

Permit No. AZ0020524 / City of Phoenix 91<sup>st</sup> Avenue Wastewater Treatment Plant

Applicant: City of Phoenix  
5615 South 91<sup>st</sup> Avenue  
Tolleson, AZ 85353

Permit Action: Final Permit Decision and Response To Comments

Date: September 29, 2016

The City of Phoenix (The City) and the Arizona Department of Environmental Quality (ADEQ) submitted comments on the proposed permit during the public comment period. The following is a description of the comments received and USEPA Region 9's (EPA or Region 9) response.

The comments are in *Italics* and Region 9's Responses are in **Bold**

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#### CITY OF PHOENIX'S COMMENTS

##### *Comments on Draft Permit:*

1. *The zip code should be changed from 85003 to 85009 on the cover page.*

**The zip code has been changed to 85009.**

2. *The following corrections are recommended for the Table of Contents:*
  - a) *Use consistent font styles and sizes for the page numbers.*

**The font styles and sizes are generated automatically by the template**

- b) *Remove the comma between Outfall Number 001 and 005 in the line for Part I.B*

**The comma has been removed.**

- c) *Remove "and" after FRW-1 in the line for Part I.C.*

**The "and" has been removed.**

- d) *Remove the extra "a" before the Part II header.*

**The extra "a" has been removed.**

3. *The following corrections are requested for Table 1:*

a) Footnote (3) is used to reference both monitoring frequency and reporting frequency. However, the footnote is only used in the Frequency column. The City recommends placing footnote (3) in the maximum allowable discharge limits box.

**Footnote (3) has been placed in the maximum allowable discharge limits box.**

b) Remove footnote (4) from Sample Type as this footnote relates to limits for chronic toxicity testing not sample type.

**Footnote (4) has been removed from Sample Type column.**

c) The limits 1, 3 for Dissolved Oxygen (DO) should be removed from the maximum daily concentration limits column. The DO limits are minimum daily limits. Providing Footnote (8) is sufficient for noting the monitoring requirements and limits.

**The limits have been retained to indicate that numeric limits apply.**

d) Ammonia Impact Ratio sample type is a calculation not a discrete sample.

**EPA will include Ammonia twice in the table for ease of monitoring for compliance. Two Ammonia values need to be reported of the same sample measured: first Ammonia (as N) in mg/L and as second Ammonia as the Ammonia Impact Ratio (AIR).**

4. *The City requests monitoring only for Ammonia and the Ammonia Impact Ratio (AIR) at Outfall 005. In turn, the City will monitor for compliance with effluent limits at FRW-1. This location is best suited for measuring the productivity of the WWTP's process. The wetlands have proven effective at removing additional Ammonia over the last six (6) years. The productivity of this system varies seasonally and may be impacted by the nitrification process of the microorganisms as they assimilate nitrogen compounds.*

**Natural processes occurring in the wetlands are generally effective at removing additional Ammonia. The data collected and reported over the past permit cycle indicates that the Tres Rios wetland has generally been very effective in removing Ammonia. However, the productivity of this system varies and may be impacted by the nitrification process of the microorganisms in the wetland, resulting in rare instances where the Ammonia level is higher at 005 than at FRW-1. The nitrification process of the microorganisms in the wetland is a natural process and is not amenable to control by the City. The Ammonia levels achieved by the City of Phoenix WWTP's process are best measured at the inflow into the Tres Rios wetland at FRW-1. Therefore compliance with the Ammonia limit may be monitored at FRW-1.**

5. *For consistency, the City requests the addition of CAS numbers for any constituent / parameter missing them in Table 1.*

**CAS numbers have been added where missing in Table 1.**

6. *The following corrections are requested for Table 1:*
  - a) *Add headers to Table 1 on subsequent pages for ease in referencing information.*

**EPA believes the Table is simple to reference as is.**

*b) Chromium III is a calculation per footnote (13), not a 24-hour composite sample type.*

**EPA agrees that Chromium III is not monitored directly but will include Chromium III in the table for ease of monitoring for compliance.**

7. *“P-chloro-m-cresol” is missing an “l”.*

**Typo corrected.**

8. *The City requests semi-annual (or 1x/ 6 months) monitoring for Hexachlorocyclohexane beta (Beta-BHC), Hexachlorocyclohexane delta, and Hexachlorocyclohexane gamma to be consistent with other parameters without effluent limitations.*

**The congeners of beta, delta, and gamma Hexachlorocyclohexane are required to be monitored semi-annually to be consistent with other parameters without effluent limits.**

