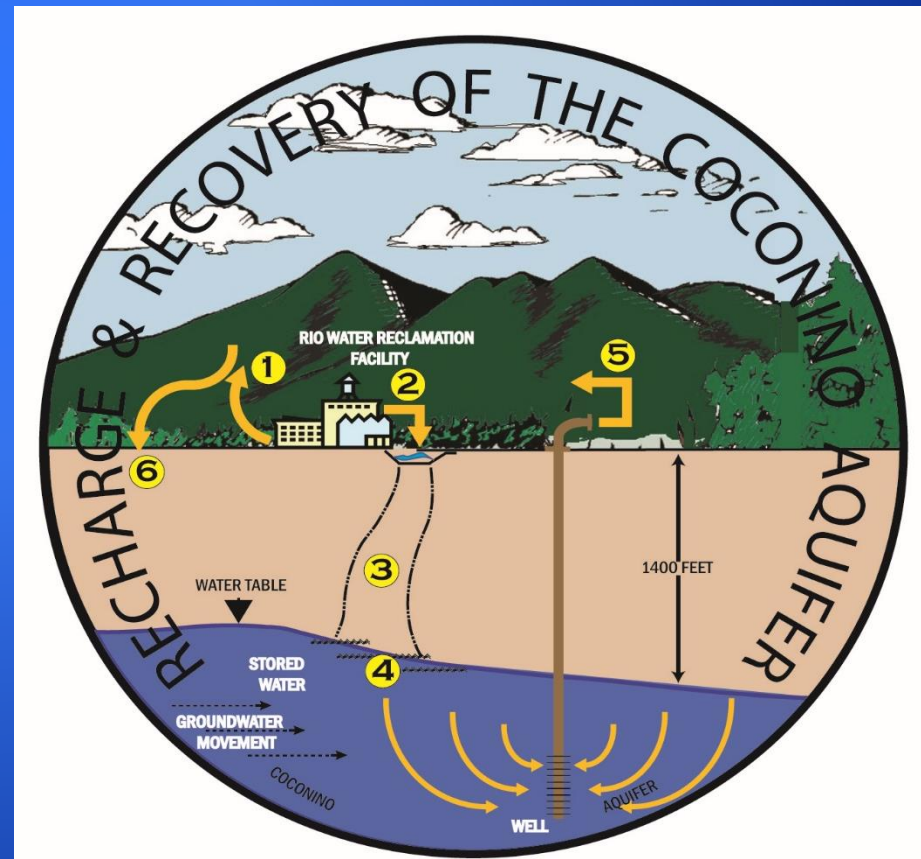
2010 Water Commission & City Council Meetings

Staff introduced “Recovered Reclaimed” to Council as a possible solution to Hopi / Navajo objection to snowmaking

~700 people attend each meeting

Good & Bad: drew attention to what City has been doing for 22+ years

water management v. water quality



HISTORY

2010/2011 City continued to sample drinking water distribution & reclaimed water system for CECs

2011 City hosted Reclaimed Water Forum (~400 attendance)
Present national & international issues; research findings; regulatory framework and Utilities industry best practices



HISTORY

2011 Hopi Tribe files a complaint for seeking *\$40 million* against City for the sale of reclaimed water to the Arizona Snowbowl for snowmaking

Lawsuit Claiming

1. Illegal Contract
2. Water Rights Infringement
3. Public Nuisance



The Official Website



Photo by: Leon Reed

HISTORY

- 2011 Arizona Superior Court dismisses all 3 claims
- 2012 Arizona Court of Appeals affirms the dismissal of Claims 1 & 2, but remands Public Nuisance Claim back to Superior Court

Lawsuit Claiming

1. ~~Illegal Contract~~
2. ~~Water Rights Infringement~~
3. Public Nuisance



The Official Website



Photo by: Leon Reed

HISTORY



2012 In August a report was released by Virginia Tech University found Antibiotic Resistance Genes in the City's reclaimed system



The Washington Post

The New York Times

Antibiotic Resistance Gene Testing of Recycled Water Samples

Summary Report to Dr. Robin Silver

Prepared by:

Dr. Amy Pruden
Associate Professor
Civil and Environmental Engineering
Virginia Tech
Blacksburg, VA

