



BEFORE THE DIRECTOR OF THE ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

In the Matter of:
Section 11 Wastewater Treatment Plant
located at 5452 E. Hunt Highway, Queen
Creek, Pinal County, Arizona;
Pecan Water Reclamation Plan (Pecan WRP)
located at 38539 N. Gantzel Road, Queen
Creek, Pinal County, Arizona;
San Tan Water Reclamation Plant (San Tan
WRP) located at 200 E Hunt Highway, Queen
Creek, Pinal County, Arizona; and Anthem at
Merrill Ranch Water Reclamation Plant
(Anthem WRP) located at 8465 W. Ocotillo
Dr., Florence, Pinal County, Arizona.

CONSENT ORDER

Docket No. App-01-21

Azurite Case ID: 192861

I. RECITALS

A. As of January 29, 2021, EPCOR Water Arizona Inc. (EPCOR) acquired Wastewater Treatment Plant (Section 11 WWTP) located at 5452 E. Hunt Highway, Queen Creek, Pinal County, Arizona; the Pecan Water Reclamation Plan (Pecan WRP) located at 38539 N. Gantzel Road, Queen Creek, Pinal County, Arizona; the San Tan Water Reclamation Plant (San Tan WRP) located at 200 E Hunt Highway, Queen Creek, Pinal County, Arizona; and the Anthem Water Reclamation Plant (Anthem WRP) located at 8465 W. Ocotillo Dr., Florence, Pinal County, Arizona., from the prior owner, Johnson Utilities, LLC, in an asset sale that was approved by the Arizona Corporation Commission on December 23, 2020, in its Decision No. 77854.

Initials JC

- B. John Calkins is a representative of EPCOR and certifies that he is fully authorized to execute this Consent Order on behalf of EPCOR and to legally bind EPCOR to this Consent Order.
- C. The Director of Arizona Department of Environmental Quality (ADEQ) has jurisdiction of this action's subject matter and is authorized to issue this Consent Order pursuant to the Arizona Revised Statutes (A.R.S.) § 49-261 and § 41-1092.07(F)(5).
- D. EPCOR agrees that the Director of ADEQ has jurisdiction of this action's subject matter.
- E. This Consent Order contains the full terms of the agreement between EPCOR and ADEQ.
- F. EPCOR voluntarily agrees to this Consent Order based only on the terms contained in the Consent Order.
- G. EPCOR understands that agreeing to this Consent Order does not resolve any liability that it may have for civil penalties for a violation of any state or federal environmental law.
- H. ADEQ agrees that so long as EPCOR remains in compliance with the terms and conditions of this Consent Order, ADEQ will not seek any civil penalties or injunctive relief for any of the violations alleged in this Order and subject to the Compliance Schedule contained in this Order.
- I. EPCOR denies any civil or criminal liability for any of the allegations contained in this Consent Order, and retains the right to assert any defense available to EPCOR under applicable law. EPCOR agrees not to dispute the validity or terms of this Consent Order in any future proceeding to enforce the terms of this Consent Order.
- J. EPCOR does not admit the validity of any Agency Determinations and Findings contained in this Consent Order.
- K. EPCOR retains the right to dispute Agency Determinations and Findings contained in this Consent Order in any proceeding other than a proceeding to enforce the terms of this Consent Order.
- L. This Consent Order does not affect any rights, obligations, or liabilities as to any Agency or governmental subdivision of the State of Arizona other than ADEQ.

## **II. AGENCY DETERMINATIONS AND FINDINGS**

EPCOR was retained by the Arizona Corporation Commission to act as the interim operator of the facilities listed in Section I.A. of this on commencing on August 28, 2018, and EPCOR purchased

the Utilities from Johnson Utilities, LLC on January 29, 2021. ADEQ has issued multiple Notices of Violations to the former owner, but those violations have not been resolved. The Director makes the following Agency Determinations and Findings that EPCOR, as the current owner and operator of the wastewater facilities, is in violation of A.R.S., the Arizona Administrative Code (A.A.C.), or an ADEQ issued permit, as described below:

**A. Section 11 WWTP**

**1. Aquifer Protection Permit (APP) P103081 / LTF ID: 66389 Section 2.3.4 Discharge Limitations**

**Failure to meet the discharge limitations listed in Section 4.2. Table 1A-1 of the APP.**

The following violations of the discharge limits were reported on self-monitoring report forms (SMRF) for the Section 11 WWTP. See attached SMRF Potential Deficiencies Report.

