



BEFORE THE ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY

Reso 2011-01
& per this
one signed.

QUALITY

In the Matter of:
City of Willcox - Wastewater Treatment Plant
located at 868 E Maley St Willcox , Cochise
County, Arizona
Inventory Number: 102778

Docket No. P-16-11

City of Willcox in its capacity as owner and/or operator of City of Willcox - Wastewater Treatment Plant located at 868 E Maley St, Willcox, Cochise County, Arizona.

RECITALS

City of Willcox ("Willcox") acknowledges that no promise of any kind or nature whatsoever, was made to induce it to enter into this Consent Order, and Willcox has done so voluntarily.

Willcox acknowledges that by entering into this Consent Order, it does not resolve any liability it may have for civil penalties for violations of any State or Federal environmental law.

By entering into this Consent Order, Willcox does not admit to any civil or criminal liability, or waive any right including but not limited to the assertion of any defense available to Willcox under applicable law. Further, Willcox does not admit, and both the Arizona Department of Environmental Quality (ADEQ) and Willcox retain the right to controvert in any subsequent proceeding except proceeding to implement or enforce this Consent Order, the validity of any Findings of Fact or Conclusions of Law contained in this Consent Order.

The undersigned representative of Willcox certifies that he is fully authorized to execute this Consent Order on behalf of Willcox and to legally bind Willcox to this Consent Order.

Willcox admits to the jurisdiction of the Director of ADEQ.

Initials ill

1 Except as to the right to controvert the validity of any Findings of Fact or Conclusion of
2 Law contained in this Consent Order in a proceeding other than to enforce this Consent Order
3 Willcox consents to the terms and entry of this Consent Order and agrees not to contest the
4 validity or terms of this Consent Order in any subsequent proceeding.

5 **THEREFORE, IT IS HEREBY ORDERED** as follows:

6 **I. JURISDICTION**

7 The Director of ADEQ has jurisdiction over the subject matter of this action and is
8 authorized to issue this Consent Order pursuant to the Arizona Revised Statutes (A.R.S.) §§
9 49-261, and 41-1092.07(F)(5).

10 **II. FINDINGS**

11 **THE DIRECTOR HEREBY MAKES THE FOLLOWING FINDINGS OF FACT AND**
12 **CONCLUSIONS OF LAW:**

13 **A. Findings of Fact**

14 1. The City of Willcox Wastewater Treatment Plant (WWTP) is located at 868 E
15 Maley St, Willcox, Cochise County. Willcox is authorized under an Aquifer Protection Permit
16 APP # P-102778, to operate the WWTP with a maximum average monthly flow of 0.6 million
17 gallons per day (MGD).

18 2. Willcox has an Arizona Pollution Elimination Discharge System (AZPDES)
19 Permit # AZ0025771 for a discharge to Lake Cochise.

20 3. Willcox does not currently possess a permit for reuse of its effluent.

21 4. On May 20, 2008, ADEQ Southern Regional Office (SRO) inspected the
22 WWTP. During the inspection, SRO discovered that Willcox had upgraded the headworks lift
23 station and added an ultra-violet (UV) disinfection system. In addition, SRO discovered that six
24 ponds at the Twin Lakes Golf Course were being used by Willcox as part the WWTP process
25 instead of as reuse ponds. Also, a portion of the effluent produced by the WWTP was being used

1 by the Twin Lakes Golf Course for irrigation purposes in a way that allowed human contact with
2 the effluent. None of these modifications to the treatment process are identified in Willcox's
3 APP # P-102778.

4 5. During the May 20, 2008 inspection, SRO also observed that water from a
5 groundwater well, that had not been identified or included in the Willcox's AZPDES permit
6 application, was being pumped and directly discharged to Lake Cochise. The analytical data
7 subsequently submitted by Willcox showed a pH as high as 9.82 in the groundwater discharged
8 to Lake Cochise.

9 6. On December 3, 2008, SRO conducted another inspection of the facility and
10 observed that a valve was discharging partially treated effluent to Lake Cochise through its
11 AZPDES outfall, bypassing a portion of the treatment process.

12 7. On December 23, 2008, ADEQ issued a Notice of Violation (NOV) to
13 Willcox alleging the following AZPDES violations: a) a discharge to Lake Cochise without an
14 AZPDES permit; b) not registering the groundwater well with ADWR; c) failure to submit the
15 discharge monitoring reports (DMRs) for the results of sampling conducted at groundwater well
16 # 001 and Lake Cochise from May 30, 2003 through May 30, 2008.