Maureen O'Brien
BS Candidate
Environmental Science and Engineering
Colorado School of Mines

Mark Mazzoquette
MS Candidate
Civil and Environmental Engineering
Virginia Tech

Dr. Nicole Fahrenfeld
Post-doctoral Researcher
Civil and Environmental Engineering
Virginia Tech

HISTORY



2012 In December the Arizona Snowbowl started making snow

The New York Times



City Needed Expert Advice

The topic of reclaimed water use continued to be amplified in the community

City Council became bombarded with citizens questions regarding the safety of using reclaimed water for irrigation, recharge or snowmaking

September 2012, City Manager requested staff to develop a panel of experts - evaluation of the human health impacts from the local use of reclaimed water

January 2013 Same time ADEQ was creating their Panel of Emerging Contaminants



CEC Advisory Panel

We are trying to resolve a science question in a political forum

- What do we need to know?
- What opportunities do we have?
- Where do we focus our efforts?
- What do we prioritize?
- Can the Panel agree on a direction/advise?



Community Advocacy Groups

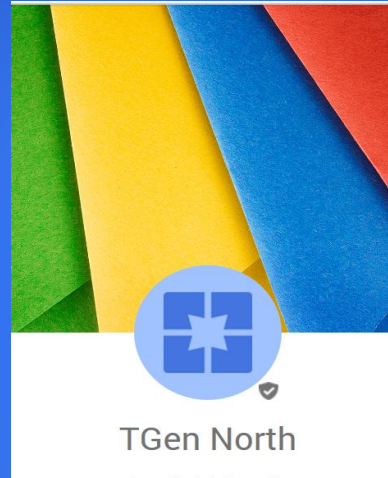
Approached City to consider pilot testing a variety of new technologies, questioned why not use Advanced Treatment now?

Hosted 4 public forums with local experts on Water; USGS, City Manager, Utilities Director, Water Resources Manager, Northern Arizona University professors, Advanced Analytical

Created a Video “Beyond Reclaimed”



Flagstaff City Manager's Advisory Panel



NORTHERN
ARIZONA
UNIVERSITY



City of Cottonwood, AZ

Heart Of The Verde Valley



PURPOSE & OBJECTIVES

Identify what steps are necessary for understanding the human health effects of CECs in raw, drinking and reclaimed water

Political Dialogue



Determine what specifically to study?

Panel met 4 times 2013-2017



Tailored Collaboration

**Toxicological Relevance
of EDCs and Pharmaceuticals
in Drinking Water**

Subject Area:
Environmental Leadership

CEC Advisory Panel

Discovery: What We Know

- Antibiotic Resistant Genes (ARG)
- Endocrine Disrupters
- Pharmaceuticals

Science: What We Don't Know

- Human Impacts
- Animal Impacts
- Environmental Impacts

Treatment

- Chlorination
- Other



CEC Advisory Panel

Discovery: What We Know

- Antibiotic Resistant Genes (ARG)
- Endocrine Disruptors
- Pharmaceuticals

Science: What We Don't Know

- Human Impacts
- Animal Impacts
- Environmental Impacts

Treatment

- Chlorination
- Advanced Treatment



CEC Advisory Panel Priorities

- Prioritize the “most achievable” opportunities.
- Prioritize monitoring for human health impacts rather than treatment options.
- Prioritize local efforts and funding on issues/studies that are not in progress nation-wide or related to regulation that is forthcoming?



CEC Sampling Update

96 CEC's sampled 2010 – 2014 (ng/L)

- Groundwater well
 - Fluoxetine
- Raw surface water – Lake Mary
 - Iohexal, Triclosan, Caffeine, DEET, Lopromide & Theobromine , Acesulfame-K
- Water Distribution System
 - Iopromide , Triclosan, Triclocarban, DEET, Azithromycin, Caffeine, Fluoxetine, Theobromine, Sulfachloropyridazine,
- Reclaimed Water System ~30 constituents



