

ORIGINAL

BEFORE THE ARIZONA CORPORATION COM



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COMMISSIONERS

BOB STUMP, Chairman
GARY PIERCE
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AZ CORP COMMISSION
DOCKET CONTROL

Arizona Corporation Commission
DOCKETED

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DOCKETED BY

IN THE MATTER OF THE APPLICATION OF FAR WEST WATER & SEWER, INC., AN ARIZONA CORPORATION, FOR A DETERMINATION OF THE CURRENT FAIR VALUE OF ITS UTILITY PLANT AND PROPERTY AND FOR INCREASES IN ITS WASTEWATER RATES AND CHARGES BASED THEREON FOR UTILITY SERVICE

DOCKET NO. WS-03478A-12-0307

INFORMATIONAL FILING

Far West Water and Sewer, Inc. ("Far West") hereby files copies of correspondence with the Arizona Department of Environmental Quality ("ADEQ") concerning the compliance status of Far West's jurisdictional facilities.

The first attachment is an October 21, 2013, letter from ADEQ to Far West stating that ADEQ is closing its Notice of Opportunity to Correct concerning Far West's Water system. It states, in part: "ADEQ has determined that substantial compliance has been achieved as requested in the NOC."

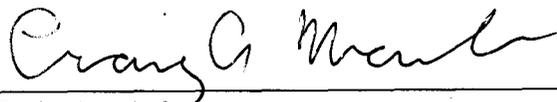
The second letter attached is dated October 25, 2013, and is from Marcia Colquitt (ADEQ's Manager of Water Quality Data and Enforcement Unit) to John LeSueur (ACC Assistant Utilities Division Director). It states that, based on Far West's self-reported data:

ADEQ finds that the Palm Shadows, Villa Royal, Marwood, Section 14, Seasons, and Del Oro WWTPs are not currently in violation at a level at which ADEQ will take an action or issue a Notice of Opportunity to Correct or Notice of Violation to Far West Water and Sewer, Inc.

The next attachments are letters dated October 22, 2013, from Ms. Colquitt to Mr. LeSueur concerning the compliance status for each of Far West's wastewater treatment plants, followed by Far West's November 5, 2013, letters to Ms. Colquitt concerning each plant.¹

¹ The attachments referenced in each November 5 letter are voluminous and are not attached. They will be provided to any party upon request.

Respectfully submitted on November 6, 2013, by:



Craig A. Marks
Craig A. Marks, PLC
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Phoenix, AZ 85028
(480) 367-1956
Craig.Marks@azbar.org
Attorney for Far West Water & Sewer Company

Original and 13 copies filed
on November 6, 2013, with:

Arizona Corporation Commission
Docket Control
1200 West Washington Street
Phoenix, AZ 85007

Copies mailed
on November 6, 2013, to:

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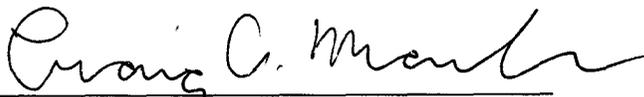
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By:


Craig A. Marks



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Henry R. Darwin
Director

October 21, 2013

Case ID #: 140311
Place ID: 5792
Water System #: 14-004

Far West Water & Sewage Co., Inc.: PWS 14-004
Attention: Andrew Capestro
12486 S. Foothills Blvd.
Yuma, AZ 85367-6002

Subject: Closure of the Notice of Opportunity to Correct, Far West Water & Sewage Co., Inc.

Dear Mr. Capestro:

The Arizona Department of Environmental Quality (ADEQ) has closed the Notice of Opportunity to Correct (NOC) issued to Far West Water & Sewage Co., Inc. on August 22, 2013. ADEQ has determined that substantial compliance has been achieved as requested in the NOC.

ADEQ will not proceed with further action at this time. However, if additional information regarding the alleged violations is discovered, or if further violations occur, ADEQ may reconsider its position and take additional action as appropriate and as allowed by law.

Should you have any comments or questions regarding this matter, please contact me at (520) 770-3126.

Sincerely,

Milena Sousa, Manager
Regional Compliance Unit
ADEQ Southern Regional Office

cc: Mindi Cross, Manager, WQCS, WQD, ADEQ
Vivian Adams, DWMPU, DWS, WQD, ADEQ

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Janice K. Brewer
Governor

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Henry R. Darwin
Director

October 25, 2013

Arizona Corporation Commission
Mr. John LeSueur, Assistant Utilities Division Director
1200 W. Washington
Phoenix, Arizona 85007

RE: Compliance Status Letters dated October 22, 2013, for Far West Water & Sewer Inc.

Dear Mr. LeSueur,

On October 22, 2013, the Arizona Department of Environmental Quality sent to your attention six (6) compliance status letters for the Far West Water & Sewer wastewater treatment plants (WWTPs). Specifically, the six compliance status letters were for the Palm Shadows, Villa Royal, Marwood, Section 14, Seasons, and Del Oro WWTPs. The six letters listed all of the self-reported monitoring violations for the period of 7/1/2012 through 6/30/2013.

