

ORIGINAL

JOHNSON UTILITIES, L.L.C.



0000136897

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

May 16, 2012

Arizona Corporation Commission  
DOCKETED

MAY 16 2012

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Hand-Delivered

Steve Olea, Director  
Utilities Division  
ARIZONA CORPORATION COMMISSION  
1200 W. Washington Street  
Phoenix AZ 85007

DOCKETED BY [Signature]

Re: Annual Water and Wastewater Compliance Report of Johnson Utilities, LLC filed pursuant to Decision 63960 (as amended by Decision 64062) and Decision 65840 (Docket Nos. WS-02987A-99-0583; WS-02987A-00-0618; W-02234A-00-0371; W-02859A-00-0774; and W-01395A-00-0784, Consolidated)

Dear Mr. Olea:

In accordance with the above-referenced decisions, Johnson Utilities, LLC ("Johnson Utilities" or the "Company") hereby files documentation from the Arizona Department of Environmental Quality ("ADEQ") demonstrating the Company's compliance with ADEQ requirements for the preceding year. **Attachment 1** contains ADEQ compliance status letters for the following facilities:

- Anthem Water Reclamation Plant
- Precision Water Reclamation Plant
- San Tan Water Reclamation Plant
- Section 11 Water Reclamation Plant
- Pecan Water Reclamation Plant
- Johnson Utilities Water System (WS 11-128)
- Anthem at Merrill Ranch Water System (WS 11-136)

ADEQ reports that the Johnson Utilities Water System and the Anthem at Merrill Ranch Water System are each in full compliance, delivering water that meets water quality standards. ADEQ also reports that the Anthem Water Reclamation Plant and the Precision Water Reclamation Plant are each in full compliance with no enforcement actions pending.<sup>1</sup> Regarding the Section 11 Water Reclamation Plant and the Pecan Water Reclamation Plant, ADEQ is reporting that these facilities are in compliance with their respective aquifer protection permits ("APPs"), but have open Notices of Violation ("NOVs"). Copies of the NOVs have previously been submitted to your attention in accordance with the requirements of the above-referenced decisions. Johnson Utilities

<sup>1</sup>The Precision Water Reclamation Plant is not operating at this time.

Mr. Steven Olea  
May 16, 2012  
Page 2

has complied with all requirements of the NOVs and is awaiting closure of the NOVs by ADEQ. Once the notices of closure have been issued on the open NOVs, Johnson Utilities will file them with the Commission along with an updated compliance status report from ADEQ showing that the facilities are in full compliance.

Regarding the San Tan Water Reclamation Plant (San Tan WRP"), ADEQ has alleged exceedances of nitrate-nitrite and total nitrogen. However, based upon the results of weekly groundwater sampling at the San Tan WRP monitoring well, which commenced in September 2009, Johnson Utilities has ascertained and documented for ADEQ that elevated levels of nitrate-nitrite and total nitrogen in the Company's monitoring well are present because the background groundwater in the area has existing elevated levels of these constituents. Based upon the Company's sample results, it is clear that effluent from the San Tan WRP does not cause or contribute to the alleged exceedances of the nitrate-nitrite and total nitrogen in the background groundwater. The effluent from the San Tan WRP has been and continues to be in compliance with the discharge limits set forth in the Company's APP. Johnson Utilities will work with ADEQ to amend its APP 43235 to increase the allowable background aquifer quality levels. The Company filed (on 5/20/2011) an application to amend its APP, and will provide periodic updates to the Commission regarding the permit amendment status.

Should you have any questions or concerns, please do not hesitate to contact me.

Sincerely,



Gregory H. Brown  
Executive Vice President  
JOHNSON UTILITIES, LLC

Enclosure: Attachment 1

cc with enclosures: Docket Control (original plus 13 copies)  
Mr. Brian Bozzo, Compliance Manager  
Jeff Crockett, Brownstein Hyatt Farber Schreck

# Attachment 1

**Arizona Department of Environmental Quality**  
**Drinking Water Monitoring and Protection Unit**  
 Mail Code 5415B-2  
 1110 West Washington Street  
 Phoenix, AZ 85007

