

Appendix 5: Regulatory Authorities and History

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REGULATORY REQUIREMENTS FOR 208 PLANS

The following section includes current federal and state regulations related to water quality management planning under section 208 of the Clean Water Act (CWA).

Federal laws regarding the CWA may be found in the [Code of Federal Regulations](#)¹.

Federally Required Elements in a 208 Plan

Federal regulations state that the following elements must be included in Water Quality Management (WQM) Plans or referenced as part of the plan if they are contained in separate documents:

- Total maximum daily loads
- Effluent limitations
- Identification of anticipated municipal and industrial waste treatment works
- Nonpoint source management and control
- Identification of agencies necessary to carry out the plan
- Identification of implementation measures necessary to carry out the plan
- Identification and development of programs for the control of dredge or fill material
- Identification of any relationship to applicable basin plans developed under section 209 of the CWA [Bains Plans]
- Identification and development of programs for control of groundwater pollution, including the provisions of section 208(b)(2)(K) of the CWA

In Arizona, these required elements are divided between the state WQM Plan and the Designated Planning Agencies' (DPA) Areawide Water Quality Management Plans (208 Plans).

Federal regulations preclude the issuance of National Pollutant Discharge Elimination System (NPDES) permits to facilities that are not consistent with the applicable 208 Plan § 208(e); 40 C.F.R. § 130.6(f) (see Code of Federal Regulations below). The complete text of the relevant federal regulations is included in [40 C.F.R. § 130.6](#)².

State Responsibilities and Plan Requirements

Federal regulations require each state to have its own WQM Plan, and the regulations provide the process for updating, maintaining, and implementing the WQM Plan. The State WQM should be updated each time a newly adopted state plan component, rule, agreement, or strategy is enacted.

¹ <https://www.gpo.gov/fdsys/pkg/CFR-2016-title40-vol24/xml/CFR-2016-title40-vol24-part130.xml>

² <https://www.gpo.gov/fdsys/pkg/CFR-2013-title40-vol23/pdf/CFR-2013-title40-vol23-sec130-6.pdf>

Federal regulations require each state to establish and maintain a Continuing Planning Process (CPP) per Section 303(e)(3) of the CWA. The most recent document describing Arizona's CPP includes a [checklist](#)³ for 208 Plan Amendment content requirements. The state requirements generally mirror the federal requirements and are subject to review by the EPA to ensure they are consistent with the CWA. CPP updates are required to incorporate the elements of the applicable 208 Plans in the state.

DPA Plan Requirements

DPA 208 Plans identify regional priority point and nonpoint water quality problems, consider alternative solutions, and recommend control measures. Control measures can include the financial and institutional measures necessary for implementing recommended solutions. In addition, 208 Plans identify existing and anticipated municipal and industrial wastewater treatment facilities, as well as Designated Management Agencies (DMAs). The DMAs are responsible for ensuring that adequate wastewater service is provided in their management areas.

Requirements to Update 208 Plans

An up-to-date 208 Plan is necessary to ensure efficient permitting decisions with regard to determining 208 consistency. Comprehensive revisions to facility, DMA or policy descriptions should occur when there have been multiple amendments to the 208 Plan or consistency reviews that provide facility updates. Population growth projections need to be updated to maintain the required 20-year planning horizon, updates to applicable local, state and federal water quality regulations should be adequately integrated, and local water quality conditions and program progress reported.

Federal regulations do not require any specific frequency for plan updates. [40 C.F.R. § 130.6\(e\)](#)⁴ states: "WQM plans shall be updated as needed to reflect changing water quality conditions, results of implementation actions, new requirements or to remove conditions in prior conditional or partial plan approvals... State CPPs shall specify the process and schedule used to revise WQM plans."

The [CPP](#)⁵ for Arizona states: "If any WQM plan becomes so outdated as to be inconsistent with state rules or policies, the director (of ADEQ) will encourage and may require the amendment of such plan, or the creation of a new plan, as appropriate." References in the 208 Plan to state rules will be updated when applicable.