- a. Total Nitrogen (Five-sample geometric mean) has historically been exceeded every month and ADEQ has no evidence that those exceedances have ceased as of January 29, 2021.
- b. Intermittent exceedances of the daily monitoring of E. coli and E. coli in reclaimed water have been reported (Attachment 1 - Self-Monitoring Report Form (SMRF) Deficiencies Report).

**2. A.A.C. R18-9-B201(J)**

**Operating a sewage treatment facility that emits an offensive odor beyond the setback.**

Between January 21 and 24, 2018, ADEQ received over 200 odor-related complaints from individuals who live near the Section 11 WWTP. On January 24, 2018, an ADEQ inspector confirmed that a strong odor was present approximately 1700 feet away from the Section 11 WWTP. The Section 11 WWTP has a design flow of over one million

gallons per day and has no noise, odor, or aesthetic controls. The facility does not meet the minimum odor setback distance of 1000 feet pursuant to A.A.C. R18-9-B201(I).

As interim operator EPCOR has implemented the improvements described below to mitigate odors. However, ADEQ is still receiving odor complaints from local residents.

- a. Installed Section 11 WWTP Ecosorb systems;
- b. Installation of hydrogen sulfide monitoring systems at the Johnson Utilities Maintenance Yard and fence-line;
- c. Repaired and replaced collection system transmission lines to reduce odor emissions;
- d. Installation of a sodium hypochlorite injection system to the wetlands to aid in the control of microbial activities which mitigates odors; and
- e. Installation of a larger Syneco odor control system at the Oasis Sunrise Lift Station.

### **3. A.A.C R18-11-305(C)**

**Use of Class B reclaimed water for a type of direct reuse requiring Class A reclaimed water.**

Class B reclaimed water produced by the Section 11 WWTP is being sent to the currently closed Oasis Golf Course for irrigation. Golf course irrigation may use Class B reclaimed water, as there is restricted access to the landscape irrigation. Because this property is no longer operating as a golf course, and there is unrestricted access to landscape irrigation, irrigation with Class B wastewater is not an allowable use.

## **B. Pecan WRP**

### **A.A.C. R18-9-301(D)(5)(vi)**

**Failure to ensure that lift stations are maintained to prevent odor from emanating beyond the lift station site.**

On August 6, 2018, ADEQ issued an NOV to the prior owner, Johnson Utilities, LLC citing offensive odors being emitted from the influent lift station during a July 17, 2018, inspection. The inspector also observed excessive signs of corrosion on the interior of the concrete wall. Hydrogen sulfide is a known contributor to the deterioration of concrete. According November 14, 2019, Comprehensive Planning Study, the plan to mitigate the odors include rebuilding the headworks and include odor scrubbing. The prior owner did not obtain the appropriate permits or construct these improvements prior to sale.

### **C. San Tan WRP**

#### **APP Permit No# Section 6.9. Duty to Modify**

**The permittee shall apply for and receive a written amendment before deviating from any of the designs or operational practices authorized by this permit.**

On September 17, 2018, ADEQ issued an NOV to the prior owner, Johnson Utilities, LLC for unapproved modifications to the San Tan WRP's primary disinfection mechanism. To date, the permittee (*i.e.*, the prior owner) did not apply for or receive a written amendment to deviate from the designs or operational practices authorized by this permit.

### **D. Anthem WRP**

#### **APP Permit P105646 / LTF ID: 69822, Section 6.9. - Duty to Modify**

**The permittee shall apply for and receive a written amendment before deviating from any of the designs or operational practices authorized by this permit.**

Section 2.1. of the Anthem Aquifer Protection Permit (APP) for the Anthem WRP states that disinfection shall be conducted using ultraviolet disinfection. There is no mention of use of chlorine for disinfection in the APP.

In the October 2019, Johnson Utilities Assessment / Private Utility Assessment prepared by Carollo, it was identified that the ultraviolet treatment process had been abandoned and removed from the channels. Bleach was being used for disinfection. To date, the permittee

(i.e., the prior owner) did not apply for or receive a written amendment to deviate from the designs or operational practices authorized by this permit.

