STUDY SESSION
Review of the Draft PAG 208 Plan Update

Presented by:
Mead Mier
Sustainability Coordinator - Watershed Planning Lead
MMier@PAGregion.com
Outline

Presentation
• Purpose of plan and today’s meeting
• Timeline of update process
• Components of the plan
• Summary of changes
• 208 procedures

Discussion
• Q&A

Next Step
• April 10 deadline
Presentation
• Purpose of plan and today’s meeting
• Development and feedback timeline
• Components of the plan
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Next Step
• April 10 deadline
Background

Designated Planning Agency (DPA)

PAG is the region’s DPA under Section 208 of the Clean Water Act

Provide guidance, technical assistance and coordination of regional water quality management planning for groundwater, stormwater, solids and wastewater

Federal
Federal Clean Water Act - Section 208
40CFR

Arizona Administrative Code
State Water Quality Planning (208)
State Aquifer Protection Permitting
ADEQ contract with PAG
1974 Governor’s Designation Letter
Purpose of DPA Planning

Assess Conditions, Strategic Actions, Public Process and Permit Review:

• Ensure stakeholder cooperation is in place, in accordance with local ordinances, reducing surprises or conflicts later
• Ensure regional watershed-based planning, prioritize actions based on issues of concern
• Encourage integrated planning and coordination with local principles
• Identify wastewater treatment facilities and encourage centralized wastewater treatment for water quality benefits

40 C.F.R. § 130.11; 208(c)(2)(A,D); 303(e)(3)(E)
Roles

Designated Management Agencies (DMAs)

- Pima County
- Town of Marana
- Town of Sahuarita
- Joint Planning Area

Responsibilities
- Treat residential, commercial and industrial wastes
- Develop facility plans
- Maintain capacity for financial arrangements
- Identify construction priorities and create schedule to provide to priority areas
- Improve water quality
- Assure capacity
- Address non-point source issues
- Maintain consistency with 208 Plan and participate in 208 process
Purpose of This Update

PAG is required to update every five years or as needed.

Purpose

- Streamline and align with ADEQ
- Maintain a minimum 20-year horizon
- Update conditions, facilities, issues, progress, future actions
Purpose of Today’s Meeting

- Review purpose and requirements
- Walk through major components of updated document to aid your review
- Provide opportunity for Q&A discussion

Reminder: Feedback due April 10 (Comment forms)
Previously Presented to EPAC/WPS

- Regional value
- Purpose of update
- Key changes and new features (inventory portal)
- Water condition update presentations
- Regulatory updates presentations
208 Presentations to Date

WPS 05-22-2017
• Initiating-the-208-update - Posted QA

EPAC 10-06-2017
• 208 Progress Update

WPS/EPAC Joint Meeting 06-01-2018
• 208 Portal Inventory
• Pharmaceuticals as Emerging Contaminants
• E. Coli research, GI Plan and NPS Outreach to address Impaired Waters
• Recycled Water Regulatory Updates

EPAC 12-07-2018
• Top Environmental Issues List For 2019

EPAC 03-01-2019
• Brownfields
• Groundwater quality presentations
• Heritage Water Project Progress

WPS/EPAC 3-28-19
• Draft Plan Review Study Session

Statewide WQMWG
• 8-2017 – Streamlining and modernizing approach & DPA Interview Questions
• 6-2018 - Portal and Stormwater components
• 3-2019 – Results of DPA Lessons, Major Changes Reviewed
Development with DMAs

March 2017 to December 2018

Initiation
- Regional Council approves consultant contract (Westland) March 2017

DMA Edits Incorporated
- Maps signed by town/city councils and Board of Supervisors
- WWTP Facility Inventory
- Point Source Appendix

DMA Meetings
- Fee update (general)
- GPCD
- Projections
- Progress updates
Presentation
• Purpose of plan and today’s meeting
• Development and feedback timeline
  • Components of the plan
  • Summary of changes
  • 208 procedures