17 8. On December 23, 2008, ADEQ issued a second NOV to Willcox alleging
18 the following APP permit violations: a) failure to report deficiencies to ADEQ, set discharge
19 limit (DL), or of an alert limit (AL) being exceeded; b) exceedances of the APP Aquifer Quality
20 Limit (AQL) and Aquifer Water Quality Standards (AWQS) for selenium on at least eighteen
21 (18) occasions and for cadmium on one occasion during 1st quarter of 2007; c) exceedances of
22 the AQL and AWQS for thallium on two occasions during 2nd and 3rd quarter of 2008; d)
23 exceedances of APP discharge limit for pH and fecal coliform for over three hundred (300)
24 occasions during the period January 2007 through November 2007.

25 9. On December 23, 2008, ADEQ issued a third NOV to Willcox alleging the

1 following reuse violations: a) Direct reuse of reclaimed water without a permit; b) Use of Class
2 C reclaimed water for a type of direct reuse requiring Class A or Class B reclaimed water; c)
3 Failure to use application methods that reasonably preclude human contact with reclaimed water
4 when irrigating with reclaimed water; c) failure to use application methods that reasonably
5 preclude human contact with reclaimed water when irrigating with reclaimed water; d) Failure to
6 place or maintain signage at required locations so the public is informed that reclaimed water is
7 in use.

8 B. Conclusions of Law

9 AZPDES Violations:

10 1. By discharging effluent and pumped water from the groundwater well into
11 Lake Cochise (listed as effluent dependent water under A.A.C. R18-11-113(D)(10)), a water of
12 the U.S. without a permit, Willcox violated A.R.S. § 49-255.01(A), which requires that a person
13 shall not discharge to a water of the U.S. except under conformance with an AZPDES or NPDES
14 permit.

15 2. By exceeding numeric Surface Water Quality Standards (SWQS) found at
16 A.A.C. R18-11-109(B), for pH in the water samples at groundwater well # 002 and at Lake
17 Cochise from 4th quarter of 2008 through 2nd quarter of 2009, Willcox violated A. A. C. R18-11-
18 109 B which provides a SWQS of 6.5-9.0 for pH.

19 3. By failing to submit DMRs for the periods May 2003 through March 2008,
20 and from April through June 2009, Willcox violated Part II.B.1 of AZPDES Permit #
21 AZ0024830 which requires the permittee to report monitoring results to ADEQ.

22 4. By failing to report to ADEQ, the quarterly results for trace substances
23 listed under Part I.B. Table 2.a, the annual results for trace substances listed under Part I.B. Table
24 2.b, the annual results for WET Testing listed under Part II.D. Table 4, Willcox violated Part
25

1 I.L.B.1 of AZPDES Permit # AZ0024830 which requires the permittee to report monitoring
2 results to ADEQ.

3 5. By exceeding the permit DLs for 5-Day biological oxygen demand (BOD)
4 on at least nine (9) occasions for the period April 2008 through June 2009, Willcox violated Part
5 I.A. Table 1 of AZPDES Permit # AZ0024830, which provides DLs of 68 Kg/day for monthly
6 average mass loading, and 30 mg/L for monthly average concentration for 5-Day BOD.

7 6. By exceeding the DLs for suspended solids (SS) on at least seven (7)
8 occasions during the period April 2008 through March 2009, Willcox violated Part I.A. Table 1
9 of AZPDES Permit # AZ0024830, which provides the DLs of 68 Kg/day for monthly average
10 mass loading, 102 Kg/day for weekly average mass loading, 30 mg/l for monthly average
11 concentration, and 45 mg/l for weekly average concentration for SS.

12 7. By exceeding the DLs for E-coli on at least seven (7) occasions during
13 the period April 2008 through February 2009; Willcox violated Part I.A. Table 1 of AZPDES
14 Permit # AZ0024830, which provides the DLs of 126 cfu/100ml for monthly average
15 concentration and 576 cfu/100ml for daily maximum concentration for E-coli.