### **III. COMPLIANCE SCHEDULE**

EPCOR agrees to comply with the provisions of this Consent Order as follows:

#### **A. Section 11 WWTP**

##### **1. Odor Study and Mitigation Activities**

- a. Within 30 days from the effective date of this Consent Order, EPCOR shall submit to ADEQ complaint response procedures to address customer complaints related to odor.
  - i. EPCOR shall respond to ADEQ's comments within 15 days of receipt.
  - ii. EPCOR shall implement the complaint response procedures within 60 days of the effective date of this Consent Order.
  - iii. EPCOR shall provide a summary of complaints and their responses with the status reports described in Section IV. of this Consent Order.
- b. Within 30 days from the effective date of this Consent Order, EPCOR shall submit a scope of work for an Odor Study for ADEQ review and comment. The scope of work shall include the following items:
  - i. A description of how the study will be conducted;
  - ii. A description of the odor study area, including parts of the Section 11 WWTP and collection system where odors may be generated;
  - iii. The technologies used to identify the sources and measure odors within the study area. This technology shall not focus solely on hydrogen sulfide emissions and should consider weather patterns that may influence odors within the study area;
  - iv. A stakeholder process including both nearby residents and Pinal County Air Quality Department officials to better understand the community's concerns surrounding odors;
    1. The stakeholder involvement process shall include a direct mail survey sent to the following:

- a. Residential customers residing within 1000 feet of the Section 11 fence line; and
  - b. Residential customers who live near the Section 11 WWTP and submitted an odor-related complaint to EPCOR, ADEQ, or Pinal County Air Quality from January 1, 2018 and the effective date of this Consent Order. This is limited to the information that is available to EPCOR.
2. Residential survey questions shall capture a January 1, 2020 to present timeframe and at a minimum include:
- a. Types of odors encountered
  - b. Dates/times of observed odors
  - c. Duration of observed odors
  - d. Weather conditions when encountering odors
3. The Pinal County Air Quality officials will be asked to provide information similar to that of the residential survey.
- v. Identification of improved and/or potential new countermeasures that can be implemented to mitigate offensive odors from emanating beyond the facility fence line.
  - vi. EPCOR shall respond to any ADEQ's comments on the study within 15 days of receipt.
  - vii. EPCOR shall implement the scope of work and submit the results of the study to ADEQ within 60 days within finalization of the scope of work, including proposed time frames for implementation of countermeasures.
  - viii. Upon approval, the ADEQ and EPCOR the agreed upon countermeasure and schedule for implementation shall become enforceable under the terms of this Consent Order.

2. Reclaimed and Reuse Mitigation Activities

- a. Within 60 days from the effective date of this Consent Order, EPCOR shall submit documentation to demonstrate that enhanced control measures have

been implemented to restrict public access to the currently closed Oasis Golf Course.

- b. EPCOR shall respond to any ADEQ's comments on the enhanced control measures within 15 days of receipt.
- c. EPCOR shall ensure that effluent delivered to the currently closed Oasis Golf Course is of Class B or greater quality.
- d. EPCOR shall ensure that all Class B reclaimed water is consumptively reused and shall not allow ponding and run-off from the currently closed Oasis Golf Course.

### 3. Groundwater Mitigation Activities

- a. Within 180 days from the effective date of this Consent Order, EPCOR shall submit an "other" APP amendment application for APP No. P103081 with a revised Contingency Plan (Plan) to include interim mitigation actions and implementation schedules should routine groundwater quality monitoring conducted under Section 4.2. of the APP exceed an alert level in Table II of the permit. The revised Plan may include the evaluation of the following potential mitigation options:
  - i. An evaluation of treatment plant performance to ensure there is no further degradation of the treatment processes;
  - ii. A reduction of influent flows, e.g. discontinuance new connections, interconnection with other utilities; and diversion of flow to other treatment plants;
  - iii. Alternate options for beneficial use of reclaimed water; and
  - iv. Other options to reduce recharge of the aquifer.
- b. EPCOR shall address any ADEQ comments within 45 days from the date of receipt.
- c. If routine groundwater quality monitoring conducted under Section 4.2. of the APP exceeds an alert level in Table II of the permit, EPCOR shall immediately notify ADEQ and implement actions contained in the Plan within 30 days of becoming aware of an alert level exceedance.