Discussion
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Next Step
• April 10 deadline
Timeline and Next Steps

Development and Research
- Westland Research
- DPA Interviews
- Facility GIS
- DMA Review
- ADEQ QA

Key Feedback and Revisions
- 2/22 Release First Draft
- 3/12 WQMWG presentation
- 3/28 WPS/EPAC Presentation
- 4/10 Feedback Due

Regional Council
- 4/24 Packet Due (Second Draft)
- 5/8 Mgt Cmte
- 5/23 Regional Council

Comment Period, Public Hearing and WPS/EPAC
- July Comment Period Begins (30 days)
- Aug. Hearing and WPS/EPAC

Additional Resources
- Template Letters
- Portal Guide
- Simplified instructions for facility updates (brochures)

Approvals
- 8/30 Packet Due (Final Draft)
- 9/11 Mgt Cmte
- 9/26 Regional Council
- WQMWG presentation
- ADEQ approval
- EPA approval

Note: Subject to Change
Presentation
- Purpose of plan and today’s meeting
- Development and feedback timeline
- Components of the plan
  - Summary of changes
  - 208 procedures

Discussion
- Q&A

Next Step
- April 10 deadline
Plan Implementation: Strategic Action Plan and Adopted Procedures

- Appendix 1: Glossary of Terms and Acronyms
- Appendix 2: List of Changes
- Appendix 3: Watershed Setting and Conditions
- Appendix 4A: Point Sources
- Appendix 4B: All Facilities Inventory
- Appendix 5: Regulatory Authorities and History
- Appendix 6: Public Participation Plan and Plan Update Records
- Appendix 7: Application Resources
- Appendix 8: References
Plan Implementation

Strategic Action Plan

Issues Identified

• Impairment of the Santa Cruz River (E. coli from stormwater sources)
• Non-attaining status of the SCR for ammonia in effluent
• Emerging contaminants and unregulated compounds:
  • pharmaceuticals, personal care products and microplastics in water reclamation resources, PFAs, PFCs
• Failure of septic and small on-site plants
• Degradation of groundwater and surface water quality
• Degradation of riparian habitat
• Effects of wells and wastewater on shallow groundwater ecosystems
Plan Implementation

Strategic Action Plan
Goals, Supporting Guidance and Recommended Actions

Goal #s

1. **Smart water reclamation planning**: Conduct 208 Amendment/Coordination processes and analyze best placement of onsite or centralized systems

2. **Regional information sharing**: Gather data and share best practices for industry, agriculture, land managers and public

3. **Prevent pollution**: Septic system education and evaluation

4. **Enhance natural resources**: Encourage reclaimed systems and local programs for environmental water uses

5. **Sustainable solid waste planning**: Landfill and wildcat dumping inventory updates, incentives or sample policies

6. **Watershed-based planning**: Cross-jurisdictional coordination
Plan Implementation

Policies and Procedures
✓ Responsibilities
✓ PAG 208 Procedures for Water Reclamation Facilities
✓ Policies and Guiding Principles
✓ Conformity by Other Regulated Programs
Watershed Setting and Conditions

Appendix 3

• Setting
  • Planning area description, natural setting and watersheds
  • Climate, geology, hydrology and biology
  • Population, local governments, land use/land ownership
  • Water resources

• Water Quality Conditions and Management Efforts
  • Water quality: groundwater, CAP water, reclaimed water, effluent, surface water, stormwater runoff
    • Past management actions
    • Data sources and conditions
    • Management and strategies
    • Emerging issues
Point Sources

Appendix 4A

- DMAs and municipal facilities (past, active, planned)
- Non-municipal WWTFs
- Other discharges
- Existing solid waste management
- Future conditions (population and flow projections)
- Methodology
All Facilities Inventory