9. *[Table 1.] Footnote (3) references Appendix B and Part V of the permit. Appendix B is not provided in the draft permit. Part V of the permit relates to Stormwater Pollution Plans (SWPP) and Best Management Plans (BMP) not water quality standards. The City requests verification of the permit references.*

**Footnote 3 has been corrected to reflect the appropriate section of the permit, i.e. Part VI.7.**

10. *[Table 1.] Footnote (7) – Request removing daily monitoring for E. coli at Outfall 005. Monitoring for E.coli has been conducted at this location for the last six years. Due to the presence of fish, ducks, and other animals in the wetlands, it is expected to be present at this site. The City will continue to monitor for E.coli at FRW-1.*

**Daily monitoring for E.coli at Outfall 005 over the past six years indicates that E.coli is present but rarely exceeds 500 cfu/100 mL. Therefore, daily monitoring for E.coli at Outfall 005 is no longer required. The footnote**

**clarifies that daily monitoring and reporting of the E.coli level at FRW-1 is considered representative of the E.coli levels for compliance purposes.**

11. *[Table 1.] Footnote (8) – The second sentence should be revised to: The single sample minimum **from** sunset to three hours after sunrise is 1.0 mg/L.*

**Footnote (8) has been revised.**

12. *[Table 1.] The “i” is missing in E.coli in Footnote [6].*

**Typo corrected.**

13. *Page 12 – Footnote (10) should be revised to include the Attachment number for the sample log. Additionally, the draft permit does not include any attachments to assist in calculating the ammonia impact ratio.*

**The correct Appendix numbers for the Ammonia Limits and the Ammonia Impact Ratio have been included in the footnote.**

14. *Page 13 - Part I.D. - The City requests a decrease in monitoring of in-stream flow through the Tres Rios Wetland at FRW-2 and FRW-3 to two (2) times per the permit term i.e. Once in 2018 and 2019. The City has provided the EPA with six (6) years of data and a complete wetland assessment to characterize the maturation of the wetland and water quality from the influent to Tres Rios to Outfall 005. These locations have not been identified by the EPA as “internal outfalls,” therefore, the City does not understand the need to monitor for all the parameters in Table 1 and Table 2 on a monthly, quarterly, or annual basis.*

**The data collected by the City during the six years of the previous permit cycle have provided a detailed view of the maturation of the wetland and water quality from the influent to Tres Rios at FRW-1 to Outfall 005. In light of this, EPA will decrease monitoring of in-stream flow to once per year during the life of the new permit term. Similarly, monitoring for all parameters in Table 2. is also required annually. This balances the need to continue to monitor and characterize the efficiency of the wetland and to reduce monitoring requirements that are unlikely to yield significant new information or help prevent effluent violations.**

15. *Page 13 – The first sentence in Part I.D. should read Table 2, not Table 3.*

**Typo corrected.**

16. *Page 13 – The City is unable to accurately measure flow at monitoring location FRW-2 and FRW-3 due to their remote locations, pattern of open water vs. emergent aquatic vegetation, and the nature and variability through the flow regulating wetlands. Monitoring and reporting flow was not required during the initial permit term and the City requests the removal of this parameter from Table 2.*

**See response to comment 14.**

17. *Page 13 – Per Table 1, monitoring and compliance for E.coli is met at monitoring location FRW-1. Due to the presence of wildlife in the wetlands cells E.coli is present at FRW-2 and FRW-3. The City requests removing this monitoring requirement from Table 2.*

**See response to com 14.**

18. *The City requests clarification on the point of contact for the 24 hour reporting in Part II.A.1. The number listed is for Ken Greenberg. During the last permit term, the City was directed by Mr. Greenberg to contact Susanne Perkins.*

**The Telephone number in the permit is that of the Clean Water Act Enforcement Manager. If he/she is not available, instructions on whom to leave a message with in case of a 24 hour noncompliance event will be available in the voicemail message at that number.**

19. *Part II.B.6 – Chromium III should be included in this section as an exception to analyze for total recoverable metals.*

**Chromium III has been included in this section as an exception.**

20. *Page 17 - Part II.B.7. – The City requests the removal of the last sentence in this section. It is not feasible to submit copies of the original laboratory reports with the DMRs. The volume of paperwork generated associated with the reporting period is substantial and would likely overwhelm both ADEQ and EPA. It is estimated that several hundred pages of additional information would be submitted. The City retains copies of the original laboratory reports and will provide copies if requested by EPA.*

