

ORIGINAL



0000019365

LAW OFFICES

FENNEMORE CRAIG

A PROFESSIONAL CORPORATION

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SUITE 2600
PHOENIX, ARIZONA 85012-2913
PHONE: (602) 916-5000
FAX: (602) 916-5999

May 10, 2005

HAND DELIVERY

Ernest Johnson, Director
Utilities Division
Arizona Corporation Commission
1200 W. Washington St.
Phoenix, Arizona 85007

Arizona Corporation Commission
DOCKETED

MAY 10 2005

DOCKETED BY

AZ CORP COMMISSION
DOCUMENT CONTROL

2005 MAY 10 10:19 2:19

RECEIVED

Re: Johnson Utilities Company: Compliance with Decision No. 65840
Notice of Violation from ADEQ dated April 28, 2005
WS-02987A-99-0583; WS-02987A-00-0618; W-02234A-00-0371;
W-02859A-00-0774; W-01395A-00-0784

Dear Mr. Johnson:

On May 3, 2005, Johnson Utilities Company ("Johnson Utilities") received a letter from the Arizona Department of Environmental Quality ("ADEQ") dated April 28, 2005, regarding exceedances in fecal coliform for effluent monitoring that occurred during the 3rd and 4th quarters of 2004. A copy of the Notice of Violation ("NOV") is attached hereto as Attachment No. 1.

Decision No. 65840 (April 22, 2003) requires that:

In the event that JUC receives any Notices of Violation ("NOV") from ADEQ, it will within seven days from receipt of such notice, provide a copy of such NOV to the Utilities Division Director ("Director"). Subsequent to the transmission of such NOV, JUC will continue to provide copies to the Director of all relevant documents, including but not limited to any documents, or pleadings filed with ADEQ and or by JUC relating to the NOV and the steps JUC takes to come into compliance, until the ultimate resolution of the NOV.

FENNEMORE CRAIG

Ernest Johnson, Director
May 10, 2005
Page 2

Attached hereto as Attachment No. 2 is a May 6, 2005, response to the NOV from Brian Tompsett, Vice President of Johnson Utilities. Johnson Utilities will continue to provide the Utilities Division with any correspondence between Johnson Utilities and ADEQ regarding this matter until final resolution, or closure of the NOV. In the meantime, should you have any questions or concerns, please do not hesitate to call me.

Thank you for your time and consideration in this matter.

Very truly yours,



Patrick J. Black

Enclosure

cc: Brian Tompsett, Johnson Utilities (w/out enc.)
Steve Olea, Assistant Director (w/enc.)
Brian Bozzo, Compliance Manager (w/enc.)
Docket Control (w/enc.)

1665172.1/51239.001

ATTACHMENT 1



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007
(602) 771-2300 • www.adeq.state.az.us



Stephen A. Owens
Director

RECEIVED MAY 03 2005

Ref: #FS05-570
April 28, 2005

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Brian Tompsett, Vice President
Johnson Utilities Company
5230 E. Shea Blvd., Suite 200
Scottsdale, AZ 85254

**Re: Annual Compliance Inspection of the Pecan Water Reclamation Plant (WRP),
Inventory No. 105324, Place ID 18583, APP No. P105324, Type 2 Reclaimed Water
General Permit No. R105491, Middle Gila River Watershed and Issuance of a
Notice of Violation for APP monitoring violations.**

Dear Mr. Tompsett:

Enclosed is a Notice of Violation ("NOV") and inspection report prepared by William J. Hare concerning the compliance inspection conducted at the site on March 30, 2005. The NOV is being issued for numerous exceedances in Fecal Coliform for effluent monitoring that occurred during the 3rd and 4th quarters of 2004. In addition, the facility failed to conduct turbidity monitoring during the 3rd and 4th quarters of 2004.

The inspection found that the facility has recently made operational and personnel changes to correct the aforementioned violations. The operational and personnel changes that have been implemented have greatly improved the overall performance of the WRP.

The attached Notice of Violation ("NOV") is an informal compliance assurance tool used by ADEQ to put a responsible party (such as a facility owner or operator) on notice that the Department believes a violation of an environmental requirement has occurred. It describes the facts known to ADEQ at the time of issuance and cites the requirement that ADEQ believes the party has violated.

Although ADEQ has the authority to issue appealable administrative orders compelling compliance, an NOV has no such force or effect. Rather, an NOV provides the responsible party an opportunity to do any of the following before ADEQ takes formal enforcement action: (1) meet with ADEQ and discuss the facts surrounding the violation, (2) demonstrate to ADEQ that no violation has occurred, or (3) document that the violation has been corrected.