#### 4. Flow and Capacity Mitigation Activities

- a. EPCOR shall ensure that the average daily effluent flow in any given month does not exceed 1.34 MG for any month to the Section 11 WWTP. EPCOR will maintain flows by implementing improvements to the collection system to allow offset of flows that are currently going to Section 11 WWTP to be diverted to other WRFs. EPCOR shall report a summary of their flows and any excursions to be included in the status reports referenced in Section IV. of this Consent Order. For the purposes of this Consent Order, the monthly average flow is a calculated value and is the average of the daily flow values in a month.
- b. If EPCOR issues any additional capacity assurance or approves any line extensions for new housing developments that would contribute flows to Section 11 WWTP, EPCOR shall ensure that an equal corresponding amount of flow will be diverted to other WRFs. EPCOR shall include details of any such approvals in the status reports referenced in Section IV. of this Consent Order.
- c. If routine groundwater monitoring conducted under Section 4.2. of the APP exceeds an alert level in Table II of the permit, EPCOR shall immediately collect a sample to confirm the exceedance. If the sample confirms an alert level exceedance, EPCOR shall discontinue the following:
  - i. Allowing the connection from developments in excess of the previously approved Arizona Corporation Commission meter management program that contributes flows to Section 11 WWTP until the completion of the activities described in Section III.A(5) of this Consent Order; and
  - ii. Issuance of any additional capacity assurance or approvals of any additional line extensions for new housing developments that would contribute flows to Section 11 WWTP until the completion of the activities described in Section III.A(5) of this Consent Order.

- d. If future groundwater monitoring conducted under Section 4.2. of the APP again falls below an alert level in Table II of the permit for two consecutive monitoring periods, EPCOR may reinstate activities outlined in Section III.A(4)(c)(i) and (ii) of this Consent Order.

**5. Copper Basin WRF**

- a. No later than June 30, 2022, EPCOR shall submit administratively complete permit applications to obtain the necessary ADEQ permits for a properly designed and constructed new regional wastewater treatment facility (Copper Basin WRF) to replace the Section 11 lagoon treatment basins.
- b. Physical construction of Copper Basin WRF shall commence as expeditiously as practicable, but no later than January 1, 2023.
- c. Construction and commissioning of Copper Basin WRF shall be completed as expeditiously as practicable, but no later than December 31, 2023.
- d. Decommissioning and closure of the Section 11 WWTP lagoon treatment basins shall be completed as expeditiously as practicable, but no later than:
  - i. December 31, 2024, for Lagoon Treatment Basins #1 and #3; and
  - ii. December 31, 2025, for Lagoon Treatment Basins #2 and #4.
- e. Any required permit amendments for modifications to the Section 11 WWTP shall be completed no later than December 31, 2024.

**B. Pecan WRP**

- 1. Within 30 days from the effective date of this Consent Order, EPCOR shall submit an administratively complete application for an Aquifer Protection Permit (APP) modification for the completion of the capital improvements identified in the October 5, 2018, Johnson Utilities System Evaluation Report and November 14, 2019, Comprehensive Planning Study to address the violations listed in Section II.B of this Consent Order. The planned improvements shall at a minimum address the following concerns:
  - a. Lack of redundant electrical and mechanical controls;
  - b. Lack of a central Supervisory Communication and Data Assessment (SCADA) system;

- c. Corrosion and deterioration of equipment from hydrogen sulfide gas;
  - d. Inadequate odor controls;
  - e. Surcharging of wastewater into the collection system resulting in sanitary sewer overflows;
  - f. Inadequate pumping capacity at lift stations and wet wells; and
  - g. Lack of additional treatment capacity.
2. All improvements shall be implemented as expeditiously as practicable, but no later than December 31, 2022. The required improvements include, but are not limited to:
- a. Pecan WRF – Influent Pump Station and Headworks Improvements;
  - b. Pecan WRF – Enhanced Odor Control Equipment;
  - c. Pecan WRF – 1 MGD Expansion;
  - d. Pecan WRF – Disinfection Upgrades;
  - e. Pecan WRF – Effluent Pump Station Upgrades;
  - f. Pecan WRF – Structural Safety Improvements;
  - g. Pecan WRF – Disc Filter Upgrades

**C. San Tan WRP**

No later than July 1, 2022, EPCOR shall submit documentation to ADEQ demonstrating that the UV disinfection unit has been repaired or replaced and returned to service.

**D. Anthem WRP**

No later than July 1, 2022, EPCOR shall submit documentation to ADEQ demonstrating that the UV disinfection unit has been repaired or replaced and returned to service.

**IV. STATUS REPORTS**

- A. EPCOR agrees to submit a written status report to ADEQ every 90 calendar days beginning 90 days from the effective date of this Consent Order, until this Consent Order terminates. Each written status report must:
- 1. Describe what measures have been taken under Section III of this Consent Order;

2. Certify when compliance with the requirements of Section III of this Order are achieved;
  3. Be accompanied by evidence showing compliance, as appropriate. Evidence showing compliance can include documents, photographs, or copies of any other supporting information that EPCOR deems necessary.
- B. ADEQ will review the status reports and inform EPCOR in writing of any disputes. EPCOR must incorporate all required modifications, changes or other alterations that ADEQ requests within a reasonable time specified by ADEQ.

