



**Pima Association of Governments**

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Tucson, AZ 85701

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## **208 Consistency Review Form & Checklist**

**Applicant: Please fill out applicable parts (I-IV) for your project and submit to PAG prior to submitting your permit application to ADEQ**

*Application Submittal: Send application and attachments to the PAG 208 program via email to [208info@pagregion.com](mailto:208info@pagregion.com). If you require assistance, call (520) 792-1093. 208 checklists in each DPA may vary.*

**Part Ia. Is your application for any of the following? Please check all that apply.**

- |   |
|---|
| <input type="checkbox"/> A new wastewater treatment facility (WWTF) <sup>12</sup>   |
| <input type="checkbox"/> A new or existing WWTF, groundwater remediation, reclaimed water or riparian restoration project that is adding an AZPDES discharge outfall or changing the location of a previously approved AZPDES discharge outfall |
| <input type="checkbox"/> An APP for a new or expanded WWTF <sup>1</sup>   |
| <input type="checkbox"/> An increase in permitted design capacity   |
| <input type="checkbox"/> Expansion of a facility service area in a JPA or within 3 miles of another DMA   |
| <input type="checkbox"/> Change of ownership of a WWTF  |
| <input type="checkbox"/> Sewage generated by an on-site WWTF 3,000 – 24,000 gpd <sup>1</sup>  |
| <input type="checkbox"/> New or changing JPA, DMA or WMU  |
| <input type="checkbox"/> Change of facility name, treatment method or land use <sup>3</sup>   |

***If you checked any of the boxes above, fill out Part II and submit it to PAG. PAG will conduct the Consistency Review and determine the next steps. If no boxes are checked, proceed directly to ADEQ.***

<sup>1</sup> If below 0.024 mgd (24,000 gpd), fill out part IIa, then sign and date item 13 or 14 and apply for a Pima County APP Type 4 General Permit unless directed otherwise by PAG during the Consistency Review application phase. For APP Type 4.01 General Permits for sewage collection systems, if the facility to be constructed will be owned by the PCRWRD, the Discharge Authorization will be issued by the Tucson Office of ADEQ.

<sup>2</sup> An industrial stormwater discharge that is in compliance with ADEQ's Multi-Sector General Permit (MSGP) or addressed by AZPDES municipal stormwater permits is considered consistent with the PAG 208 Plan and exempt from Consistency Review.

<sup>3</sup> Provide PAG with updated information in the form below. A Consistency Review is not required, provided that these changes will not negatively impact discharged water quality.

## Process A: Consistency Review & Data Update

Part II is required for the following 208 processes, unless otherwise directed by PAG:

- Process A: Consistency Review and Data Update
- Process B: Coordination Process for Public Facilities
- Process C: Amendments

Part IIa. Basic Information			
Facility Name			
Facility Address		Phone	
Facility Owner/Operator		Phone	
Applicant Name		Phone	
Applicant Email Address			

For existing facilities and/or data updates, only new or changing content is needed below.

Part IIb. Facility Information		Please fill in the blanks below (Provide a brief description)						
1. Permit Type	a. AZPDES	<input type="checkbox"/> New <input type="checkbox"/> Existing		Permit # (if existing)				
	b. If AZPDES, give name of surface water receiving the discharge	Current surface water discharged to and receiving protected water:						
		If applicable, future surface water discharged to:						
	c. APP	<input type="checkbox"/> New <input type="checkbox"/> Existing		Permit # (if existing)				
2. Facility Location	a. County							
	b. DPA							
	c. DMA or JPA							
	d. Name of incorporated area (if applicable)							
	e. AZPDES outfall location	Latitude	DD		MM		S	
		Longitude	DD		MM		S	
	f. Township, Range, Section		T		R		S	
3. Submit a map that includes the following items. Check the boxes where applicable.								
<input type="checkbox"/> a. Facility/site location		<input type="checkbox"/> b. Discharge location(s)		<input type="checkbox"/> c. Other disposal options				
<input type="checkbox"/> d. Service Area (for expansion include current and future area)								
a. New WWTF								