ADEQ reserves the right to take a formal enforcement action, such as issuing an administrative order or filing a civil lawsuit, regardless of whether the Department has issued an NOV. Neither ADEQ's issuance of an NOV nor its failure to do so precludes the Department from pursuing

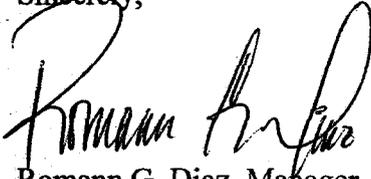
Northern Regional Office
1515 East Cedar Avenue • Suite F • Flagstaff, AZ 86004
(928) 779-0313

Southern Regional Office
400 West Congress Street • Suite 433 • Tucson, AZ 85701
(520) 628-6733

these remedies. However, the timeliness of a complete response to this notice will be considered by ADEQ in determining if and how to pursue such remedies.

If you should have any questions please contact me at (602) 771-4814, or Bill Hare at (602) 771-4838.

Sincerely,



Romann G. Diaz, Manager
Water Quality Field Services Unit

cc: **By U.S. Mail:**

Reg Glos, Pinal County Health Department
P.O. Box 868
Florence, AZ 85232

By Interoffice Mail:

Michele Robertson, Manager, WPS, ADEQ

Vivian Burns, Program and Project Specialist, WQCS, ADEQ

Don Shroyer, Manager, WQDU, ADEQ

Facility File

Reading File

**ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY
 WATER QUALITY DIVISION - WATER QUALITY COMPLIANCE SECTION
 Field Services Unit**

SUMMARY OF INSPECTION - WASTEWATER

Facility: Pecan Ranch WRP

Inventory No: 105324

Aquifer Protection Permit (APP) No: P105324

AZPDES Permit No: N/A

Reuse Permit No: R105491

Place ID: 18583

Inspected by: William J. Hare, E.P.S.

Inspection Date: March 30, 2005

Accompanied by: Tom Moulton -Operator
 Gary Larsen – Operations Manager
 Greg Brown, P.E.

Report Date: April 28, 2005

YES NO N/A UNKNOWN

1. WWTF quality meets the following permit requirements:
 - A. Aquifer Protection Permit
 - B. Reuse Permit
 - C. AZPDES Permit
2. A certified operator is employed by the owner per ADEQ regulations.
3. This system meets ADEQ requirements for operation and maintenance as noted in the APP

	X*		
X			
		X	
X			
X**			

* The facility had numerous exceedances of Fecal Coliform in effluent monitoring during the last six months of 2004 for the 3rd and 4th quarters of 2004.

** At the time of the inspection, the WRP was found to be operating effectively during recent weeks.

Facility Description:

The Pecan Water Reclamation Plant (WRP) Phase I, has the capacity to collect and treat a maximum average monthly flow of 999,998 gallons per day (g.p.d) of wastewater from an ADEQ approved service area. The total planned capacity at build-out of the WRP is 4.0 million gallons per day (MGD). The WRP treatment process consists of an influent lift station, headworks with barscreen, extended aeration with nitrification-denitrification, clarifiers, filters, ultraviolet (UV) disinfection, sludge digesters, sludge dewatering belt filter press, and an effluent pump station. All the WRP units are constructed of either reinforced concrete or steel. All the odor and noise producing units which include the headworks, the extended aeration process

including the blower room, and the sludge dewatering belt filter press are enclosed inside a metal building with odor control scrubbers installed on all vents. The entire WRP is surrounded by an aesthetic, 6 foot tall, chain link fence and block wall. All the effluent generated is discharged for reuse as regulated under valid Reclaimed Water Reuse Permits. All of the sludge, including the screenings, grit, and scum, is hauled off site for proper disposal at an approved landfill. Depth to groundwater at the WRP site is approximately 377 feet and the direction of groundwater flow is to the northwest.

The WRP produces reclaimed water meeting Class A+ Reclaimed Water Standards (A.A.C. R18-11, Article 3) and may be delivered for beneficial use under a valid reclaimed water permit under A.A.C. R18-9 Article 7. The average monthly flow is limited to 998,998 g.p.d.

INSPECTION PURPOSE AND SCOPE

The purpose of the site visit was to inspect the Pecan Ranch WRP and determine the compliance status of the facility regarding the Aquifer Protection Permit and Reuse Permit issued to the facility by ADEQ.

Pre-inspection File Review, for P105324, LTF No. 29510

The pre-inspection file review was conducted on March 29, 2005 and indicated numerous Aquifer Protection Permit (APP) exceedances for Fecal Coliform in effluent monitoring that occurred during the 3rd and 4th quarters of 2004. **The facility exceeded the Fecal Coliform limit of 23 c.f.u. per 100 ml for effluent monitoring on 44 occasions during the 3rd quarter and 20 occasions during the 4th quarter of 2004.** The exceedances meet ADEQ's criteria for significant non compliance (SNC) and are violations of the APP.

Johnson Utilities (JU) Vice President Brian Tompsett had sent a letter to ADEQ to explain the cause(s) of the above noted exceedances. The letter was dated January 21, 2005 and cited several equipment adjustments and an infestation of red worms as a cause for the compliance problems with Fecal Coliform effluent monitoring.

The facility had failed to conduct turbidity monitoring during the 3rd and 4th quarters of 2004. The turbidity monitoring device was not operational until January of 2005. The device had been in place at the site, but needed some work before it became operational during early January of 2005.

