

ORIGINAL



0000107177

WS-03478A-08-0454

RECEIVED

Robert Rist
9593 E. 34th Place
Yuma AZ 85365

2010 FEB -5 | A 11: 35

February 1, 2010

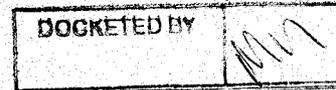
AZ CORP COMMISSION
DOCKET CONTROL

To: Benjamin Grumbles, Director ADEQ
email copy: Kristen Mayes, Chairman ACC
email copy: Jane Rodda, Administrative Judge ACC
email copy: Michelle Wood, Counsel RUCO

Arizona Corporation Commission
DOCKETED

FEB - 5 2010

Subject: Far West Water and Sewer



Dear Sir

I am writing to bring to your attention the catch 22 situation where we users of Far West Sewer find ourselves trapped. As a result of the many notices of violation brought against Far West and the resulting consent orders, Far West began construction on the changes ordered, however they ran out of money to complete the projects when they were at about 80 to 90 percent complete. Hearings have shown this was a result of extremely poor planning and mismanagement. They then felt the only option was to request a permanent rate increase of around 250%. Shortly after that request they came back with an emergency rate increase request of 101%, because they felt it could be expedited faster than the permanent rate increase. The permanent rate case was put on hold, while the emergency case was being heard. Hearings for the emergency case went on for a year, and ended in being denied, as well as possibly putting an interim manager at Far West. The ACC stated they had no confidence in the management of Far West.

Now ACC will move into the hearings for the permanent rate case. Far West fired their attorney and hired a new one. The new attorney has requested a delay of 6 to 8 weeks in order to familiarize himself with the case and meet the people he representing. so consequently the next scheduled meeting on the matter is in late March. All indications are that this hearing will take at least a year, once started. We, the users so far agree with all the findings of the ACC, except that there has not been a follow thru of putting an interim manager in place. Far West has so far managed to delay that decision by claiming they had financing coming, which would allow them to pull the Emergency rate case all together, and avoid the interim manager.

Meanwhile we are stuck with these fowl smelling plants. The catch 22: grant the undeserved rate increase, and hope they can borrow the money based on the increased rate, or deny the increase and sit here doing nothing to fix the situation. Construction will not continue until Far West stockholders get some skin in the game, and that is looking very unlikely.

Palm Shadows wastewater plant is probably the worst of the plants slated for decommissioning. It was wrong from the very beginning, being poorly designed, poorly sited, and grossly undersized. The six open ponds (only two of which were permitted, four installed without permit) were suppose to percolate in the ground and evaporate into the air. Percolation

does not take place, and the water just sits there and stinks. I recently toured Palm Shadows plant and made several suggestions for ways to reduce or eliminate the odors from this plant, however I don't think any action will be taken unless they are required to do so by ADEQ.

The problem is inadequate treatment in the installed Santec underground package system. The effluent then goes into the ponds and becomes septic. I asked the operator what the dissolved oxygen level was in the ponds, in which he replied that was not a requirement of the operating permit, so wasn't tested. I am pretty certain that the D.O. level is around zero and BOD is very high.

Some Solutions

1. Pump it to the City of Yuma. Currently 5 of the 6 ponds are full of stinking septic water. Five or six days a week tank trucks (owned by H&S Developers) are hauling this partially treated sewage to a nearby manhole that goes to Yuma's new sewage treatment plant, where it is treated all over again. Far West has testified that it costs them \$45,000.00 per month to haul this sewage to Yuma and have it treated. I ask how much was the charge from Yuma, and how much was the cost of the trucking operation, but was told they did not know. I feel a temporary 3" or 4" PVC line could be installed the short seven tenths of a mile to the nearest manhole. Put in a small electric pump, which would pump out of one small pond. The stated daily flow of Palm Shadows is 250,000 gallons. This can be pumped around the clock at 175 GPM. A small holding pond will allow for the daytime high flow, and will be pumped down at night. Since most of the distance is a downhill grade to the manhole, I think a pump smaller than 5 HP would handle it. This would need to be negotiated with the City of Yuma, but should be stressed that it would be temporary and that part of the sewage comes from Vista Del Sol, a sub-division within the city.

Advantages

- (a). Only one small pond will need to have water in it, drastically reducing the area where any smell can come from.
 - (b). Yuma would get a steady flow, no surges from the truck loads being dumped. This can be easier for the operation of their plant.
 - (c). A sampler can be installed in the receiving manhole which will allow automatic sampling 24 hours a day.
 - (d). Flows can easily be determined either with a flow meter installed, or by calculating based on pump time.
 - (e). No trucks or drivers are needed. This gets rid of complaints of dust from the trucks constantly traveling the dirt road. It does away with noisy gas driven pumps used to load the trucks from the ponds.
2. Provide aeration for the ponds. Bringing up the dissolved oxygen will sweeten up this sewage and remove bad smell. Aerated ponds or lagoons are used successfully in many places with no odor problems. Aeration could be accomplished several ways.

- (a). Floating aerators. These float on top of the water and use a motor with a propeller that churns the water, allowing aeration and evaporation to take place.
- (b). Blowers with a diffuser pipe installed in the pond.
- (c). Pump water from the pond, and spray it over the surface.

All of these will add oxygen to the water, and will accelerate evaporation, reducing the amount that needs to be hauled.

3. A third suggestion is provide some chlorination in the ponds. Chlorine is an oxidizer and can be a very effective odor controller. Probably the safest form of chlorination is dry powdered chlorine, mixed with water. Then injected into the pond with a chemical pump (very inexpensive), at a point that it will get mixed through the whole pond.

Far West has hired an engineering firm which has designed the changes in the treatment systems, that were agreed to in the Consent Orders. They supposedly went through the whole system immediately after being hired, and came up with a plan for odor control. They even published an article in their Company news letter of "Winter 2006" which was titled "The sweet smell of success". The article brags about how they tackled all the odor problems and accomplished the goal. In my 30 plus year career of working in wastewater plants, I have been in many, and have never seen a situation that stunk as much and as bad as this. I am a winter resident here in Arizona, and go back to Oregon for the summer. If it stinks as bad as it does here in the winter, I can't imagine what it is like in the summer.

I sincerely hope you will address this situation. I feel there are things that could be done to get this resolved. With all the Violations I would think the environmental concerns would warrant some government loan or grant, to get construction done, then take necessary action against the company.

Sincerely

Robert Rist