Reclaimed Distribution System

CEC Constituent	# of Samples Collected	# of samples with detections	Lowest Concentration Detected	Highest Concentration Detected	Units
N-Nitroso-dimethylamine (NDMA)	11	8	ND	2.3 - 17	ng/l
1,7-Dimethylxanthine	11	10	ND	Oct-90	ng/l
2,4-D	11	7	ND	32 - 240	ng/l
4-nonylphenol - semi quantitative	11	6	ND	240 - 1000	ng/l
4-tert-octylphenol	11	2	ND	160 - 340	ng/l
Acesulfame-K	11	11	520	17000	ng/l
Acetaminophen	11	5	ND	220 - 690	ng/l
Albuterol	11	5	ND	59 - 110	ng/l
Amoxicillin (semi-quantitative)	11	1	ND	220	ng/l
Androstenedione	11	1	ND	5	ng/l
Atenolol	11	11	25	330	ng/l
Atrazine	11	1	ND	5.2	ng/l
Bezafibrate	11	1	ND	5.8	ng/l
BPA	11	2	ND	34 - 770	ng/l
Butalbital	11	5	ND	5.2 - 9.8	ng/l
Caffeine	11	10	ND	7.7 - 66	ng/l
Carbamazepine	11	11	37	150	ng/l
Carisoprodol	11	11	20	55	ng/l
Cotinine	11	11	15	78	ng/l
DACT	11	4	ND	5.5 - 45	ng/l
DEA	11	1	ND	10	ng/l
DEET	11	10	ND	18 - 340	ng/l
Dehydronifedipine	11	9	ND	5.1 - 66	ng/l
Diclofenac	11	1	ND	20	ng/l
Dilantin	11	11	29	170	ng/l
Diuron	11	11	6.4	98	ng/l
Erythromycin	11	2	ND	13 - 27	ng/l
Estradiol	11	3	ND	15-Jun	ng/l
Estrone	11	6	ND	6.7 - 13	ng/l
Flumequine	11	5	ND	370 - 910	ng/l
Fluoxetine	11	7	ND	Oct-45	ng/l
Furosimide	11	1	ND	24	ng/l

DATA SUMMARY

Fluoxetine or Prozac
(groundwater concentration)

@ 24 ng/L

must drink *1.76 million*
8 oz. glasses of water to get one
standard dose prescribed
by a doctor (10 mg)



INTERIM REPORT

July 16, 2013

Framework: CECs into 3 categories:

1. Pharmaceuticals,
2. Endocrine Disrupters
3. Antibiotic Resistance Genes/Bacteria

Prioritize most critical issues
addressing the concerns raised by the
use of reclaimed water by the City:

*human health impacts as opposed to
animal, aquatic or environmental impacts*

“we had to start somewhere”

Flagstaff City Manager's Compounds of Emerging Concern Advisory Panel – Interim Report

The City Manager's Advisory Panel on Compounds of Emerging Concern (CEC) met several times in the first half of 2013. The result was some helpful advice regarding the management of CECs in the City's drinking, wastewater and reclaimed water.

Background

As a precursor to those results, it should be noted that solving a scientific problem in a political environment is a very challenging merger of practices and perspectives. To start, the science associated with water, wastewater and reclaimed water utilities is extremely detailed and complex. No single study, investigation or finding can provide enough data to make an informed business decision. Politics and media coverage often look for the single discovery as evidence of a conclusion or the sole motivation for action. Science is based upon multiple replicated, controlled studies. And even after that string of investigations and results, the decisions implemented must be regularly tested, reviewed and analyzed. With that as a background, the panel of distinguished experts felt comfortable providing the City Manager the following advice.

As a framework, the Panel divided CECs into three categories: pharmaceuticals, endocrine disrupters, and antibiotic resistance genes (ARG). Upon further discussion, the Panel also categorized CECs into chemical and microbial – pharmaceuticals and endocrine disrupters being the former and antibiotic resistant genes and any associated bacteria (ARB) being the latter.

Further, the universe of research is enormous and the City Manager had to prioritize what was most critical to addressing the concerns raised by the utility operation. To that extent, he asked the Panel to focus on “human health effects” as opposed to animal, aquatic or environmental impacts. All are important and not necessarily mutually exclusive, but this work required a starting point.

