

Best management practices for alcohol and fermentation operations



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1.0 Introduction

In recent years there has been a great deal of growth in the alcohol and fermentation sector both in the province of Alberta and within the city of Calgary. Operations that fall into the fermentation category include home brewers, micro-breweries, cideries, wineries, distilleries and kombucha producers. Many of the brewing and fermenting processes used in these operations are capable of producing a high-strength discharge, when compared to typical municipal wastewater. This wastewater is of concern as it can cause issues at the receiving wastewater treatment plant. High-strength wastewater can result in increased treatment costs for The City to meet regulatory requirements and, if in large volumes, can cause treatment plant upsets.

The purpose of this Best Management Practice (BMP) document is to offer guidance in addressing the high-strength discharge from fermentation operations. Non-compliance fines for discharging a prohibited substance begin at \$1000 and can exceed \$3000. Applied monthly surcharge fees can vary greatly from customer to customer as they are based on the strength of the wastewater and water usage. This document contains some federal, provincial and municipal regulations relevant to fermentation operations as well as potential strategies to lower the risk to sanitary infrastructure and the environment.

2.0 **Basic Brewing Process**

Below are common steps involved in a typical brewery.

- 1.) Milled grain is added to water and heated.
- 2.) The liquid (wort) is separated and boiled in another tank. Hops are added at this time.
- 3.) After boiling, the wort is separated and transferred to a fermentation tank.
- 4.) In the fermentation tank, yeast is added and sugars are converted to alcohol.
- 5.) The product is filtered, then allowed to mature.
- 6.) The product is filtered once more and then carbonated.
- 7.) The final product is Packaged (bottling or canning).

The steps and processes in the manufacture of other fermented products will vary and could contain a wide range of ingredients.

3.0 Regulations

The regulations listed below are a summary of some, but not all, of the guidelines and requirements that apply to alcohol and fermentation operations in the city of Calgary. This list of regulations is for information purposes only. Referencing of the actual legislation document is recommended.

3.1 The City of Calgary Regulations

Wastewater Bylaw Number 14M2012 (from now on referred to as Wastewater Bylaw) is a City of Calgary bylaw that allows the municipality to regulate wastewater. This bylaw sets concentration limits for contaminants found within fermentation wastewater. There are multiple sections addressing contamination limits within this bylaw. These sections include but are not limited to:

Schedule A

- This section lists substances that should not be released into the wastewater system in any concentration. An example of prohibited substances relevant to the fermentation industry include:
 - Wastewater with a pH of less than 5.5 or greater than 10, or with a temperature exceeding 75 degree Celsius.

Schedule B

This section states concentration limits for inorganic and organic contaminants.

Schedule C

 This section outlines concentration limits for substances for which a surcharge fee may be applied if limits are exceeded.

Drainage Bylaw Number 37M2005 (from now on referred to as Drainage Bylaw) is a City of Calgary bylaw that allows the municipality to regulate storm drainage, including discharges to the storm water collection system. Sections include but are not limited to:

Section 2 (t)

- "Prohibited Material" means any substance that may, directly or indirectly, obstruct the flow of water within the storm drainage system or may have an adverse effect and includes, but is not limited to:
 - Soaps or detergents
 - Soil, sediment, waste or other solid matter
 - Industrial waste (including empty chemical containers and drums, acids, caustics, sludge and industrial sump water)

Section 4

- No Person shall Release, or allow to be Released, any Prohibited Material into the Storm Drainage System unless permitted in Subsection (3)
 - Subsection (3) does not include wash water generated from alcohol and fermentation operations.

3.2 Provincial Regulations

Environmental Protection and Enhancement Act supports and promotes the protection, enhancement and wise use of the environment while recognizing the need for economic growth and sustainable development as well as other factors.

Wastewater and Storm Drainage Regulation is an Alberta regulation under the Environmental Protection and Enhancement Act that addresses wastewater discharge and storm drainage.

Section 7

 Owners of wastewater or storm drainage systems are not permitted to use, or dispose of, substances into the wastewater or storm drainage system in an amount, concentration, level or rate of release that may hinder the integrity, operation or quality of the treated materials within these systems.

4.0 **Best Management Practices**

This section describes some Best Management Practices (BMPs) that can be followed to reduce the impact fermentation operations have on the environment, local community and wastewater treatment facilities. Following the suggested BMPs can assist in meeting regulatory requirements, lowering wastewater surcharge fees as well as better protecting your business, community and environment.

The BMPs in this document emphasize eliminating pollutants at the source. Once pollutants are mixed into a single waste stream, reduction and separation of these pollutants becomes increasingly difficult and cost intensive.