## Process A: Consistency Review & Data Update

<b>4. Describe applicable application action(s) checked in Part I. above.</b>	b. New outfall or change in outfall location	
	c. Capacity expansion (MGD)	
	d. Expansion of service area	
	e. Change in WWTF ownership	
	f. Sewage generated by an on-site wastewater treatment facility 0.003 – <0.024 MGD	
	g. Change of JPA, DMA or WMU	
	h. New JPA, DMA or WMU	
	i. Change to an existing public facility less than 5 MGD	<input type="checkbox"/> Check this box if expanded capacity is no more than the Maximum Flow for 208 Consistency
	j. AZPDES permit for an industrial stormwater discharge that is not in compliance with ADEQ's MSGP or is not addressed by AZPDES municipal stormwater permits	
	k. Change of facility name, treatment method or land use (only if triggered)	
	l. New or expanding on-site facility with a design capacity below 0.024 MGD (only if triggered)	
<b>5. Facility Information</b>	a. Treatment process	Existing:
		Future:
	b. Industrial pretreatment (for facilities with capacity 5 MGD or greater)	Existing:
		Future:
	c. Design capacity (annual average daily flow; MGD)	Existing: (Permitted Design Capacity)
		Future: (Proposed Capacity based on annual average daily flow)
	d. Effluent disposal method	Existing:
		Future:
	e. Effluent quality	Existing:
		Future:

## Process A: Consistency Review & Data Update

	f. Solids handling/disposal methods	Existing:	
		Future:	
	g. Flow projections (MGD; unless 20-year minimum is already available)	5-Year:	10-Year:
		15-Year:	20-Year:
<b>6. What type of entity will operate the facility?</b> (check applicable box)	<input type="checkbox"/> a. Municipal/public utility	Name:	
	<input type="checkbox"/> b. Private utility	Name:	
	<input type="checkbox"/> c. Semi-public ( <i>sanitary district, improvement district</i> )	Name:	
	<input type="checkbox"/> d. Other ( <i>explain type</i> )	Name: Type:	
<b>7. Timeline</b>	a. Provide a timeline of activities, including phasing information		
	b. Temporary facilities?		
<b>8. Additional project information</b>	a. How will the project be funded?		
	b. Engineering Firm		
	c. Engineering Firm Contact Information		
<b>9. Service Area</b> (describe changes, if changed)	a. Written description of service area		
	b. Is the service area... (if one or more boxes are checked, please explain below)	<input type="checkbox"/> Within more than one DPA?	
		<input type="checkbox"/> Within more than one DMA?	
		<input type="checkbox"/> Within 3 miles of another DMA?	
		<input type="checkbox"/> Within a JPA?	
		<input type="checkbox"/> Within a WMU?	
		Explanation:	
	c. Identify nearby environmental justice stakeholders		
<b>10. Describe impacts or benefits of</b>	a. If effluent is used as reclaimed water, recharged or discharged to a riparian area, describe impacts/benefits		

## Process A: Consistency Review & Data Update

the proposed project	b. For discharges to a surface water, describe the discharge impact area, including the anticipated extent of flow	
	c. Describe impacts or benefits to the following	Surrounding land uses:
		Priority water bodies identified in PAG 208 Plan:
		Odor:
		Noise:
		Water quality:
		Air Quality:
11. Purpose	a. Describe the purpose/ reason for the proposed project	
	b. Describe alternatives considered and reason for preferred alternative, including economic considerations	
<b>12. Provide the following attachments. Check the boxes where applicable.</b>		
<input type="checkbox"/> a. Support letter from DMA in which the facility is located ( <i>if applicant is not the current DMA</i> ). <input type="checkbox"/> b. Support letter(s) from other DMA(s) ( <i>if within 3 miles of another DMA or if service area or outfall are partially or completely in another DMA or JPA</i> ). <input type="checkbox"/> c. Support letter(s) from impacted jurisdiction(s) ( <i>if different than DMA</i> ). <input type="checkbox"/> d. GIS data (discharge location, facility location, service area, planning area; <i>if feasible</i> ). <input type="checkbox"/> e. Hydrogeologic studies ( <i>if available</i> ). <input type="checkbox"/> f. A cost-effectiveness analysis that substantiates the plant as the most viable method of serving the area in both the long- and short-term ( <i>optional at this stage unless requested or otherwise specified</i> ).		