As background, the majority of violations reported to ADEQ on a Self-Monitoring Report Form (SMRF), which is required by a facility's Aquifer Protection Permit and due quarterly, are resolved through informal compliance assurance tools and do not constitute taking an action against the permittee. Rather, ADEQ provides the opportunity for all permitted facilities to correct missing and/or deficient self-reported data through re-submittal of the missing and/or deficient data. Permit limit exceedances are evaluated by ADEQ to make a determination if they meet the criteria for significant non-compliance, the level at which ADEQ would take an informal enforcement action.

As of the date of this letter and based upon the latest self-reported data available through the 2nd quarter of 2013 ending 6/30/2013, ADEQ finds that the Palm Shadows, Villa Royal, Marwood, Section 14, Seasons, and Del Oro WWTPs are not currently in violation at a level at which ADEQ will take an action or issue a Notice of Opportunity to Correct or Notice of Violation to Far West Water and Sewer, Inc.

Should you have any questions or require further information regarding the compliance status letters dated October 22, 2013, for Far West Water and Sewer Inc., I can be reached at 602-771-4651 or by email at mrc@azdeq.gov.

Sincerely,

Marcia Colquitt, Manager
Water Quality Data and Enforcement Unit

cc: Andrew J. Capestro, Far West Water & Sewer, Inc.

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Henry R. Darwin
Director

October 22, 2013

Arizona Corporation Commission
Mr. John LeSueur, Assistant Utilities Division Director
1200 W. Washington
Phoenix, Arizona 85007

RE: Compliance Status for Far West Water and Sewer, Del Oro WWTP. Inventory number
101816, Place ID number 1637, and permit number 42243.

Dear Mr. LeSueur,

Your request for evaluation of the compliance status for the above facility is completed. Our records indicate that above facility has an Aquifer Protection Permit (APP) number 42243 issued on 2/25/2008.

Review of the APP reporting requirements and self monitoring results that have been submitted for the period of 7/1/2012 through 6/30/2013 indicate there are monitoring and reporting violations during the period as follows:

1. Missing thirty one daily results for BOD (7 day average) and thirty one daily results TSS (7 day average) for the third quarter of 2012 at monitoring point ID 132673, end of UV unit.
2. Discharge limit exceedance for Total Kjeldahl Nitrogen for the month of September, at monitoring point 132673, end of UV unit.
3. Discharge limit exceedance for daily average Turbidity on 9/15, 9/16 and 9/21 for the third quarter of 2012 at monitoring point 132673, end of UV unit.
4. Thirty four reporting deficiencies for Fecal Coliform 4 of 7 samples during the third quarter of 2012 at monitoring point 132673, end of UV unit table 1A.
5. Thirty four reporting deficiencies for Fecal Coliform 4 of 7 samples during the third quarter of 2012 at monitoring point 132739, end of UV unit table 1B.
6. Discharge limit exceedance for Fecal Coliform on 7/25, 8/21, and 9/10 at during the third quarter of 2012 at monitoring point 132740, reclaim class A+.
7. Discharge limit exceedance for monthly average Turbidity on 9/15/, 9/16 and 9/21 during the third quarter of 2012 at monitoring point 132740, reclaim class A+.
8. Missing thirty seven one daily results for BOD (7 day average) and thirty seven one daily TSS (7 day average) for the fourth quarter of 2012 at monitoring point 132673, end of UV unit table 1 A.
9. Twenty nine reporting deficiencies for Fecal Coliform 4 of 7 samples during the fourth quarter of 2012 at monitoring point 132673, end of UV unit table 1A.
10. Discharge limit exceedance for TSS (7 day average) on 12/10, at monitoring point 132673, end of UV unit table 1A.

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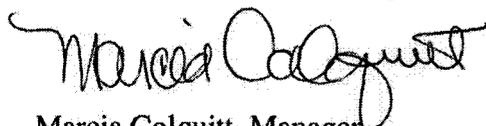
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11. Discharge limit exceedances for Monthly Average Flow during the months of November and December at monitoring point 132673, end of UV unit table 1A.
12. Discharge limit exceedance for BOD (7 day average) on 9/16 at monitoring point 132673, end of UV unit table 1A.
13. Discharge limit exceedance for Nitrite-N on 10/16 at monitoring point 132673, end of UV unit table 1A.
14. Discharge limit exceedance for Fecal Coliform on 11/26 at monitoring point 132740, reclaim class A+.
15. Not in PH3 range on 1/19 and 1/31 at monitoring point 132673, end of UV unit table 1A.
16. Discharge limit exceedances for monthly average flow on 1/31 and 2/28 of 2013 at monitoring point 132673, end of UV table 1A.
17. Twenty seven one daily reporting deficiencies for Fecal Coliform 4 of 7 samples during the first quarter of 2013, at monitoring point 132739, end of UV unit table 1B.
18. Twenty seven one daily reporting deficiencies for Fecal Coliform 4 of 7 samples during the first quarter of 2013, at monitoring point 132740, reclaim class A+.
19. Missing thirty five one daily results for BOD (7 day average) and thirty five one daily results for TSS (7 day average) for the first quarter of 2013, at monitoring point 132673, end of UV unit table 1A.
20. Twenty seven one daily reporting deficiencies for Fecal Coliform 4 of 7 samples during second quarter of 2013 at monitoring point 132739, end of UV unit table 1B.
21. Twenty seven one daily reporting deficiencies for Fecal Coliform 4 of 7 samples during the second quarter of 2013 at monitoring point 132740, reclaim class A+.
22. Missing Twenty nine one daily results for BOD (7 day average) and twenty nine TSS (7 day average) during the second quarter of 2013, at monitoring point 132673, end of UV unit table 1A.
23. Missing results for PH3 on 4/14/2013 at monitoring point 132673, end of UV unit table 1A.