4.1 Contamination Limits

Two primary contaminants of concern regarding fermentation wastewater is the Biochemical Oxygen Demand (BOD) and Total Suspended Solids (TSS). Below are concentration limits outlined in the City of Calgary Wastewater Bylaw:

Surcharge Parameter	Bylaw Limit
Biological Oxygen Demand (BOD)	300 mg/L
Total Suspended Solids (TSS)	300 mg/L

If the above limits are exceeded, then surcharge fees may be applied to the customers monthly water/wastewater bill. See Wastewater Bylaw 14M2012 Schedule "C" and "F" for more information on the surcharge program and formula used to determine fees.

It is also common for wastewater in the fermentation industry to experience fluctuating pH values and high temperatures. Either of the conditions below would qualify as a prohibited substance and should not be released to the wastewater system in any quantity:

Wastewater with a pH of less than 5.5 or greater than 10 and/or a temperature greater than 75°C.

It is important to note that the contaminants mentioned above are the most common substances found in the fermentation industry. Individual operations may have additional contaminants based on their source ingredients, type of processes etc. It is the responsibility of each individual fermentation operation to ensure their wastewater meets all requirements of wastewater bylaw 14M2012.

If a food service establishment is combined with at fermentation operation, please refer to the Best Management Practices for Food Service Establishments document.

4.2 Managing Contaminants

As shown in the table below, concentrations of BOD and TSS in alcohol and fermentation wastewater are typically well above the wastewater bylaw limits. To bring concentrations within limits some form of pre-treatment or waste management is required.

BOD (mg/L)	Bylaw Limit	[®] Typใcal Industry Average					
TSS (mg/L)	300	1,600					

^{*} AverAverages determined from numerous North American literature reviews

Solids Reduction

Take all reasonable efforts to maximize capture of solid product. Solids in your operation's process stream may include spent husks, grains, pulp, yeast, hops and trub. The use of filter bags or sparging bags will help ease removal of solids from tanks. Installing the correct gauge of filter downstream of processes will also lead to a significant decrease in solids. If space and additional tankage exists, settling and decanting may also be an option. The separated solids from the bottom of the vessels may have use as cooking ingredients, animal feed, fertilizer or compost. For smaller operations, disposing of this solid waste at an organic recycling facility may be a cost-effective option.

As a last line of defense, all operations should have some type of floor drain and/or sump to prevent solids from entering the sanitary system. To capture solids screens, filters or baskets should be installed on all floor drains and connections to sanitary system. Even with these devices in place, floor drains and water should never replace the use of a mop and broom.

Side-Streaming

Different processes in the fermentation process will contribute varying quality and strength of wastewater. For example, some studies estimate that wastewater from the fermentation process can account for up to half of the BOD and 70% of the TSS. Side-streaming is a very simple and effective way of reducing effluent BOD and solids content by targeting processes that are contributing a proportionately higher quantity of contaminants. Side-streaming requires the separation of high-strength waste at the source and then either treating it onsite or sending it offsite for disposal. Off-site disposal must be sent to waste treatment facilities permitted to receive this type of waste.

Off-Spec Product and Spillage

Final product that does not meet the standards for consumption should never be released directly into the sanitary system. This liquid waste likely contains a very high BOD (between 90,000 and 120,000 mg/L) and an unacceptable pH value (pH<5.5). This would also apply to any spillage that may occur during bottling process. If an unavoidable spill of product occurs, you will need to contact the City at 311 with the volume and characteristics of the spilled material (see the **Spill Response** section for more info).

Cleaning and Water Use

In the alcohol and fermentation industry the final product tends to be acidic in nature. This, combined with the fact that cleaning solutions in the industry tend to be either acidic or caustic, leads to a highly variable pH wastewater. Manual scrubbing and using less environmentally harsh chemicals may be options to minimize fluctuating pH.

Daily testing of the operations effluent pH should be completed and recorded. If effluent is outside of the acceptable bylaw limits, a neutralization or equalization tank may need to be added at the end of the process. This tank can be dosed to bring effluent within pH limits prior to discharge. If temperature exceedances are also common, this will have the added benefit of allowing process water to cool to an acceptable level prior to discharge to the wastewater system.

Explore ways to reduce the amount of water and chemical used during cleaning. Clean-inplace (CIP) systems are typically more efficient that manual cleaning. CIP systems can reduce water and chemical use by up to 50%. Proactive planning and installation of a CIP system is best as retroactive installment may be cost prohibitive. If CIP cleaning is not an option, manual cleaning and scrubbing may be the best way to reduce water and chemical use. High pressure nozzles and hoses can use up to 30% less water than a standard hose.