**The language in the last sentence has been amended to state that the City shall retain copies of original laboratory reports and provide copies if requested by EPA.**

21. *Part II.B.9 – The signatory requirements located in Part VII of the permit, not Part V.A.1.k as it is listed.*

**Typo corrected.**

22. *Page 17 - Part II.B.11 – According to the Final NPDES Electronic Reporting Rule, Biosolids reporting for authorized state NPDES programs is effective five (5) years after the effective date of the rule. The City requests that the Biosolids/Sludge Sewage Report be removed from this section.*

**As Arizona is an authorized state NPDES program, the requirement to submit electronic Annual Biosolids Reports to EPA has been removed and replaced with a requirement to submit such Reports to ADEQ by mail or**

**electronically once ADEQ creates an electronic portal to do so in the near future, but no later than five years after the effective date of the Final NPDES Electronic Reporting Rule. Also see response to ADEQ’s comment number 1. which addresses the same issue.**

23. *The first sentence in Part III.B.1 should be changed to the “permit establishes a chronic toxicity **action level** for water flea.....” According to Table 1.footnote (4), water flea has an action limit, not an effluent limit. This is further supported by the significant changes summary on page 10 of the fact sheet.*

**Typo corrected.**

24. *The City recommends revising the formatting of [Part III. B.]Section 7 and Part C as the alignment of these paragraphs are consistent with other sections in the permit.*

**Formatting revised.**

25. *Page 23 - Part III.C.1.a(1) should be updated to reflect the new AAC for the removal of biosolids. Updated in 2015, the AAC repealed the prohibition on incineration of biosolids and became effective July 4, 2015. Subsequently, 40 CFR 503, Subpart E was adopted and incorporated into AAC Title 18, Chapter 9, Article 10.*

**The language in Part III.C.1.a(1) has been updated to reflect the repeal on the prohibition on the incineration of biosolids.**

25. *Page 29 – Part III.D.4.a – The City requests a revision to the first sentence of this paragraph: “A summary analytical results from representative, flow proportioned, 24-hour composite sampling of the POTW’s influent and effluent for those pollutants identified under CWA Section 307(a), **with the exception of mercury and cyanide (collected as discrete samples)** which are known....” The methods utilized for sample collection do not allow for a composite sample, therefore the City requests this modification.*

**The suggested clarification has been included.**

- 27a. *Page 32 - Part IV, Section A. – The City request the removal of this reporting requirement from the permit. The City implemented a Capacity, Management, Operations, and Maintenance (CMOM) Plan and filed a notice of intent to discharge under the General 2.05 CMOM Permit with the Arizona Department of Environmental Quality (ADEQ). The CMOM permit for the City has been effective since June 2008. The City will continue to report sanitary sewer overflows to ADEQ under the reporting requirements per Arizona Administrative Code (AAC) R18-9-C305(F). This will alieve the administrative burden for both the EPA and the City to address each event within 24 hours and provide / receive a 5 day letter. Additionally, on Page 12 of the fact sheet, it states: “Since the issuance of the previous permit the COP 91<sup>st</sup> Avenue facility has obtained and maintains coverage under a State-issued general permit for CMOM. This is*

*substantially equivalent to the requirements under the SSO special condition and therefore this special condition is no longer required.”*

*However, if the EPA still requires this type of reporting, the City proposes the submission of an annual summary which will provide the details associated with each event.*

**EPA requires all facilities that it directly permits to maintain a system for Reporting, Record keeping, and Public Notification for Unauthorized Sewage Overflows. By obtaining and maintaining coverage under Arizona’s General 2.05 CMOM Permit with ADEQ the City has obtained coverage under a State-issued CMOM permit that is substantially equivalent to the requirements under the SSO special conditions in the previous permit. So, detailing these in a special condition section is no longer necessary. However, EPA still must be notified orally within 24 hours, and in writing (via email is acceptable) within 5 days of the time the permittee becomes aware of any unauthorized overflow from a sanitary or combined sewer over which the permittee has ownership or operational control. EPA retains the authority to independently enforce against any SSOs via this federally issued permit.**

- 27b. *As a second point, the draft permit requires the Sub Regional Operating Group (SROG) Cities to initiate and continue programs in their individual cities to comply with the provisions of the 2.05 General Permit for CMOM. The City does not have permitting authority over the other SROG Cities to require CMOM programs. Each of the remaining SROG Cities operates its separate sewage collection systems under a Type 4 Aquifer Protection Permit (APP) per AAC R18-9-E301. As such, the City has no control on whether the remaining SROG cities report SSOs occurring within its individual sewage collection systems under its Type 4 APP or otherwise. Given this, the City submits that it is unnecessary to impose additional SSO reporting requirements on the SROG Cities in connection with this NPDES Permit.*