Far West Water and Sewer, Inc., ("Far West") and the Arizona Department of Environmental Quality, entered into *First Amended Consent Judgment Civil Action No. CV 2008-021676*. The First Amended Consent Judgment, which was signed by the Court on October 14, 2013, establishes a scope and compliance schedule for actions to be performed by Far West for the Del Oro WWTP.

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. This compliance review is based on the most current information available.

Sincerely,



Marcia Colquitt, Manager
Water Quality Data and Enforcement Unit

cc: Andrew J. Capestro, Far West Water & Sewer, Inc.
Facility file



FAR WEST WATER & SEWER, INC.

November 5, 2013

Marcia Colquit
Water Quality Enforcement Unit
Water Quality Compliance Section
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, Arizona 85007

Re: Compliance Status for Far West Water and Sewer, Inc.
Del Oro WWTP, Inventory number 101816

Dear Ms. Colquit,

After consulting with Tracy Bunch of your office, the operators of the Del Oro WWTP have been able to correct the majority of the reporting deficiencies referenced in your letter to John LeSueur, Assistant Director, the Corporation Commission's Utilities Division, dated October 22, 2013. The meeting was very helpful in resolving issues concerning the reporting of weekends, as well as other reporting issues that came to light from your letter to Mr. LeSueur.

Attached are amended reports for items numbered 1, 4, 5, 8, 9, 10, 11, 12, 13, 16, 17, 18, 19, 20, 21, and 22 of that letter. Those reports should now correct and/or resolve the issues raised in your letter.

For items 2, there was a high TKN level which was due to having power interrupted for the mixers in the above ground tank bioreactor. The power to the mixers had tripped off because of a power surge. Power was restored and the mixers are now working properly.

For items 3 and 7, turbidity levels spiked on three separate days and therefore exceeded the limits set for the Del Oro WWTP. The spikes were caused by damaged membrane fibers. To rectify the problem, the membrane cassettes were removed and the broken fibers were repaired.

For item 6, fecal coliform exceeded the limit set for this plant. This exceedance was caused by the UV system not functioning properly. To function properly, the UV system must be cleaned periodically with citric acid. On this occasion, the citric acid did

not fully clean the UV system. To rectify this, the citric acid cleaning time has been extended and the days of cleaning with citric acid have also been increased.

For item 14, fecal coliform was found above the limit allowed by the permit. Those samples were taken and analyzed by Fresh Terra, the lab employed by Far West. Far West suspected that there was a possibility of the samples being contaminated before testing. To eliminate that possibility in the future, Far West has instituted strict retrieval procedures, requiring that samples in the future be obtained by an operator employed by Far West, not by an employee of Fresh Terra; that the sampler be disinfected with a chlorine solution before each use; and that the sampler be flushed with the effluent stream three times before the sample is taken, after which the sample is placed in a sterile container. In addition, Far West has employed a lab technician certified by the State of Arizona to conduct such tests. This will ensure timely results without the problems of suspected contamination, as well as allow for the opportunity to retest the effluent in the case where a positive result above the limit is obtained.

For item 15, the PH3 went over the accepted range on two separate days because of chlorine residual in the membrane tank. Chlorine bleach is used to clean the membranes and was still present when the system was placed back in service.

If you have any additional questions, do not hesitate to contact me. Isaac Yocupicio, our Waste Water Plant Supervisor, has sent this material directly to Tracy Bunch for review.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew J. Capestro", written in a cursive style.

Andrew J. Capestro



Janice K. Brewer
Governor

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Henry R. Darwin
Director

October 22, 2013

Arizona Corporation Commission
Mr. John LeSueur, Assistant Utilities Division Director
1200 W. Washington
Phoenix, Arizona 85007

RE: Compliance Status for Far West Water and Sewer, Marwood WWTP. Inventory number 102829, Place ID number 488, and permit number 26816.

Dear Mr. LeSueur,

Your request for evaluation of the compliance status for the above facility is completed. Our records indicate that above facility has an Aquifer Protection Permit (APP) number 26816 issued on 8/15/2002.

APP number 26816 was issued to include Class B Reclaimed Water Standards. Instead of Class B Reclaimed Water Standards, Class A+ Reclaimed Water Standards for turbidity and fecal coliform were inadvertently added to the discharge monitoring table in the permit. The turbidity violations listed below are the result of this. ADEQ issued a minor amendment to the permit on September 18, 2012 to remove the Class A+ Reclaimed Water Standard for turbidity and modify the fecal coliform limits to reflect the Class B Reclaimed Water Standard in the discharge monitoring table of the permit.