The file review also included a review of the monitoring data for the 1st quarter of 2005 that was provided by Johnson Utilities personnel during at the time of the inspection. This review indicated that the facility was in compliance with effluent monitoring for the months of January – March of 2005. This includes both Fecal Coliform and turbidity effluent monitoring.

Summary of Field Observations:

The following comments are based on observations made by WOFSU staff during the inspection and information furnished by the operator:

APP Inspection, LTF No. 29510

General Observations and Flow rates

(1) The Pecan WRP began receiving wastewater during May of 2004 but did not discharge any effluent until July of 2004. From May to July 2004 the WRP was discharging wastewater to the Section 11 WWTP permitted in P103081.

(2) The facility noted that some operational and personnel changes were implemented during November and December of 2004. These changes were implemented to improve the overall compliance status of the WRP. Two new operators were hired and two previously employed operators were terminated. The changes also included operational adjustments for the WRP to improve the performance of the AeroMod wastewater treatment plant (WWTP). The operational control adjustments implemented by the supervisory operator, Tom Moulton significantly improved the performance of the WWTP.

(3) The inspection noted that the flow rate of influent into the WWTP has averaged 373,000 g.p.d. during March of 2005. This includes influent from the area previously served by the Meadow Vista and Links WWTPs. The Meadow Vista and Links WWTP previously served the subdivisions of Los Praderas, Cambria, Castlegate and the Links. In addition, there are several subdivisions still in the early phases of development that contribute flows into the Pecan WRP. The facility provided flow rate information as noted below:

- 585 residential service connections from the Castlegate subdivision (previously served by the Links WWTP, but currently connected to the Pecan WRP).
- 271 residential service connections from the Moon Shadow subdivision (previously the Meadow Vista WWTP).
- 91 residential service connections from the Vineyard Estates subdivisions.
- 441 additional residential hookups from numerous subdivisions in the early stages of development including Pecan Creek, Trail Side, Desert Spring, The Villages, Sunrise Parcel 6, Scott Communities and The Orchards.
- 150,000 gallons per day of partially treated sewage from the Links Estates WWTP (exact number of hookups is not known because the area is still controlled by Federal Bankruptcy Court). This includes wastewater from the Links Estates and the Cambria subdivisions.

The total number of residential hookups at the Pecan WRP is 1,431, excluding the flow from the Links WWTP. The facility utilizes a magnetic flow meter (MAG meter) for influent and effluent measurements. Peak influent flows have been as high as 718,000 g.p.d. on January 3, 2005 and 676,000 g.p.d. on February 13, 2005. The facility currently has two significant amendments

pending processing by ADEQ's Water Permits Section. One of the amendments includes the expansion of the WRP from 1.0 to 2.0 MGD. The second amendment addresses the recharge of treated effluent into several vadose zone injection wells that will be constructed near the pecan orchard.

Inspection of WRP:

(1) The headworks components were functioning adequately, including the air scrubber mechanism. The headworks and sludge belt press components are currently covered with an air scrubber device. The device utilizes potassium permanganate granules and was effectively eliminating septic odors before air is discharged from the headworks building. No septic odors were detected outside the building area and nearby surrounding residential area.

(2) The operational components of the WWTP were inspected and no deficiencies were noted. The inspection found the aeration cells, anoxic cells and digesters to be functioning well. In addition, the clarifier(s) and sand filter were also found to be functioning very well. The "Hach" turbidity device was reading 0.4 NTU at the time of the inspection. The facilities UV disinfection component was also functioning adequately at the time of the inspection. Effluent quality from the sand filter was very good. The operator advised that the sand filter had previously experienced operational problems that were corrected during December of 2004. The problems were caused because the filter had been previously utilized by another utility and needed various repairs.

(3) Both of the influent wetwell liftstation motors were being replaced. The facility was utilizing a portable pumping equipment to pump influent from the wetwell into the headworks.

(4) The inspection noted that the two adjacent unlined storage ponds located next to the pecan orchard both contained effluent. Effluent was also being pumped to the nearby eight acres of pecan trees for irrigation. The anticipated 1.0 MGD expansion of the WRP will take place where the referenced effluent storage ponds are currently located. The facility intends to construct 3-4 vadose zone injection wells, pending the approval from ADEQ's WPS and the Arizona Department of Water Resources (ADWR).

Onsite Monitoring well

The inspection noted the presence of a 400 foot deep groundwater monitoring well located at the far northeast corner of the property. The well will be utilized to monitor the aquifer for various constituents after a recharge project is approved by ADWR/ADEQ. The current APP does not require groundwater monitoring.

Compliance Schedule , LTF No. 29510

The APP contains a compliance schedule in Section 3.0. The permit requires that documentation be provided to verify that there is sufficient disposal capacity to discharge flows greater than 0.5 MGD. On June 17, 2004, the facility submitted a letter to ADEQ's Water Permits Section satisfying this requirement. In addition, the facility has retained the services of Specific Engineering, LLC to prepare documentation to amend the APP No. P105324. The pending

amendment request the construction of several injection wells to enhance effluent disposal options. JU was found to be in compliance with the APP compliance schedule.

