

Water Quality Division: 1.09 Permit TWG Meeting 1: June 21

(See Link to Google Meets in Calendar Invite)

Members in Attendance:

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| <input type="checkbox"/> Steve Christensen, Alpine Sanitary District | <input checked="" type="checkbox"/> Jon Heidrich, Mogollon RV Park & AZARVC |
| <input type="checkbox"/> Jake Garrett, Gila County | <input checked="" type="checkbox"/> Kathy Mills, Mills Engineering LLC |
| <input type="checkbox"/> Trika Graham, Freeport-McMoRan Bagdad Inc. | <input type="checkbox"/> Ray Morgan, ADEQ |
| <input checked="" type="checkbox"/> Thomas Hanson, MCESD | <input checked="" type="checkbox"/> Luke Peterson, ADEQ |
| <input checked="" type="checkbox"/> Maher Hazine, CHAIR, REI Development Services, LLC | <input checked="" type="checkbox"/> Jenny Vitale, Self Employed |

Agenda (Est Time)	Lead	Overview	Documents	Action Requested	NOTES
Welcome	Chair	Introductions			Maher asked the members to introduce themselves and their interest in the work group.
Group Charter (30 mins)	Chair	Review and determine if any changes are needed to the charter.	Group Charter*	For Approval	Maher reviewed the charter. Jake suggested the group look at which issues can be resolved and included in the phase 1 rulemaking. This should be the group's first priority.
White Paper Outline	Chair	Review the outline of the deliverable	White Paper Outline*	For Review	https://static.azdeq.gov/wqd/rulemaking/onsite/twg_wp.pdf Maher stated this is an outline of what should be included but does not need to be a formal paper.
Meeting Logistics (35 mins)	Chair	Group to determine the following: <ul style="list-style-type: none"> ● Goal date for completion of assignments ● Frequency of meetings ● Meeting date, time, length ● Method for decision making ● Ground rules ● Additional assignments 		For Decision	<ul style="list-style-type: none"> ● Talk about assignments before we set a goal date. ● Set tentative deadlines with understanding we are busy and may not always meet them. Having a deadline helps us focus. ● Start with the problem statement and identify what can be in the phase 1 rule change which could be done in the next meeting or two. ● Meet 2 times per month initially (during the summer in the afternoon) – 1st and 3rd Wednesday, 1:15-3:15 pm. ● Will adjust as needed. ● Decision making will be made by consensus

<p>Assigned Issues</p>	<p>Chair</p>	<p>Review the assigned list. Categorize and add to the list as needed. Determine the priority issues and/or how the group will approach the assignment.</p>	<p>Issue Prioritization Worksheet*</p>	<p>For Prioritization</p>	<p><u>Regulatory issues/problems:</u></p> <ul style="list-style-type: none"> • Frequent issues in communal dwellings with shared system (apartments, mobile home park, etc.) and often without a reserve • Nitrogen requirements were not previously considered and to replace is financially difficult • The residential failures are due to lack of pumping and may be low income without the resources to replace • Lots of failures that go un-reported • In Gila County, many failures result in having to upgrade the park based on the current rules • Most of 1.09 in Gila County are cesspools at single family residences with limited or no regulation (no existing permits) and on small lots • Repairs section of the rule needs to be updated (install 10 linear feet of leach line without a new permit) <p><u>ADEQ issues/problems:</u></p> <ul style="list-style-type: none"> • 2 big questions: What is the universe? What is the number affecting the environment? May be worthwhile to go through existing databases to try to determine event it is a difficult task. • Define what information we need to obtain and what will it tell us. <p><u>Designer/Engineers perspective:</u></p> <ul style="list-style-type: none"> • Hear rumors about and have seen illegal replacements. How do we track the impact? • The costs of the replacements result in maintenance that might not be affective. • Encourages compliance without being the nightmare of having to have an APP. • Frustrated by message that these systems are causing contamination. Need to look at existing ADEQ groundwater data. • Provide septic options for RV parks. • Potentially rehab of existing disposal area. • Quantify the problem in a variety of ways. • Setback constraints and lack of O&M on systems. • Creative solutions for small lots with cesspools. • What is the definition of a system failure? Some appear to be working but they are not. • There are passive alternative systems that are cheaper. • Need to get data and analyze – has a cost to it. • If a neighbor drills a well and you need to have a new system you may be limited by the 100-foot setback <p><u>RV Park Perspective:</u></p> <ul style="list-style-type: none"> • Using water meters as usage is not an accurate measure of what is sewage flow. • To rebuild rec hall had to have ADA restrooms which put the park over the limit for the septic system. • Was able to use insurance provision to pay for complying with the new regulations (took 4 years, lot of frustration and \$250,000 to rebuild)
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					Potential data to look for to determine performance: look for gray water on the ground, tank replacements, minimal vertical separation. In 2018, reviewed Gila County old systems based on population data and interviews with contractors and estimated the untreated wastewater going into the ground beyond vertical separation distance. Nobody will allow ADEQ to do testing around their septic system. Gathering hard data maybe limited; how do we overcome the need for the data to get new regulations.
Next Steps	Chair	Plan the topics for the next agenda and any homework assignments		For Decision	Next meeting July 7. Before meeting review current 1.09 rule sections and the brainstorming from today's meeting. Come to meeting prepared to discuss the definition of failure and what is repair or maintenance (conditions when a permit may be required.) See brainstorming information below the action plan in this document.
Adjourn	Chair				

Action Plan:

Task	Person Responsible	Due Date	Status
Determine if counties can have a tic sheet on the 1.09 failures on a monthly basis	Tom		
Set up ShareFile for the TWG	Theresa	By next meeting	
Send the group the WDAG priority ranking for 1.09 issues	Theresa	By next meeting	
Search ADEQ files for documents from 2014/2015 rule revision discussions	Theresa/Luke	By next meeting	
Schedule meetings for 1 st and 3 rd Wednesday from 1:15-3:15	Theresa	Today	
Review the failure sheet and add to it	Members	Prior to next meeting	
Next meeting		July 7	

RAINSTORM during meeting

Definition of Failure (a scenario in where you have to obtain a permit)-Not working as designed

A fixable failure – any component can be repaired and replaced such that the system can continue to function as designed (no permit) – restore to originally designed system

Black death – in order to restore intended function of system a major component must be replaced a tank or disposal area (permit for modification) – replaced to originally designed system (replace in kind)

The facility does not create an unsanitary condition or environmental nuisance, or cause or contribute to a violation of either an Aquifer Water Quality Standard or a Surface Water Quality Standard

Meet conditions of permit when it leaves the vertical separation (function correctly) – installed in good ground, designed correctly,

Define point of compliance at the point of vertical separation

REPAIR requires new permit – disposal field failure

MAINTENANCE does not require a new permit – bringing back to condition

- Surfacing and soil staining (failure)
- Backing up in the house
- Hydro overloading (leaking toilets)
- Fouling (grease traps/use of grease in a kitchen)
- Uneven distribution of flow
- Structural failure (cesspool/tank collapse or rotting)
- Is a tank collapse a system failure?
- Cesspool yes is a failure
- If tank is collapsing indication of inadequate materials
- Pipe break between tank and D box? Does this repair equate to a failure? This is maintenance...
- Replacement of a line (part of disposal) This is a repair....
- If at D box – no
- When leach line begins do need a permit (some counties replacement of perf pipe and around/above is maintenance but not rock below)