

MAG 208 Water Quality Management Plan Small Plant Review and Approval Process Pre-Application Packet

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What is the MAG 208 Water Quality Management Plan?

The Maricopa Association of Governments (MAG) is the designated Regional Water Quality Management Planning Agency for Maricopa County. This designation was made in 1974 by the Governor, in accordance with Section 208 of the Clean Water Act. In this capacity, MAG prepares the 208 Water Quality Management Plan for the region. The MAG 208 Plan consists of two major elements: the Point Source element and the Nonpoint Source element. The Point Source element describes the preferred wastewater treatment system to serve the needs of the region over a 20 year time period. The Nonpoint Source element primarily describes regional surface and groundwater quality, and federal and state program activities designed to control nonpoint source pollution.

The MAG 208 Plan is the key guiding document used by the Arizona Department of Environmental Quality

and Maricopa County in granting permits for wastewater treatment plants in the region. If a proposed facility is not included in the MAG 208 Plan, the Plan would need to be modified. The MAG 208 Plan is subject to change in accordance with three established procedures: a Periodic Major Revision of the 208 Plan; the 208 Plan Amendment Process; and the Small Plant Review and Approval Process. This pre-application packet addresses the Small Plant Review and Approval Process, which is a shortened process for small wastewater treatment plants. Under this process, a small plant is one with an ultimate capacity of 2.0 million gallons per day or less with no discharge requiring an Arizona Pollutant Discharge Elimination System (AZPDES) Permit.



MAG 208 Plan Small Plant Review and Approval Process—Where Do I Begin?

This pre-application packet has been developed to provide the applicant with useful tools in navigating the MAG 208 Plan Small Plant Review and Approval Process.

Contact the jurisdiction in which the facility would be located (sponsoring jurisdiction) to discuss the potential need for the small plant and this pre-application packet.

If it is determined that a Small Plant Review and Approval is required, draft the document, addressing the guidelines or criteria from the appropriate table in this pre-application packet, and submit it to the sponsoring jurisdiction.

To assist the applicant in completing the small plant document, please refer to previously approved MAG 208 Plan Small Plant Review and Approvals that are available on the MAG website at <http://www.azmag.gov/Projects/Project.asp?CMSID2=1142&MID=Environmental%20Programs>

Inside This Packet

1. Fact Sheet on Incorporating a Small Plant into the MAG 208 Water Quality Management Plan (Step-by-Step Description of the Small Plant Review and Approval Process).
2. Guidelines for Small Plants Within a Municipal Small Plant Planning Area.
3. Criteria for Feasibility Report for Small Plants Outside of a Municipal Small Plant Planning Area.

For more information:

Maricopa Association of Governments
302 North 1st Avenue, Suite 300, Phoenix, AZ 85003
Phone: (602) 254-6300, Website: www.azmag.gov



Streamlined MAG 208 Small Plant Review and Approval Process Incorporating a Small Plant into the MAG 208 Water Quality Management Plan



What is the MAG 208 Water Quality Management Plan?

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What is the Approval Process?

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Streamlined MAG 208 Small Plant Review and Approval Process

include but would not be limited to: population and flow projections for the twenty-year planning period for the facility; anticipated phasing; unit flows; site location; setbacks; odor control; adjacent areas that could potentially be included in the area to be served; master plans prepared that would provide substationing information; methods of disposal; any mitigating issues in the area such as Superfund Sites; assumptions used; and the sponsoring jurisdiction's General Plan, Water and Wastewater Master Plans, and Capital Improvement Program. In addition, the sponsoring jurisdiction reviews the small plant based on the appropriate table in the pre-application packet (e.g., Guidelines for Small Plants Within Municipal Small Plant Planning Area, Criteria for Feasibility Report for Small Plants Outside of Municipal Small Plant Planning Area). It is important to note that the 60 day clock would stop if the jurisdiction is waiting for comments to be addressed or additional information to be provided. If the sponsoring jurisdiction has not submitted the small plant at the end of the 60 days, the application would be considered by MAG through the Small Plant Review and Approval Process.