By 2019, all the changes mentioned above had occurred and warranted a comprehensive update. Additionally, PAG's goals for the 2019 update were to 1) consolidate background information for concise reading, 2) modernize the facility inventory and 3) streamline policies and procedures. The federal regulations lay out a process for "assuring adequate authority for intergovernmental cooperation in the implementation of the State WQM program" (40 C.F.R. § 130.5). Per federal requirements, the water quality programs must be developed with local, regional, and other planning agencies. Under the Arizona CPP, the WQMWG was established. It is a voluntary group that assists in the review and updates to the state WQM programs, for example, by participating in comments regarding state updates to water quality standards or by

³ https://legacy.azdeq.gov/function/forms/download/list/Continuing_Planning_Process_4_93.PDF

⁴ <https://www.gpo.gov/fdsys/pkg/CFR-2016-title40-vol24/xml/CFR-2016-title40-vol24-part130.xml>

⁵ https://legacy.azdeq.gov/function/forms/download/list/Continuing_Planning_Process_4_93.PDF

providing updates through DPA 208 Plans. The WQMWG includes volunteers from the state DPAs. The WQMWG assists ADEQ in ensuring that the program addresses both regional and statewide water quality needs. ADEQ's 1993 CPP Appendix IV, Page IV-2 states: "The Water Quality Management Working Group is a voluntary advisory body that meets quarterly, or as necessary, to consider and make recommendations to ADEQ regarding matters of statewide WQM policy and program implementation. The WQMWG is instrumental in the review and revision of state WQM programs, as it assists the Department in developing an integrated WQM program, from both a regional and statewide perspective."

Federal regulations require planning funding be directed to and prioritized for DPAs for purposes of developing and operating a continuing areawide waste treatment management planning processes. CWA SEC. 208 [33 U.S.C. 1288] Areawide Waste Treatment Management, Section 208(f)(1) requires the administrator to make grants to any agency designated under Section 208, subsection (a) for payment of the reasonable costs of developing and operating a continuing areawide waste treatment management planning process. ADEQ distributes federal funding to the DPAs for water quality programs. CWA SEC. 205 [33 U.S.C. 1285] Allotment, Section 205(j)(3) requires states to give funding priority to DPAs for purposes of carrying out WQM planning, and allows for an allocation of less than 40 percent in any fiscal year only if it has been determined that the allocation of at least 40 percent to regional public comprehensive planning organizations will not result in significant participation by such organizations in water quality management planning, will not significantly assist in development and implementation of the WQM plan, will not aid in achieving the goals of the Clean Water Act, and only after consultation with the regional public comprehensive planning organizations and with the approval of the EPA Administrator. 40 CFR §130.1, Program management, Section 130.11(a) establishes that local or regional planning organizations may request CWA Section 205(j) funds from a State for planning and management activities. Federal funding for 208 planning and plan updates in Arizona is primarily available through section 604(b) grants. Current information regarding state funding can be found on the ADEQ Statewide Water Quality Management Working Group (WQMWG) Agenda and Meeting Minutes [webpage](#)⁶.

Federal regulations require ADEQ to consult with DPAs in the joint development, review and revision of State work program and WQM planning activities. In 40 CFR §130.11, the Program management Section 130.11(e) establishes the EPA, States, areawide agencies, and local and Regional governments as joint participants in the water pollution control program. CWA SEC. 205 [33 U.S.C. 1285] Allotment, Section 205(j)(3) also requires states to develop jointly with local, regional, and interstate entities, a plan for carrying out the WQM program. DPAs and their regional WQM plans are integral to updating and maintaining the State's Continuing Planning Process (CPP) and WQM plan under CWA Section 303(e)(3)(B) which requires each state's CPP to include the incorporation of all elements of any applicable areawide waste management plans under section 208. In AAC R18-5-301 Definitions, Paragraph 7 defines "State water quality management plan" to mean a planning document that includes (a) Certified Areawide Water Quality Management Plans and amendments, and (e) intergovernmental agreements between the Department and a designated water quality planning agency or a designated management agency as elements. State work programs are required to be developed jointly with Regional and other comprehensive planning organizations.