## Drinking Water Compliance Status Report

<b>System Name</b>	<b>System Type</b>	<b>Is system consecutive?</b>
ANTHEM AT MERRILL RANCH	<input checked="" type="checkbox"/> Community	<input type="checkbox"/> Yes, to PWS #
<b>System ID #</b>	<input type="checkbox"/> Non-transient Non-community	<input checked="" type="checkbox"/> No
11136	<input type="checkbox"/> Transient Non-community	

<b>Overall compliance status</b>	<input checked="" type="checkbox"/> No major deficiencies	<input type="checkbox"/> Major deficiencies
<b>Monitoring and Reporting status</b>	<input checked="" type="checkbox"/> No major deficiencies	<input type="checkbox"/> Major deficiencies
Comments: Increased monitoring for nitrate at EPDS002 began the second quarter of 2011 following a trigger in the first quarter of 2011.		

<b>Operation and Maintenance status</b>	<input checked="" type="checkbox"/> No major deficiencies	<input type="checkbox"/> Major deficiencies
<b>Date of last Sanitary Survey</b>	9-28-10	<b>Inspector</b>
		Karen Berry, PHX
Major unresolved/ongoing operation and maintenance deficiencies:		
<input type="checkbox"/> unable to maintain 20psi	<input type="checkbox"/> inadequate storage	
<input type="checkbox"/> cross connection/backflow problems	<input type="checkbox"/> surface water treatment rule	
<input type="checkbox"/> treatment deficiencies	<input type="checkbox"/> ATC/AOC	
<input type="checkbox"/> certified operator	<input type="checkbox"/> other =	
Comments: None		

<b>Is an ADEQ administrative order in effect?</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Comments: None		

System Information			
Population Served	5006		
Service Connections	1788		
Number of Entry Points to the Distribution System	2		
Number of Sources	4		
Initial Monitoring Year	2008		
Monitoring Assistance Program (MAP) System	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/> No

<b>Evaluation completed by</b>	Donna Calderon, Manager  Drinking Water Monitoring and Protection Unit		
<b>Phone</b>	602-771-4641	<b>Date</b>	February 3, 2012
<input checked="" type="checkbox"/>	Based upon data submitted by the water system, ADEQ has determined that this system is currently delivering water that meets water quality standards required by 40 CFR 141/Arizona Administrative Code, Title 18, Chapter 4, and <b>PWS is in compliance.</b>		
<input type="checkbox"/>	Based upon the monitoring and reporting deficiencies noted above, ADEQ <b>cannot determine</b> if this system is currently delivering water that meets water quality standards required by 40 CFR 141/Arizona Administrative Code, Title 18, Chapter 4, and/or <b>PWS is not in compliance.</b>		
<input type="checkbox"/>	Based upon the operation and maintenance deficiencies noted above, ADEQ <b>cannot determine</b> if this system is currently delivering water that meets water quality standards required by 40 CFR 141/Arizona Administrative Code, Title 18, Chapter 4, and/or <b>PWS is not in compliance.</b>		

***This compliance status report does not guarantee the water quality for this system in the future, and does not reflect the status of any other water system owned by this utility company.***

**Arizona Department of Environmental Quality**  
**Drinking Water Monitoring and Protection Unit**  
 Mail Code 5415B-2  
 1110 West Washington Street  
 Phoenix, AZ 85007

### Drinking Water Compliance Status Report

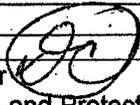
<b>System Name</b>	<b>System Type</b>	<b>Is system consecutive?</b>
JOHNSON UTILITIES	<input checked="" type="checkbox"/> Community	<input type="checkbox"/> Yes, to PWS #
<b>System ID #</b>	<input type="checkbox"/> Non-transient Non-community	<input checked="" type="checkbox"/> No
11128	<input type="checkbox"/> Transient Non-community	

<b>Overall compliance status</b>	<input checked="" type="checkbox"/> No major deficiencies	<input type="checkbox"/> Major deficiencies
<b>Monitoring and Reporting status</b>	<input checked="" type="checkbox"/> No major deficiencies	<input type="checkbox"/> Major deficiencies
Comments: None		