16 8. By exceeding the DLs for the percentage of removal of suspended solids
17 on at least six (6) occasions during the period April 2008 through March 2009, Willcox violated
18 Part I.A. Table 1 of AZPDES Permit # AZ0024830, which provides a DL of .85 for the
19 percentage of removal of suspended solids

20 9. By exceeding the permit DLs for the percentage of removal of 5-Day
21 biological oxygen demand on at least four (4) occasions during the period April 2008 through
22 March 2009, Willcox violated Part I.A. Table 1 of AZPDES Permit # AZ0024830, which
23 provides a DL of 85 for the percentage of removal of 5-Day biological oxygen demand

24 APP Violations:

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1 10. By exceeding the APP AQL and AWQS for selenium on at least nineteen
2 (19) occasions for the period June 2002 through December 2007, Willcox violated Section 4.0
3 Table II of APP # P-102778 which provides an AQL and AWQS of 0.05 mg/l for selenium.

4 11. By exceeding the APP AQL and AWQS for cadmium on one occasion
5 during 1st quarter of 2007, Willcox violated Section 4.0 Table II of APP # P-102778 which
6 provides an AQL and AWQS of 0.005mg/l for cadmium.

7 12. By exceeding the APP AQL and AWQS for thallium on four (4)
8 occasions during the 2nd and 3rd quarter of 2008, and 2nd quarter of 2009, Willcox violated
9 Section 4.0 Table II of APP # P-102778 which provides an AQL and AWQS of 0.002mg/l for
10 thallium.

11 13. By exceeding the APP AQL and AWQS for beryllium on one occasion
12 during 4th quarter of 2006, Willcox violated Section 4.0 Table II of APP # P-102778 which
13 provides an AQL and AWQS of 0.004mg/l for beryllium.

14 14. By exceeding the APP AQL and AWQS for total tri-halomethane
15 (TTHM) in significant amount on one occasion during the 4th quarter 2006, Willcox violated
16 Section 4.0 Table II of APP # P-102778 which provides an AQL and AWQS of 0.1 mg/l for
17 TTHM.

18 15. Willcox failed to report to ADEQ permit violations as required by APP
19 No. P-102778.

20 16. By exceeding the APP discharge limit for daily sampling of fecal
21 coliform on at least twenty nine (29) occasions from 4th quarter of 2008 through 2nd quarter of
22 2009, Willcox violated Section 4.0 Table I of APP No. P-102778 which provides a DL of
23 800cfu/100ml for daily sampling of fecal coliform.

24 17. By failing to conduct daily sampling of fecal coliform on over five
25 hundred (500) occasions from 4th quarter of 2002 through the 2nd quarter of 2009, Willcox

1 violated Section 4.0 Table I of APP No. P-102778 which lists the parameters which require
2 monitoring and the sampling frequency for those parameters.

3 18. By exceeding the APP discharge limit for 4 out of 7 weekly samples for
4 fecal coliform on at least thirty nine (39) occasions from 4th quarter of 2002 through 1st quarter of
5 2009, Willcox violated Section 4.0 Table I of APP No. P-102778 which provides a DL of 200cfu
6 /100ml for 4 out of 7 samples for fecal coliform.

7 19. By exceeding the APP discharge limit of 6-9 for pH on at least ninety
8 two (92) occasions from 1st quarter of 2007 through 2nd quarter of 2009, Willcox violated Section
9 4.0 Table I of APP # P-102778 which provides a DL of 6-9 for pH.

10 20. By failing to conduct verification sampling after exceeding AQLs for
11 total coliform, cadmium, selenium, thallium, and total tri-halomethane (TTHM); Willcox
12 violated Section 2.6.4.(1) of APP # P-102778 which requires the permittee to conduct
13 verification sampling within five (5) days of becoming aware of an AQL violation.

14 21. By failing to conduct verification sampling after exceeding DLs for
15 pH, fecal coliform, and monthly average flow, Willcox violated Section 2.6.3.(1) of APP # P-
16 102778 which requires the permittee to conduct verification sampling within 24 hours of
17 becoming aware of a DL violation.

18 Reuse Violations:

19 22. By operating a reuse facility at the Twin Lakes Golf Course without
20 an APP permit for reuse of reclaimed water, Willcox has violated A.A.C. R18-9-704(E) which
21 requires that a person shall not directly reuse reclaimed water unless permitted under this Article.