DPAs have a very strong nexus with local elected officials and play key roles in assuring intergovernmental cooperation in WQM planning and implementation required under 40 CFR §

⁶ <http://www.azdeq.gov/statewide-water-quality-management-working-group-agenda-minutes>

130.5(b)(5) and CWA Section 303(e)(3)(E). ADEQ's CPP further outlines this in ADEQ's 1993 CPP Appendix III, Page III-8: "The COGs and ADEQ have a unique and very valuable relationship in WQM planning, starting with the WQM planning partnership role established by CWA Section 208 (see Appendix V [of the CPP]). The COGs provide a vehicle through which local governments may participate in the WQM planning process. They provide technical assistance to local entities in the preparation, amendment and update of Areawide WQM Plans, including promoting and ensuring adequate public participation in plan development and adequacy of plan amendments. The COGs assist the local/state agency information exchange, public participation processes, and help elevate local needs and priorities to ADEQ's attention for consideration in its statewide WOM program efforts. All major regional policy decisions are reviewed and approved by the COG decision making bodies, or regional boards, which are comprised of local elected officials."

State laws regarding the CWA may be found in [A.R.S. § R18-57](#) and [A.R.S. § R18-98](#).

Please see the Plan Implementation: Strategic Action Plan and Adopted Procedures section on DPA Responsibilities in for the list of PAG's designated responsibilities delegated by the state.

REGULATORY CONFORMITY

The following regulations require conformity with 208 Plans.

Groundwater

Protection of groundwater quality from the disposal of pollutants on land or in subsurface excavations is a required element of 208 Plans [§208(b)(2)(K)] and has been a principal goal of PAG's 208 Planning program since its inception. In Arizona, the APP program is the major regulatory program aimed at protecting groundwater quality. PAG's 208 Plan helps ensure the success of the APP program by limiting the proliferation of potential pollutant sources and thus minimizing the strain that numerous small or uncompliant facilities would otherwise place on the monitoring and enforcement resources available for the APP program. State regulations preclude the construction of sewage treatment facilities that are not consistent with the applicable 208 Plan (A.A.C. § R18-5-303, see link below) or the issuance of an Aquifer Protection Permit (APP) to sewage treatment facilities that are not consistent with the 208 Plan (A.A.C. § R18-9-A201B, see link below).

PAG will continue to ensure that wastewater treatment facilities are sited, planned, and managed in a way that ensures the protection of groundwater quality. PAG will also continue to work with local governments to inventory land uses and identify potential impacts to groundwater quality from various land uses and potential pollution sources.

Resource Conservation and Recovery Act

According to the EPA (2018b), the goals of the Resource Conservation and Recovery Act (RCRA) are to:

- Protect us from the hazards of waste disposal

⁷ http://apps.azsos.gov/public_services/Title_18/18-05.pdf

⁸ http://apps.azsos.gov/public_services/Title_18/18-09.pdf

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- Conserve energy and natural resources through recycling and recovery
- Reduce or eliminate waste
- Clean up waste that may have spilled, leaked, or been improperly disposed of

In Arizona, RCRA is implemented by ADEQ's Waste Programs Division, which is responsible for permitting facilities that treat, store, or dispose of hazardous waste and for approving solid waste facility plans. According to ADEQ (2016a), the following types of facilities are subject to solid waste facility plan approval or will be once the appropriate rules are promulgated:

- Biosolids processing facilities
- Composting facilities
- Medical waste facilities
- Municipal solid waste landfills
- Recycling facilities
- Non-municipal solid waste landfills
- Solid waste storage facilities
- Special waste facilities
- Transfer stations
- Waste tire collection sites

CERCLA

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), also known as Superfund, was enacted by Congress in 1980. CERCLA provides broad federal authority to respond to releases or threatened releases of hazardous substances that may endanger public health or the environment. The EPA maintains the National Priorities List, which is a list of national priorities among the known or threatened hazardous releases. The list guides the EPA in determining which sites warrant further investigation. Long-term remedial actions may only be taken at sites on the National Priorities List. The Tucson International Airport Area is the only site in Pima County on the National Priorities List.