**The requirement for SROG Cities to initiate and continue programs in their individual cities to comply with the provisions of Arizona’s 2.05 General Permit for CMOM has been removed under this permit. However, any SSOs that occur from a sanitary or combined sewer over which the City of Phoenix has ownership or operational control, regardless of which jurisdiction it may be located in shall be reported under this permit.**

28. *Page 32 – Part V - The City would like to make note that the 2008 Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity was replaced with the 2015 MSGP.*

**Typo corrected.**

29. *Page 32 – Part V - The 91<sup>st</sup> Avenue WWTP has coverage under Arizona’s MSGP. Requiring the facility to follow the requirements of the federal permit is redundant, and can result in conflicting requirements being imposed upon the City. Additionally, the draft NPDES permit includes detailed requirements*

*regarding the contents of the Stormwater Pollution Prevention Plan (SWPPP), control measures, etc. Specifying this level of detail could result in duplicate, or contradictory requirements imposed upon the facility. This section should provide the City the option to either follow the EPA or Arizona MSGP. Furthermore, the six pages of details from the federal MSGP requirements should be removed from this permit, since this is duplicate regulation. Unless EPA's intent is that compliance with the specific stormwater requirements in the NPDES permit would satisfy any regulatory requirements under the federal or state MSGP (i.e., coverage under the MSGP is unnecessary). If that is the case, the City requests that this is clearly stated.*

**During the development of the previous permit, the exact discharge location of stormwater runoff from the City's WWTP was unclear and therefore the previous NPDES permit included a section on control of stormwater discharges. In applying for this permit renewal the City has stated that it does not directly discharge any stormwater runoff to either State or Tribal land. With the exception of precipitation that falls directly into the Facility's effluent channel, all stormwater run-off at the Facility is retained on-site and is either drained or pumped back into the treatment process. Berms or block walls have been constructed around the perimeter of the Facility to prevent off-site run-on from entering the Facility as well. In the absence of direct stormwater discharge from the facility, the City's NPDES permit only authorizes discharge of treated wastewater from designated outfalls 001 and 005 and no stormwater discharge is authorized under the NPDES permit. Therefore the provision in the previous permit regarding controlling stormwater discharges has been eliminated.**

30. *Part VII.A.1.a(1) – In the third to the last sentence, the word “note” should be changed to “not” to read: “be subject to a fine of **not** more than \$250,000...”*

**Typo corrected.**

31. *Page 44 - Part VII.A.1.l(1)(iii) – First sentence should read “The alteration or addition results in a significant change in the permittee’s sludge use or disposal practices, **and** such alteration...”*

**Typo corrected.**

32. *Page 45 - Part VII.A.1.l.(4)(i) – Delete extra period at the end of the last sentence.*

**Typo corrected.**

33. *Part VII.A.1.l.(6)(i) – Delete the end parenthesis at the end of the fourth sentence.*

**Typo corrected.**



34. *Page 50 - Part VII.B.– The “Specific Categories of NPDES Permits” header goes immediately to subpart a. Additionally, after item (3) on page 50, the numbering goes back to (1) after a statement on the Resource and Recovery Act. The City requests review of this section to confirm that all standard language is in place.*

**Language in the permit is identical to standard language from Region 9 NPDES Permit Section’s template for Standard Permit Conditions.**

35. *Page 50 - Part VII.B.2(1) – Remove the hyphen and add a period to correct the statement “ 40 CFR 261.31 through 261.33” in the second sentence.*

**Typo corrected.**

*Comments on Draft Fact Sheet:*

36. *Page 3 - Section II – second paragraph – third sentence should read: “The COP 91<sup>st</sup> Ave WWTP is authorized to operate at a design flow capacity of 230 million gallons per day...”*

**Typo corrected.**

37. *Page 5 - Section III – Paragraph 8 starting with “In addition to wastewater the plant receives...” should be updated. It includes data from 2003 through 2005, and does not reference Outfall 005.*

**The paragraph has been updated and reference to the previous permit deleted.**

38. *Page 5 – Section III – The latitude for Outfall 005 should be 18” not 18.3” to remain consistent with the other coordinates.*