To be approved for construction within a Municipal Small Plant Planning Area, a small wastewater treatment plant (2.0 mgd ultimate capacity of less) not otherwise mentioned in the MAG 208 Plan, must have the approval of the municipality in whose planning area it will be located; not adversely affect the operation or financial structure of existing or proposed wastewater treatment plants; be consistent with State and County regulations and other requirements; and be otherwise consistent with the MAG 208 Plan.

To be approved for construction outside of a Municipal Small Plant Planning Area, a small wastewater treatment plant (2.0 mgd or less) not otherwise mentioned in the MAG 208 Plan, must have the review and comment of any municipality whose Small Plant Planning Area is within three miles of the proposed location of service area; not adversely affect the operation or financial structure of existing or proposed wastewater treatment plants; be consistent with State and County regulations and other requirements; be otherwise consistent with the MAG 208 Plan; and, if approved, or modified by Maricopa County Environmental Services Department.

December 2015



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To assist the applicant in completing the small plant document, please refer to previously approved MAG 208 Plan Small Plant Review and Approvals that are available on the MAG website at

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Incorporating a Small Plant into the MAG 208 Water Quality Management Plan



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The MAG 208 Plan is the key guiding document used by the Arizona Department of Environmental Quality (ADEQ) and Maricopa County in granting permits for wastewater treatment plants in the MAG region. Consistency is required for the Aquifer Protection Permit and Arizona Pollutant Discharge Elimination System (AZPDES) Permit issued by the Arizona Department of Environmental Quality. Consistency is also required for the Approval to Construct issued by the Maricopa County Environmental Services Department.

What is the Small Plant Review and Approval Process?

Rather than amend the MAG 208 Water Quality Management Plan to include every acceptable new small plant, a small plant review and approval process was developed in 1982 by a Small Plants Technical Steering Committee composed of representatives from the cities, state, county, and homebuilders. Under this process, a small wastewater treatment plant not specifically identified in the MAG 208 Plan can be approved as part Plan if the facility goes through the Small Plant Review and Approval Process. A small plant is one with an ultimate capacity of 2.0 million gallons per day (mgd) or less, with no discharge requiring an AZPDES Permit. By requiring proposed plants in the area to obtain approval using this formal process, an uncontrolled proliferation of small plants that could cause problems in the future could be prevented.

Three areas of responsibility apply in the Small Plant Review and Approval Process. The first is the Municipal Small Plant Planning Area, which is the same as the MAG Municipal Planning Area. This is the area identified by the municipality within which the City or Town would have responsibility for the first review and approval of proposed wastewater reclamation facilities. The second is the County Planning Area, in which the County would have the responsibility for deciding which wastewater reclamation facilities were constructed. Between the two areas is a third area. This is the area in the County that is within three miles of a Municipal Small Plant Planning Area. Although this area is within the County's area of responsibility, the County must consider the comments of the nearby City or Town concerning proposed facilities in this three mile area.

Streamlined MAG 208 Small Plant Review and Approval Process

Incorporating a Small Plant into the MAG 208 Water Quality Management Plan (continued)

When is a MAG 208 Plan Small Plant Review and Approval required?

A MAG 208 Plan Small Plant Review and Approval is required for:

- New publicly or privately owned wastewater treatment facility 2.0 mgd or less with no discharge requiring an AZPDES Permit that is not identified in the MAG 208 Plan.
- Increasing the capacity of a publicly or privately owned small wastewater treatment facility specifically identified in the MAG 208 Plan where the expanded facility would still meet the small plant threshold of 2.0 mgd or less.

Plants greater than 2.0 mgd and those with a discharge requiring an AZPDES Permit would go through the MAG 208 Water Quality Management Plan Amendment Process. Contact MAG for more information on this process.



How Long Does the Small Plant Review and Approval Process Take?

The Small Plant Review and Approval Process takes approximately six months, which includes the MAG member agency (sponsoring jurisdiction) portion: four months; MAG portion: one-and-one-half months; and the Arizona Department of Environmental Quality portion: one-half month. The steps of the Small Plant Review and Approval Process are provided on the following pages.