WQARF

Arizona's Water Quality Assurance Revolving Fund (WQARF) supports the cleanup of hazardous substance releases in Arizona. It is funded by legislative appropriations, cost recovery from responsible parties, taxes, and fees. ADEQ maintains the "WQARF" registry, which is a list of the sites most in need of cleanup. WQARF sites in Pima County are discussed in Appendix 3 – Watershed Setting and Conditions.

HISTORY

The following section includes historical federal and state regulation development as well as local wastewater management related to 208 planning.

Clean Water Act

The Clean Water Act (CWA) began as the Federal Water Pollution Control Act of 1948. Growing concern over water pollution led to major amendments in 1972. The amendments include a prohibition on the discharge of any pollutant to waters of the United States from a point source unless the discharge is authorized by a permit issued pursuant to the NPDES. With additional amendments in 1977, the law became commonly known as the CWA. The objective of the CWA is to restore and maintain the biological, chemical, and physical integrity of the nation's waters.

Federal and State Changes Reflected in Previous 208 Plan Updates

Several key changes had occurred in state government since the original 208 Plan was adopted; these were incorporated into the previous PAG 208 Plan updates. Foremost was the creation of the ADEQ by passage of the Environmental Quality Act in 1986 (A.R.S. § 49-102). Whereas the original 1978 PAG 208 Plan identified the Arizona Department of Health Services – Bureau of Water Quality Control as the state water pollution control agency, the Environmental Quality Act established ADEQ as the agency responsible for all major federal water quality legislation.

In 1987, Congress amended the CWA, Section 402(p), to require implementation of the stormwater program in two phases to address stormwater discharges. In 1990, the EPA issued regulations authorizing the creation of an NPDES permitting system for stormwater discharges from certain industrial activities. The NPDES program is designed to track point sources and requires the implementation of the control measures necessary to minimize or eliminate the discharge of pollutants to waters of the United States. The first phase of the program, commonly referred to as “Phase I,” was promulgated on November 16, 1990 (55 FR 47990). Phase I requires NPDES permits for stormwater discharge from priority sources, including MS4s generally serving populations of 100,000 or more. On August 7, 1995, the EPA promulgated a final rule that required facilities to be regulated under Phase II to apply for an NPDES permit. In 1999, the EPA published rules to expand Phase II permit coverage to include small municipalities and construction sites that disturb between 1 and 5 acres. ADEQ was delegated authority from the EPA to implement the NPDES stormwater program in Arizona (except on Native Nations) on December 5, 2002, also known as the Arizona Pollution Discharge Elimination System (AZPDES). Arizona obtained primacy for the NPDES in 2002. With state primacy, ADEQ issues AZPDES permits as well as APPs. ADEQ also regulates the reuse of treated effluent and enforces reclaimed water quality standards.

The CWA also established the aquifer protection program to protect the quality of the state's aquifers. All discharging facilities (including wastewater treatment facilities) must obtain APPs.

A groundwater related change at the state level was the passage of the Arizona Groundwater Management Act (GMA) in 1980. The purpose of the GMA is to address the issue of groundwater overdraft in several critical areas of the state. The GMA requires the ADWR to develop and promulgate a series of management plans that promote regulatory conservation programs for the Industrial, Municipal, and Agricultural water use sectors. The Tucson AMA is one of five in the State

of Arizona and has a safe-yield goal to be achieved by the year 2025. The AMAs are areas in the state that have experienced severe groundwater overdraft. The safe-yield goal and assured water supply requirements have led to increased emphasis on the use of CAP water and reclaimed water supplies. The GMA is incorporated into Arizona Revised Statute Title 45.

