



COUNTY ADMINISTRATOR'S OFFICE

PIMA COUNTY GOVERNMENTAL CENTER
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520-724-8661, FAX 520-724-8171

C.H. HUCKELBERRY
County Administrator

September 16, 2021

Submitted via email: Kasanneni.swathi@azdeq.gov

Swathi Kasanneni
Arizona Department of Environmental Quality
Water Quality Division
1110 W. Washington
Phoenix, AZ 85007

Re: **AZPDES Permit No. AZ0026417 - Tucson Airport Remediation Project (TARP)
Discharge into the Santa Cruz River**

Dear Ms. Kasanneni:

On August 10, 2021, the Pima County Board of Supervisors provided direction to County staff directing that if water from the TARP facility is transported and discharged into the Santa Cruz River, the PFAS level in the discharged water needs to be below 18 parts per trillion (ppt). The City Manager was notified of this direction on August 17, 2021, and was informed that Pima County would submit such comments during the Arizona Department of Environmental Quality (ADEQ) discharge permit public comment period.

Notification was also provided ADEQ Director Misael Cabrera of Pima County's position on August 24, 2021. The draft ADEQ permit included with Public Notice No. 21-05, published on September 3, 2021, includes a maximum discharge limit for PFAS (PFOS and PFOA) of 70 ppt. Pima County requests that the maximum allowable PFAS limits for discharged TARP groundwater for AZPDES Permit No. AZ0026417 be set below 18 ppt, if such is technically and economically feasible.

Sincerely,

A handwritten signature in black ink, appearing to read "C.H. Huckelberry".

C.H. Huckelberry,
County Administrator

c: The Honorable Chair and Members, Pima County Board of Supervisors
Carmine DeBonis, Jr., Deputy County Administrator for Public Works
Francisco Garcia, MD, MPH, Deputy County Administrator & Chief Medical Officer,
Health and Community Services
Michael Ortega, City Manager, City of Tucson