



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

CERTIFIED MAIL
Return Receipt Requested

Case ID #: 178116

September 17, 2018

Johnson Utilities, LLC
Attention: Gary A. Drummond
5230 E Shea Blvd
Ste 200
Scottsdale, AZ 85254

Subject: Opportunity to Correct Deficiencies
Santan Water Reclamation Plant, Place ID 18584
200 E Hunt Hwy / Queen Creek, AZ 85143

Dear Mr. Drummond:

The Arizona Department of Environmental Quality (ADEQ) has reason to believe that Johnson Utilities, LLC as the owner/operator of Santan Water Reclamation Plant may be in violation of Arizona's environmental requirements. The purpose of this letter is to update you on the status of ADEQ action resulting from an ADEQ inspection as required by A.R.S. §41-1009(H), and to allow you an opportunity to correct these deficiencies without enforcement by ADEQ. An ADEQ inspection of the facility completed on September 06, 2018 revealed the following:

1. **A.A.C. R18-9-B702(I)**

Signage and Notification. A permittee shall place and maintain signage at locations and provide applicable notification specified in Table 1 so the public is informed reclaimed water is in use and no one should drink from the system.

During the 9/6/18 inspection, ADEQ visited the effluent holding ponds located within the San Tan Heights area. Signage was observed that read "no fishing and swimming". This language differs from the General Requirements for Reclaimed Water R18-9-B702 (I).

2. **A.A.C. R18-9-B710 (B)(2)**

A person holding a Type 3 Recycled Water Permit for a Reclaimed Water Agent: Shall maintain a contractual agreement with each end user stipulating any end user responsibilities for the requirements specified under subsection (A).

During the inspection, the effluent holding ponds located within San Tan Heights were observed to have signage that read "no fishing and swimming". This language does not comply with the requirement to notify the public that no one should drink from the system. Additionally, it could not be verified that the end users were notified of the requirements under R18-9-B710(B)(2) Type 3 Recycled Water General Permit for a Reclaimed Water Agent.

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To establish compliance:

1. Within 21 calendar days of receipt of this letter, please submit documentation that demonstrates that all end users have signage installed to prevent human consumption as required per R-18-9-B702(I). Suggested signage language may read "CAUTION: RECLAIMED WATER, DO NOT DRINK" and display the international "do not drink" symbol. Additionally, to complete this condition, submit a copy of Johnson Utilities' contractual agreement demonstrating that signage and notification requirements under R-18-9-B702(I) have been met.

Please review the above and submit a written response to:

Arizona Department of Environmental Quality, Attention: Oliver Navo, GW/Reuse Inspections & Compliance, 1110 W Washington St, Phoenix, AZ 85007 MC: 5415B-3

ADEQ may verify compliance by on-site inspection or other appropriate means. Within 30 days of receipt of your response to this letter, ADEQ will notify you whether the facility is in substantial compliance.

Although ADEQ has the authority to issue appealable administrative orders compelling compliance, this letter has no such force or effect. Your point of contact for resolution of these deficiencies will be Oliver Navo who can be reached at (602) 771-8708. Please contact him/her if you have any questions about this letter or need additional guidance.

Sincerely,



Ethan Leiter, Manager
GW/Reuse Inspections & Compliance



Oliver Navo
GW/Reuse Inspections & Compliance