At the federal level, changes related to the CWA have also occurred since 1978. One change is the level of funding available for 208 Planning and 208 Plan implementation. In the 1970s and early 1980s, funding authorized by Section 208 of the CWA for developing and operating the 208 Plans was approximately \$100,000,000 per year. Today, federal funding for 208 Planning in Arizona is primarily available through section 604(b) grants, which in Arizona are limited to a total of \$40,000 for the entire state plus any remaining budget from the previous year. Current information regarding state funding can be found on the ADEQ Statewide Water Quality Management [Working Group Agenda and Meeting Minutes webpage](#)⁹.

Other changes include the establishment of the Clean Water State Revolving Fund in 1987, recently amended in 2014, which provides states with funds for water quality infrastructure projects.

Federal and State Changes Since the 2006 PAG 208 Plan Update

In October 2011, EPA's Office of Water and Office of Enforcement and Compliance Assurance issued this joint memo encouraging EPA Regions to assist their state and local partners in pursuing an integrated planning approach to CWA waste and stormwater obligations. The memo identifies GI as one comprehensive solution that can improve water quality and provide other benefits that enhance the vitality of communities.

In a 2012 evaluation of ADEQ's AZPDES process, the EPA required that ADEQ reissue MS4 permits to local jurisdictions and that they include measurable and enforceable standards for LID.

In 2017, ADEQ revised the Arizona Administrative code to allow the use of advanced treatment of recycled water for potable use. ADEQ now regulates the use of recycled water and enforces recycled water quality standards.

The Water Infrastructure Improvement Act, signed by the resident January 2019, provides flexibility to municipalities wishing to prioritize investments in wastewater and stormwater projects needed for Clean Water Act compliance and requires the EPA to promote the option of GI, which allows communities to use natural processes to infiltrate or reuse storm water runoff beneficially on-site where it is generated. This helps communities use GI to meet critical water management goals, while protecting the health, safety, and well-being of their residents by authorizing the use of GI into integrated plan permits under the integrated municipal stormwater and wastewater planning approach framework issued by the EPA.

Arizona's intrastate Drought Contingency Plan in 2019 included approval of state legislation granting an increase from 50% to 95% credit for six managed recharge projects in the state, among them the two Santa Cruz River in-channel projects. One is downstream of Tucson and the second is at the proposed Heritage Project near downtown. This legislation incentivizes recharging effluent in riverbeds at these six locations, as opposed to recharging the effluent in constructed basins elsewhere.

⁹ <http://www.azdeq.gov/statewide-water-quality-management-working-group-agenda-minutes>

DPA Designation Phase

Section 208 of the 1972 amendments to the CWA required the governor of each state to identify areas having water quality control problems, delineate the boundaries of these areas, and designate for each area “a single representative organization, including elected officials from local governments or their designees, capable of developing effective areawide waste treatment management plans” (CWA SEC. 208 [33 U.S.C. § 1288] Areawide Waste Treatment Management. Section 208(a)(2)). The law required each organization designated by the governor to develop a plan for areawide waste treatment management. The “single representative organization, including elected officials from local governments or their designees, capable of developing effective areawide waste treatment management plans” designated by the governor to develop a plan for its respective area is commonly referred to as the “Designated Planning Agency” or “DPA.” The plan itself is known as the “Certified Areawide Water Quality Management Plan” or “208 Plan.” These terms are defined in Arizona rule under [A.R.S § R18-5-301](#)¹⁰.

On July 8, 1970, Arizona Governor Jack Williams signed [Executive Order 70-2](#)¹¹, which divided Arizona into six initial planning districts, and directed that all planning functions conducted on a district-, regional-, or areawide basis conform to the prescribed planning areas. Per the law, existing regional agencies could be designated as the DPA. In 1974, PAG was designated as the DPA for Pima County, one of eight DPAs in Arizona. As the region’s DPA, PAG applied for a grant to develop the 208 Plan in 1975. The 208 Plan was completed and approved in 1978. The first region-wide, comprehensive update to the 1978 plan was approved in 2006.