<b>Operation and Maintenance status</b>	<input checked="" type="checkbox"/> No major deficiencies	<input type="checkbox"/> Major deficiencies
<b>Date of last Sanitary Survey</b>	9-28-10	<b>Inspector</b>
		Karen Berry, PHX
<b>Major unresolved/ongoing operation and maintenance deficiencies:</b>		
<input type="checkbox"/> unable to maintain 20psi	<input type="checkbox"/> inadequate storage	
<input type="checkbox"/> cross connection/backflow problems	<input type="checkbox"/> surface water treatment rule	
<input type="checkbox"/> treatment deficiencies	<input type="checkbox"/> ATC/AOC	
<input type="checkbox"/> certified operator	<input type="checkbox"/> other =	
Comments: None		

<b>Is an ADEQ administrative order in effect?</b>	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
Comments: None		

System Information	
Population Served	54242
Service Connections	19372
Number of Entry Points to the Distribution System	10
Number of Sources	14
Initial Monitoring Year	2000
Monitoring Assistance Program (MAP) System	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No

<b>Evaluation completed by</b>	Donna Calderon, Manager 		
	Drinking Water Monitoring and Protection Unit		
<b>Phone</b>	602-771-4641	<b>Date</b>	February 3, 2012
<input checked="" type="checkbox"/>	Based upon data submitted by the water system, ADEQ has determined that this system is currently delivering water that meets water quality standards required by 40 CFR 141/Arizona Administrative Code, Title 18, Chapter 4, and <b>PWS is in compliance.</b>		
<input type="checkbox"/>	Based upon the monitoring and reporting deficiencies noted above, ADEQ <b>cannot determine</b> if this system is currently delivering water that meets water quality standards required by 40 CFR 141/Arizona Administrative Code, Title 18, Chapter 4, and/or <b>PWS is not in compliance.</b>		
<input type="checkbox"/>	Based upon the operation and maintenance deficiencies noted above, ADEQ <b>cannot determine</b> if this system is currently delivering water that meets water quality standards required by 40 CFR 141/Arizona Administrative Code, Title 18, Chapter 4, and/or <b>PWS is not in compliance.</b>		

***This compliance status report does not guarantee the water quality for this system in the future, and does not reflect the status of any other water system owned by this utility company.***



Janice K. Brewer  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007  
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin  
Director

March 28, 2012

Arizona Corporation Commission  
Mr. Marlin Scott, Utilities Engineer  
1200 W. Washington  
Phoenix, Arizona 85007

RE: Compliance Status for Santan Water Reclamation Plant, Inventory Number 105325, Place ID 18584, Permit number 43235.

Dear Mr. Scott,

Your request for evaluation of compliance status for the above facility is completed. Our records indicate that the above facility was issued Aquifer Protection Permit (APP) Number 43235 on 10/24/2007.

Review of the Self-Monitoring Report Forms submitted under the requirements of the APP for the year 2011 indicates that Johnson Utilities, LLC self-reported the following monitoring/reporting violations during the year.

1. Aquifer Quality Level Exceedance for nitrate-nitrite as N on January 10, July 8, and August 12, 2011. Monitoring point 114124. Monitoring SMP PT #2.
2. Aquifer Quality Level Exceedance for total nitrogen on January 11, July 29, and August 12, 2011. Monitoring point 114124. Monitoring SMP PT #2.

ADEQ is not aware of any other on-going environmental regulatory issues concerning maintenance and operation of the facility. It should be understood that the compliance status of a facility may change at any time. This compliance review is based on the most current information available. If you have any questions regarding this matter, please contact me at (602) 771-2209.

Sincerely,

Mindi Cross, Manager  
Water Quality Compliance Section  
Arizona Department of Environmental Quality

CC: Greg Brown  
Facility file

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

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Janice K. Brewer  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007  
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Henry R. Darwin  
Director

March 28, 2012

Arizona Corporation Commission  
Mr. Marlin Scott, Utilities Engineer  
1200 W. Washington  
Phoenix, Arizona 85007

RE: Compliance Status Pecan Water Reclamation Plant, Inventory Number 105324,  
Place ID 18583, Permit Number 37771.

Dear Mr. Scott,

Your request for evaluation of compliance status for the above facility is completed. Our records indicate that above facility was issued Aquifer Protection Permit (APP) Number 37771 on 02/04/2008.