Type 2 Reclaimed Water General Permit, R105491

The inspection noted that the pecan tree orchard was being irrigated with treated effluent. The area was fenced and bermed to prevent any runoff of effluent. No runoff was noted. The reclaimed water permit was issued on May 21, 2004.

Findings:

The inspection found that the facility had experienced numerous exceedances in Fecal Coliform monitoring during the 3rd and 4th quarters of 2004. The facility hired an experienced operator in late November of 2004, who has since made several operational control changes at the WRP. These changes have greatly improved the overall operation of the WRP. At the time of the inspection, the facility was producing excellent quality effluent with a turbidity reading of 0.40 NTU. The inspection found the facility to be well operated and maintained during recent months, since the operational and personnel changes have been implemented.

Compliance Summary

1. Aquifer Protection Permit (APP). The APP requires daily monitoring for flow, Fecal Coliform and Turbidity and quarterly testing for thirteen metals and annual testing for volatile organic compounds (VOCs). Operational monitoring is also required on a daily basis. The SMRFs for the 2nd, 3rd and 4th quarters of 2004 have been submitted to ADEQ. The facility experienced numerous exceedances for Fecal Coliform monitoring during the 3rd and 4th quarters of 2004. **Rating: Non Compliance**

2. Operator Certification Requirements. This facility is rated as a Grade 1 WWT and a Grade 2 WWC wastewater treatment facility. Tom Moulton is the onsite operator who is certified by ADEQ both as a Grade 4 WWT and a Grade 4 WWC
Rating: Compliance

3. Operation & Maintenance (O&M) Requirements. The inspection found the WRP to be performing very well at the time of the inspection. The various components including the motors and blowers were functioning adequately. **Rating: Compliance.**

END OF REPORT



Janet Napolitano
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street Phoenix, Arizona 85007
(602) 771-2300 www.adeq.state.az.us



Stephen A. Owens
Director

CERTIFIED MAIL
Return Receipt Requested

Case ID #: 34567

April 28, 2005

Johnson International Inc
Attention: Brian Tompsett
5230 E Shea Blvd Ste 200
Scottsdale, AZ 85254-5750

Subject: Pecan Water Reclamation Plant, 18583
28539 N Gantzel Rd / Queen Creek, AZ 85242

NOTICE OF VIOLATION

The Arizona Department of Environmental Quality (ADEQ), has reason to believe that Johnson International Inc as the owner/operator of Pecan Water Reclamation Plant, has violated a requirement of the Arizona Revised Statutes (A.R.S.), a rule within the Arizona Administrative Code (A.A.C.), or an applicable permit/license, administrative order or civil judgment. ADEQ discovered the violations alleged below during an inspection completed on March 30, 2005.

I. LEGAL AUTHORITY and NATURE OF ALLEGED VIOLATION(S)

1. Permit 29510 (P105324) - 4

Table 1 limits the single sample daily maximum for Fecal Coliform effluent monitoring to 23 c.f.u./100ml.

The facility exceeded the single sample Fecal Coliform daily maximum on 44 occasions during the 3rd quarter of 2004 and twenty occasions during the 4th quarter of 2004.

2. Permit 29510 (P105324) - 4

Table 1 requires turbidity effluent monitoring on a daily basis.

The facility failed to conduct turbidity monitoring during the 3rd and 4th quarters of 2004.

II. DOCUMENTING COMPLIANCE

1. Within 60 calendar days of receipt of this Notice, please submit documentation that the violation(s) never occurred, or submit an explanation of the efforts undertaken by the utility to prevent a reoccurrence of the exceedances in effluent monitoring for Fecal Coliform. In addition, include an explanation for the failure conduct turbidity monitoring during the 3rd and 4th quarters of 2004.

Northern Regional Office
1515 East Cedar Avenue Suite F Flagstaff, AZ 86004
(928) 779-0313

Southern Regional Office
400 West Congress Street Suite 433 Tucson, AZ 85701
(520) 628-6733

Printed on recycled paper

III. SUBMITTING COMPLIANCE DOCUMENTATION

Please send all compliance documentation and any other written correspondence regarding this Notice to ADEQ at the following address:

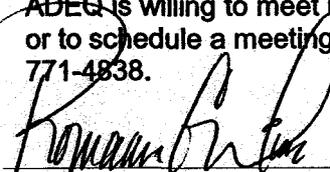
Arizona Department of Environmental Quality, Attention: William J. (Bill) Hare, Water Quality Field Service Compliance Unit, 1110 W Washington St, Phoenix, AZ 85007 MC: 5415B-1

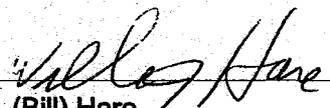
IV. STATEMENT OF CONSEQUENCES

1. The time frames within this Notice for achieving and documenting compliance are firm limits. Failure to achieve or document compliance within the time frames established in this Notice will result in an administrative compliance order or civil action requiring compliance within a reasonable time frame, substantial civil penalties, and/or the suspension or revocation of an applicable permit/license. ADEQ will agree to extend the time frames only in a compliance schedule negotiated in the context of an administrative consent order or civil consent judgment.
2. Achieving compliance does not preclude ADEQ from seeking civil penalties, and/or suspending or revoking an applicable permit/license for the violation(s) alleged in this Notice as allowed by law.