PAG’s DPA legally encompasses all of Pima County but PAG does not have DPA authority over Native American lands. When PAG’s original 208 Plan was drafted, the boundary was delineated to reflect that the Tohono O’odham Nation is not within the PAG DPA. The Pascua Yaqui Tribe received federal recognition as a sovereign government in 1978 and so the PAG DPA is updated to reflect this. The Pascua Yaqui Tribe are provided wastewater service through the Pima County DMA and PAG coordinates with the Native American nations and invites them to be part of the 208 process, as desired.

History of Wastewater in Pima County

Prior to the Clean Water Act, the first public sanitary sewers in Pima County were installed in Tucson in 1900 and the first WWTF was constructed in 1928. Prior to construction of the treatment facility, wastewater was used directly for agricultural irrigation. In 1951, Phase 1 of the City of Tucson’s Roger Road WWTF began operation, and in 1961 the Pima County Sanitary District #1 installed the first wastewater treatment lagoon at the Ina Road site. This sanitary district was dissolved in 1968 and replaced by the Pima County Department of Sanitation.

In 1974, the City of Tucson and Pima County formed the Metropolitan Utilities Management Agency, through an intergovernmental agreement (IGA). This agency was created to operate water and sewerage systems within the Tucson city limits and in the unincorporated areas of Pima County (PAG 1975). However, the City of Tucson and Pima County continued to operate their respective sewerage systems until the joint agency was dissolved in 1976.

¹⁰ http://apps.azsos.gov/public_services/Title_18/18-05.pdf

¹¹ https://www.pagnet.org/documents/Water/PC208/ApxE_Apr06.pdf

Management Agency Designation Phases in Pima County

PAG, as the region's DPA, initially identified both Pima County and the City of Tucson as DMAs responsible for sewerage facilities. However, based on input from the EPA that preferred a single management agency, the 1978 208 Plan recommended consolidation of sewage treatment programs in the metropolitan area (PAG 1978).

In 1979, ownership and all responsibilities for the construction, operation, and maintenance of the City of Tucson's sewerage systems were transferred to Pima County. In recognition of the pending consolidation of facilities, the PAG Regional Council passed resolution 78-12-07 in December 1978 requesting that the Governor designate Pima County as the single 208 DMA for municipal wastewater treatment and sewer system operations. This designation is noted in a [1980 amendment](#)¹² to the 1978 208 Plan.

The 1979 IGA transferring the sewerage system stipulated that the City of Tucson would own and have unilateral control over the use and disposition of effluent discharged from metropolitan WWTFs. The IGA stated that Pima County was entitled to up to 10 percent of the effluent for use on County parks, golf courses, and recreational facilities. A supplemental IGA was negotiated in 2000 that addressed control of effluent from non-metropolitan facilities, access by other water providers to effluent derived from their water supplies, and establishment of a conservation pool of up to 10,000 AF per year for use of effluent in habitat conservation plans and other approved projects.

In 1998, the County's sanitation department was renamed the Pima County Wastewater Management Department and has since been renamed the Pima County Regional Wastewater Reclamation Department. Pima County remained the only DMA in the PAG planning area until March 1999, when the PAG Regional Council approved a 208 Plan Amendment designating the Town of Sahuarita as a DMA. The 2006 208 Plan identified a JPA outside the Sahuarita DMA boundaries that could be served by either the Sahuarita DMA or the Pima County DMA in the future. These areas are considered a part of both DMAs.

On March 27, 2014, an [amendment to the 208 Plan](#)¹³ established the Town of Marana as a DMA to provide wastewater collection and treatment services in a boundary area agreed to by the Town of Marana and Pima County. No additional DMAs have been proposed.

Previous 208 Plans, Amendments, and Policy Updates

Development of the 208 Plan since the original plan in 1978 is described in the section below.