22 23. By applying reclaimed water that did not meet Class B standards at
23 Twin Lakes Golf Course, Willcox has violated A.A.C. R18-11-307(C) which requires that a
24 person shall not use Class C reclaimed water for a type of direct reuse listed as Class B.

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1 **III. COMPLIANCE SCHEDULE**

2 **THE DIRECTOR HEREBY ORDERS** and Willcox agrees to comply with the provisions of
3 this Consent Order as follows:

4 A. Within thirty (30) days of the effective date of this Consent Order Willcox
5 shall schedule an APP pre-application meeting with the Water Quality Division Ground Water
6 Section.

7 B. Within sixty (60) days of the pre-application meeting, Willcox shall submit an
8 administratively complete application for an amendment to APP# 102778 to re-engineer the
9 WWTP using the appropriate technology so the discharge limits (DLs) and all other APP limits
10 and conditions are met and maintained. Willcox shall respond to any deficiencies noted by
11 ADEQ within the time prescribed by ADEQ.

12 C. Upon the effective date of this Consent Order, Willcox shall submit a
13 withdrawal of its current APP application received by ADEQ on April 22, 2005 to the Water
14 Quality Division Ground Water Section.

15 D. Within ninety (90) days of the effective date of this Consent Order, Willcox
16 shall submit to ADEQ for approval, a Workplan to address solids removal, and disposition of the
17 ponds that are dry and not in use on the Twin Lakes Golf Course. Storage of the solids removed
18 must include measures detailed in the Workplan to prevent or minimize the likelihood of
19 adversely affecting human health or the environment, and shall include but is not limited to:

- 20 a. contamination of groundwater
21 b. nuisance such as odor and vectors
22 c. diversion of stormwater run-off

23 After review of the Workplan by ADEQ, Willcox shall respond to any
24 deficiencies noted within the time prescribed by ADEQ. Once approved, Willcox shall
25 implement the Workplan including any deadlines therein.

1 E. Within one hundred and eighty (180) days of the effective date of this
2 Consent Order, Willcox shall develop and submit to ADEQ for approval a Pretreatment Toxic
3 Control Plan that will ensure compliance with pretreatment methods for control of toxic
4 pollutants discharged to the WWTP. The PTCP shall include but is not limited to:

5 a. An industrial waste survey to identify all commercial and industrial
6 dischargers likely to discharge pollutants which may adversely impact the collection system or
7 treatment works.

8 b. Identification of operating problems known or suspected to have been
9 caused by commercial or industrial discharges.

10 c. Identification of Best Management Practices for commercial and
11 industrial discharges including septage haulers and restaurants with potential fats, oil and grease
12 discharges which are harmful to the treatment system.

13 d. Standard operating procedures that will be implemented to ensure
14 compliance with the PTCP and;

15 e. Timeline to update the City of Willcox Sewer Use Ordinance as needed
16 to reflect the necessary authorities to implement and enforce the PTCP.

17 F. Upon the effective date of this Consent Order, Willcox shall conduct the
18 necessary actions to meet compliance with Conditions A. Table 5 and B. Table 6 under Part V
19 Special Conditions of AZPDES permit # AZ0025771. Willcox shall complete all monitoring
20 requirements, including whole effluent toxicity (WET) testing and verification sampling and
21 submit the results to ADEQ in accordance with Part IV of AZPDES permit # AZ0025771.

22 G. Upon the effective date of this Consent Order, Willcox shall continue all
23 monitoring in accordance with Section 4.0 of APP Permit P-102778 for the duration of this
24 Order or until the APP amendment is in effect.

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1 H. Within three (3) years of ADEQ's issuance of the amended APP,
2 Willcox shall complete all implementation of the tasks and construction in the amended APP and
3 notify ADEQ in writing within fifteen days of completion of such tasks. Where required,
4 Willcox shall submit an Engineer's Certificate of Completion within thirty days of completion of
5 construction activities prior to discharging.

6 **IV. STATUS REPORTS**

7 A. Willcox agrees to submit a written status report to ADEQ every thirty (30)
8 calendar days beginning thirty (30) days from the effective date of this Consent Order, until
9 termination of this Consent Order. Each written status report shall describe what measures have
10 been taken under Section III, of this Consent Order, and shall certify when compliance with the
11 requirements of Section III of this Order has been achieved. Each report shall be accompanied
12 by evidence of compliance including, as appropriate, submittal of documents, photographs or
13 copies of any other supporting information that Willcox deems necessary.

