



MEMORANDUM

Date: June 13, 2025

To: The Honorable Chair and Members
Pima County Board of Supervisors

From: Jan Leshner 
County Administrator

Re: **Project Blue Update Regarding Reclaimed Water Discharge on the Pima County Wastewater System**

The following is additional information regarding Project Blue in advance of the June 17, 2025, Board of Supervisors Meeting. Provided below is information responding to recently-received inquiries regarding any potential impact on the Pima County Wastewater system from the discharge of process water used by Project Blue. The questions have been specifically related to the composition and concentration of discharged wastewater including dissolved constituents, such as total dissolved solids (TDS), which is essentially the aggregate measure of all salts, minerals and metals in the water, and its potential impact on the system.

As stated in previous memos, Project Blue will ultimately be sustained through 100% reclaimed water delivered from pipeline being constructed at the developer's expense. Project Blue has been in close coordination with Pima County Regional Wastewater Reclamation Department (RWRD) to ensure compliance with all required discharge and composition thresholds into the wastewater system. The wastewater discharge will be comprised mainly of influent water that has been concentrated through purification (potentially ultrafiltration and reverse osmosis) and cooling processes. This purification process will maximize water efficiency in the cooling process and reduce overall water usage.

The main items being concentrated include dissolved constituents like TDS. The only additions to the water are typical of water treatment systems, like anti-scalants and biocides, but only those that are approved by RWRD. As Project Blue will be an industrial discharger, they will be required to continue working directly with RWRD to receive a permit for operation to be allowed to discharge, which will require full compliance with current and future requirements set forth by RWRD.

Any wastewater discharged from the project will be thoroughly analyzed before and during operations to ensure compliance with an approved permit from RWRD. Any treatment of potential discharge necessary to achieve an acceptable quality standard will be the responsibility of Project Blue. Below is further information to specific questions that have been assembled by Pima County Economic Development, RWRD and Beale Infrastructure:

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The Honorable Chair and Members, Pima County Board of Supervisors

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- 1. What is the composition and concentration of the wastewater discharge, and is it safe to put into the public sewer system?**

The wastewater discharge that leaves the site will be fully compliant with all Pima County RWRD requirements to ensure that it is safe to put into the public sewer system. The main composition is concentrated influent water (cooling system blowdown and reverse osmosis concentrate) that has been treated with RWRD-approved additives.

- 2. How will the discharge impact the regional wastewater treatment system?**

RWRD and Project Blue will collaborate to ensure that the permit limits established by RWRD will allow for a safe discharge that will have no negative impacts on the system. As noted, the main constituents are TDS, which is an aggregate measure of all of the salts, minerals and metals in the water. Pima County's industrial permitting process will establish the most reasonable limit to apply to the discharge to protect the sewer system, the treatment facility, and downstream users.

- 3. What wastewater requirements must be met to discharge into the public sewer system and what is the process, and which are the agencies responsible for ensuring applicable requirements are met?**

RWRD has final jurisdiction and will be responsible for determining industrial discharge permissible limits, monitoring frequency, and overall compliance. Additional agencies that may be consulted for guidance include the Arizona Department of Environmental Quality (ADEQ) or the Environmental Protection Agency (EPA), and other municipalities. Project Blue will be responsible for any upgrades onsite that are necessary to achieve that required discharge quality.

Please contact me or Economic Development Director Heath Vescovi-Chiordi if you have additional questions.

JKL/anc

c: Carmine DeBonis, Jr., Deputy County Administrator
Steve Holmes, Deputy County Administrator
Heath Vescovi-Chiordi, Director, Economic Development
Jackson Jenkins, Director, Pima County Regional Wastewater Reclamation Department
Chris Poirier, Director, Development Services
Jeffrey Teplitzky, Director, Real Property Services