Overview of the Original 208 Plan

The PAG Regional Council approved the 208 Plan for Pima County on June 22, 1978. The 208 Plan identified the roles of federal, state, regional, and local governments in water pollution control and addressed both point and nonpoint sources of pollution. The 208 Plan identified the

¹² <http://apps.pagnet.org/paglibrary/Electronic/Environmental/Wastewater/Water-PAG-1980-Amendment-to-208-Areawide-WW-Mgmt-Plan-1981.pdf>

¹³ <http://apps.pagnet.org/paglibrary/Electronic/Environmental/Wastewater/Water-PAG-208-Plan-Marana-Amendment-2013.pdf>

City of Tucson and Pima County as DMAs for their respective parts of the Tucson metropolitan area sewerage system. Pima County was identified as the DMA for rural parts of Pima County.

The final 1978 208 Plan (PAG 1978), which was essentially a summary report based on numerous supporting documents, noted that facility needs in the Tucson metropolitan area would be addressed in a parallel 201 facilities planning program under Section 201 of the CWA; the 201 Facility Plan, once adopted, would become part of the 208 Plan. The 208 Plan stated that 201 facilities planning and best management practices planning would be the prime responsibility of the City and County sewerage management agencies and that all 201 planning would be consistent with the recommendations for wastewater treatment contained in the approved 208 Plan.

The adopted 201 Facility Plan, *Metropolitan Tucson Regional Wastewater Management System* (Brown and Caldwell 1978), consisted of five documents: a summary/background report and four supplements. The four supplements were:

1. Regional Wastewater Treatment System
2. Regional Interceptor System
3. Environmental Impact Assessment
4. Outlying Facility Plans

The Facility Plan provided a much more detailed description of the WWTFs identified in the *PAG Areawide Wastewater Management Plan*. However, it did not identify any additional facilities, with the exception of a replacement facility for the Catalina Wastewater Treatment Plant, proposed to be located 2 miles south of the existing (at that time) facility.

Amendments and Point Source Updates to the 208 Plan

The 1978 208 Plan listed numerous point sources, including public WWTFs in the metropolitan area, public WWTFs outside the metropolitan area, and point sources from private WWTFs. Various 208 Plan Amendments and minor updates approved since 1978 have identified additional point sources, including facilities that existed at the time and facilities that were proposed for the future.

Table 1 contains all 208 Plan amendments and updates along with other Regional Council actions significantly affecting the 208 Plan from 1978 through 2018. The point sources identified since the creation of the 1978 208 Plan and each amendment and update since then are available online in the PAG [Facility Web Portal](#)¹⁴. Additionally, a map showing the locations of all the point sources (existing, closed, and proposed) previously identified in the 208 Plan and up to date as of January 2019 is available in Appendix 4 – Point Sources.

The 2006 208 Plan consolidated the original 1978 208 Plan and the various individual amendments and updates into one document. Updates included changes to municipal and industrial WWTFs and other point sources identified in the current plan and integration of policies that have been adopted through amendments. Changes that were incorporated into the 2006 update included the designation of the Town of Sahuarita as a DMA in 1999, negotiation of a supplemental IGA between the City of Tucson and Pima County in 2000 regarding treated

¹⁴ <https://gismaps.pagnet.org/PAG208Plan/Default.aspx>

wastewater effluent, additional IGAs between the City of Tucson, the Metro Water District, and Oro Valley, and passage of the Southern Arizona Water Rights Settlement Act. The 2006 208 Plan also updated the list of wastewater treatment facilities that had been constructed, updated, expanded, or closed from the original 1978 208 Plan.

The objective of the 2019 update to the 208 Plan was similarly to bring content up to date since the last comprehensive review in 2006 and to streamline the plan amendment process and consistency criteria. Since the 2006 208 Plan, the Town of Marana was designated as a DMA in 2014, and since the 2006 208 Plan was adopted, several wastewater treatment facilities have been constructed or upgraded, a number of existing facilities have been expanded, and some facilities have been closed. The changes included in this plan update have been documented in Appendix 2 – List of Changes for clarity during the approval process and can be incorporated here after adoption.