V. OFFER TO MEET

ADEQ is willing to meet regarding this Notice. To obtain additional information about this Notice or to schedule a meeting to discuss this Notice, please contact William J. (Bill) Hare at (602) 771-4838.


Romann G. Diaz, Manager
Water Quality Field Service Compliance Unit


William J. (Bill) Hare
Water Quality Field Service Compliance Unit

ATTACHMENT 2

JOHNSON UTILITIES COMPANY L.L.C

5230 East Shea Boulevard * Scottsdale, Arizona 85254
PH: (480) 998-3300; FAX: (480) 483-7908

May 6, 2005

William J. Hare
Water Quality Field Service Compliance Unit, MC 5415B-1
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, AZ 85007

RE: Pecan Wastewater Reclamation Plant
Notice of Violation, Case ID #: 34567

Dear Mr. Hare:

On April 28, 2005, Arizona Department of Environmental Quality (ADEQ) issued Johnson International, Inc. a Notice of Violation (NOV), Case ID #:34567. The NOV was issued for violations at the Pecan Water Reclamation Plant operated by Johnson Utilities Company (JUC) under Aquifer Protection Permit, P-105324. The alleged violations were for ~~exceedances of the daily maximum for fecal coliform on 44 occasions during the 3rd quarter of 2004 and 20 occasions during the 4th quarter and failure to conduct turbidity monitoring during the 3rd and 4th quarters of 2004.~~ This letter serves as the documentation required in accordance with the Notice of Violation, Section II. Documenting Compliance, regarding implementation of procedures to prevent a reoccurrence of these violations.

During the 3rd quarter, the Pecan Wastewater Reclamation Plant was started to accept waste from the Arizona Utility Supply and Services at the request of ADEQ. Unfortunately the plant was under construction at this time. During startup the plant experienced operational upsets from an infestation of red worms to equipment adjustments. The plant was operated by Gerald E. Beeler, Arizona Certified Class 4 Operator ID # 00134. The 3rd quarter Self Monitoring Report Form (SMRF) reported the turbidity meter was under construction and fecal coliform exceedances. The fecal exceedances can be explained by the lack of proper sampling techniques to operational upsets of the plant during startup.

During the 4th quarter, the expectation of correcting the above problems was not met. As shown in the 4th quarter SMRF, the turbidity meter was still not installed and the plant continued to experience fecal coliform exceedances. However, there were no exceedances of fecal coliform in the month of December 2004. Because the problems were not corrected, on January 14, 2005, JUC replaced Mr. Beeler. The new plant operator is Thomas J. Moulton, Arizona Certified Class 4 Operator ID # 12111. All of these operational changes were explained in correspondence to ADEQ in a letter dated January 21, 2005. Never the less, the following additional tasks were taken to ensure compliance:

William J. Hare
May 6, 2005
Page 2 of 2

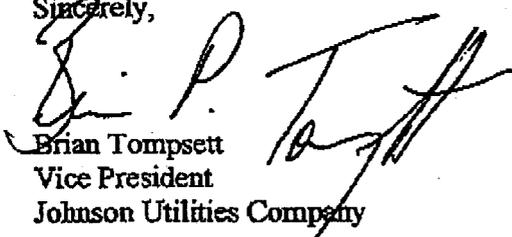
1. A 24 hour continuous recording turbidity meter was installed, operated, and tested during the week of 1/17/05. Page 1 of the 2005 1st quarter SMRF (attached) shows daily reporting of turbidity and demonstrates compliance with the discharge limit. Enteric Virus testing was started in January 2005 as a result of the turbidity meter not being operational. To date, JUC has received two test results which were negative. It takes approximately 90 days to complete this test.

2. Classes were held on the proper sampling technique for fecal coliform and a new sampling point was constructed. This task resulted in zero exceedances in December 2004 and the 1st quarter of 2005 as documented on pages 2 and 5 of the attached 2005 1st quarter SMRF for the single daily fecal coliform limit and non detect of 4 of the last 7 samples respectively.

It can be seen from the attached 2005 1st quarter SMRF's, that the implementation of the above tasks has resulted in a well operated and documented facility. We have every reason to believe that the facility will continue to be in full compliance.

It is my understanding that this documentation will result in the closure of the Notice of Violation, Case ID #: 34567. If you have any questions or comments, please contact me at 480 998-3300.