Findings/Advice

Drinking Water

From a chemical standpoint, we learned that the U.S. EPA, with advice from various scientific panels and previous analytical studies, has developed a list of CECs (both chemical and microbial) that may warrant further consideration for possible regulation in US water. This list of contaminants is referred to as the Contaminant Candidate List (CCL) and considers only

INTERIM REPORT

July 16, 2013



Findings/Advice – Drinking water:

- USEPA on advice from various national scientific panels and analytical studies of currently unregulated CECs may warrant further consideration for regulation. **Advisory panel recommended evaluating which contaminants on the list are being utilized or prescribed within Flagstaff as background information**
- Antibiotic Resistance Genes are not on the USEPA's unregulated list (Contaminant Candidate List #3) but 9 hormones & 1 antibiotic are on the list.
- No documented study exists from around the world on human health impacts of the 10 CECs on list



INTERIM REPORT

July 16, 2013

Findings/Advice – Reclaimed water:

No data at the present time to suggest that continued use of reclaimed water provides undue risk to human health

Advisory Panel recommended monitor four (4) chemicals on the CCL3 drinking water list in reclaimed water

Advisory Panel suggested parallel study to compare effects of various treatment technologies on removal of CECs including antibiotic resistance

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INTERIM REPORT

July 16, 2013

Findings/Advice – Overall:

Pharmaceuticals & Endocrine Disruptors
being studied significantly

While documented environmental
impacts of CECs – none to human

Little to no data exists on Antibiotic
Resistant Genes/Bacteria on
public health in reclaimed water

Opportunity for research collaboration

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Research Subgroup of Advisory Panel

tasked with outlining a cutting edge
epidemiological and microbial study focusing
on antibiotic resistance

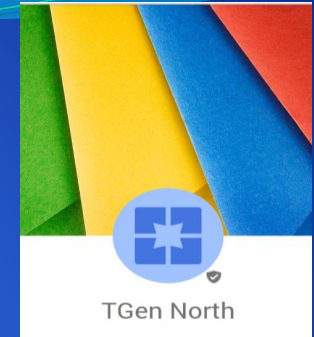
Identify what, if any Antibiotic Resistance Bacteria (ARBs)
are found leaving the treatment plants

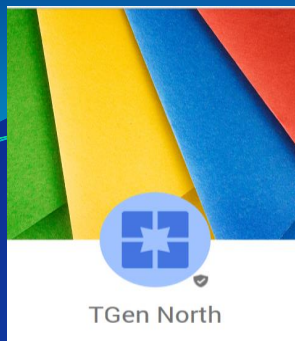
Identify what, if any ARBs are found at various end points in
Flagstaff's distribution system

Identify if any ARBs can be found in raw and potable City water

Identify where any of the ARBs are most prevalent (soil, raw meat,
Flagstaff Medical Center, etc)

Identify what treatments kill or remove ARBs in water





UPDATE REPORT

May 2014

NORTHERN
ARIZONA
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City of Flagstaff – CEC Advisory Panel Update

Overview of the City Manager's CEC Advisory Panel

The City of Flagstaff recycles over 700 million gallons of water each year for conservation purposes. By recycling we mean wastewater that is sent from our homes or businesses to a treatment plant where it is highly treated to meet state and federal reclaimed water quality standards. Once treated, the water is termed "reclaimed water, recycled water or effluent" and enters a separate distribution system after being chlorinated. Reclaimed water is used not only in Flagstaff but by communities around the world in lieu of drinking water for irrigation purposes. The City has undertaken this proactive water conservation strategy for the past 20 years in our community. Recently, there have been numerous studies both locally and nationally regarding trace (or extremely low concentrations) of certain chemicals found in water around the United States that are not regulated by the U.S. EPA. These are collectively known as Compounds of Emerging Concern (CECs) and include pharmaceuticals, personal care products, endocrine disrupters and antibiotic resistance genes. In Flagstaff, CECs can enter the wastewater system at our homes, businesses and medical care facilities and raw water.