14 B. ADEQ will review the status reports and relay any disputes in writing to Willcox.
15 Willcox shall incorporate all required modifications, changes or other alterations, as requested by
16 ADEQ, within a reasonable time specified by ADEQ.

17 **V. VIOLATIONS OF ORDER/STIPULATED PENALTIES**

18 A. Under A.R.S. § 49-262, violation of this Consent Order subjects Willcox to civil
19 penalties of up to \$25,000 per day per violation. ADEQ and Willcox agree that the calculation
20 of civil penalties for violation of this Consent Order would be very difficult.

21 B. ADEQ and Willcox therefore agree that if Willcox fails to comply with any
22 requirement of this Consent Order, Willcox shall pay a stipulated penalty pursuant to the
23 schedule below:

<u>Period of Failure to Comply</u>	<u>Penalty Per Day of Violation</u>
1st to 30 th day	\$100 per day per violation

1 B. Nothing in this Consent Order shall constitute a permit of any kind, or a
2 modification of any permit of any kind, or an agreement to issue a permit of any kind under
3 federal, state or local law, or relieve Willcox in any manner of its obligation to apply for, obtain,
4 and comply with all applicable permits. Nothing in this Consent Order shall in any way alter,
5 modify or revoke federal, state, or local law, or relieve Willcox in any manner of its obligation to
6 comply with such laws. Compliance with the terms of this Consent Order shall not be a defense
7 to any action to enforce any such permits or laws.

8 **VII. FORCE MAJEURE**

9 A. Willcox shall perform all the requirements of this Consent Order according to the
10 time limits set forth herein, unless performance is prevented or delayed by events which
11 constitute a *force majeure*. *Force majeure*, for the purposes of this Consent Order, is defined as
12 any event, arising from causes beyond the control of Willcox or its authorized representatives
13 which delays or prevents the performance of any obligation under this Consent Order and which
14 could not have been overcome or prevented by Willcox. The financial inability of Willcox to
15 comply with the terms of this Consent Order, shall not constitute a *force majeure*.

16 B. In the event of a *force majeure*, the time for performance of the activity affected
17 by the *force majeure* shall be determined by ADEQ and extended for a period no longer than the
18 delay caused by the *force majeure*. The time for performance of any activity dependent on the
19 delayed activity shall be similarly extended. In the event of a *force majeure*, Willcox shall notify
20 ADEQ in writing within five (5) calendar days after Willcox or its agents become aware of the
21 occurrence. The written notice provided to ADEQ shall describe in detail the event, the
22 anticipated delay, the measures taken and to be taken by Willcox to prevent or minimize delay,
23 and a proposed timetable under which those measures will be implemented. Willcox shall take
24 all reasonable measures to prevent or minimize any delay caused by the *force majeure*. Failure
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1 of Willcox to comply with any requirements of this paragraph for a particular event shall
2 preclude Willcox from asserting any claim of *force majeure* for that event.

3 **VIII. SITE ACCESS**

4 ADEQ may at any time, upon presentation of credentials to authorized personnel on duty,
5 enter upon the premises at the Facility for the purpose of observing and monitoring compliance
6 with the provisions of this Consent Order. This right of entry shall be in addition to, and not in
7 limitation of or substitution for, ADEQ's rights under applicable law.

8 **IX. CORRESPONDENCE**

9 All documents, materials, plans, notices, or other items submitted as a result of this
10 Consent Order shall be transmitted to the addresses specified below:

11 To ADEQ:

12 Arizona Department of Environmental Quality
13 Water Quality Division
14 Attention: Nirupma Bhatia, Case Manager
15 Water Quality Enforcement Unit
16 1110 West Washington Street
17 Phoenix, Arizona 85007-2935
18 Telephone: (602) 771-4479
19 Email: nb3@azdeq.gov

20 To Willcox:

21 Pat McCourt, City Manager
22 City of Willcox
23 101 S Railroad Ave
24 Ste B
25 Willcox, AZ 85643-2135

26 Submissions to ADEQ as a result of this Consent Order shall be deemed submitted upon receipt.

27 **X. RESERVATION OF RIGHTS**

28 A. This Consent Order is based solely upon currently available information. If
29 additional information is discovered, which indicates that the actions taken under this Consent
30 Order are or will be inadequate to protect human health, safety, or the environment, or to

1 conform with applicable federal or state laws, ADEQ shall have the right to require further
2 action.

