

**STATEMENT OF BASIS FOR MODIFICATION
OF AZPDES PERMIT NO. AZ0025178**

Pursuant to A.C.C. R18-9-B906, on December 7, 2022, ADEQ received an application from the City of Casa Grande, owner of the Casa Grande Wastewater Reclamation Facility (WRF) to modify AZPDES Permit No. AZ0025178 which became effective on April 4, 2019. The request would increase the permitted design flow from 6 million gallons per day (MGD) to 14 MGD. In addition, Outfall 002 to the Santa Cruz Wash will be added.

During the permit modification, ADEQ determined the AZPDES program does not limit discharge flow because flow is not a pollutant. Limitations on flow have been removed from this permit.

Facility Information

The Casa Grande WRF is a Publicly Owned Treatment Works (POTW). The Casa Grande WRF currently has a constructed design capacity of 12 MGD; however, the City of Casa Grande has an agreement with the Ak-Chin Indian Community to limit discharge from Outfall 001 to 6 MGD to ensure surface flows do not reach the Ak-Chin Indian Community. The City of Casa Grande is planning to expand their design capacity to 18 MGD and add an additional outfall to the main branch of the Santa Cruz Wash.

In accordance with A.A.C. R18-9-A903(6), a permit cannot be issued for any discharge inconsistent with a plan or plan amendment approved under section 208(b) of the Clean Water Act. During the 208 Plan Consistency Review, it was determined that Casa Grande WRF’s approved design capacity is 14 MGD. Therefore, this permit modification will increase Casa Grande WRF’s permitted design flow to 14 MGD. The City of Casa Grande will submit an amendment to the Central Arizona Governments (CAG) Water Quality Management Plan to increase their design capacity to 18 MGD. This permit may be modified to increase the permitted design flow to 18 MGD after the amendment is approved.

Treatment processes at the Casa Grande WRF include influent screening, grit removal, activated sludge biological treatment, secondary clarifiers, tertiary filtration, chlorination, and dechlorination. Sludge is sent to the City of Casa Grande Landfill for disposal.

The planned facility expansion includes the following process modifications: influent pump station capacity expansion to 36 MGD, conversion of existing unused pretreatment basin to an equalization basin, installation of super-oxygenation system for odor mitigation, replacement of existing grit pumps, retrofitting oxidation ditches, retrofitting existing disk filters to increase redundant capacity, and upgrading effluent pump station to accommodate a new reclaimed water distribution system (RWDS).

Outfall Locations

Outfall No.	Latitude	Longitude	Legal
001	32° 54' 57" N	111° 47' 13" W	Township 6 S, Range 5 E, Section 12
002	32° 52' 46" N	111° 49' 43" W	Township 6 S, Range 5 E, Section 21

Receiving Waters

The receiving water for the Outfall 001 is the North Branch of the Santa Cruz Wash which is a tributary to the Santa Cruz Wash in the Santa Cruz River Basin. The receiving water for the Outfall 002 is the Santa Cruz Wash in the Santa Cruz River Basin.

The applicable designated uses for the North Branch of the Santa Cruz Wash (Outfall 001) are Aquatic and Wildlife effluent-dependent water (A&Wedw) and Partial Body Contact (PBC).

The applicable designated uses for the Santa Cruz Wash (Outfall 002) are Aquatic and Wildlife ephemeral (A&We), Partial Body Contact (PBC), and Agricultural Livestock watering (AgL). Per A.A.C. R18-11-113(D), the water quality standards that apply to effluent-dependent waters (EDWs) will be applied to derive discharge limitations for any point source discharge of wastewater to an ephemeral water. The AZPDES permit includes discharge limitations and monitoring requirements designed to achieve compliance with A&Wedw standards.

Therefore, the following uses are being applied to the Santa Cruz Wash (Outfall 002):

- Aquatic and Wildlife effluent-dependent water (A&Wedw)
- Partial Body Contact (PBC)
- Agricultural Livestock watering (AgL)

Proposed Changes

ADEQ has reviewed the request and proposes to modify the permit as follows:

Current Permit	Modification	Reason for Change
6 MGD permitted design flow	14 MGD permitted design flow	Facility expansion as described above.
Outfall 001	Outfall 001 and Outfall 002	Additional outfall added.
Report noncompliance to (602) 771-2330	Noncompliance resulting in imminent threat to human health or the environment must be reported to (602) 771-2330, while all other noncompliance must be reported to (602) 771-1440.	Routing emergency calls to the emergency hotline, but all other calls to a non-emergency number.
Flow from Outfall 001 limited to 6 mgd	No limitations on flow	AZPDES permits do not limit flow because flow is not a pollutant. The City of Casa Grande and the Ak-Chin Indian Community may agree to restrict discharge amongst themselves.

Current Permit	Modification	Reason for Change
Discharge Flow Exceedance Notification to the Ak-Chin Indian Community's Environmental Protection Department Director or Designee orally by phone at 520-568-1140 within 30 days of the facility becoming aware that it has exceeded the permitted daily flow rate of 6 MGD for Outfall 001.	No notification requirements	The AZPDES program will not enforce flow rate notifications. The City of Casa Grande and the Ak-Chin Indian Community may agree to notification requirements amongst themselves.

Anti-Backsliding Considerations:

“Anti-backsliding” refers to statutory (Section 402(o) of the Clean Water Act) and regulatory (40 CFR 122.44(l)) requirements that prohibit the renewal, reissuance, or modification of an existing NPDES permit that contains effluent limits, permit conditions, or standards that are less stringent than those established in the previous permit. The rules and statutes do identify exceptions to these circumstances where backsliding is acceptable. This permit has been reviewed and drafted with consideration of anti-backsliding concerns. 40 CFR 122.44(l)(2)(i)(B)(1) allows a permit to be modified to contain a less stringent effluent limitation if information becomes available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance. No limits have been removed from the permit.

Public Notice (A.A.C. R18-9-A907) / Public Comment Period:

These changes are considered a major modification. This proposed modification will be public noticed for a 30-day comment period prior to issuance of the final permit decision.

EPA Review (A.A.C. R18-9-A908(C))

A copy of this draft permit modification any revisions made to this draft as a result of public comments received will be sent to EPA Region 9 for review. If EPA objects to a provision of the draft, ADEQ will not issue the permit until the objection is resolved.