

## EXECUTIVE SUMMARY

Within the greater Tucson community, wastewater must be collected and treated on a continuous basis. Treatment may be accomplished by large publicly-owned treatment facilities, privately-owned facilities serving smaller residential communities, or individual septic systems. This document, known as the *Areawide Water Quality Management Plan* or “208 Plan,” provides for the provision of sewage treatment services in a manner that is consistent within the context of a predetermined planning framework. Once adopted, existing and new wastewater facilities must be in conformance with this *Areawide Water Quality Management Plan*.

The federal Clean Water Act, in Section 208, directs states to designate agencies to conduct water quality management planning in defined regions. Once identified as a Designated Planning Agency (DPA), the agency must prepare and implement Areawide Water Quality Management Plans (commonly referred to as “208 Plans”). Pima Association of Governments (PAG) is the designated planning agency for Pima County.

PAG developed the original *Areawide Water Quality Management Plan* (208 Plan) in 1978. Since then, the 208 plan document was amended numerous times. Those amendments were stand alone additions - the result being a cumbersome 208 plan consisting of many separate documents that could not easily be reviewed. Additionally, the original 208 Plan, adopted in 1978, is now out of date, given the extensive urban growth that has occurred in eastern Pima County, the introduction of local habitat protection planning, the changing economic make-up of the region, and new water-related state and federal regulations.

This document represents a comprehensive “update” which combines the original 208 plan and integrates its subsequent amendments into one cohesive and coherent document. This revised and updated plan also incorporates current information on existing point source discharges, areas of water quality problems, and priority surface waters. While this document is primarily focused on wastewater treatment facilities, it also addresses other potential pollutant sources like solid waste disposal facilities and urban stormwater runoff.

Wastewater treatment plants in Pima County have a wide range of capacities, treatment systems and service areas. The majority of the existing wastewater treatment facilities are owned and operated by the two designated management agencies (DMA) in Pima County – Pima County Wastewater Management Department and the Town of Sahuarita. Large, regional treatment facilities serve the metropolitan Tucson area. Small wastewater treatment facilities in Pima County serve small subdivisions, rural communities, parks, schools and prisons. Other facilities are privately owned, and are located in rural areas where it is impractical to connect to DMA-owned infrastructure. Excluding septic systems, capacities range from 15,000 gallons per day to 41 million gallons per day, and treatment technologies vary from evaporative lagoons to complex secondary treatment works. Current service area populations range from approximately 132 people served by the Mt. Lemmon Wastewater Treatment Facility to an estimated 513,557 people residing within the Rogers Road Wastewater Treatment Plant service area.

The 208 Plan is required to maintain a 20-year planning horizon. Therefore, this update to the plan includes projections of future wastewater volumes, using agreed upon population estimates, for the service areas of existing wastewater treatment facilities over a 20-year time period.

208 Plan consistency reviews are required to determine whether a proposal is consistent with the 208 Plan any time new wastewater treatment facilities or expansions of existing facilities are proposed in Pima County. A finding that a facility is consistent with the 208 plan is a requirement that must be met before water discharge permits can be issued. New and existing wastewater treatment facilities must conform to the facility ownership and effluent volumes specified in the 208 Plan in order to be deemed consistent.

This update establishes a set of guiding principles. These include:

PAG's 208 Plan identifies the desirability and preference that new wastewater flows be treated in publicly-owned, regional facilities;

The policies contained in the 208 Plan apply to facilities already constructed even where they may not be in conformance with the 208 Plan;

The plan supports AZPDES permits for municipal stormwater discharges, groundwater remediation projects, reclaimed water projects, and small-volume (i.e., *de minimis*) discharges, encourages riparian restoration projects and effluent re-use, and acknowledges on-site (septic) systems as an acceptable treatment option in some cases;

The plan identifies 18 priority water bodies, and provides that future wastewater treatment facility discharges to these priority water bodies are strongly discouraged by the 208 Plan.

The document introduces the concept of watershed-based 208 planning, which is promoted by both ADEQ and EPA, and which calls for planning within watershed boundaries instead of jurisdictional boundaries.

This 208 Plan update was developed over a period of two years with substantial opportunity for comment by PAG's member jurisdictions. The primary stakeholder groups included PAG's Environmental Planning Advisory Committee and Watershed Planning Subcommittee, both of which approved the plan in February / March 2006. All comments were noted and responded to as part of the public participation effort, which is documented in an Addendum to the 208 Plan.