Review of the Self-Monitoring Report Forms submitted under the requirements of the APP for the year 2011 indicates that there were no monitoring or reporting violations during the year. However, there are three open Notices of Violation (NOV)s associated with the Pecan Water Reclamation Plant. Detailed descriptions of these NOV's are provided in the Arizona Department of Environmental Quality's (ADEQ)'s compliance status letter for the Pecan Water Reclamation Plant to the Arizona Corporation Commission, dated July 12, 2011. A copy of the letter is attached for your convenience.

ADEQ confirms Johnson Utilities, LLC has met the "Compliance Conditions" of NOV's with Case IDs 92021, 97512, and 120285. ADEQ is in discussions with Johnson Utilities, LLC to resolve the company's liabilities for the violations cited in the NOV, and will maintain the open status of the NOV's until a resolution is reached. ADEQ is not aware of any other on-going environmental regulatory issues concerning maintenance and operation of the facility. It should be understood that the compliance status of a facility may change at any time. This compliance review is based on the most current information available.

If you have any questions regarding this matter, please contact me at (602) 771-2209.

Sincerely,

Mindi Cross, Manager  
Water Quality Compliance Section  
Arizona Department of Environmental Quality

cc: Greg Brown  
Facility file

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Governor

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Henry R. Darwin  
Director

March 28, 2012

Arizona Corporation Commission  
Mr. Marlin Scott, Utilities Engineer  
1200 W. Washington  
Phoenix, Arizona 85007

RE: Compliance Status for Precision WWTP, Inventory number 105004. Place ID Number 138145 and Permit Number 23124.

Dear Mr. Scott,

Your request for evaluation of compliance status for the above facility is completed. Our records indicate that the above facility was issued Aquifer Protection Permit (APP) Number 23124 on 04/08/2004.

Review of the APP reporting requirements and monitoring results that have been submitted indicate the facility **is in compliance** based on the current information that is available to ADEQ.

It should be understood that the compliance status of a facility may change at any time. This compliance review is based on the most current information available.

Sincerely,

A handwritten signature in black ink, appearing to read "Mindi Cross".

Mindi Cross, Manager  
Water Quality Compliance Section  
Arizona Department of Environmental Quality

cc: Greg Brown  
Facility file

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Janice K. Brewer  
Governor

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Henry R. Darwin  
Director

March 28, 2012

Arizona Corporation Commission  
Mr. Marlin Scott, Utilities Engineer  
1200 W. Washington  
Phoenix, Arizona 85007

RE: Compliance Status for Anthem Wastewater Reclamation Plant, Inventory Number 105646, Place ID 91546, Permit Number 45436.

Dear Mr. Scott,

Your request for evaluation of compliance status for the above facility is completed. Our records indicate that the above facility was issued Aquifer Protection Permit (APP) Number 45436 on 04/03/2008.

Review of the APP reporting requirements and monitoring results that have been submitted indicate the facility is **in compliance** based on the current information that is available to ADEQ.

It should be understood that the compliance status of a facility may change at any time. This compliance review is based on the most current information available.

Sincerely,

Mindi Cross, Manager  
Water Quality Compliance Section  
Arizona Department of Environmental Quality

cc: Greg Brown  
Facility file

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

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Janice K. Brewer  
Governor

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Henry R. Darwin  
Director

March 28, 2012

Arizona Corporation Commission  
Mr. Marlin Scott, Utilities Engineer  
1200 W. Washington  
Phoenix, Arizona 85007

RE: Compliance Status for Section 11 WWTP, Inventory number 103081,  
Place ID 142, Permit Number 35634.

Dear Mr. Scott,

Your request for evaluation of compliance status for the above facility is completed. Our records indicate that the above facility was issued Aquifer Protection Permit (APP) Number 35634 on 04/10/2006.

Review of the Self-Monitoring Report Forms submitted under the requirements of the APP for the year 2011 indicate that there were no monitoring or reporting violations during the year. However, there are two open Notices of Violation (NOV)s associated with the Section 11 WWTP. Detailed descriptions of these NOV's are provided in the Arizona Department of Environmental Quality's (ADEQ)'s compliance status letter for the Pecan Water Reclamation Plant to the Arizona Corporation Commission, dated July 12, 2011. A copy of the letter is attached for your convenience.

