

PAG 208 Questions and Answers

How many years are in the 208 Planning horizon?

Regulations encourage you to look at a 20 year horizon, but our previous plan included flow projections going forward 30-35 years. This was made possible through population data adopted in our Long Range Transportation Plans.

What improvements can be made in the Plan?

Our primary goal is to streamline and update. We plan to investigate how other COGs have done this. We'd like to hear from our stakeholders.

Is the plan related to wastewater treatment plants, stormwater or solid waste? Is this only related to activities that lead to discharges? Does green infrastructure fall under this 208 hat?

To the extent practicable, wastewater treatment management shall be on an areawide basis. The Plan includes statuses of pollutants in the environment that can affect water quality— sanitary sewer, solid wastes, and stormwater quality. What the Clean Water Act intends for the 208 plan amendment is to look at wastewater, wastewater treatment, future projections for wastewater discharges, AZPDES program, APP program, etc. The focus of Amendment approvals is wastewater treatment and discharges. There are also areas in the 2006 Plan which address other topics, such as surface water quality and riparian areas.

We will investigate more to see if a green infrastructure and One Water approach to water quality management can be incorporated as a terminology updates where integrated planning and stormwater resource terminology was used in the plan that was adopted in PAG's 2006 208 Plan.

AZPDES permits come through PAG for review of consistency with the 208 Plan. When a permit comes through PAG for review, it prompts an opportunity to coordinate within our committees or to state our regional guiding principles such as riparian or GI approaches in the alternatives. There is a section in our 208 Plan on stormwater, and our ADEQ contract encourages integrated planning with non-point source pollutants. Because of this, we decided in the past to initiate the Stormwater Management Working Group and our related outreach.

How do you handle mobile treatment systems?

Brick and mortar treatment facilities need to be included. The new Innovation Challenge system will not be changing an outfall location and so they don't trigger a plan amendment.

How do you handle discussion of advanced treatment systems for direct potable reuse?

Reclaimed water use is an important component of the plan that will also be updated. There is a section in the Plan that looks at future conditions. Many agencies are starting that public information process now to help the public understand the safe quality so that they may accept the change and future potential need for that. If a local jurisdiction has adopted a plan or policy we can investigate and discuss

if it should be mentioned in their DMA section called a future conditions, to represent long-term planning efforts.

How do you incorporate public and stakeholder opinions? For example, if public comments stated they do not want recycled water, would we be committed to that, or would it be optional?

We plan to only update to match current regulations. The Plan itself provides guidelines to increase regional cooperation and ensure a process is followed. The “updating” will only address laws, rules, etc. codified since 2006; On a case by case basis, we may update the future conditions section for each facility to reflect their current local policies. We will focus PAG regional policy updates on matters that streamline the process.

How is the EPA involved? Are they involved in the process?

They are the last phase of approval. 208 planning is a local effort that goes through local approval processes, up the line to ADEQ and ADEQ forwards this to the EPA for informational purposes. The EPA has an opportunity to review the plan and make comments. If EPA does not provide feedback, the Plan is adopted.

EPA doesn't get involved unless there is something raised during the process very early. An ADEQ representative will be involved as soon as there is a draft. If something jumps out and the issue is worth further discussion, the ADEQ representative may bring that up to their director, and then it would move on up. What usually happens is that it goes through a regional process, and any issues that are raised at that time will hopefully go through that process and be resolved. That's the whole purpose of having this local DPA process. How does everyone in the region feel about the plan? What are the issues we agree on? There should be some consensus on that. When the regional process is through, then it goes through ADEQ to the Statewide Water Quality Management Working Group, which is made up of all of the DPAs in Arizona. If the Working Group identifies any issues, then they bring those back to ADEQ and the ADEQ representative writes up a review so ADEQ's management can see what the issues are. What are the discharges? What are any waters that are of concern? Part of the reason we do this is to identify water quality concerns, whether it's the Santa Cruz, other areas or stormwater. After ADEQ's directors to sign off, the Plan is sent to EPA electronically. ADEQ will notify EPA if there may be an issue. The EPA reviews it. If the EPA requires additional information, ADEQ will furnish it to them. The EPA has 30 days to review the plan. ADEQ expects a return letter that says the EPA has reviewed it and is okay with it. If a return letter is not received within 30 days, ADEQ tells the DPA that this is okay; EPA has not raised any concerns; it is delayed; as soon as ADEQ receives the letter, they will furnish it to the DPA to document that it is an approved plan.

PAG will keep the Statewide Water Quality Management Working Group up to date as we go along so there is no surprise after we send it to Regional Council, before it gets sent to the Working Group for final approval.