208 PLAN AMENDMENT OUTLINE
FOR NEW PRIVATE WASTEWATER TREATMENT PLANTS

The purposes of this outline are to (1) provide guidance to anyone preparing a 208 Plan Amendment and (2) to assist those reviewing the proposed amendment in determining whether all requirements have been met. By following this outline, the author should meet all of PAG’s and ADEQ’s requirements for a 208 Plan Amendment. This proposed outline is similar to the existing outline in PAG’s 1990 Guide to Areawide Water Quality Management Planning as Required under Section 208 of the Clean Water Act. It includes criteria in ADEQ’s 208 Amendment Checklist and requirements set forth in the 1985 PAG/Pima County Wastewater Areawide Wastewater Management Plan Point Source Update.

Items marked with an * are items required by ADEQ, as identified in the Continuing Planning Process checklist. Items marked with ** are based on requirements in the 1985 PAG/Pima County Wastewater Areawide Wastewater Management Plan Point Source Update.

Executive Summary

Introduction

Purpose of amendment
Brief description of study area location, with reference to map
Rationale for amending plan (e.g., unavailable infrastructure, population growth)

Natural setting

Groundwater and surface water hydrology
Depth to groundwater
Groundwater flow direction
Areas of natural or artificial groundwater recharge
Major washes, rivers and floodplains

Groundwater quality
Surface water quality (if relevant)
Significant geologic or topographic constraints (if any)
Proximity to existing aquatic or riparian habitats
Proximity to habitat of threatened, endangered, or candidate species
Current Conditions

Population, including significant seasonal trends
Land use
Description and status of existing local and regional wastewater treatment facilities (if any)*

brief legal description and proximity; access
service areas and sanitary district boundaries*
treatment method
capacity
current wastewater flows
compliance status

Planned expansions and improvements

local and regional wastewater conveyance system
wastewater treatment facilities

Existing water quality problems (if any)*

Future Conditions

Population

POPTAC- or PAG-approved population projections for 20-year period*
Proposed development within study area

Wastewater Flows

Estimates of future wastewater flows for 20-year period*

Types of wastewater flows

commercial/industrial
residential
septic

Potential problems prompting the need for a new facility

(e.g., lack of capacity, wastewater quality problems*, public health and safety, odors or insects, and/or regulatory compliance)
General Description and Evaluation of Alternatives for Conveyance and Treatment*

Conveyance/Location Alternatives

Feasibility
Cost
Environmental impacts
Effluent reuse potential

Treatment method alternatives

   Effluent quality and reuse potential
   System reliability
   Cost

No Action alternative

Detailed Description of Recommended Alternative*

Site Location
Site size / acreage available for treatment plant
Land ownership* / easement requirements
System ownership / responsibility *
Permits needed and restrictions specified by any existing permits*
Measures to ensure public health and safety (e.g., fencing)
Brief description of conveyance lines
Capacity, including phases*
Design life (must be a minimum of 25** years)
Plan for wastewater service to neighboring areas, including flow-through conveyance
   capacity and easements**

Proposed treatment process*

   Effluent quality
   Effluent disposal*
   Effluent reuse potential and plans for effluent reuse (including ownership of reuse sites and ownership of effluent and re-distribution system)*

Sludge disposal*

   description of alternatives*
   recommended alternative*
Time line for developing treatment works*

Description of how discharges will comply with EPA municipal and industrial stormwater discharge regulations*

Non-point sources of pollution related to the proposed facility and procedures to control them*

Any significant measures necessary to carry out plan (e.g., institutional, financial, economic, etc.)*

Plans for turnover of facilities to the DMA (if applicable)**

**Impacts of proposed facility**

Impacts on existing wastewater facilities or regional wastewater plans*

Impacts on surface water and groundwater quality

Impacts on existing institutional arrangements (including Intergovernmental Agreements**)  
Impacts on communities and businesses affected by the plan*

Location relative to 100-year flood plain and areas subject to erosion hazard, and procedures used to prevent flood or erosion damage**

Impacts on surrounding land uses (e.g. wellfields, recreational facilities, residential areas, artificial recharge sites, potential pollution sources)

Impacts on potentially sensitive features, including cultural sites, riparian areas, designated Unique Waters, etc.

Designated use of receiving surface water body (if applicable)

Description of how recreational opportunities will result from improved water quality (if applicable)*

Potential use of lands associated with treatment works and increased access to water-based recreation (if applicable)*

Potential for odors

Potential for insect problems

**Financing**

Financial constraints, if any *  
Cost of implementing Plan Amendment, including capital costs and operation and maintenance costs  
Financial impact on public** (including estimated O&M costs and sewer fees)  
Method of financing*  
Financial information demonstrating that the DMA or owner/operator has the financial capability to operate and maintain the wastewater system over its useful life*  
Impacts on Public Bonds, Debts, Debt Retirement  
Provision for bond indemnification in the event that the proposed plant does not operate as anticipated, or the developer no longer assumes responsibility for the project
Construction*

Construction priorities*
Party responsible for construction*
Phases
Time line*
Description of how wastewater service will be provided until proposed system is complete (if applicable)
Description of how and when existing wastewater facilities will be connected (if applicable)
Potential for specific pollutants to be produced during construction or excavation*
Procedures or methods for controlling construction-activity related sources of pollution*

Description of proposed pretreatment program*

Pretreatment requirements
Method of enforcement
Demonstration of authority

Conclusion

Discussion of why the proposed alternative is the most desirable option for both the short term and long term**
Summary of positive and negative impacts of the proposal

Study Area Map(s) showing:

Boundaries of proposed and existing service areas*
Boundaries of designated management areas and planning areas (if relevant)*
Location of treatment facility
Conveyance lines
Location(s) of nearby, existing or proposed treatment and major conveyance facilities
Areas relying on septic systems within or adjacent to service area
Locations of potentially-impacted land uses (e.g. wellfields, recreational facilities, residential areas, artificial recharge sites, potential pollution sources)
Locations of existing and potential reuse sites*
Locations of potentially sensitive features (including cultural sites, riparian areas, designated Unique Waters, etc.)
Locations of 100-year flood plains**
Washes and rivers
Appendices

Self Certification Information for DMAs (if relevant)*
Letter from DMA indicating that DMA declines to serve
Assurances (bonds, letters of credit, or similar device) that the facility will be built, operated, maintained and repaired for its design life
Plans for service beyond facility design life
Public participation (prepared by PAG)
ADEQ checklist