Review of the APP reporting requirements and self monitoring results that have been submitted for the period of 7/1/2012 through 6/30/2013 indicate there are monitoring and reporting violations during the period as follows:

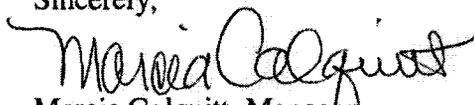
1. Three daily discharge limit exceedances for turbidity in third quarter of 2012 at monitoring point 11494, POD for disinfection unit to effluent.
2. Fifteen daily discharge limit exceedances for average turbidity in the third quarter of 2012 at monitoring point 11494, POD for disinfection unit to effluent.
3. Thirty one daily discharge monitoring reporting deficiencies for Fecal Coliform 4 of 7 samples during the third quarter of 2012. Monitoring point 11494, POD for disinfection unit to effluent.
4. Thirty one daily reuse reporting deficiencies for Fecal Coliform 4 of 7 samples during the third quarter of 2012, at monitoring point 11494, POD for disinfection unit to effluent.
5. Missing one week self inspection results for pump integrity and treatment plant comp in third quarter of 2012 at monitoring point 11495, self inspections.

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6. Twelve self inspection failures for pump integrity in the third quarter of 2012 at monitoring point 11495, self inspection.
7. Three daily discharge limit exceedances for Fecal Coliform on 11/7/2012, 11/8/2012 and 11/28/2012 in the fourth quarter of 2012 at monitoring point 143602, POD for disinfection unit to effluent.
8. Twenty nine discharge monitoring reporting deficiencies for Fecal Coliform 4 of 7 samples in the fourth quarter of 2012 at monitoring point 143602, POD for disinfection unit to effluent.
9. Twenty nine reuse reporting deficiencies for Fecal Coliform 4 of 7 samples in the fourth quarter of 2012 at monitoring point 143602, POD for disinfection unit to effluent.
10. Four self inspection failures for pump integrity in the fourth quarter of 2012 at monitoring point 11495, self inspections.
11. Two daily discharge limit exceedances for Fecal Coliform reuse on 1/22/2013 and 3/18/2013 in the first quarter of 2013 at monitoring point 143602, POD from disinfection to effluent.
12. Two daily discharge limit exceedances for Fecal Coliform discharge monitoring on 1/22/2013 and 3/18/2013 in the first quarter of 2013 at monitoring point 143602, POD disinfection to effluent.
13. Twenty six reuse reporting deficiencies for Fecal Coliform 4 of 7 samples in the first quarter of 2013 at monitoring point 143602, POD disinfection to effluent.
14. Twenty six discharge monitoring reporting deficiencies for Fecal Coliform 4 of 7 samples in the first quarter of 2013 at monitoring point 143602, POD disinfection to effluent.
15. Ten self inspection failures for pump integrity during the first quarter of 2013 at monitoring point 11495, self inspections.
16. Three self inspection failures for pump integrity during the second quarter of 2013 at monitoring point 11495, self-inspections.

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. This compliance review is based on the most current information available.

Sincerely,


Marcia Colquitt, Manager
Water Quality Data and Enforcement Unit

cc: Andrew J. Capestro, Far West Water and Sewer, Inc.
Facility file



FAR WEST WATER & SEWER, INC.

November 5, 2013

Marcia Colquit
Water Quality Enforcement Unit
Water Quality Compliance Section
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, Arizona 85007

Re: Compliance Status for Far West Water and Sewer, Inc.
Marwood WWTP, Inventory number 102829

Dear Ms. Colquit,

After consulting with Tracy Bunch of your office, the operators of the Marwood WWTP have been able to correct the majority of the reporting deficiencies referenced in your letter to John LeSueur, Assistant Director, the Corporation Commission's Utilities Division, dated October 22, 2013. The meeting was very helpful in resolving issues concerning the reporting of weekends, as well as other reporting issues that came to light from your letter to Mr. LeSueur.

Attached are amended reports for items numbered 3, 4, 5, 6, 8, 9, 10, 13, 14, 15, and 16 of that letter. Those reports should now correct and/or resolve the issues raised in your letter.

Of the remaining 5 items, 2 are for turbidity exceedances and 3 are for fecal coliform exceedances. As pointed out in your letter, the permit for the Marwood WWTP was issued for Class B Reclaimed Water Standards, but somehow Class A+ Standards for turbidity and fecal coliform were inadvertently added to the discharge table for this permit. Those standards required a non-detect for fecal coliform in 4 out of 7 daily samples, a maximum daily turbidity of 5, and an average turbidity of 2 in a 24 hour period. The amendment issued September 18, 2012 corrected these mistakes, and eliminated the requirement of turbidity testing altogether, increased the single sample maximum for fecal coliform to 800 and changed the 4 out of 7 daily samples maximum for fecal coliform to 200. The operators of the Marwood WWTP will be able to meet these corrected standards.