Installing water meters on hoses, taps and other water lines inside the facility will help to identify which processes are using the most water and where potential efficiencies may be realized. Simply being aware of total water consumption has been shown to reduce overall water use by 10 to 20%.

Other water conservation methods include:

- Performing dry clean up procedures before wet clean up;
- Installing water efficient equipment;
- Exploring alternatives to water-cooled chilling equipment; and
- Creating awareness around water usage and set water saving goals.

Advanced Pre-Treatment Options

There are many advanced pre-treatment options to reduce solids and BOD in effluent water that may be cost effective for larger operations. These options include: aerobic digestion, membrane filtration, electrochemical methods or activated carbon treatment.

An educational handout sheet, included in Appendix A, can be downloaded from calgary.ca.

Records

As required in section 26 (4) of the wastewater bylaw, a written record of all maintenance, cleaning and inspections of your pre-treatment system must be kept on file for a minimum of two years. An example of a pre-treatment record form, shown in Appendix B, can be downloaded from calgary.ca.

4.3 Effluent Metering Program

Alcohol and fermentation operations typically have a water use to wastewater ratio lower than other businesses as they consume water in their product. As such, customers may want to participate in the effluent meter program. Data collected from the effluent meter will be used to calculate wastewater bills and surcharge fees.

Note: There are specific requirements that must be met to qualify for the effluent metering program. More information can be found at calgary.ca by typing "effluent meter program" into the search bar.

4.4 Employee Training and Education

Spill Response

It is important to train all staff in the correct steps and procedures to follow when dealing with a spill. Instructions should be posted in the work place and appropriate spill response equipment should be made available. The contents of a spill kit will depend on the requirements of each individual operation. Some examples of items that may be found in spill kits includes:

- Protective clothing and equipment
- Absorbent materials such as sand, sawdust, absorbent pads, kitty litter, mops, brooms and rags
- Brooms, shovels and dustpans to clean up the absorbent materials
- Portable barriers or storm drain covers to prevent spills from entering the storm drainage system

Secondary containment for stored chemicals is recommend as a last line of defense to prevent spills and leaks from reaching the sanitary or storm system.

During a spill it is important to act quickly to prevent wastewater from entering any nearby storm drain. Spills entering the storm drainage system could have adverse effects on the local environment. The City of Calgary Wastewater Bylaw section 35 requires the person who released or allowed the release of wastewater to notify:

- The City by calling 311 and emailing the industrial monitoring group at IMG@calgary.ca
- The owner of the premise where the release occurred
- Any other person that may be affected by the release

5.0 For More Information:

For more information regarding best management practices for alcohol and fermentation operations, please contact The City at 311.

6.0 Summary of Mandatory and Recommend Actions:

Required Actions							
Regulation	Action						
Wastewater Bylaw 14M2012 Wastewater Bylaw 14M2012	22 (1) A person must not allow the release of any wastewater into the wastewater system that: (a) contains a substance described in Schedule "A": Prohibited Substances. (b) contains a substance that is above the approved concentration limits as described in Column 2 of Schedule "B" or Column 2 of Schedule "C"; or, Does not comply with the requirements of this bylaw. 26 (1) The Director, Water Resources may require an owner to do any one or more of the following: (a) Install, operate, monitor and properly maintain at all times a wastewater pre-treatment system that is located at a directly accessible location on the upstream side of a monitoring access point at the owner's premises (2) An owner who fails to install, operate, monitor, provide access to and properly maintain at all times a wastewater pre-treatment system as required by the Director pursuant to subsection (1) (a), (b) or (b.1) is guilty of an offence under this bylaw. (4) An owner of premises with a pre-treatment system installed in or on a premises must: (b) maintain a maintenance schedule and record of each maintenance for every pre-treatment system installed at the premises for a minimum period of two years, including records for disposal of waste residue						
Wastewater Bylaw 14M2012 – Section 35	A person who released or allowed the release of a substance must notify: 1. The City by calling 311 and emailing the industrial monitoring group at IMG@calgary.ca 2. The owner of the premise where the release occurred 3. Any other person that may be affected by the release						

Recommended Actions							
Туре	Action						
Employee Education	 Clean up spills immediately. Use a broom and mop to clean the floor. Do not overfill tanks. 						

Appendix A



What is a fermentation operation?

Any business that produces beer, wine, cider, spirits, kombucha or other fermented products.

Why are these operations a concern?