For More Information:

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Phoenix, Arizona 85003

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Steps for the Small Plant Review and Approval Process

Step 1: Determination if a Small Plant Review and Approval is Required

The applicant would contact the jurisdiction in which the facility would be located (sponsoring jurisdiction) to discuss the potential need for a Small Plant Review and Approval and the pre-application packet, which is available on the MAG website at www.azmag.gov. The pre-application packet includes: a step-by-step description of the Small Plant Review and Approval Process; a table on the Guidelines for Small Plants Within Municipal Small Plant Planning Area; a table on the Criteria for Feasibility Report for Small Plants Outside of Municipal Small Plant Planning Area; and links to previously approved small plants to use as an example. If a Small Plant Review and Approval is required, the applicant would draft the small plant document, addressing the guidelines or criteria in the appropriate table in the pre-application packet, and submit it to the sponsoring jurisdiction.

Step 2: 60 Day Completeness Review by the Sponsoring Jurisdiction

The sponsoring jurisdiction has 60 days to review the application, which includes the draft small plant document that addresses the guidelines or criteria from the appropriate table in the pre-application packet. A pre-application meeting is conducted by the sponsoring jurisdiction within the 60 day completeness review period. The sponsoring jurisdiction indicates if the application is complete or if additional information is necessary. If the sponsoring jurisdiction requests additional information, the 60 day clock stops until it is provided.

Step 3: 60 Day Small Plant Review by the Sponsoring Jurisdiction and Workshop with Neighboring Jurisdictions

The sponsoring jurisdiction has 60 days to submit the Small Plant Review and Approval to MAG once it has determined that the small plant application is complete. In accordance with Section 208(b)(2) of the Clean Water Act, the MAG 208 Water Quality Management Plan is required to include the identification of the treatment works necessary to meet the anticipated municipal and industrial needs of the area over a twenty-year period and identify the economic, social, and environmental impacts. Therefore, the review of the small plant by the sponsoring jurisdiction may

include but would not be limited to: population and flow projections for the twenty-year planning period for the facility; anticipated phasing; unit flows; site location; setbacks; odor control; adjacent areas that could potentially be included in the area to be served; master plans prepared that would provide substantiating information; methods of disposal; any mitigating issues in the area such as Superfund Sites; assumptions used; and the sponsoring jurisdiction's General Plan, Water and Wastewater Master Plans, and Capital Improvement Program. In addition, the sponsoring jurisdiction reviews the small plant based on the appropriate table in the pre-application packet (e.g., Guidelines for Small Plants Within Municipal Small Plant Planning Area, Criteria for Feasibility Report for Small Plants Outside of Municipal Small Plant Planning Area). It is important to note that the 60 day clock would stop if the jurisdiction is waiting for comments to be addressed or additional information to be provided. If the sponsoring jurisdiction has not submitted the small plant at the end of the 60 days, the application would be considered by MAG through the Small Plant Review and Approval Process.

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To be approved for construction outside of a Municipal Small Plant Planning Area, a small wastewater treatment plant (2.0 mgd or less) not otherwise mentioned in the MAG 208 Plan, must: have the review and comment of any municipality whose Small Plant Planning Area is within three miles of the proposed plant location of service area; not adversely affect the operation or financial structure of existing or proposed wastewater treatment plants; be consistent with State and County regulations and other requirements; be otherwise consistent with the MAG 208 Plan; and, be evaluated and approved, or modified by Maricopa County Environmental Services Department.

Steps for the Small Plant Review and Approval Process (continued)

A workshop is held by the sponsoring jurisdiction during the 60 day small plant review period to inform the other jurisdictions within three miles of the small plant and request letters of no objection, support, or comment. For a small plant within a Municipal Small Plant Planning Area, the MAG 208 Plan recommends that the City or Town reviewing a proposed development contact any adjacent community if the proposed development is within three miles of the boundary between the two communities. For a small plant outside a Municipal Small Plant Planning Area, it must have the review and comment of any municipality whose Small Plant Planning Area is within three miles of the proposed plant location or service area. The purpose of the workshop is to make it easier to obtain letters of no objection, support, or comment from neighboring jurisdictions and save time. The workshop makes the local and regional 208 process easier to navigate.