Sincerely,



Brian Tompsett
Vice President
Johnson Utilities Company

Enclosures: 2005 1st quarter SMRF, pages 1, 2, and 5
Enteric Virus Test Results

LEGEND

Technical Services, Inc.

www.legend-group.com

17631 N. 25th Avenue • Phoenix, AZ 85023

P (602) 324-6100 • F (602) 324-6101

4585 S. Palo Verde Rd., Ste. 423 • Tucson, AZ 85706

P (520) 327-1234 • F (520) 327-0518

ADHS#0004

Johnson Utilites Co., LLC
968 E. Hunt Hwy
Queen Creek AZ, 85242

Project: Enteric Virus Analysis
Project Number: Pecan Creek WWTP
Project Manager: Tom Multan

Reported:
03/28/05 14:11

#1 (5011175-01) Wastewater (Grab) Sampled: 01/26/05 09:30 Received: 01/26/05 16:00

Analyte	Result	RL	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Microbiology

Enteric Viruses	<1.1		1.1 MPN/40 L	1	B503624	01/27/05	01/27/05	SM 9510	
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Case Narrative:

Holding Times: All holding times were met unless otherwise qualified.
QA/QC Criteria: All analyses met method requirements unless otherwise qualified.
Comments: There were no problems encountered during the processing of the samples, unless otherwise noted.

Notes and Definitions

Legend Technical Services of Arizona, Inc.


Client Services Representative

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

LEGEND

Technical Services, Inc.

www.legend-group.com

17631 N. 26th Avenue • Phoenix, AZ 85023
 P (602) 324-6100 • F (602) 324-8104
 4885 S. Palo Verde Rd., Ste. 423 • Tucson, AZ 85706
 P (520) 327-1234 • F (520) 327-0518
 ADH890004

Johnson Utilities Co., LLC
 988 E. Hunt Hwy
 Queen Creek AZ, 85242

Project: Enteric Virus Analysis
 Project Number: Pecon Creek WWTP
 Project Manager: Gary Larsen

Report#: 05/06/05 08:36

#1 Virus (5020979-01) Wastewater (Grab) Sampled: 02/18/05 10:00 Received: 02/18/05 13:08

Analyte	Result	RL	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Microbiology

Enteric Viruses	<1.0		1.0MPN/40 L	1	B506113	02/18/05	02/18/05	SM 5810	
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#1 Swabs (5020979-02) Swab (Grab) Sampled: 02/18/05 10:55 Received: 02/18/05 13:08

Analyte	Result	RL	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Microbiology

Iron Bacteria	Absent		1 P/A	1	B503220	02/22/05	02/22/05	Mod SM 3240B	
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#1 Cl 2 (5020979-03) Wastewater (Grab) Sampled: 02/18/05 10:55 Received: 02/18/05 13:08

Analyte	Result	RL	Units	Dilution	Batch	Prepared	Analyzed	Method	Notes
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Inorganic Chemistry

Residual Chlorine	1.30		0.0500 mg/L	1	B502488	02/18/05	02/18/05	SM 4500 CL D	
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Case Narrative:

Holding Times: All holding times were met unless otherwise qualified.
QA/QC Criteria: All analyses met method requirements unless otherwise qualified.
Comments: There were no problems encountered during the processing of the samples, unless otherwise noted.

Notes and Definitions

M1 Matrix spike recovery was high, the method control sample recovery was acceptable.

Legend Technical Services of Arizona, Inc.

[Signature]
 Client Services Representative

The results in this report apply to the samples analyzed in accordance with the chain of custody document. This analytical report must be reproduced in its entirety.

**SELF MONITORING REPORT FORM
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Facility Name: PECAN WATER RECLAMATION PLANT Latitude: 33 13 43.43 Facility ID: 18583
 Contact: Gary Larsen Longitude: 111 33 40.83 ADEQ Permit Number: 29510
 Address: 38539 N. Gantzel Road Section: 29 Lab ID: AZ 0004
 _____ Township: 3 Lab Name: Legend
 _____ Range: 8 Date Prepared: _____
QUEEN CREEK, AZ 85242 Quarter: b.c.b Reporting Period: 1st Qtr 2005

