



**AREA-WIDE WATER QUALITY MANAGEMENT SECTION 208 PLAN REVIEW**

Date Re-Evaluated: 9.13.16  
 Permittee: Pinewood Consulting LLC c/o Cottonwood Riverfront Water Reclamation Facility  
 Facility Location: Cottonwood, Arizona  
 Type of Permit: Aquifer Protection Permit (APP) Amendment  
 Evaluator: Chris Fetzer, Executive Director

**Proposal**

Reconsideration of previous position statement.

**Reviewer Notes**

**1. Point Source Determination**

Is this Point Source or Non Point Source facility?

**2. Centralized Wastewater Treatment Facilities**

Are there WTF operating within vicinity? (pg 64)

**3. Small Plan Review / Approval Process**

Is 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)

**4. Conditions Requiring Plan Amendment**

Is there new management agency recommendations?

Changes in management or planning area boundaries?

Adoption of site-specific water quality standards or Total Max Daily Loads (TMDLs)

Construction/permitting of POTWs not included in the WQM Plan

Modifications design capacity

Increase Quantity of pollutants discharged

Change in method of effluent disposal

**5. Facility Permits**

Individual Permits for facilities not included in Area wide Plan

Issuance of New NPDES permits or NPDES permit renewals

**NACOG DETERMINATION**

Maintain position on following statement forwarded to Ken Knickerbocker of Pineview Consulting on March 8, 2016:

After discussing with ADEQ and given that the scope of the project, as currently configured, has been significantly reduced in size and does not include the need for an AZPDES permit, it is not necessary to proceed with a Section 208 Plan Amendment at this point. In my discussion with ADEQ the parties agreed it makes sense to do a comprehensive amendment that defines how treatment and disposal will be handled in each of the zones throughout the city, while also including short/long-term options will be for addressing the 89 & Vine project.

A Plan Amendment is not recommended.