



WATER QUALITY MANAGEMENT SECTION 208 PLAN REVIEW

Date Evaluated: **09.24.17**
 Permit Requestor: **City of Phoenix**
 Engineering Firm: **NCS Engineers**
Steve Wedwick, PE
steve@ncseng.com
602-629-0206
 Type of Permit: **Aquifer Protection Permit (APP)**
 Evaluator: **Jason Kelly, Planning Director**

Proposal

- **Location: unincorporated Coconino County between Strawberry and Winslow**
- **New On-site WWT & disposal system 6600 gpd**
- **Treatment process: textile filter**
- **Effluent Disposal: pressurized drip**

Reviewer Notes

Point Source Determination (Section VI pg 57)

Is this Point Source or Non Point Source facility?

- *A point source is defined as "any discernible confined and discrete conveyance including but not limited to a pipe, ditch, channel, or conduit from which pollutants are or may be discharged.*
- *Nonpoint source pollution (NPS) represents the most significant source of pollution overall in the country. The Clean Water Act (CWA) does not provide a detailed definition of nonpoint sources. However, numerous types of precipitation-induced runoff are treated as point sources rather than as nonpoint sources under the CWA -- including storm-water associated with industrial activity, construction-related runoff, and discharges from municipal separate storm sewer systems*

Centralized Wastewater Treatment Facilities

Are there WTF operating within vicinity? (pg 66)

No

Applicability of Small Plan Review / Approval Process

Does this WTF have ultimate capacity greater than .025 MGD which is not specifically identified in the Plan, and plants with surface water discharge (requiring NPDES) permit not specifically identified in the Plan? (pg 136)

NACOG has developed a small plant review and approval process allowing local jurisdictions control in approval of small WWTP without need to process formal plan amendments for every WWTP. Facilities less than 0.025 not discharging per AZ/NPDES permit requires Aquifer Protection Permit

No.

Per the engineer, this was permitted under a General Permit that allows up to 24,000 gpd. The original design, constructed wetlands with pressurized drip disposal, was undersized because the design flow was too low, which could explain why it failed (original design flow was 3,350 gpd). The current design flow of 6,600 gpd is based on the maximum number of campers and flows from Table 1 of the General Permits rules.

Capacity is less than 0.025 and plant not identified in 208 Plan.

Is the facility located within an existing municipality or sanitary district? Pg 137	No
Is this facility located within unincorporated area <u>and</u> within 3 miles of municipal or sanitary facility?	No
Conditions Requiring Plan Amendment	
Is there new management agency recommendations?	No
Changes in management or planning area boundaries?	No
Adoption of site-specific water quality standards or Total Max Daily Loads (TMDLs)?	None Proposed. Already permitted under a General Permit (4.23).
Construction/permitting of POTWs not incl/ in the WQM Plan?	None Proposed
Modifications design capacity?	Yes, but not to exceed existing General Permit allowance of 24,000 gpd.
Increase Quantity of pollutants discharged?	None proposed. Already considered under General Permit (4.23)
Change in method of effluent disposal?	No. The proposed disposal method is consistent with the disposal method. However, the drip field was undersized hence this proposal includes increased scope of field size.
Facility Permits	
Individual Permits for facilities included in Area wide Plan?	No
<p>Issuance of New NPDES permits or NPDES permit renewals?</p> <p><i>The Clean Water Act prohibits discharging "pollutants" through a "point source" into a "water of the United States" unless a National Pollutant Discharge Elimination System (NPDES) permit. The permit will contain limits on discharge, monitoring and reporting requirements, and other provisions to ensure discharge does not negatively influence water quality or public health. In essence, the permit translates general requirements of the Clean Water Act into specific provisions tailored to the operations of each person discharging pollutants.</i></p>	No
NACOG DETERMINATION	
<p>The proposal is to increase management capacity for a small WTF that is not in proximity to other WTF. Disposal method will remain static. The proposal does not, therefore, adversely impact existing centralized or regional WWTF.</p> <p>NACOG finds the proposal <i>Not Inconsistent</i> with the 208 Plan and therefore does not require a Plan Amendment.</p>	