**The latitude coordinate has been changed to 18”.**

39. *During the permit term, the City observed sporadic detections of heptachlor in both the influent and effluent. The City conducted internal investigation and found that there was at least (1) one issue with the analytical results. Due to the sporadic nature of these detections, the City proposes to monitor this compound with assessment levels, as opposed to effluent discharge limits.*

**The heptachlor limit was exceeded multiple times during the previous permit cycle therefor reasonable potential for exceedance exists and a limit has been included.**

40. *Permethrin is misspelled and Parathion is missing in Section V – Significant Changes to Permit table.*

**Typo corrected.**

41. *In the “Monitoring Frequency for Parameters in Table 1” row, the last cell in the table references “Oil and Gas.” This should be changed to “Oil and Grease.”*

**Typo corrected.**

42. *Part VI.C.1 – The City requests clarification if the table listed under CBOD and TSS apply to both parameters or just TSS?*

**In Part VI.C.1. The table listed applies to both parameters. The table has been updated to indicate that.**

43. *First sentence on Page 16 should be revised to reference TSS not E.coli: “The Wetland Treatment Assessment, required in the previous permit was designed to characterize the effect of the wetland on TSS concentration.*

**Typo corrected.**

44. *Last sentence in the CBOD5 and TSS section should be modified to accurately reflect permit conditions: “Therefore the permit **allows** that compliance with the TSS effluent limit be achieved at **FRW-1**, and that monitoring for TSS occurs at **Outfall 005**, after disinfection of the treated effluent (**if required**) but period[sic] to the introduction of TSS from natural sources.*

**The language has been clarified in this section.**

45. *Chlordane, Toxaphene, and DDT Metabolites do not have monitoring requirements with an action level in the permit. According to Table 1, Footnote (1), no effluent limits are set at this time, but monitoring and reporting is required. The last sentence of this section should be deleted.*

**The last sentence has been clarified to indicate that monitoring and reporting is required but no action level has been set**

46. *Page 16 – The last sentence should be updated to: Flow monitoring is continuous at Outfalls 001 and 005, and FRW-1 and weekly at FRW-2 and FRW-3. However, as stated in comment 15, the City is unable to measure flow at FRW-2 and FRW-3 and requests this requirement be removed from the permit.*

**See response to comment 14. Additionally, the language has been updated to be consistent with both Table 1. and Table 2. in the permit.**

47. *Page 17 - Part VI.C.2 – Cyanide – The maximum observed concentration and projected maximum effluent concentration values are missing from the table.*

**The maximum observed and projected maximum effluent concentration values have been added to the table.**

48. *Page 17 – Part VI.C.2 - Selenium - The maximum observed concentration noted in this table of 10.7 mg/L was attributed to interference during sample analysis. The City conducted a thorough investigation and provided a copy to EPA. The City requests EPA consider this incident and complete the reasonable potential analysis accordingly.*

**Maximum Observed Concentrations noted were attributed to interference during sample analysis from Bromide. Thus despite exceedance of the water quality criterion, it is indeterminate if there is reasonable potential for exceedance. If after a 12 months of data collection and analysis at 2X/month no further exceedances are observed, the permittee may petition to reduce monitoring to once per quarter.**

49. *Page 18 – Part IV.E – The last sentence in the third paragraph under the Antidegradation Policy section should be revised to “which allow the plant to treat it’s effluent to a higher and more consistent caliber, it is **expected** that the quality...”*

**Typo Corrected.**

50. *Section VIII.A. The next to the last sentence should be corrected to accurately reflect reporting periods as required by the permit: “All monitoring data shall be reported on monthly DMR forms and submitted **monthly** as specified in the proposed permit.”*

**Typo Corrected.**

51. *Page 20 - Part IX.C – Based on comment 27, the City requests either the removal of this section from the fact sheet or a revision to the following statement: “Since the issuance of the previous permit the COP 91<sup>st</sup> Avenue facility has maintained coverage under a State-issued general permit for CMOM. This is substantially equivalent to the requirements under the SSO special condition and therefore this special condition is no longer required.” This statement is consistent with Page 12 of the fact sheet.*

**Please see response to comment 27. As the City has obtained and maintained coverage under the State-issued general permit for CMOM the detailed requirements outlined previously under the special condition are no longer required. However, EPA has retained the requirement for 24 hour and 5 day notification of SSOs in the permit. The statement on Page 12 of the fact sheet has been clarified to state that while the detailed requirements outlined previously are no longer necessary, reporting of SSOs is still required under the permit.**

52. *Page 20 – Part IX.E – Based on comment 29, the City requests removal of this section from the fact sheet.*