#### **V. COMPLIANCE WITH OTHER LAWS**

- A. This Consent Order does not include issues regarding releases, contamination, sources, operations, facilities or processes not expressly stated by the terms of this Consent Order, and does not interfere with the rights that ADEQ or EPCOR have under any federal or Arizona environmental statutes and rules regarding such issues.
- B. This Consent Order is not a permit of any kind, does not modify any permit of any kind, nor is it an agreement to issue a permit of any kind under federal, state or local law.
- C. This Consent Order does not alter, modify or revoke federal, state, or local law.
- D. This Consent Order is not a defense to any action to enforce any such permits or laws.
- E. EPCOR has an obligation to:
  1. Apply for, obtain, and comply with all applicable permits.
  2. Comply with federal, state or local law.
  3. Comply with the terms of this Consent Order.

#### **VI. SITE ACCESS**

Upon presenting credentials to authorized personnel on duty, ADEQ may at any time enter the premises at the Facility in order to observe and monitor compliance with the provisions of this Consent Order. This right of entry is in addition to ADEQ's rights under applicable law.

#### **VII. CORRESPONDENCE**

- A. EPCOR shall send all correspondence by email, mail, or hand delivery, such as documents, materials, plans, notices, or other items under this Consent Order, to:

Arizona Department of Environmental Quality  
Water Quality Division  
Attention: Mindi Cross, Case Manager  
1110 West Washington Street  
Phoenix, Arizona 85007-2935  
Telephone: (602)771-2209  
Email: [cross.mindi@azdeq.gov](mailto:cross.mindi@azdeq.gov)

- B. Any submission to ADEQ is treated as submitted when ADEQ receives it.
- C. ADEQ shall send all correspondence by email, mail, or hand delivery under this Consent Order to:

EPCOR Water Arizona Inc.  
John Calkins, Director of Compliance  
2355 W. Pinnacle Peak Road, Suite 300  
Phoenix, AZ 85027  
Telephone: (623) 445-2406  
Email: [JCalkins@epcor.com](mailto:JCalkins@epcor.com)

#### **VIII. RESERVATION OF RIGHTS**

- A. ADEQ agrees to this Consent Order based solely upon currently available information. If additional information is discovered, which indicates that the actions under this Consent Order are or will be inadequate to protect human health, safety, or the environment, or to conform with applicable federal or state laws, ADEQ has the right to require further action.
- B. ADEQ has the right to:
  - 1. Seek civil penalties for any and all violations of A.R.S. Title 49 or the applicable rules, occurring before the effective date of this Consent Order;
  - 2. Disapprove EPCOR's work that fails to comply with this Consent Order;
  - 3. Take enforcement action for any and all violations of this Consent Order; and,
  - 4. Take enforcement action for any and all violations not included in this Consent Order and which occur after the effective date of this Consent Order.
- C. As to this Consent Order, EPCOR waives all rights to appeal this Order under A.R.S. Title 41, pursuant to the ability to waive this right based on A.R.S. § 41-1004.

**IX. VIOLATIONS OF ORDER**

If EPCOR fails to comply with this Consent Order, EPCOR can be liable for other administrative or judicial sanctions, including civil penalties under A.R.S. § 49-262 the same as if for a violation of any State or Federal environmental law.

**X. SEVERABILITY**

If a court of law declares that any provision of this Consent Order is invalid or unenforceable, all other provisions of this Consent Order remain in full force and effect.

**XI. MODIFICATIONS**

Any modifications of this Consent Order must be in writing and EPCOR and ADEQ both must approve the modifications.

**XII. FORCE MAJEURE**

- A. “Force Majeure” is defined as any event arising from causes beyond the reasonable control of EPCOR or their contractors that delays the performance of any obligation under this Consent Order. Force Majeure does not include financial inability to complete any requirement of this Consent Order.
- B. EPCOR shall perform all the requirements of this Consent Order according to the time limits set forth herein, unless its performance or delayed by events which constitute a Force Majeure. EPCOR shall take all reasonable measures to prevent or minimize any delay in performing the requirements of this Consent Order.
- C. If any Force Majeure event occurs that may delay the performance of any obligations under this Consent Order, EPCOR shall notify Water Quality Division contact listed in Section VII. Of this Consent Order within 48 hours. Within ten (10) days of the Force Majeure event, EPCOR shall provide to ADEQ in the manner provided under Section VII., a written explanation and description of the reasons for the delay in performance; the anticipated duration of the delay; all actions taken or to be taken to prevent or minimize the delay; a schedule for implementation of any measures to be taken to prevent or mitigate the delay or the effect of the delay; and the rationale for attributing such delay to a Force Majeure event. Failure to comply with the above requirements shall preclude the EPCOR from asserting any claim of Force Majeure. EPCOR shall be deemed to have knowledge of any

Force Majeure circumstance of which its contractors, or any party acting on its behalf had or should have had knowledge.