Appendix 4B
- Facility Inventory Portal
- PAG 208 Facility Inventory Report

- Provides modernized access to the inventory
- Allows for immediate updates so it can stay current
- Eases Consistency Reviews
Appendix 7

- Application brochures
- Forms
- Template letters
- Portal guidance
Presentation
• Purpose of plan and today’s meeting
• Development and feedback timeline
• Components of the plan
• **Summary of changes**
  • 208 procedures

Discussion
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Next Step
• April 10 deadline
Streamlined

• Shorter, clarified procedures, with fewer procedure triggers
  • *Especially for regional public systems*
• Allows for administrative updates of some content
  • *Regional Council approval still needed for action plan, policies, and procedure changes*
• New, supportive resources, such as template letters
• Options for earlier DPA and Regional Council review
• Data updates and links to web-based inventories instead of data tables
• Organizational changes and reduction of redundant or unnecessary text
Changes: DPA Lessons Integrated

- Cross-DPA agreements
- WMUs
- Appeal process
- Action plan format
- Advisory group requirements
- City/town council signatures on DMA maps
- Individual Consistency Review Form
- Coordinate when 2-3 miles proximity
- Average fees
Changes

Fees
$3,500 since 1984

2019 Draft Plan
- Process A: $1,000 for Consistency Reviews
  - funds go toward Coordination or Amendment Processes if those processes are needed
- Process B: $3,500 for Public Facility Coordination processes, when necessary
- Process C: $8,000 base fee per amendment for public and private facilities
- $1,000 extra per repeated step that extends the process
## Comparison of 208 Plan Processes – Private Facilities

<table>
<thead>
<tr>
<th>CONDITION THAT TRIGGERS PROCESS</th>
<th>2006 PAG 208 PLAN</th>
<th>2019 PAG 208 PLAN</th>
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</thead>
<tbody>
<tr>
<td>Change to an existing private facility currently in the PAG 208 Plan.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>A new septic or on-site private facility with a capacity greater than 0.024 MGD (0.02 MGD for 2006 Plan).</td>
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<td></td>
</tr>
<tr>
<td>Expansion of a private facility service area with a capacity greater than 0.024 MGD (0.02 MGD for 2006 Plan).</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Expansion of a private facility service area that crosses a DMA, DPA, or JPA.</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Very small, isolated wastewater treatment facilities (less than 0.024 MGD (0.02 MGD for 2006 Plan) meeting a number of conditions</td>
<td>determined &quot;not inconsistent&quot; if followed Consistency Report Process</td>
<td></td>
</tr>
<tr>
<td>A new WMU (new category in 2019).</td>
<td>-</td>
<td>-</td>
</tr>
</tbody>
</table>
## Comparison of 208 Plan Processes – Public Facilities

### Condition That Triggers Process

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<td>A new or existing public facility that requires a change to an existing DMA or JPA boundary (such as expansion of service area).</td>
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</tr>
<tr>
<td>A new DMA.</td>
<td>X</td>
<td>X</td>
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<tr>
<td>Expansion of a public facility’s service area within an existing DMA or JPA.</td>
<td>X</td>
<td>X, if over 3 miles from other DMA, X, if less than 3 miles from other DMA</td>
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*Process A, Process B, Process C*
## Less Process Steps than in 2006

<table>
<thead>
<tr>
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<tbody>
<tr>
<td>No Regional Council meeting needed to initiate</td>
<td>No Regional Council meeting needed to initiate</td>
</tr>
<tr>
<td>Task Force not required, DMA support letters if within 3 miles</td>
<td>Task Force not required</td>
</tr>
<tr>
<td>Joint WPS/ EPAC meetings, Scheduled as needed</td>
<td>Joint WPS/ EPAC meetings, Scheduled as needed</td>
</tr>
<tr>
<td>No Public Hearing, Optional mailings</td>
<td>Public Hearing may be held concurrently with committee meeting</td>
</tr>
<tr>
<td>No Mgmt Mtg or Regional Council review, DMA map changes must be signed</td>
<td>SWQMWG Meets as needed</td>
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Next Step
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208 Processes for Water Reclamation Proposals