ADEQ confirms that Johnson Utilities, LLC has not met the "Compliance Conditions" for Case ID Nos. 102722 and 103357. ADEQ is in discussions with Johnson Utilities, LLC to resolve the company's liabilities for the violations cited in the NOV's, and will maintain the open status of the NOV's until a resolution is reached. ADEQ is not aware of any other on-going environmental regulatory issues concerning maintenance and operation of the facility. It should be understood that the compliance status of a facility may change at any time. This compliance review is based on the most current information available.

If you have any questions regarding this matter, please contact me at (602) 771-2209.

Sincerely,

Mindi Cross, Manager  
Water Quality Compliance Section  
Arizona Department of Environmental Quality

cc: Greg Brown  
Facility file

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Janice K. Brewer  
Governor

# ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

1110 West Washington Street • Phoenix, Arizona 85007  
(602) 771-2300 • www.azdeq.gov



Henry R. Darwin  
Director

July 12, 2011

Arizona Corporation Commission  
Mr. Steve Olea, Director  
Utilities Division  
1200 W. Washington  
Phoenix, Arizona 85007

Re: Compliance Status for Pecan Water Reclamation Plant, Inventory number 105324,  
Place ID 18583, Permit number 41570, and 37771.

Dear Mr. Olea:

Your request for evaluation of compliance status for the above facility is completed. Our records indicate the above facility has aquifer protection permit numbers 37771, and 41570 issued on 02/04/2008, and 11/20/2006, respectively. Johnson Utilities requested termination of Arizona Pollution Discharge Elimination System permit #AZ0025445 and the Arizona Department of Environmental Quality (ADEQ) granted the voluntary termination on March 23, 2011.

The aquifer protection permit reporting requirements and monitoring results submitted indicate the facility is not in compliance based on the current information that is available to the ADEQ. Data reviewed for this report was for the monitoring period of January 1, 2009 to March 31, 2011. Based upon a review of ADEQ's records, the following Notices of Violation (NOVs) were issued to Johnson Utilities and are unresolved.

1. A Notice of Violation (Case ID 97512) was issued to Johnson Utilities on June 5, 2008, related to an incident that occurred during the weekend of May 17 and 18, 2008, where the Pecan Water Reclamation Plan Plant had two sanitary sewer overflows (SSOs) with a combined estimate of 10,000 gallons or more of untreated raw sewage through a spillway into Queen Creek. Johnson Utilities was cited for the the following alleged violations including: addition of a pollutant to navigable waters from a point source without a permit (A.R.S. § 49-255.01 (A)); discharge without an Aquifer Protection Permit (A.R.S. §49-241(A)); violation of the numeric surface water quality standard for E. coli; and reporting violations related to the incident.
  - a. The clean up of the sewage spill was address under Compliance Order Docket No. P-57-08, issued July 14, 2008, and Consent Order Docket No. P-57-08, issued on September 13, 2008. Both Orders were terminated on November 17, 2008.
  - b. Johnson Utilities has not submitted the following documentation that was requested in the June 5, 2008, NOV; therefore the NOV remains open:
    - i. For each SSO, details regarding the volume of the discharge, the method of calculating the volume, the location of the discharge, and the actions taken by Johnson Utilities to address the discharge. Correspondence dated June 13, 2008 and June 19, 2008, was received by ADEQ from Johnson Utilities.

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However, after review of the responses, ADEQ determined that the details provided were incomplete for the following reasons: the response did not include a list of all SSOs that occurred since January 1, 2007 related to the Pecan Water Reclamation Plant or sewer collection systems that flow into the Pecan WRP; details regarding the volume of the discharge; the method of calculating the volume; and the location of the discharge.