The sponsoring jurisdiction provides updates to MAG staff on the timelines for the small plant application completeness and review.

The applicant identifies and contacts private utilities within three miles of the Small Plant Review and Approval to make them aware of the proposed small plant.

Step 4: Request for Small Plant Review and Approval

The sponsoring jurisdiction initiates the request to MAG to include the new small wastewater treatment facility in the MAG 208 Plan. Prior to the official request, the jurisdiction may also request an informal review of the Small Plant Review and Approval by MAG staff to ensure that all pertinent items have been addressed in the document. The Guidelines for Small Plants Within Municipal Small Plant Planning Area and Criteria for Feasibility Report for Small Plants Outside of Municipal Small Plant Planning Area and examples of previously approved Small Plant Review and Approvals are available on the MAG website at www.azmag.gov.

Step 5: MAG Water Quality Advisory Committee

Once MAG receives the official request from the jurisdiction in which the facility would be located and the Small Plant Review and Approval document, a meeting of the MAG Water Quality Advisory Committee is scheduled. The Committee reviews the proposal for overall 208 Plan compliance to ensure that the Small

Plant Process is followed, and to ensure that regional impacts are addressed. The MAG Water Quality Advisory Committee then makes a recommendation to the MAG Management Committee. In general, the MAG Water Quality Advisory Committee meetings are conducted on an as needed basis.

Step 6: MAG Management Committee

The MAG Management Committee reviews the recommendation from the Water Quality Advisory Committee. The Management Committee then makes a recommendation to the MAG Regional Council. In general, the MAG Management Committee meets on a monthly basis.

Step 7: MAG Regional Council

The MAG Regional Council reviews the recommendation from the Management Committee. The Regional Council then takes official action to approve the Small Plant Review and Approval. The Regional Council is the decision-making body of MAG. In general, the MAG Regional Council meets on a monthly basis.

Step 8: Arizona Department of Environmental Quality

Based on Regional Council action, MAG sends a letter to the Arizona Department of Environmental Quality and a proposal summary (copies to developer, City and the Maricopa County Environmental Services Department), stating whether the proposed project is compatible with the overall 208 Plan. Within 15 days, ADEQ submits a letter and proposal summary to the Maricopa County Environmental Services Department and developer stating whether the proposed project is in conformance with the MAG 208 Plan.

Step 9: Maricopa County Environmental Services Department

Upon receipt of an approval letter from the Arizona Department of Environmental Quality, the developer submits plans and specifications, and a copy of the approved design concept to the Maricopa County Environmental Services Department. The County reviews these items based on the ADEQ Bulletin #11 and County regulations, and issues the Approval to Construct.

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GUIDELINES FOR SMALL PLANTS WITHIN MUNICIPAL SMALL PLANT PLANNING AREA

The guidelines below pertain to small plants that would be located within a Municipal Small Plant Planning Area. For purposes of the MAG 208 Water Quality Management Plan, Municipal Small Plant Planning Areas are the same as MAG Municipal Planning Areas.

Guidelines for Small Plants Within Municipal Small Plant Planning Area	
1)	<ul style="list-style-type: none"> Plant Justification <ul style="list-style-type: none"> • Why Plant is Required <ul style="list-style-type: none"> - Limited capacity at existing plant or sewer - Too far from trunk sewer - Temporary plant - Soil limitations - Effluent reuse or water conservation - Sludge management options - Other
	<ul style="list-style-type: none"> • Master Plan Compatibility <ul style="list-style-type: none"> - Is plant compatible with future plans for the area? - Will proposed plant impact existing or proposed plants? - Will proposed plant impact existing or proposed reuse plans in the region?
	<ul style="list-style-type: none"> • Benefits of Plant <ul style="list-style-type: none"> - Net water saving - Delays major capital expenditures - Better scheduling and project control - Allows development
	<ul style="list-style-type: none"> • Potential Problems <ul style="list-style-type: none"> - High capital and operating costs - Impacts on groundwater - Impacts on surface water - Inability to meet State regulations - Financial failure of operation - Poor operation and maintenance (O&M)
	<ul style="list-style-type: none"> • Financial <ul style="list-style-type: none"> - Who will fund construction? - Who will fund O&M costs - short term? - Who will fund O&M costs - long term? - Financial security
	<ul style="list-style-type: none"> • Operation <ul style="list-style-type: none"> - Who will operate plant - short term? - Who will operate plant - long term?