The City Manager, Kevin Burke recognizing the importance of water to the future of our community, organized an Advisory Panel of 12 local, state and nationally recognized researchers, scientists and industry professionals to help understand what CECs mean locally. Flagstaff has been known around the State as a leader in its willingness to tackle tough issues relating to water head-on and the creation of this Advisory Panel is just one more example. The Advisory Panel first met in January 2013 and was asked to help the City determine what to study and identify steps that are necessary to better understand the effects, if any, CECs have in our raw water, drinking water and reclaimed water. The focus of discussions has initially been around the "human health impacts" as opposed to animal, aquatic or environmental impacts. The City recognizes that all of these are important to our community; however, the first priority is human health.

Review of Findings of Interim Report

The Advisory Panel issued an Interim Report in July 2013 which contained numerous findings, advice, recommendations and priorities to the City on CECs in drinking water and reclaimed water. A few of the findings and recommendations from the City Manager's CEC Advisory Panel Interim Report are paraphrased below:

Drinking Water

1. The U.S. EPA from the advice of various national scientific panels and analytical studies has developed a list of currently unregulated CECs that may warrant further consideration for

Partnering with University of Arizona, Northern Az University and Virginia Tech

- Research Grant Proposals, Master Thesis
- ARG & CEC Sampling





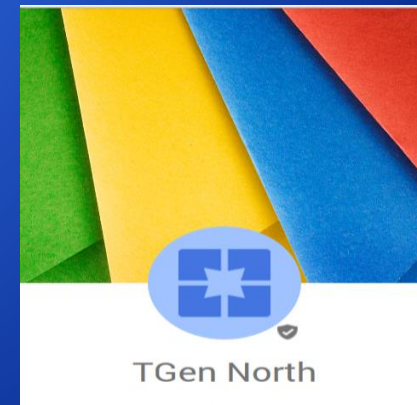
National Science Foundation Project

Relative Abundance and Diversity of Antibiotic Resistance Genes and Pathogens in Reclaimed Versus Potable Water Distribution Systems

