

## Septic Usage confirmed in phone convo (excerpts from field notes)

02-14-18 Need to arrange to **Meeting with Monica Philips of ADEQ** regarding changing to septic systems. Phone:(602) 771-2253 Email: [mp5@azdeq.gov](mailto:mp5@azdeq.gov) (if discharge < 24,000 gals/day then we could use General permit, but if eventual discharge is greater, we need to have special permit approved after meetings with ADEQ.

02-26-18, ADEQ meeting scheduled for Thursday, March 1<sup>st</sup>, at 1PM. Need to send agenda. (see below **Meet with Monica Philips of ADEQ**)

02-26-18, Questions for Monica: Since we'll have only seasonal occupancies, can we average the wastewater flows to meet the < 24,000 gpd General Permit limits? (250 RV sites total, each @ < 100 gpd. With 70% vacancy = 7,500 gpd.) **update: In phone call just now, Monica referred to "daily flows not established", total flows-daily & monthly, average monthly flows, 95% of 24,000=alert level,**

02-26-18, ADEQ meeting scheduled for Thursday, March 1<sup>st</sup>, at 1PM. Need to send agenda.

03-01-18, Met with ADEQ in Phx, Monica Phillips, Ali Baadiyan, Shivani Shah, and Todd Rothrock from Paradise Septic. Meeting confusing to all attendees it seemed, as ADEQ staff couldn't agree on interpreting the code as applies to our use of the property. Eventually, it was felt that we need a secondary treatment for multiple input septic tanks before dispersal field.

03-02-18, In researching all day the Administrative Code and Internet filtration schemes, it may be that we can use peat in the processing. While pricing hasn't been determined for peat, it may be the least expensive and most effective filtration to reduce nitrogen in the soil.

03-02-18, sent Ms. Phillips an email with list of options we could consider, asking for input from her department.

03-19-18, sent a followup query email to Ms. Phillips since I haven't heard a reply from the March 2<sup>nd</sup> missive.

03-20-18, Received call from Ali to report septic would be allowed without secondary treatment as long as total for project didn't exceed 24,000 GPD. After that threshold additional wastewater would require APP standards for treatment.

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... turn off autorenewal and was given confirmation code: 900721758.

05-08-19, Spoke with **Linneth Lopez of ADEQ**, 602-771-4457. She confirmed we could use septic up to 24,000 gpd. She said they have approved Eco Coco filters for adequate treatment beyond 24,000 gpd. In our discussion she revealed that the 100 gpd number they use for RVs could be less if we could prove that RVs use less water.

05-09-19, **Eco Coco Filters** from **Premiere Tech** 800-632-6356, ext. 7702 (MARY), or **Regis Michaud** 418-860-7597 (cell) Left message with Regis.

05-10-19, **Coco Filter** - Received email introduction from **Mike Dunn of Premier Tech**. Re: our need for tertiary filtration at the Preserve. Sent him pertinent plans, and copied his team. Michael Dunn – 267-640-5755, [dunm@premiertech.com](mailto:dunm@premiertech.com) – [www.premierrtechqua.com](http://www.premierrtechqua.com)

WASTEWATER  
5-24-19

Developing RV park campground in La Paz Valley.

Aquifer Protection Permit in place, but WWTP just does not make sense so we're forced to pursue the individual clustered septics approach. (Plant doesn't work with low flows or seasonal use.)

All is good with ADEQ on individual clustered septics, but we must not exceed the 24,000 GPD in total under the 408 general permit.

Our project, when fully developed, would exceed the limit and we've been told that we'll need an Individual Permit once it's exceeded. Our fully matured park would approach 28,000 GPD, but that's based on the Administration Code's 100 GPD for an RV. We believe that's an unreasonably high number for an RV.

In speaking with **Linneth Lopez** on 05-08-2019, at ADEQ, we're told if we can produce credible evidence, including studies and other unspecified data, the unrealistic 100 GPD number used for RVs can be changed to the lower, more realistic number of 55-60 GPD per RV. This would allow our entire subdivision RV park campground to go forward under the General Permit rules, thereby saving us a ton of money and time.

I'm thinking we might be able to get other RV parks in the state to share their water usage, too.

The ADEQ representative, **Linneth Lopez**, was very open to looking at anything that they could use for their files proving less water is used by RVs.

LINNETH LOPEZ [Lopez.Linneth@azdeq.gov](mailto:Lopez.Linneth@azdeq.gov)

**From:** James Kunisch jim@landarizona.net  
**Subject:** Re: WWTP meeting- 1 external and four internal

**Date:** February 26, 2018 at 4:32 PM  
**To:** Monica Phillips Phillips.Monica@azdeq.gov

**Cc:** Ryan Fitzpatrick Fitzpatrick.Ryan@azdeq.gov, Shivani Shah Shah.Shivani@azdeq.gov, Ali S. Baadiyan Baadiyan.Ali@azdeq.gov , Monica Hubbard Hubbard.Monica@azdeq.gov, Todd Rothrock Todd@paradiseseptic.com, Kunisch Ann annmarie@nbotv.com

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Hello Ms. Phillips...

We have calendared our meeting with you at your office on Thursday, March 1, 2018 at 1:00 PM MST. Our expert, Mr. Todd Rothrock will be able to join us. I am copying him in this email.

The discussion topic: We desire to provide wastewater treatment for our seasonal guests using on-site facilities and avoid the cost-prohibitive central wastewater treatment plant, as originally planned for the now abandoned residential subdivision. Since inception of this project, over 10-years ago, we have repositioned it to become a KOA franchised RV campground, with approximately 250 seasonal guests. If a new APP is required, we would hope the engineering provided to you for our existing permit (105912) would be of value, thereby saving us the expense and time to provide anew.

We are prepared to show how the camping sites will be configured, with the number of public bathrooms, laundry facilities and campground park store.

We look forward to meeting you and your team on Thursday, the 1st. Best regards, Jim

On Feb 26, 2018, at 1:10 PM, Monica Phillips <Phillips.Monica@azdeq.gov> wrote: The facility will be located in La Paz.

The owner of the Arroyos Preserve Wastewater Treatment Plant ( APP- 105912) has scheduled this meeting to discuss the possibility of obtaining an APP for a smaller on-site facility.

<Mail Attachment.ics>

**JK**

James Kunisch  
Cardiff by the Sea, CA 92007 760-753-7897 fax **760-505-8999 cel**

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