If you have any additional questions, do not hesitate to contact me. Isaac Yocupicio, our Waste Water Plant Supervisor, has sent this material directly to Tracy Bunch for review.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew J. Capestro". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Andrew J. Capestro

4.0 TABLES OF MONITORING REQUIREMENTS

TABLE I
DISCHARGE MONITORING

Sampling Point Number	Identification	Latitude	Longitude
1	Point of discharge from the disinfection unit to the effluent storage ponds	32° 37' 38" North	114° 23' 29" West

Parameter	Alert Level	Discharge Limit	Units	Sampling Frequency	Reporting Frequency
Flow	Reserved	Reserved	mgd	Daily	Quarterly
Flow	N/A	0.34	mgd	Daily	Quarterly

Nutrients, Coliform & Turbidity:

Total Nitrogen ¹	Reserved	Reserved	mg/l	Monthly	Quarterly
Nitrate-Nitrite as N	Reserved	Reserved	mg/l	Monthly	Quarterly
Total Kjeldahl Nitrogen (TKN)	Reserved	Reserved	mg/l	Monthly	Quarterly
Fecal Coliform (in 4 of last 7 daily samples)	Non-detect	Non-detect	CFU	Daily ²	Quarterly
Fecal Coliform (in 4 of last 7 daily samples)	Reserved	23	CFU	Daily ³	Quarterly
Turbidity ⁴ (max. at any time)	Reserved	5	NTU	Daily ⁵	Quarterly
Turbidity (24 hour average)	Reserved	2	NTU	Daily ⁶	Quarterly

¹ Total Nitrogen is equal to Nitrate-Nitrite-N plus TKN.

² Means every day in which a sample can be taken and analyzed as long as no fewer than four samples are taken and analyzed per calendar week. If the permittee samples the reclaimed water for fecal coliform more than four days per week, then all sample results shall be included on the SMRF.

³ Means every day in which a sample can be taken and analyzed as long as no fewer than four samples are taken and analyzed per calendar week. If the permittee samples the reclaimed water for fecal coliform more than four days per week, then all sample results shall be included on the SMRF.

⁴ Appropriate technology for turbidity monitoring shall be an instrument with a signal averaging time not exceeding 120 seconds.

⁵ Means continuous readings 24-hours per day; to be reported as the highest number recorded in each 24-hour period.

⁶ Means continuous readings 24-hours per day; to be reported as the 24-hour average.

Amended:08/15/02

OLD Menwood Permit

4.0 TABLES OF MONITORING REQUIREMENTS

TABLE I
DISCHARGE MONITORING

Sampling Point Number	Identification	Latitude	Longitude
1	Point of discharge from the disinfection unit to the effluent storage ponds	32° 37' 38" North	114°23' 29" West

Parameter	Alert Level	Discharge Limit	Units	Sampling Frequency	Reporting Frequency
Flow: Daily	Reserved	Reserved	mgd	Daily	Quarterly
Flow: Monthly Average ¹	N/A	0.34	mgd	Monthly Calculation	Quarterly
Total Nitrogen ²	Reserved	Reserved	mg/l	Monthly	Quarterly
Nitrate-Nitrite as N	Reserved	Reserved	mg/l	Monthly	Quarterly
Total Kjeldahl Nitrogen (TKN)	Reserved	Reserved	mg/l	Monthly	Quarterly
Fecal Coliform (BADCT) (in 4 of last 7 daily samples)	Reserved	200 ³	CFU or MPN ⁴	Daily ⁵	Quarterly
Fecal Coliform (BADCT) (Single sample maximum)	Reserved	800	CFU or MPN	Daily	Quarterly
Fecal Coliform (Reuse) (in 4 of last 7 daily samples)	Reserved	200 ⁶	CFU or MPN	Daily ⁷	Quarterly
Fecal Coliform (Reuse) (Single sample maximum)	Reserved	800	CFU or MPN	Daily	Quarterly

¹ Monthly average of daily flow values

² Total Nitrogen is equal to Nitrate-Nitrite-N plus TKN.

³ If at least four of the last seven samples are equal to or less than 200 CFU or MPN per 100 ml, report "yes" in the appropriate space on the SMRF (indicating that the standard has been met). If at least four of the last seven samples are greater than or equal to 200 CFU or MPN per 100 ml, report "no" in the appropriate space on the SMRF (indicating that the standard has **not** been met).

⁴ CFU = Colony Forming Units per 100 ml; MPN = Most Probable Number per 100 ml.

⁵ Means every day in which a sample can be taken and analyzed as long as no fewer than four samples are taken and analyzed per calendar week. If the permittee samples the effluent for fecal coliform more than four days per week, then all sample results shall be included on the SMRF.

⁶ If at least four of the last seven samples are equal to or less than 200 CFU or MPN per 100 ml, report "yes" in the appropriate space on the SMRF (indicating that the standard has been met). If at least four of the last seven samples are greater than 200 CFU or MPN per 100 ml, report "no" in the appropriate space on the SMRF (indicating that the standard has **not** been met).

⁷ For fecal coliform, "daily" sampling means every day in which a sample can practicably be obtained and delivered in sufficient time for proper analysis, provided that no less than four samples in each seven-day period are obtained and analyzed.

This page was amended on September 18, 2012



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Henry R. Darwin
Director

October 22, 2013

Arizona Corporation Commission
Mr. John LeSueur, Assistant Utilities Division Director
1200 W. Washington
Phoenix, Arizona 85007

RE: Compliance Status for Far West Water and Sewer, Seasons RV Village WWTP.
Inventory number 103618, Place ID number 5406, and permit number 14662.