A. Pruden (Virginia Tech), M. Edwards (Virginia Tech), J. McLain (Univ Arizona), D. Engelthaler (TGen)

Award **\$330,000**

August 1 2014-July 31, 2017



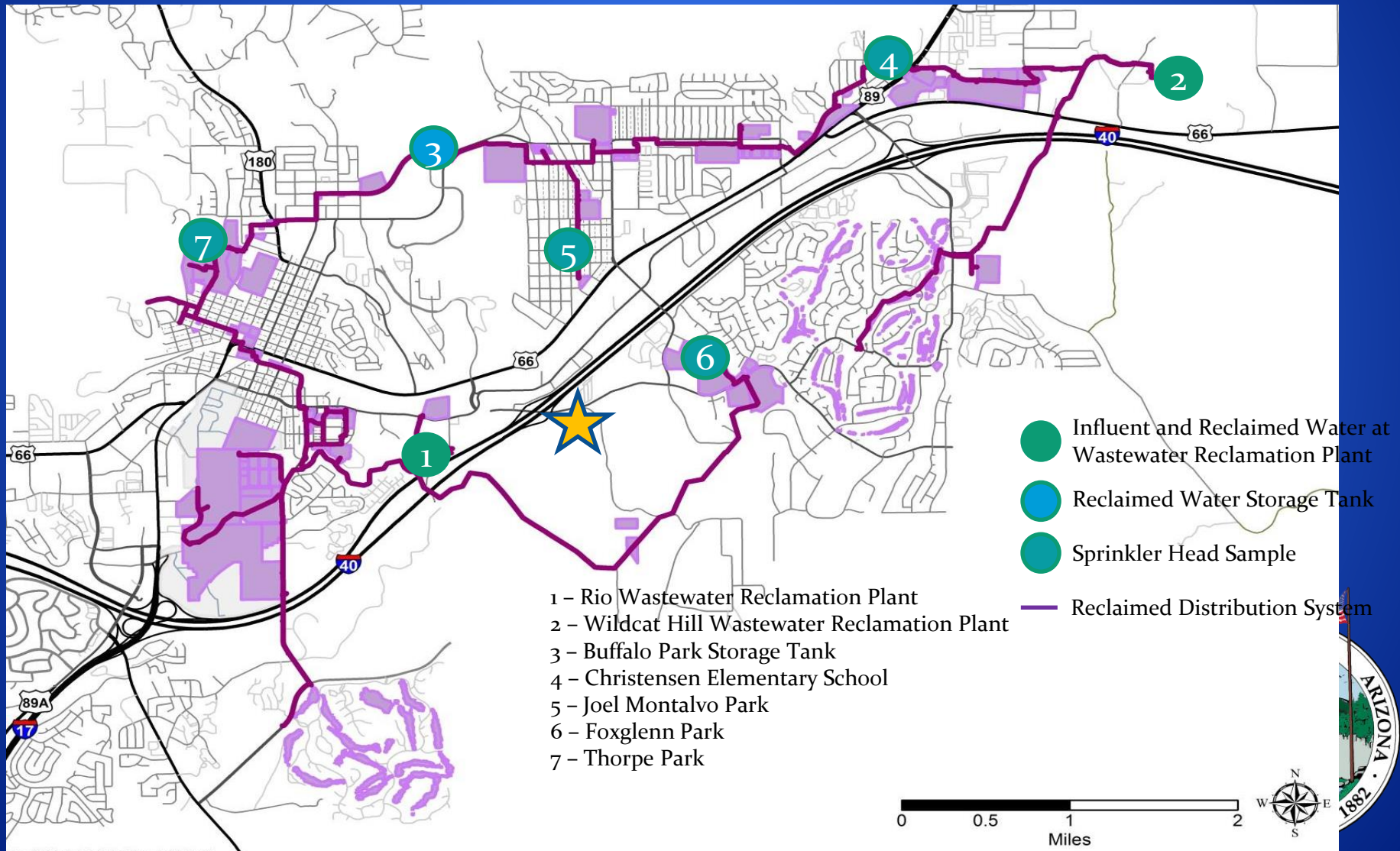
RESEARCH QUESTIONS



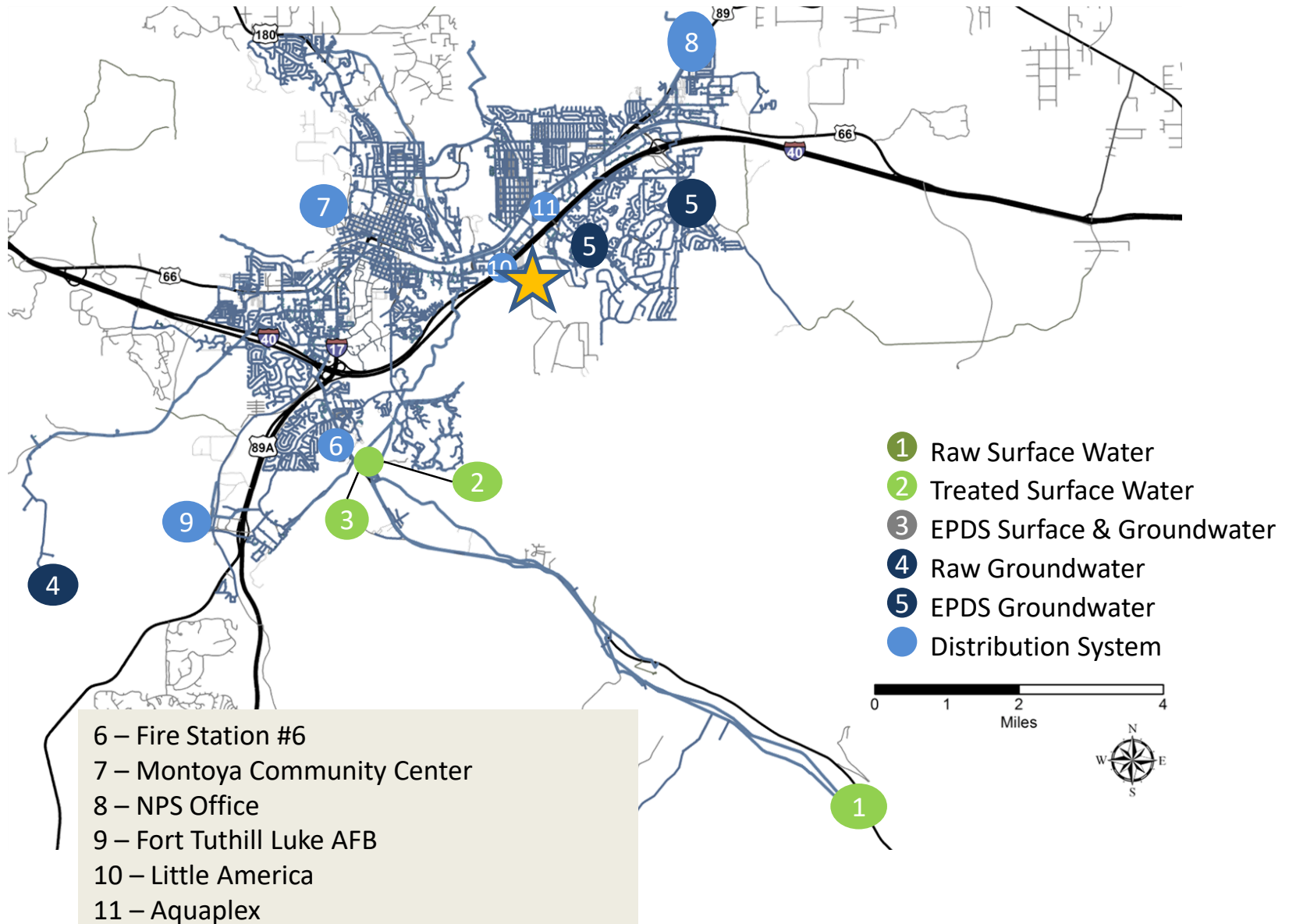
- #1 – Are the Kinds & levels of ARGs found in Flagstaff reclaimed water different from in other reclaimed waters from other parts of the country?
- #2 – Are the kinds & levels of ARGs present in reclaimed water greater, equal, or less than those found in comparable background samples
- #3 – Are live ARBs detectable in the reclaimed water (E. coli or Enterococcus)
- #4 – What is the best way to operate & maintain a reclaimed water distribution system free of pathogens & ARGs equal to background?