Monitoring Point ID: 21992 Monitoring Name: PECAN WRP - FACILITY INSPECTION

Sampling/Reporting Frequencies: Daily Monitoring/QUARTERLY

STORET: 00070 Permit Limit: AL: RSVD DL: 5 AQL: N/A MIN: _____ MAX: _____

TURBIDITY Method: METER Units: NTU

ANALYZED	RESULTS	ANALYZED	RESULTS	ANALYZED	RESULTS
01/01/05		02/01/05	0.70	03/01/05	1.10
01/02/05		02/02/05	1.10	03/02/05	1.30
01/03/05		02/03/05	2.30	03/03/05	1.50
01/04/05		02/04/05	3.40	03/04/05	7.6*
01/05/05		02/05/05	4.30	03/05/05	10*
01/06/05		02/06/05	6.3*	03/06/05	1.30
01/07/05		02/07/05	1.60	03/07/05	0.90
01/08/05		02/08/05	1.70	03/08/05	5.4*
01/09/05		02/09/05	1.70	03/09/05	1.10
01/10/05		02/10/05	1.60	03/10/05	0.70
01/11/05		02/11/05	1.40	03/11/05	1.50
01/12/05		02/12/05	1.40	03/12/05	1.20
01/13/05		02/13/05		03/13/05	1.20
01/14/05		02/14/05		03/14/05	0.80
01/15/04		02/15/05	1.70	03/15/05	0.80
01/16/05		02/16/05	1.50	03/16/05	0.80
01/17/05		02/17/05	1.70	03/17/05	out of service
01/18/05		02/18/05	1.20	03/18/05	0.50
01/19/05		02/19/05	1.20	03/19/05	out of service
01/20/05		02/20/05	1.20	03/20/05	
01/21/05		02/21/05	1.10	03/21/05	
01/22/05		02/22/05	1.10	03/22/05	1.10
01/23/05	1.50	02/23/05	1.10	03/23/05	1.10
01/24/05	1.50	02/24/05	1.20	03/24/05	out of service
01/25/05	1.00	02/25/05	3.70	03/25/05	1.09
01/26/05	1.50	02/26/05	1.20	03/26/05	
01/27/05	1.50	02/27/05	1.20	03/27/05	
01/28/05	1.00	02/28/05	1.10	03/28/05	0.40
01/29/05	1.50			03/29/05	0.40
01/30/05	1.50			03/30/05	0.40
01/31/05	1.50			03/31/05	0.50

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINES AND IMPRISONMENT.
 SIGNATURE OF PRINCIPLE EXECUTIVE OFFICER OR AUTHORIZED AGENT _____ DATE _____

* Unit calibration value

**SELF MONITORING REPORT FORM
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Facility Name: PECAN WATER RECLAMATION PLANT Latitude: 33 13 43.49 Facility ID: 18583
 Contact: Gary Larsen Longitude: 111 33 40.83 ADEQ Permit Number: 29510
 Address: 38539 N. Gantzel Road Section: 29 Lab ID: AZ 0004
 _____ Township: 3 Lab Name: Legend
 _____ Range: 8 Date Prepared: 04-07-05
QUEEN CREEK, AZ. 85242 Quarter: bcb Reporting Period: 1st Qtr 2005

Monitoring Point ID: 21992 Monitoring Name: PECAN WRP - EFFLUENT PUMP STATION
 Sampling/Reporting Frequencies: Daily Monitoring/QUARTERLY

STORET: 74057 Permit Limit: AL: RSVD DL: 23 AQL: N/A MIN: _____ MAX: _____
 FECAL COLIFORM Method: SM9222D Units: _____

DATE	RESULTS	DATE	RESULTS	DATE	RESULTS
01/01/05	<2	02/01/05	<1	03/01/05	<1
01/02/05	<2	02/02/05	<1	03/02/05	<1
01/03/05	<2	02/03/05	<1	03/03/05	<1
01/04/05	2	02/04/05	<1	03/04/05	<1
01/05/05	<2	02/05/05	<1	03/05/05	<1
01/06/05	<2	02/06/05		03/06/05	<1
01/07/05	<2	02/07/05	<1	03/07/05	<1
01/08/05	<2	02/08/05	<1	03/08/05	<1
01/09/05		02/09/05	<1	03/09/05	<1
01/10/05	<2	02/10/05	<1	03/10/05	<1
01/11/05	2	02/11/05	<1	03/11/05	<1
01/12/05	<2	02/12/05		03/12/05	
01/13/05	<2	02/13/05		03/13/05	
01/14/05	<2	02/14/05	<1	03/14/05	<1
01/15/05	<2	02/15/05	<1	03/15/05	<1
01/16/05		02/16/05	<1	03/16/05	<1
01/17/05	<2	02/17/05	<1	03/17/05	<1
01/18/05		02/18/05	<1	03/18/05	<1
01/19/05		02/19/05		03/19/05	
01/20/05	<2	02/20/05		03/20/05	
01/21/05	<1	02/21/05	3	03/21/05	<1
01/22/05	<1	02/22/05	<1	03/22/05	<1
01/23/05		02/23/05	<1	03/23/05	<1
01/24/05	<1	02/24/05	3	03/24/05	<1
01/25/05	<1	02/25/05	<1	03/25/05	<1
01/26/05	<1	02/26/05	<1	03/26/05	<1
01/27/05	<1	02/27/05	1	03/27/05	
01/28/05	<1	02/28/05	1	03/28/05	<1
01/29/05				03/29/05	<1
01/30/05				03/30/05	<1
01/31/05	<1			03/31/05	<1

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 SIGNATURE OF PRINCIPLE EXECUTIVE OFFICER OR AUTHORIZED AGENT: Thomas Moulton DATE 04-07-05

**SELF MONITORING REPORT FORM
ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY**

Facility Name: PECAN WATER RECLAMATION PLANT Latitude: 33 13 43.43 Facility ID: 18583
 Contact: Gary Larsen Longitude: 111 33 40.83 ADEQ Permit Number: 29510
 Address: 38539 N. Gantzel Road Section: 29 Lab ID: AZ 0004
QUEEN CREEK, AZ. 85242 Township: 3 Lab Name: Legend
 Range: 8 Date Prepared: 04-07-05
 Quarter: b.c.b Reporting Period: 1st Qtr 2005