Dear Mr. LeSueur,

Your request for evaluation of the compliance status for the above facility is completed. Our records indicate that the above facility has an Aquifer Protection Permit (APP) number 14662 issued on 12/24/1998.

Review of the APP reporting requirements and self monitoring results that have been submitted for the period of 7/1/2012 through 6/30/2013 indicate there are monitoring and reporting violations during the period as follows:

1. Discharge limit exceedance for monthly average flow for the month of July during third quarter of 2012 at monitoring point 12477, before discharge to pond.
2. Discharge limit exceedances for monthly average flow on for the months of November and December during the fourth quarter of 2012 at monitoring point 12477, before discharge to pond.
3. Discharge limit exceedances for total nitrogen on 1/3/2013, 2/19/2013 and 3/27/2013 at monitoring point 12477, before discharge to pond.
4. Discharge limit exceedances for total kjeldahl nitrogen (TKN) on 2/19/2013 and 3/27/2013 at monitoring point 12477, before discharge to pond.
5. Discharge limit exceedances for monthly average flow for the months of January, February and March at monitoring point 12477, before discharge to pond.
6. Discharge limit exceedances for total nitrogen on 5/7/2013 and 6/25/2013 at monitoring point 12477, before discharge to pond.
7. Discharge limit exceedance for total kjeldahl nitrogen on 6/25/2013 at monitoring point 12477, before discharge to pond.

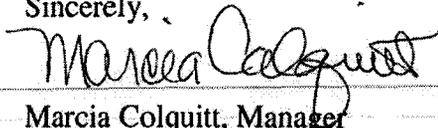
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Far West Water and Sewer, Inc., ("Far West") and the Arizona Department of Environmental Quality, entered into *First Amended Consent Judgment Civil Action No. CV 2008-021676*. The First Amended Consent Judgment, which was signed by the Court on October 14, 2013, establishes a scope and compliance schedule for actions to be performed by Far West for the Seasons RV Village WWTP.

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. This compliance review is based on the most current information available.

Sincerely,



Marcia Colquitt, Manager
Water Quality Data and Enforcement Unit

cc: Andrew J. Capestro, Far West Water & Sewer, Inc.
Facility file.



FAR WEST WATER & SEWER, INC.

November 5, 2013

Marcia Colquit
Water Quality Enforcement Unit
Water Quality Compliance Section
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, Arizona 85007

Re: Compliance Status for Far West Water and Sewer, Inc.
Seasons WWTP, Inventory number 103618

Dear Ms. Colquit,

After consulting with Tracy Bunch of your office, the operators of the Seasons WWTP have been able to correct the majority of the reporting deficiencies referenced in your letter to John LeSueur, Assistant Director, the Corporation Commission's Utilities Division, dated October 22, 2013. The meeting was very helpful in resolving issues relating to reporting that came to light from your letter to Mr. LeSueur.

Attached are amended reports for items numbered 1, 2, and 5. Those reports should now correct and/or resolve the issues raised in your letter. As shown in the attached excerpt from the consent Order, Far West was allowed to operate the Seasons WWTP with a maximum flow of 70,000 gpd. Based upon this criteria, the Seasons WWTP did not exceed the monthly flow for the months cited.

The remaining issues concerning total nitrogen and total kjeldahl nitrogen are being addressed pursuant to the Consent Judgment entered October 14, 2013 which requires the completion of an upgraded membrane filtration plant at this site.

If you have any additional questions, do not hesitate to contact me. Isaac Yocupicio, our Waste Water Plant Supervisor, has sent this material directly to Tracy Bunch for review.

Sincerely,

Andrew J. Capestro



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Henry R. Darwin
Director

October 22, 2013

Arizona Corporation Commission
Mr. John LeSueur, Assistant Utilities Division Director
1200 W. Washington
Phoenix, Arizona 85007

RE: Compliance Status for Far West Water and Sewer, Section 14 WWTP. Inventory number 105014, Place ID number 15108, and permit number 44366.

Dear Mr. LeSueur,

Your request for evaluation of the compliance status for the above facility is completed. Our records indicate that the above facility has an Aquifer Protection Permit (APP) number 44366 issued on 9/4/2008.

Review of the APP reporting requirements and self monitoring results that have been submitted for the period of 7/1/2012 through 6/30/2013 indicate there are monitoring and reporting violations during the period as follows:

1. Twenty nine discharge monitoring reporting deficiencies for Fecal Coliform 4 of 7 samples in the third quarter of 2012 at Monitoring point 134420, Phase I - effluent meter.
2. Twenty nine reuse reporting deficiencies for Fecal Coliform 4 of 7 samples in the third quarter of 2012 at monitoring point 134423, reclaim class A+.
3. Missing result for surface elevation for the months of July and August in the third quarter of 2012 at monitoring point 134424, GW-POC #2.
4. Discharge limit exceedances for 5 SMP Rolling GEO Mean Total Nitrogen for the months of October, November and December in the fourth quarter of 2012 at monitoring point 134420, Phase I - effluent meter point.
5. Discharge limit exceedances for Fecal Coliform on 10/05 and 11/26 in the fourth quarter of 2012 at monitoring point 134420, effluent meter point.
6. Discharge limit exceedances for 5 SMP Rolling GEO Mean Total Nitrogen for the months of October, November and December in the fourth quarter of 2012 at monitoring point 134423, reclaim class A+.
7. Discharge limit exceedances for Fecal Coliform on 10/05 and 11/26 in the fourth quarter of 2012 at monitoring point 134423, reclaim class A+.
8. Discharge limit exceedance for Total Coliform on 3/04 in the first quarter of 2013 at monitoring point 134424, GW - POC #2.
9. Discharge limit exceedance for monthly average flow during the month of January in the first quarter of 2013 at monitoring point 134427, Phase I - DM - EFF VZ -1.