- D. If ADEQ agrees that the delay in performance is attributable to a Force Majeure event or is reasonable under the circumstances, the time for performance of the obligations under this Consent Order that are affected by the Force Majeure event and the time for performance of any activity dependent on the delayed activity shall be extended for such time as is necessary to complete those Obligations. An extension of time for performance of the obligations affected by the Force Majeure event or non-Force Majeure event shall not, of itself, extend the time for performance of any other obligation. If ADEQ does not approve the delay or agree that the delay or anticipated delay has been or will be caused by a Force Majeure event, or is not otherwise reasonable, ADEQ shall notify the EPCOR in writing of its decision. If ADEQ agrees that the delay is attributable to a Force Majeure event or is reasonable under the circumstances, ADEQ shall notify the EPCOR in writing of the length of the extension which will be equivalent in time to the reasonable delay, if any, for performance of the Obligations affected by the Force Majeure event, or as otherwise approved by ADEQ.

### **XIII. EFFECTIVE DATE**

The effective date of this Consent Order is the date this Consent Order is signed by ADEQ and EPCOR. If ADEQ and EPCOR sign on different dates, the later date is the effective date of this Consent Order.

### **XIV. PARTIES BOUND**

EPCOR is responsible, and will remain responsible, for carrying out all activities required under this Consent Order, regardless of change in ownership, corporate status, or partnership status, or transfer of assets or real or personal property relating to the subject of this Consent Order, unless:

- A. The Party to whom the right, title, or interest has been sold, transferred, or assigned agrees in writing to fulfill the obligations of this Consent Order; and,
- B. ADEQ approves the provisions transferring the obligation.

**XV. TERMINATION**

- A. ADEQ will notify EPCOR in writing that this Consent Order is ended when ADEQ determines that EPCOR has demonstrated that all of the terms of this Consent Order have been completed or satisfied.
- B. If ADEQ denies EPCOR's request for termination, ADEQ will notify EPCOR in writing and describe which terms of the Consent Order have not been completed to ADEQ's satisfaction.
- C. ADEQ reserves the right to terminate this Consent Order unilaterally at any time for any reason, but will notify EPCOR in writing as to the reason(s) for termination.

Signed this 8 day of March, 2021.



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Randall Matas, Deputy Director  
Water Quality Division  
Arizona Department of Environmental Quality

**CONSENT TO ORDER**

John Calkins, on behalf of EPCOR acknowledges that he has read all of the Consent Order. EPCOR agrees:

- A. With the statements made,
- B. To this Consent Order with the Arizona Department of Environmental Quality, and,
- C. That EPCOR will comply with Consent Order and waive any right to appeal.

Signed this 5 day of March, 2021.

John Calkins  
John Calkins (Mar 5, 2021 13:38 MST)

John Calkins  
Director of Compliance  
EPCOR Water Arizona Inc.



**I HEREBY CERTIFY** that on 9 day of March, 2021, the **ORIGINAL** was filed in the facility file located at:

Arizona Department of Environmental Quality  
1110 W Washington St  
Phoenix, AZ 85007-2935

**I HEREBY CERTIFY** that on 9 day of March, 2021, a true and correct copy was emailed, if provided to:

EPCOR Water Arizona Inc.  
John Calkins, Director of Compliance  
2355 W. Pinnacle Peak Rd.  
Suite 300  
Phoenix, AZ 85027  
[JCalkins@epcor.com](mailto:JCalkins@epcor.com)

**I HEREBY CERTIFY** that on 9 day of March, 2021, a true and correct copy was mailed/emailed to:

Arizona Department of Environmental Quality  
Office of Administrative Counsel

Curtis Cox, Chief Counsel, Environmental Enforcement Section, Office of the Attorney General  
Ethan Leiter, Unit Manager, Groundwater Inspections and Compliance Unit  
Mindi Cross, Case Manager, Surface Water Protection Value Stream

Pinal County Public Health Services  
[mary.clements@pinal.gov](mailto:mary.clements@pinal.gov)



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Dodie O'Bier