**Process A:** Consistency Review and Data Update
- PAG determination
- PAG data update

**Process B:** Coordination Process for Public Facilities
- Cross-DPA/DMA coordination
- Joint committee meeting
- PAG determination
- PAG data update

**Process C:** Amendments
- Draft Amendment
- Joint committee meeting
- Initial Statewide WQMWG presentation
- PAG Management Committee
- Public hearing
- PAG Regional Council approval
- Statewide WQMWG review
- ADEQ & EPA approval
- PAG data update
208 Processes for Plan Updates

Appendices

- Data Updates – Occur administratively, at least every 5 years, after applicable process

- Appendix 4 – Point Sources flow projections will be updated when new PAG population projections are adopted (~4 years) with DMA and Executive Director review

- Appendix 3 – Ongoing coordination with WPS/EPAC for water quality conditions, resulting local management and impacts

The 208 Plan’s “Implementation Plan”

- Use Process C (Amendments) including the Regional Council
- For example, Changes to Action Plan updates or Policy and Procedure changes
Presentation
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Next Step
- April 10 deadline

Clarify content, roles or timeline?
Any support or concerns?
Any issue gaps?
Feedback due April 10

Thank you!

Mead Mier
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(520) 792-1093
Supplemental slides
208 Process Demos
### Expansion of Capacity to Existing Public Facility

**Hypothetical Run-Through – Public Facilities**

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<td></td>
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<tr>
<td>below the Consistency Factor calculation for maximum flows, with no</td>
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<tr>
<td>changes to the DMA.</td>
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<tr>
<td>JPA.</td>
<td></td>
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Scenarios presented for demonstration only. Actual 208 process may vary depending on the situation. Please see the 208 Plan for more information.
Expansion of Capacity to Existing Public Facility

**Hypothetical Scenario:**
- Public facility expanding capacity more than 10% and under 5 MGD
- If maximum flow for 208 consistency not exceeded
  - **Follow Process A:** Consistency Review & Data Update

### Phase I
**Application:**
- Parts I and II of CR Form

### Phase II
**Determination:**
- Passes as “Consistent with PAG 208 Plan”

**Action:**
- PAG Data Update

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## Expansion of Service Area

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Expansion of Service Area

**Hypothetical Scenario:**

- A public facility expands service area entirely within its DMA
- Facility is over 3 miles from a neighboring DMA
  - PAG Data Update only

<table>
<thead>
<tr>
<th>Phase I</th>
<th>Phase II</th>
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<tbody>
<tr>
<td><strong>Application:</strong></td>
<td><strong>Action:</strong></td>
</tr>
<tr>
<td>• Only missing or updated information is needed</td>
<td>• PAG Data Update</td>
</tr>
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Expansion of Service Area

Hypothetical Scenario:
• A public facility expands service area entirely within its DMA
• Facility is under 3 miles from a neighboring DMA
  ➢ **Follow Process A:** Consistency Review and Data Update

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<tr>
<td><strong>Application:</strong></td>
<td></td>
</tr>
<tr>
<td>• Parts I and II of CR Form</td>
<td></td>
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<tr>
<td>• Support letter from other DMA</td>
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<tr>
<td><strong>Determination:</strong></td>
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<tr>
<td>• Passes as “Consistent with PAG 208 Plan”</td>
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### Hypothetical Scenario:
- A public facility plans to expand service area into another DMA
- **Follow Process B**: Coordination Process for Public Facilities

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<tr>
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<th>Phase II</th>
<th>Phase III</th>
</tr>
</thead>
</table>
| **Application:**<br>• Parts I, II and III of CR Form | **Coordination:**<br>• Other DMA provides support letter | **Determination:**<br>• Passes as “Consistent with PAG 208 Plan”
| **Action:**<br>• PAG Data Update |
## Joint Planning