Note: The guidelines for small plants within a Municipal Small Plant Planning Area are also provided in the October 2002 MAG 208 Plan beginning on Page 4-230 and the June 2014 MAG 208 Plan Point Source Update beginning on Page 3-8.

**CRITERIA FOR FEASIBILITY REPORT FOR SMALL PLANTS OUTSIDE OF
MUNICIPAL SMALL PLANT PLANNING AREA**

The criteria below pertain to small plants that would be located outside a Municipal Small Plant Planning Area. For purposes of the MAG 208 Water Quality Management Plan, Municipal Small Plant Planning Areas are the same as MAG Municipal Planning Areas.

Criteria for Feasibility Report for Small Plants Outside of Municipal Small Plant Planning Area	
1)	<p>Technical Criteria</p> <ul style="list-style-type: none"> • Why is small plant desired? <ul style="list-style-type: none"> - Depth to groundwater less than ____ ft. - Soil limitations prevent use of septic tanks - Potential for reuse or water conservation - Lot size one acre or less - Area not planned for regional service for ____ years - Density of projected population - Will serve industrial or commercial area
	<ul style="list-style-type: none"> • What is the anticipated quality of the wastewater? <ul style="list-style-type: none"> - Domestic - Commercial and/or Industrial - If commercial and/or industrial wastes are anticipated, what provisions are being taken to ensure no toxic substances will be discharged?
	<ul style="list-style-type: none"> • How and why was small plant design and capacity selected? <ul style="list-style-type: none"> - What criteria were used? - What alternatives were considered? - What are benefits, problems of alternatives? - Will there be problems meeting State or County regulations? - What sludge management options were considered?
2)	<p>Planning Criteria</p> <ul style="list-style-type: none"> • Is proposed plant compatible with County adopted master plans, guidelines, etc., for the area? <ul style="list-style-type: none"> - What plans apply? - What guidelines or policies apply?
	<ul style="list-style-type: none"> • Can the proposed plant be expanded to serve growing population? <ul style="list-style-type: none"> - What population is projected for the service area? - Would certain areas lend themselves, topographically or hydrologically, by planned use or density to being included in the service area?
	<ul style="list-style-type: none"> • Will proposed plant adversely impact existing or approved nearby land uses? <ul style="list-style-type: none"> - What are land uses within ____ miles? - What is zoning for the surrounding area? - What are reactions of nearby landowners to proposed facility?

**CRITERIA FOR FEASIBILITY REPORT FOR SMALL PLANTS OUTSIDE OF
MUNICIPAL SMALL PLANT PLANNING AREA (continued)**

Criteria for Feasibility Report for Small Plants Outside of Municipal Small Plant Planning Area	
	<ul style="list-style-type: none"> • Will there be a net water saving from effluent reuse? <ul style="list-style-type: none"> - How will effluent be disposed of? - What is the estimated water saving?
	<ul style="list-style-type: none"> • Do nearby existing or proposed land uses indicate a need for a larger capacity sewage plant than that proposed? <ul style="list-style-type: none"> - Should nearby areas be sewered or otherwise join the proposed plant for water quality or economic reasons? - Do these areas wish to join the proposed plant?
3)	<p>Development Criteria</p> <ul style="list-style-type: none"> • Who will fund construction? • Who will fund operation and maintenance costs? • Is there adequate financial security to assure continual and proper operation and maintenance? • Who will operate and maintain the plant and system? • What are anticipated capital and operation and maintenance costs?

Note: The criteria for small plants outside a Municipal Small Plant Planning Area are also provided in the October 2002 MAG 208 Plan beginning on Page 4-232 and the June 2014 MAG 208 Plan Point Source Update beginning on Page 3-11.