**This section has been amended to be consistent with response to comment 29.**

53. *Page 21 – Part X – In 2016, the Yuma Clapper rail’s name was changed to Yuma Ridgeway’s Rail [sic], Rallus obsoletus yumanensis. This should be corrected in the list of birds.*

**The species name for the erstwhile Yuma Clapper Rail has been updated to reflect the correct current common and scientific names.**

54. *Section X – The third paragraph on the page should be revised to: “Subsequently in 2014, the COP and the USFWS entered into a Safe Harbor Agreement (SHA) for City-owned lands along the Salt and Gila Rivers, and the Tres Rios area of southwest Phoenix. EPA reviewed this document. COP is in the process of amending the original SHA to add the western yellow-billed cuckoo, reflect a name change for Yuma Clapper Rail to Yuma Ridgeway’s [sic] rail, and to slightly modify the included lands.”*

**The language has been updated and clarified.**

55. *Section X – Revise the sixth paragraph on the page to: “EPA also reviewed the 2015 Baseline [sic] Determinations and Biological Monitoring Report prepared by the Arizona Game and Fish Department (AGFD) completed in June 2016. This document was prepared to revise baseline habitat acreages for City and AGFD lands. Additionally, the City and AGFD are in the process of finalizing a Certificate of Inclusion document to allow coverage for AGFD lands under the City’s SHA for a period of 10 years.”*

**The language has been updated and clarified.**

56. *Section X – Replace “WWTF” with “WWTP” in the second bullet point and the first full paragraph on this page.*

**Typo corrected.**

57. *Page 27 - Section XV – Appendix A Site Maps: The description in Outfall 001 should be changed to read: “Outfall (effluent) to the Salt River from the 91<sup>st</sup> Avenue Plant used for intermittent discharge or emergency events.*

**The language has been clarified in Appendix A.**

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY'S COMMENTS

1. *Part II.B.11 [of the Draft Permit] states:*

*“The permittee must electronically submit compliance monitoring data and reports using electronic reporting tools provided by EPA Region 9 (NetDMR and NeT) or ADEQ’s myDEQ system. The reports that must be electronically reported are:*

- *Discharge Monitoring Reports (DMRs); and*
- *Biosolids/Sewage Sludge Report.*

*Prior to December 21, 2016, the permittee may elect to use NetDMR to electronically submit DMRs instead of mailing paper DMRs. Starting on December 21, 2016, the permittee must electronically report DMRs may cease mailing paper DMRs.*

*The requirement for submitting annual biosolids/sewage sludge reports using EPA’s NPDES Electronic Reporting Tool (“NeT”) goes into effect December 21, 2016. You must submit your biosolids report for calendar year 2016, which is due by February 19, 2017 and subsequent biosolids annual reports using NeT (see “Electronic Submissions” section below).”*

*ADEQ is authorized to administer the NPDES Biosolids/Sewage Sludge Management Program. The schedule of compliance dates listed in Table 1 of CFR 127.16(a) lists the start date of electronic submissions for Biosolids Annual Program Reports for states authorized to administer the NPDES program as December 21, 2020. ADEQ has developed an electronic portal called myDEQ that allows facilities to submit Discharge Monitoring Reports that was required in phase 1 of the rule. Once phase 1 requirements are complete, ADEQ will develop a portal to allow electronic submittal of Annual Biosolids Reports. Please remove the requirement of submitting the electronic Biosolids/Sewage Sludge Report using “NeT” tool from the draft permit and include the following mailing address for submittal of the annual report:*

*AZPDES Individual Permits Unit  
ADEQ Biosolids Coordinator  
1110 W. Washington St.  
Phoenix, AZ 85007*

**The language in Part II.B.11 of the permit has been clarified to indicate that Biosolids/Sewage Sludge Reports do not need to go to EPA using the “NeT” tool, but rather should continue to be submitted to the appropriate ADEQ address provided, until ADEQ develops a portal to allow electronic submittal of Annual Biosolids Reports. Also see response to comment 22. above.**

2. *Part III.C.7 [of the Draft Permit] should read as follows:*

*AZPDES Individual Permits Unit  
ADEQ Biosolids Coordinator  
1110 W. Washington St.  
Phoenix, AZ 85007*

**Address corrected.**

3. *Part III.D.6 [of the Draft Permit] should read as follows:*

*AZPDES Individual Permits Unit  
ADEQ Pretreatment Coordinator  
1110 W. Washington St.  
Phoenix, AZ 85007*

**Address corrected.**