This industry has the potential to release large volumes of high-strength wastewater into the City's sanitary sewer system. The amount and strength of this wastewater can stress the treatment capacity of the receiving wastewater treatment plant. Individual facilities may contribute smaller quantities of these substances however collectively, impact from the industry can be significant.

Sources					
Alcohol, sugars, yeast, raw materials					
Spent grains, pulp, fruit, hops, trub					
Acidic final product, caustic and acidic cleaning solutions					
Organic source materials					
Boiling and fermenting process					



Brewery tanks



Impact our ability to treat wastewater

What helps to reduce the risk to The City's sanitary system and the environment?

Pre-Treatment System Options

Solids Management: Install screens, filters or baskets within the process stream. Keep solids from hitting the ground and prevent material from entering floor drains. Solids may have value as animal feed or compost.

Biological Oxygen Demand (BOD) Reduction: Diverting concentrated sources of waste rather than mixing and releasing to the wastewater system. Once segregated this high strength waste can either be treated or hauled away for offsite disposal. Ensure spilled product does not enter floor drains. Some of the options to reduce BOD in effluent are Anaerobic (commonly used in breweries) or Aerobic Digestion, Membrane Filtration, Advanced Oxidation, Electrochemical Methods or Activated Carbon treatment.

pH Treatment: The wastewater bylaw 14M2012 states wastewater must fall between 5.5 and 10.0. This can be achieved, for example, by adjusting effluent pH through a pH Equalization/Neutralization Tank prior to releasing to the wastewater system.

Maintenance Record: When maintaining a pre-treatment system, it is important to keep records of any activities completed. Records are required to be kept onsite for minimum of two years.

If you have any questions about installation of a pre-treatment system, please call 311.

Wastewater Bylaw 14M2012 Fines for Non-Compliance

Schedule "A" Prohibited Substances

The following must not be released into the wastewater system:

- (k) wastewater having a pH of less than 5.5 or greater than 10;
- wastewater having a temperature in excess of 75 degree Celsius;
- 22 (1) (a) Releasing, or allowing the release of wastewater that contains a prohibited substance into the wastewater system

Min. \$1000, Specified Penalty \$3000

Release Reporting

35 (1) Failing to immediately notify the proper authorities in accordance with subsection 35 (1) where a substance is released into the wastewater system in contravention of the Bylaw Min \$500 Specified Penalty \$1000

Monitoring Access Points

28 (a) Failing to provide one or more monitoring access points for the monitoring of wastewater in compliance with subsection 26 (1) (a)

Min \$500 Specified penalty \$2000

Records Maintenance

26 (4) (b) Failing to maintain a maintenance schedule and record of each maintenance for the pre-treatment system installed at a premises for a period of two years, including records for disposal of waste residue Min \$100 Specified Penalty \$500

Surcharge Program (Wastewater Bylaw 14M2012)

Untreated, high strength Alcohol and Fermentation Wastewater effluent likely contains one or more substances at a concentration that would fall under the City of Calgary's Surcharge program (Schedule "C").

Wastewater Bylaw 14M2012 Schedule "C" Surcharge Substances

To recover costs incurred for the treatment of high strength effluent a surcharge may be applied to your monthly water bill. The table below shows the average effluent quality of Alcohol and Fermentation Wastewater and how it would translate to a surcharge bill. The surcharge has been broken down by parameter and range of cost by \$/m3 of wastewater generated. This would need to be multiplied by the estimated wastewater volume you would produce from your operation.

Parameter	Bylaw Limit	*Typical Industry Average	**Approximate Surcharge \$/m3			
BOD (mg/L)	300	8,500	11.83			
TSS (mg/L)	300	1,600	1.49			
pH	5.5-10					

Ranges and average determined from numerous North American literature reviews

More information on the surcharge program and rate formula can be found at calcary ca in Schedule "C" and "F" of wastewater bylaw 14M2012.

Effluent Metering Program

Alcohol and fermentation customers typically have a water use to wastewater ratio less than other industries as they consume water in their product. As such, you may want to consider participating in the Effluent Metering Program. This will be used to calculate your wastewater bill by measuring the flows leaving the building and will also be used when calculating your monthly surcharge. More information on the program visit calgary.ca and search for effluent metering.

^{**} Approximate surcharge rate based on typical industry average

Appendix B

"Solids should not be more than 25% in the final chamber





Date of inspection

Pre-treatment Maintenance Record

A written record of all maintenance, cleaning and inspections of your pre-treatment must be kept on file for two years. The form below is available at calgary.ca

						aned s/No
						Contractor used Yes/No
						Contractor name (if applicable)
						Disposal location
						Condition of interceptor (good, fair, poor)
						Sludge or Sediment layer (%)*