- ii. ADEQ requested a report for each sanitary sewer overflow that occurred on May 17 and 18, 2008 including the date, time (beginning and end) and location of the SSO; estimate quantity discharged; method of estimating the quantity, volume and method of recovery; method, location and quantity of disinfection products used; any human exposure to discharged materials; and cause of SSO. Correspondence dated June 13, 2008 and June 19, 2008, was received by ADEQ from Johnson Utilities. However, after review of the responses, ADEQ determined that the details provided were inadequate.
2. On September 25, 2008, ADEQ inspectors observed one open, and two buried, disposal pits containing biosolids and other debris at the Section 11 facility. The pits constitute surface disposal sites under the biosolids rules and were not constructed or operated in accordance with the biosolids rules at the Johnson Utilities Section 11 Waste Water Treatment Plant. The biosolids originated from several Johnson Utilities' facilities, including the Pecan Water Reclamation Plant. This incident resulted in two Notices of Violation (Case ID 103357 and Case ID 102722) alleging placement of biosolids on a surface disposal site in a manner not consistent with applicable biosolids rules and disposal of sludge in a manner not prescribed in an Aquifer Protection Permit as a result of the September 25, 2008, ADEQ inspection. The ADEQ Solid Waste Inspections and Compliance Unit also issued a Notice of Violation (Case ID 103956) for failure to obtain an Aquifer Protection Permit ADEQ inspection for a large pit containing disposed concrete, plastic debris, and biosolids.
    - a. In response to the NOVs, Johnson Utilities submitted documentation to demonstrate proper disposal of the biosolids.
    - b. To date, Johnson Utilities has not submitted a closure plan that achieves clean closure and meets the requirements of A.R.S. § 49-252 and A.A.C. R18-9-A209. Therefore, these NOVs remain open.
  3. On October 19, 2010, a Notice of Violation (Case ID 120285) was issued to Johnson Utilities alleging the following:
    - a. Violation of APP permit 37771 (105324) for failure to provide timely written notification regarding cessation of the AZPDES Outfall and Subsurface Recharge Facility.
    - b. Violation of APP permit 37771 (105324) for failure to submit a closure plan regarding the closure of the AZPDES Outfall and Subsurface Recharge Facility.
    - c. Violation of A.A.C. R18-9-A208 (A) for failure to follow a compliance schedule established in an individual aquifer protection permit. Johnson Utilities was required to submit well installation reports within 60 days after installation and completion of recharge testing. However, Johnson Utilities failed to submit driller's logs and results of testing necessary to determine the available recharge rates.
    - d. Violation of APP permit 37771 (105324) which requires submittal of a design report for the lift station located at the Pecan WRP and the pumps located within the lift station. Johnson Utilities replaced the 100HP Flygt lift stations pumps authorized under the APP P-105324 with 85HP Flygt pumps.

- e. Violation of A.R.S. § 49-241(A) for disposal of effluent in the pecan groves at rates which constitutes disposal rather than beneficial reuse (as evidenced by the number of dead pecan trees in the groves).
- f. Violation of APP permit 37771 (105324) Section 2.1 for construction of 22 vadose zone recharge wells at locations not authorized under the APP.
  - i. As stated above, Johnson Utilities requested termination of Arizona Pollution Discharge Elimination System permit #AZ0025445 and the Arizona Department of Environmental Quality (ADEQ) granted the voluntary termination on March 23, 2011.
  - ii. However, Johnson Utilities has not submitted the following documentation as requested in the October 19, 2010, NOV, including: (1) written notification of closure of AZPDES Outfall Subsurface Recharge Facility; (2) a closure plan for the AZPDES Outfall Subsurface Recharge Facility; (3) a vadose zone recharge well completion report that contains as-built construction diagrams sealed by an Arizona registered geologist, infiltration testing/capacity data, a demonstration of sufficient recharge capacity and infiltration rates for facility discharges which demonstrate adequate disposal capacity for permitted flows of effluent; (4) a complete and accurate response to ADEQ's letter dated September 28, 2010 entitled Inadequate Response to Comprehensive Request for Additional Information; (5) and an aquifer protection permit amendment application that demonstrates the disposal capacity for the Pecan WRF after closure of the AZPDES Outfall and Subsurface Recharge Facility and a proposal for disposal of effluent in the pecan groves. As a result, this NOV remains open.

It should be understood that the compliance status of a facility may change from time to time based upon monitoring results or a facility inspection. Therefore this letter is based on the most current information available for the Pecan Water Reclamation Plant.

Sincerely,



Mindi Cross, Manager  
Water Quality Compliance Section

cc: Greg Brown, Johnson Utilities, LLC  
Facility file