## Process A: Consistency Review & Data Update

### 13. For Private On-Site Facilities Only

By signing below, I agree to follow PAG's policies for private on-site facilities and assert that the following statements are true:

- The facility will employ best practices so that there is no odor or water quality impact.
- The facility will not discharge to waters of the U.S.
- The facility will be connected to a DMA-owned facility (regional public facility) when service becomes available.
- The facility will not accept industrial waste.
- The facility will not accept commercial waste unless the waste is generated by light commercial applications including schools, RV parks, strip malls and small subdivisions.

Provide the following attachments:

- ☐ a. Notify property owners within ½ mile and provide documentation (*only required for facilities between 0.003 and <0.024 MGD*).
- ☐ b. Letter of agreement from water provider in the area.
- ☐ c. Letter of financial capability.

<b>Owner/Manager Name</b>		
<b>Owner/Manager Signature</b>		Date:

### 14. For Public On-Site Facilities Only

By signing below, I agree to follow PAG's policies for public on-site facilities and assert that the following statements are true:

- Integration to the regional wastewater system is neither planned nor anticipated.
- The facility will be functionally and environmentally sound.
- The facility is the most cost-effective alternative to the public for relief of deficiencies of conveyance system capacity.

Provide the following attachments:

- ☐ a. Notify property owners within ½ mile and provide documentation (*only required for facilities between 0.003 and <0.024 MGD*).
- ☐ b. Letter of agreement from water provider in the area.
- ☐ c. Documentation of regional approval, such as approved facility plans.
- ☐ d. A cost-effectiveness analysis that substantiates the plant as the most viable method of serving the area in both the long- and short-term.

<b>Facility Manager Name</b>		
<b>Facility Manager Signature</b>		Date:

### 15. For Change of Ownership Between Two Private Entities Only (*If not already provided in the Consistency Review Portal*)

By signing below, I agree to follow PAG's policies for private facilities and assert that the following statements are true:

## Process A: Consistency Review & Data Update

- Integration to the regional wastewater system is neither planned nor anticipated.
- The facility will be functionally and environmentally sound.
- The facility is the most cost-effective alternative to the public for relief of deficiencies of conveyance system capacity.

Provide the following attachments\*:

- ☐ a. A cost-effectiveness analysis that substantiates the plant as the most viable method of serving the area in both the long- and short-term.
- ☐ b. An approved plan for service to the affected area throughout the design life and afterwards.
- ☐ c. A DMA-approved plan for wastewater service to neighboring areas.
- ☐ d. Documentation of public hearing, including:
  - A copy of mailing list used to notify the public of the public hearing.
  - Location where documents are available for review at least 30 days before public hearing.
  - A copy of the public notice of the public hearing as well as an official affidavit of publication from the area newspaper at least 45 days before the hearing.
  - A responsiveness summary for the public hearing.

*\*Documents a through c may be provided by previous owner unless new owner wishes to revise these plans and seek new approvals.*

<b>New Owner Name</b>		
<b>New Owner Signature</b>		Date:

**Application Submittal by one of the following:**

<b>Applicant Name</b>		Title:
<b>Applicant Signature</b>		Date:
<b>Permit Writer Name</b>		Title:
<b>Permit Writer Signature</b>		Date:

**PAG DPA Evaluation:**

<b>Reviewer Name</b>		Title:
<b>Reviewer Signature</b>		Date:
<b>Executive Director Name</b>		
<b>Executive Director Signature</b>		Date:

## Process A: Consistency Review & Data Update

PAG DETERMINATION (PAG USE ONLY)		
<input type="checkbox"/> Consistent	<input type="checkbox"/> Not Inconsistent	<input type="checkbox"/> Inconsistent
Notes: <i>See PAG determination letter for complete recommendation.</i>		
Is a 208 Plan Coordination Process Required? <input type="checkbox"/> Yes <input type="checkbox"/> No		
Is a 208 Plan Amendment Required? <input type="checkbox"/> Yes <input type="checkbox"/> No		

Based on Section 208 of the Federal Water Pollution Control Act, Arizona Administrative Code R18-9-108(B) (10), and/or the Certified Area Water Quality Management Plan this request for 208 Consistency Review has been completed.