Table 1. Amendments and Updates to the 208 Plan and Other Related Regional Council Actions, 1978–2019

#	Title	Author	Year	PAG Library # or Link
1	PAG Areawide Wastewater Management Plan 1980 Amendment	PAG	1980	Link
2	El Conquistador Wastewater Reclamation Facility and Service Area	PAG	1981	Link
3	Amendment to PAG 208 Plan Point Source Element: Mt. Lemmon	PAG	1981	Link
4	Domestic Point Source Water Quality Planning Update Report for Areas A1 & A2	PRC Toups for PAG	1982	Link
5	Domestic Point Source Water Quality Planning Update Report for the Upper Canada del Oro Area	PRC Toups for PAG	1982	Link
6	Metropolitan Tucson Regional Wastewater Management System Facility Plan: Sludge Management and Disposal Program for the Roger Road Wastewater Treatment Facility	Pima County Wastewater Management Department	1983	Link
7	Regional Council Implementation of Processing Fee of \$3500 for administration of 208 Plan Amendments	PAG	1984	
8	Facility Plan Report Proposed 208 Point Source Element Amendment for MSP Companies WWTF	Greiner Engineering	1984	Link
9	Foothill Utility Wastewater Reclamation Facility Broadmoor Golf Course	Dooley-Jones & Associates	1984	Link
10	Green Valley Cortaro Area Management Plans	PAG	1984	Link
11	Areawide Wastewater Management Plan Point Source Update	PAG	1985	Link
12	Continental Ranch 208 Consistency Report – Continental Ranch Pump Station	WLB Group	1986	Link

Table 1. Amendments and Updates to the 208 Plan and Other Related Regional Council Actions, 1978–2019

#	Title	Author	Year	PAG Library # or Link
13	Catalina 208 Consistency Report and Plan Amendment (one document 1985 and 1987)	Pima County Wastewater Management Department	1987	Link
14	208 Plan Amendment for Canada Hills Development Company L.P.	Arthur Beard Eng	1987	
15	Marana Study Area 208 Consistency Report	Pima County Wastewater Management Department	1988	Link
16	Regional Council statement that the Target Area concept may be acceptable for the 208-planning process only when the plan amendment or consistency analysis is initiated by a public jurisdiction which is subject to land acquisition regulation	PAG	1988	
17	Guide to Areawide Water Quality Management Planning as Required Under Section 208 of the Clean Water Act	PAG	1990	Link
18	208 Consistency Report for MSP Companies WWTF	WLB Group	1992	Link
19	208 Plan Amendment for Management & Training Corporation – Marana Treatment Facility, Wastewater Reclamation Facility	Moore and Associates, Inc.	1993	Link
20	208 Plan Amendment for La Mirage Estates Wastewater Treatment Facility (WWTF)	ICON Consultants	1995	Link
21	Criteria for Establishing New Designated Management Agencies in Pima County (Regional Council policy)	PAG	1998	
22	The Wastewater Management Plan for Sahuarita – An Amendment to the PAG Areawide 208 Plan	Town of Sahuarita	1999	Link
23	Ajo Improvement Company 208 Plan Amendment	Ajo Improvement Company	1999	Link
24	Standard Outline guidance document for private wastewater facilities pursuing a 208 Plan Amendment (Regional Council policy)	PAG	1999	Link
25	Marana 208 Areawide Water Quality Management Plan Update	Malcolm Pirnie	2000	Link
26	Corona de Tucson Wastewater Treatment Facility Expansion Consistency Report	Pima County Wastewater and PAG	2004	Link
27	Miraval Resort, LLC. 208 Plan Amendment	WestLand Resources, Inc., for Miraval Resort Tucson and PAG	2007	Link

Table 1. Amendments and Updates to the 208 Plan and Other Related Regional Council Actions, 1978–2019

#	Title	Author	Year	PAG Library # or Link
28	Ina Road Wastewater Reclamation Facility and New Water Reclamation Campus at Roger Road (Regional Optimization Master Plan – ROMP)	Greeley & Hansen for Pima County Regional Wastewater Reclamation Department	2009	Link
29	Areawide Water Quality Management Plan Amendment for Town of Marana Facilities and DMA	WestLand Resources, Inc., for Town of Marana and PAG	2013	Link