Reclaimed System Sampling 2014-2015



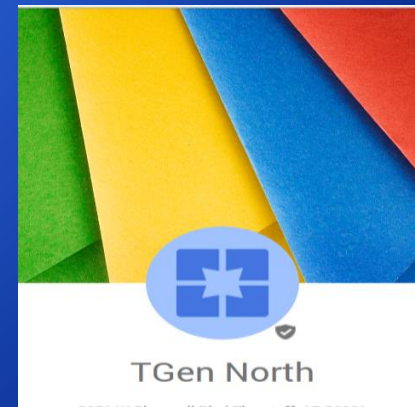
Water System Sampling 2014-2015



CEC Panel Research Subcommittee Results

November 3, 2017

- 1000s of data points were collected across Flagstaff & other municipal systems
- Genomic analysis of Flagstaff's reclaimed water system has not identified any obvious concerns with continued public use
- Genomic epidemiologic analysis of bacterial isolates did not identify any ongoing linkage between the local healthcare system and the water system



Flagstaff City Manager's CEC Advisory Panel

Final Report

January 9, 2018



Five Years ago, Flagstaff's City Manager recognized the importance of water to the future of our community and organized an Advisory Panel of 12 local, state and nationally recognized researchers, scientists and industry professionals to help understand what Compound of Emerging Concern (CECs) mean to our local community. Flagstaff has been known around the State as a leader in its willingness to tackle tough issues relating to water head-on and the creation of this Advisory Panel is just one more example.

The Advisory Panel first met in January 2013 and was asked to help the City determine what to study and identify steps that are necessary to better understand the effects, if any CECs have in our raw, treated and reclaimed water. The focus of discussions has initially been around the "human health impacts" as opposed to animal, aquatic or environmental impacts. The City recognizes that all of these are important to our community; however, we needed to start somewhere.