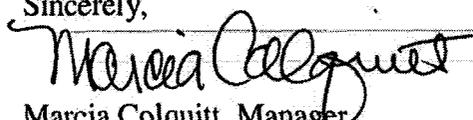
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10. Missing results for BOD (30 day average) for the month of February in the first quarter of 2013 at monitoring point 134427, Phase I – DM – EFF VZ – 1.
11. Missing results for TSS (30 day average) for the month of February in the first quarter of 2013 at monitoring point 134427, Phase I – DM – EFF VZ - 1.
12. Missing results for para-dichlorobenzene, dichloromethane, O-dichlorobenzene, Toluene, Benzene, Carbon Tetrachloride and Total Cadmium. Twice yearly frequency for the semi-annual monitoring January 1 through June 30, 2013 at monitoring point 134420, Phase I- effluent meter.

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. This compliance review is based on the most current information available.

Sincerely,



Marcia Colquitt, Manager
Water Quality Data and Enforcement Unit

cc: Andrew J. Capestro, Far West Water & Sewer , Inc.
Facility file.



FAR WEST WATER & SEWER, INC.

November 5, 2013

Marcia Colquit
Water Quality Enforcement Unit
Water Quality Compliance Section
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, Arizona 85007

Re: Compliance Status for Far West Water and Sewer, Inc.
Section 14 WWTP, Inventory number 105014

Dear Ms. Colquit,

After consulting with Tracy Bunch of your office, the operators of the Section 14 WWTP have been able to correct the majority of the reporting deficiencies referenced in your letter to John LeSueur, Assistant Director, the Corporation Commission's Utilities Division, dated October 22, 2013. The meeting was very helpful in resolving issues concerning the reporting of weekends, as well as other reporting issues that came to light from your letter to Mr. LeSueur.

Attached are amended reports for items numbered 1, 2, 3, 9, 10, 11 and 12 of that letter. Those reports should now correct and/or resolve the issues raised in your letter. For items 5, 7 and 8, fecal coliform was found above the limit allowed by the permit. Those samples were taken and analyzed by Fresh Terra, the lab employed by Far West. Far West suspected that there was a possibility of the samples being contaminated before testing. To eliminate that possibility in the future, Far West has instituted strict retrieval procedures, requiring that samples in the future be obtained by an operator employed by Far West, not by an employee of Fresh Terra; that the sampler be disinfected with a chlorine solution before each use; and that the sampler be flushed with the effluent stream three times before the sample is taken, after which the sample is placed in a sterile container. In addition, Far West has employed a lab technician certified by the State of Arizona to conduct such tests. This will ensure timely results without the problems of suspected contamination, as well as allow for the opportunity to retest the effluent in the case where a positive result above the limit is obtained.

The final two items, 4 and 6, are for discharge limit exceedances above the Rolling Mean for Total Nitrogen. Far West has addressed these problems as shown in

the attached report, and has been working with its consulting engineer to resolve that problem on a going-forward basis.

If you have any additional questions, do not hesitate to contact me. Isaac Yocupicio, our Waste Water Plant Supervisor, has sent this material directly to Tracy Bunch for review.

Sincerely,

A handwritten signature in black ink, appearing to read "Andrew J. Capestro". The signature is fluid and cursive, with a large initial "A" and "C".

Andrew J. Capestro



Janice K. Brewer
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

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Henry R. Darwin
Director

October 22, 2013

Arizona Corporation Commission
Mr. John LeSueur, Assistant Utilities Division Director
1200 W. Washington
Phoenix, Arizona 85007

RE: Compliance Status for Far West Water and Sewer, Villa Royal WWTP. Inventory number 100221, Place ID number 740, and permit number 14559.

Dear Mr. LeSueur,

Your request for evaluation of the compliance status for the above facility is completed. Our records indicate that above facility has an Aquifer Protection Permit (APP) number 14559 issued on 2/06/1998.

Review of the APP reporting requirements and self monitoring results that have been submitted for the period of 7/1/2012 through 6/30/2013 indicate there are monitoring violations during the period as follows.

1. Missing one week result for Fecal Coliform during the third quarter of 2012 at monitoring point 12114, Villa Royale effluent restricted area.
2. Missing one week result for Fecal Coliform GEO Mean during the third quarter of 2012 at monitoring point 12114, Villa Royale effluent restricted area.
3. Discharge limit exceedance for Fecal Coliform on 7/25/2012 at monitoring point 15296, Del Ray effluent.
4. Missing one week result for Fecal Coliform during the third quarter of 2012 at monitoring point 15296, Del Ray effluent.
5. Missing one week result for Fecal GEO Mean during the third quarter of 2012 at monitoring point 15296, Del Ray effluent.
6. Missing one week result for Fecal Coliform during fourth quarter of 2012 at monitoring point 12114, Villa Royale effluent restricted area.
7. Missing one week result for Fecal Coliform GEO Mean during fourth quarter of 2012 at monitoring point 12114, Villa Royale effluent restricted area.
8. Missing one week result for Fecal Coliform during fourth quarter of 2012 at monitoring point 15296, Del Ray effluent.
9. Missing one week result for Fecal Coliform GEO Mean during fourth quarter of 2012 at monitoring point 15296, Del Ray effluent.