Monitoring Point ID: 21992 Monitoring Name: PECAN WRP - EFFLUENT PUMP STATION

Sampling/Reporting Frequencies: Daily Monitoring/QUARTERLY

STORET: FC4-7 Permit Limit: AL: RSVD DL: 0 AQL: N/A Min: MAX:

FECAL COLIFORM 4 OF 7 SAMPLES Method: Units: CFU

DATE	RESULTS	DATE	RESULTS	DATE	RESULTS
01/01/05	YES	02/01/05	YES	03/01/05	YES
01/02/05	YES	02/02/05	YES	03/02/05	YES
01/03/05	YES	02/03/05	YES	03/03/05	YES
01/04/05	YES	02/04/05	YES	03/04/05	YES
01/05/05	YES	02/05/05		03/05/05	YES
01/06/05	YES	02/06/05		03/06/05	
01/07/05	YES	02/07/05	YES	03/07/05	YES
01/08/05	YES	02/08/05	YES	03/08/05	YES
01/09/05	YES	02/09/05	YES	03/09/05	YES
01/10/05	YES	02/10/05	YES	03/10/05	YES
01/11/05	YES	02/11/05	YES	03/11/05	YES
01/12/05	YES	02/12/05		03/12/05	
01/13/05	YES	02/13/05		03/13/05	
01/14/05	YES	02/14/05	YES	03/14/05	YES
01/15/05	YES	02/15/05	YES	03/15/05	YES
01/16/05	YES	02/16/05	YES	03/16/05	YES
01/17/05	YES	02/17/05	YES	03/17/05	YES
01/18/05	YES	02/18/05	YES	03/18/05	YES
01/19/05	YES	02/19/05		03/19/05	
01/20/05	YES	02/20/05		03/20/05	
01/21/05	YES	02/21/05	YES	03/21/05	YES
01/22/05	YES	02/22/05	YES	03/22/05	YES
01/23/05	YES	02/23/05	YES	03/23/05	YES
01/24/05	YES	02/24/05	YES	03/24/05	YES
01/25/05	YES	02/25/05	YES	03/25/05	YES
01/26/05	YES	02/26/05	YES	03/26/05	
01/27/05	YES	02/27/05	YES	03/27/05	
01/28/05		02/28/05	YES	03/28/05	
01/29/05				03/29/05	YES
01/30/05	YES			03/30/05	YES
01/31/05				03/31/05	YES

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED HEREIN AND BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION I BELIEVE THE SUBMITTED INFORMATION IS TRUE ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION INCLUDING THE POSSIBILITY OF FINES AND IMPRISONMENT.
 SIGNATURE OF PRINCIPLE EXECUTIVE OFFICER OR AUTHORIZED AGENT Thomas Moulton DATE 04-07-05



SPECIFIC ENGINEERING, LLC.

1020 E. SHEA BOULEVARD SUITE 220
SCOTTSDALE, ARIZONA 85254
Phone: (480) 896-6826
FAX: (480) 896-6137



To: Bill Hare
ADEQ
1110 W. Washington
Phoenix, AZ 85007

Date: May 6, 2005

Job No.: _____

Drawing/Spec Reference: _____

Re: Pecan WRP NOV Case #: 34567

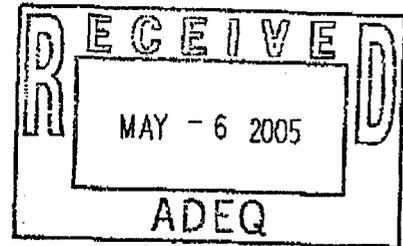
We Transmit: Herewith Under Separate Cover Via _____

Material Format

Requested Action

- | | | | |
|----------------------------------|--|---|---|
| <input type="checkbox"/> Letter | <input type="checkbox"/> Shop Drawings | <input type="checkbox"/> For Your Approval | <input type="checkbox"/> Your Review |
| <input type="checkbox"/> Memo | <input type="checkbox"/> Clarification Drawing | <input type="checkbox"/> For Your Signature | <input type="checkbox"/> Please Comment |
| <input type="checkbox"/> Prints | <input type="checkbox"/> Modification Drawing | <input type="checkbox"/> Information | <input type="checkbox"/> Make Recommendation |
| <input type="checkbox"/> Sketch | <input type="checkbox"/> Specifications | <input type="checkbox"/> Resubmit | <input type="checkbox"/> Issue Construction Order |
| <input type="checkbox"/> Reports | <input type="checkbox"/> Sepias | <input type="checkbox"/> As Requested | <input type="checkbox"/> For Your Use |
| <input type="checkbox"/> Mylars | <input type="checkbox"/> _____ | <input type="checkbox"/> Issue Change Order | <input type="checkbox"/> _____ |

Remarks:



Copies To: _____

Signed: _____

Gregory H. Brown

Received By: _____

Date: 5/8/05