### Hypothetical Run-Through – Public Facilities

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<td>other DMA.</td>
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Joint Planning

Hypothetical Scenario:

• An existing facility service area expands from a DMA into an existing JPA

➢ **Follow Process A**: Consistency Review and Data Update

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## Joint Planning

### Hypothetical Scenario:
- Two DMAs agree to construct a new joint facility with a service area that crosses DMA boundaries

- **Follow Process B:** Coordination Process for Public Facilities

<table>
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<tr>
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<th>Phase II</th>
<th>Phase III</th>
</tr>
</thead>
</table>
| **Application:**  
Parts I, II and III of CR Form | **Coordination:**  
- Both DMAs provide notification letters to PAG  
- Joint committee meeting inquiries are met with satisfactory answers | **Determination:**  
- Passes as “Not Inconsistent with PAG 208 Plan”  
**Action:**  
- New JPA formed *(if not already JPA)*  
- PAG Data Update |

*Scenarios presented for demonstration only. Actual 208 process may vary depending on the situation. Please see the 208 Plan for more information.*
## New or Changing Private Facility

### Hypothetical Run Through – Private Facilities

<table>
<thead>
<tr>
<th>CONDITION</th>
<th>No PAG Process</th>
<th>Consistency Review (Process A)</th>
<th>Coordination Process (Process B)</th>
<th>Amendment (Process C)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Change to an existing private facility currently in the PAG 208 Plan.</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>A new septic or on-site private facility with a capacity greater than 0.024 MGD.</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Expansion of a private facility service area with a capacity greater than 0.024 MGD</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Expansion of a private facility service area that crosses a DMA, DPA, or JPA.</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Very small, isolated wastewater treatment facilities (less than 0.024 MGD meeting a number of conditions)</td>
<td>X, apply for Pima County APP Type 4 General Permit</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>A new WMU (new category in 2019).</td>
<td></td>
<td></td>
<td></td>
<td>X</td>
</tr>
</tbody>
</table>

Scenarios presented for demonstration only. Actual 208 process may vary depending on the situation. Please see the 208 Plan for more information.
New or Changing Private Facility

Hypothetical Scenario:
- A private facility expands to a capacity greater than 0.024 MGD and service area crosses 2 DMAs

Follow Process C: Amendment

<table>
<thead>
<tr>
<th>Phase I</th>
<th>Phase II</th>
<th>Phase III</th>
</tr>
</thead>
<tbody>
<tr>
<td>Application:</td>
<td>Public Stakeholder Review:</td>
<td>Approvals:</td>
</tr>
<tr>
<td>• Parts I, II, III and IV of CR Form</td>
<td>• Joint committee and PAG Management Committee review and forward to PAG Regional Council</td>
<td>• PAG Regional Council, SWQMWG, ADEQ and EPA review and approve</td>
</tr>
<tr>
<td>• Encouraged to join public centralized facility</td>
<td>• Public hearing after 45-day notice</td>
<td>Determination:</td>
</tr>
<tr>
<td>• Support letter from all applicable DMAs</td>
<td></td>
<td>• 208 Plan amended</td>
</tr>
<tr>
<td>Draft Amendment:</td>
<td></td>
<td>Action:</td>
</tr>
<tr>
<td>• PAG adequacy review</td>
<td></td>
<td>• PAG Data Update</td>
</tr>
</tbody>
</table>

Scenarios presented for demonstration only. Actual 208 process may vary depending on the situation. Please see the 208 Plan for more information.
New or Changing Private Facility

Hypothetical Scenario:

• A new on-site facility with a capacity under 0.024 MGD
• Proposal meets conditions in the 208 Plan
  ➢ No PAG process needed

Scenarios presented for demonstration only. Actual 208 process may vary depending on the situation. Please see the 208 Plan for more information.
Feedback due April 10

Thank you!

Mead Mier
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(520) 792-1093