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10. Missing one week result for Fecal Coliform during the first quarter of 2013, at monitoring point 12114, Villa Royale effluent restricted area.
11. Missing one week result for Fecal Coliform GEO Mean during the first quarter of 2013 at monitoring point 12114, Villa Royale effluent restricted area.
12. Missing one week result for Fecal Coliform during the first quarter of 2013 at monitoring point 15296, Del Ray effluent.
13. Missing one week result for Fecal Coliform GEO Mean during the first quarter of 2013 at monitoring point 15296, Del Ray effluent.

Far West Water and Sewer, Inc., ("Far West") and the Arizona Department of Environmental Quality, entered into *First Amended Consent Judgment Civil Action No. CV 2008-021676*. The First Amended Consent Judgment, which was signed by the Court on October 14, 2013, establishes a scope and compliance schedule for actions to be performed by Far West for the Villa Royal WWTP.

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. This compliance review is based on the most current information available.

Sincerely,



Marcia Colquitt, Manager
Water Quality Data and Enforcement Unit

cc: Andrew J. Capestro, Far West & Sewer, Inc.
Facility file



FAR WEST WATER & SEWER, INC.

November 5, 2013

Marcia Colquit
Water Quality Enforcement Unit
Water Quality Compliance Section
Arizona Department of Environmental Quality
1110 W. Washington Street
Phoenix, Arizona 85007

Re: Compliance Status for Far West Water and Sewer, Inc.
Villa Royal WWTP, Inventory number 100221

Dear Ms. Colquit,

After consulting with Tracy Bunch of your office, the operators of the Villa Royal and Del Rey WWTPs have been able to correct the majority of the reporting deficiencies referenced in your letter to John LeSueur, Assistant Director, the Corporation Commission's Utilities Division, dated October 22, 2013. The meeting was very helpful in resolving issues concerning the reporting of weekends, as well as other reporting issues that came to light from your letter to Mr. LeSueur.

Attached are amended reports for items numbered 1, 2, 4, 5, 6, 7, 8, 9, 10, 11, 12, and 13 of that letter. Those reports should now correct and/or resolve the issues raised in your letter. For item 3, fecal coliform was found above the limit allowed by the permit. Those samples were taken and analyzed by Fresh Terra, the lab employed by Far West. Far West suspected that there was a possibility of the samples being contaminated before testing. To eliminate that possibility in the future, Far West has instituted strict retrieval procedures, requiring that samples in the future be obtained by an operator employed by Far West, not by an employee of Fresh Terra; that the sampler be disinfected with a chlorine solution before each use; and that the sampler be flushed with the effluent stream three times before the sample is taken, after which the sample is placed in a sterile container. In addition, Far West has employed a lab technician certified by the State of Arizona to conduct such tests. This will ensure timely results without the problems of suspected contamination, as well as allow for the opportunity to retest the effluent in the case where a positive result above the limit is obtained.

If you have any additional questions, do not hesitate to contact me. Isaac Yocupicio, our Waste Water Plant Supervisor, has sent this material directly to Tracy Bunch for review.

Sincerely,

A handwritten signature in cursive script, appearing to read "Andrew J. Capestro". The signature is written in black ink and is positioned above the printed name.

Andrew J. Capestro



Janice K. Brewer
Governor

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Henry R. Darwin
Director

October 22, 2013

Arizona Corporation Commission
Mr. John LeSueur, Assistant Utilities Division Director
1200 W. Washington
Phoenix, Arizona 85007

RE: Compliance Status for Far West Water and Sewer, Palms Shadows WWTP. Inventory number 103608, Place ID number 8319, and permit number 14681.

Dear Mr. LeSueur,

Your request for evaluation of the compliance status for the above facility is completed. Our records indicate that above facility has an Aquifer Protection Permit (APP) number 14681 issued on 4/14/1999.

Review of the APP reporting requirements and self monitoring results that have been submitted for the period of 7/1/2012 through 6/30/2013, indicate the facility did not self-report any violations. The facility is in compliance based on the self monitoring and reporting results submitted to ADEQ.

Far West Water and Sewer, Inc., ("Far West") and the Arizona Department of Environmental Quality, entered into *First Amended Consent Judgment Civil Action No. CV 2008-021676*. The First Amended Consent Judgment, which was signed by the Court on October 14, 2013, establishes a scope and compliance schedule for actions to be performed by Far West for the Palm Shadows WWTP.

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. This compliance review is based on the most current information available.

Sincerely,

Marcia Colquitt, Manager
Water Quality Data and Enforcement Unit

cc: Andrew J. Capestro, Far West Water & Sewer, Inc.
Facility file

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