The purpose of this Final Report is to provide a summary conclusion to the five (5) year collaborative work conducted by the Flagstaff City Manager's CEC Advisory Panel. The last meeting of the full panel was on November 3, 2017. Additionally, this report contains the analytical results of sampling conducted by the City in 2014 and 2015. Over the past five years, the City has sought advice from the Panel on the meaning of these CEC analytical results and whether they warrant concern or modification of Flagstaff's use and management of reclaimed water. This effort has looked at both chemical and antibiotic resistance aspects of CECs. The results and conclusions of the antibiotic resistant bacteria (ARB) / antibiotic resistance gene (ARG) sampling will be provided in a separate report.

The last time City staff provided an update to the Advisory Panel was September 14, 2015, via a Preliminary Data Report. This report summarized sampling updates for CECs in source water (untreated lake water and groundwater), potable water (after filtration or disinfection of source water), and reclaimed water. **Flagstaff's water system currently meets all U.S. EPA and state regulatory requirements. All analyses of recent samples collected from our source water and the distribution system are below the primary (regulated) and secondary (nonregulated) maximum contaminant level (MCL) standards.**

CEC & ADVISORY PANEL BACKGROUND

Compounds of Emerging Concern (CECs) are substances that have been released to, found in, or have the potential to enter our water supplies. Collectively, CECs include chemicals — pharmaceuticals, personal care products (PPCPs), endocrine disruptors, antibiotic resistant bacteria (ARB), and antibiotic resistance genes (ARGs) — found in trace or very low concentrations that are unregulated by the U.S. EPA. These compounds are termed "emerging"

Final REPORT

January 2018

- *Summary of all data collected*
- *Panel: After 5 years of study, NO DATA suggest continued use of reclaimed water provides undue risk to human health*



HISTORY

2017 Hopi Tribe appealed Public Nuisance dismissal to Appellate Court

Lawsuit Claiming

1. Illegal Contract
2. Water Rights Infringement
3. Public Nuisance



2018 Arizona Supreme Court just accepted the case



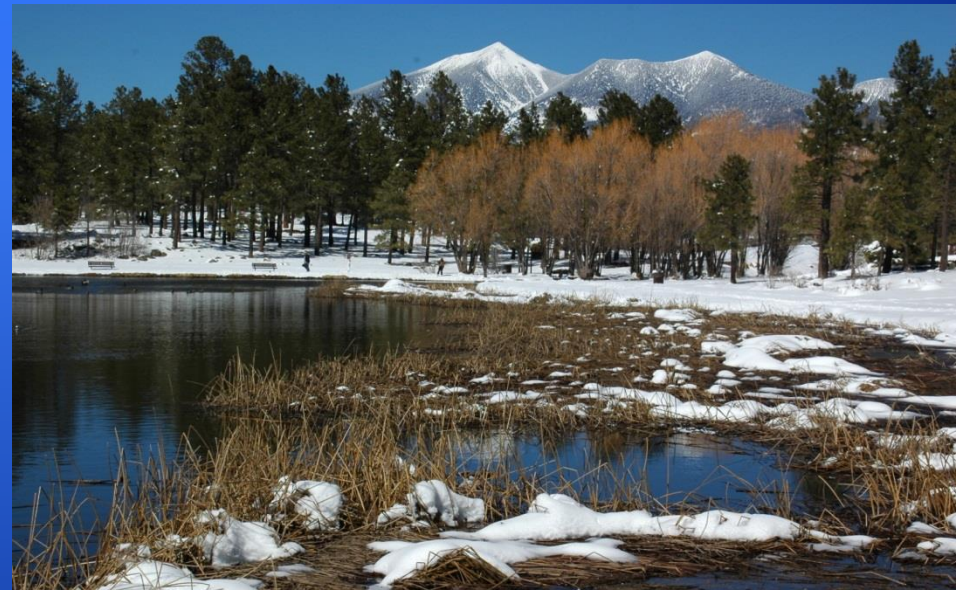
Summary

Reclaimed water is important to Flagstaff

20% of total water deliveries and recharge groundwater system

City has been proactive in understanding Compounds of Emerging Concerns (inc. ARBs) within our community

Sampled for CECs for years



Summary

City Manager's CEC Advisory Panel

Successful **technical solution** to a **political problem**

Helped our community bring **sound science into public policy making**

Research Results Showed no link between the antibiotic resistance at the hospital and what's found in reclaimed water

Council approved **Advanced Treatment Feasibility Study** - DPR