3 B. ADEQ shall have the right: to pursue civil penalties for violations of any and all
4 violations of A.R.S. Title 49, or the rules promulgated thereunder, occurring before entry of this
5 Consent Order; to disapprove of work performed by Willcox that fails to comply with this
6 Consent Order; to take enforcement action for any and all violations of this Consent Order; and
7 to take enforcement action for any and all violations of A.R.S. Title 49, or the rules promulgated
8 thereunder, occurring after the entry of this Consent Order.

9 **XI. SEVERABILITY**

10 The provisions of this Consent Order are severable. If any provision of this Consent
11 Order is declared by a court of law to be invalid or unenforceable, all other provisions of this
12 Consent Order shall remain in full force and effect.

13 **XII. MODIFICATIONS**

14 Any modifications of this Consent Order shall be in writing and must be approved by
15 both Willcox and ADEQ.

16 **XIII. EFFECTIVE DATE**

17 The effective date of this Consent Order shall be the date this Consent Order is signed by
18 ADEQ and Willcox. If such signatures occur on different dates, the later date shall be the
19 effective date of this Consent Order.

20 **XIV. PARTIES BOUND**

21 No change in ownership, corporate status, or partnership status relating to the subject of
22 this Consent Order will in any way alter the responsibilities of Willcox under this Consent Order.
23 Willcox will be responsible, and will remain responsible, for carrying out all activities required
24 under this Consent Order.

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1 **XV. TERMINATION**

2 The provisions of this Consent Order shall be deemed satisfied and this Consent Order shall be
3 terminated upon receipt of written notification from ADEQ that Willcox has demonstrated, to the
4 satisfaction of ADEQ, that all of the terms of this Consent Order have been completed. Any
5 denial of a request for termination from Willcox will be in writing and describe which terms of
6 the Consent Order have not been completed to the satisfaction of ADEQ. ADEQ reserves the
7 right to terminate this Consent Order unilaterally at any time for any reason. Any termination
8 will include a written explanation of the reason(s) for termination.

9 ISSUED this 14th day of February, ²⁰¹¹~~2010~~.

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12 _____
13 Michael A. Fulton, Director
14 Water Quality Division
15 Arizona Department of Environmental Quality
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CONSENT TO ORDER

The undersigned, on behalf of Willcox, hereby acknowledges that [he/she] has read the foregoing Consent Order in its entirety, agrees with the statements made therein, consents to its entry and issuance by the Arizona Department of Environmental Quality, agrees that Willcox will abide by the same and waive any right to appeal therefrom.

DATED this 3rd day of JANUARY, ²⁰¹¹ ~~2010~~.

City of Willcox
By: Monika S. Cronberg
Pat McCourt, City Manager
City of Willcox
Vice Mayor Monika S. Cronberg

David W. Lindsey
Mayor

ORIGINAL of the foregoing Consent Order was sent certified mail, return receipt requested, this 15th day of February, 2010, to:

Pat McCourt, City Manager
City of Willcox
101 S Railroad Ave
Ste B
Willcox, AZ 85643-2135

COPY of the foregoing Consent Order was filed this 15th day of February, 2010, with:

Arizona Department of Environmental Quality
Office of Administrative Counsel
Attention: Hearing Administrator
1110 West Washington Street
Phoenix, Arizona 85007-2935

COPIES of the foregoing Consent Order were sent by regular/interdepartmental mail, this 15th day of February, 2010, to the following:

Mark Horlings, Civil Unit Chief
Environmental Enforcement Section,
Office of the Attorney General
1275 West Washington Street
Phoenix, Arizona 85007

Cynthia Campbell, Manager, WQCS, ADEQ
William Ellett, Acting SRO Director, ADEQ
Jerry Smit, Manager, GWS, ADEQ
Marnie Greenbie, Manager SWS, ADEQ
Marcia Colquitt, Manager, WQBU, ADEQ

Vaira Harik, Director
Cochise County Health Department
1415 W. Melody Ln. Bldg A
Bisbee, AZ 85603

Ken Greenberg, Manager
CWA Compliance Office (WTR-7)
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

