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The findings, determinations, and assertions contained in this document are not final and subject to change following the public comment period.

**FACT SHEET AND STATEMENT OF BASIS
AUTOLIV ASP INC., PROMONTORY PLANT
NEW PERMIT: DISCHARGE
UPDES PERMIT NUMBER: UT0024911
UPDES MULTI-SECTOR STORM WATER GENERAL PERMIT NUMBER: UTR000000
MINOR INDUSTRIAL**

FACILITY CONTACTS

Person Name: Burke Nelson
Position: Environmental Coordinator
Phone Number: (435) 471-3117

Facility Name: Autoliv ASP Inc., Promontory Plant
Mailing Address: 16700 West Highway 83
Promontory, Utah 84307

Actual Address: 16700 West Highway 83
Promontory, Utah

DESCRIPTION OF FACILITY

Autoliv is an automotive safety device manufacturer. The Promontory facility produces gas generant for the automotive airbag units. Fuels and oxidizers are blended and spray dried into a DOT 1.3C explosive powder. This powder is then pressed into tablets and wafers that go into the airbag inflator units. Nitrogen gas is generated by the rapid burning of the gas generant when an airbag is initiated. The facility has a Standard Industrial Classification (SIC) code 3714, for Motor Vehicle Parts and Accessories

Water is trucked into the wastewater plant from various production facilities on site. Wastewater is first filtered through a Shriver hydraulic filter press, rated at 25 microns, to remove the bulk of the solids. Water is then passed through a 5 micron polishing filter system and stored in tanks prior to distillation treatment. Final treatment is achieved by running the distillate through resin filter beds to remove any remaining minor contaminants, primarily ammonia. Treated water is then stored in 30,000 gallon storage tanks, where it is either recycled through the plant boiler system or discharged to Blue Creek. The facility anticipates a maximum discharge rate of 30,000 gallons per day.

The Autoliv ASP-6 wastewater treatment plant previously held a UPDES discharge permit (UT0024911) for its facility. The permit was not renewed in 2002 because the plant was able to recycle all of its treated water at the time. The Promontory Plant has since changed its formulation for airbag propellant from sodium azide to copper oxide. The wastewater plant was modified to treat the new waste stream. As a result, the volume of treated water sometimes exceeds the facilities' capacity to recycle, and needs to be discharged. The discharge is expected to be mainly during the winter months from October to March.

During the summer months, it is anticipated that most of the distilled water generated will be recycled in the process.

DESCRIPTION OF DISCHARGE

<u>Outfall</u>	<u>Description of Discharge Point</u>
001	Located at latitude 40°40'31.23" N and longitude 112°26'39.65" W. The discharge is pumped out of a holding tank to a pipeline that runs west-northwest for approximately 1.3 miles to Blue Creek.

RECEIVING WATERS AND STREAM CLASSIFICATION

Discharge is to Blue Creek, which is classified as Class 2B, 3D, 4 according to *Utah Administrative Code (UAC) R317-2-13*:

- Class 2B Protected for Boating, water skiing, and similar uses, excluding recreational bathing (swimming)
- Class 3D Protected for waterfowl, shore birds, and other water-oriented wildlife not included in classes 3A, 3B, and 3C, including the necessary aquatic organisms in their food chain.
- Class 4 Protected for agricultural uses including irrigation of crops and stock watering.

BASIS FOR EFFLUENT LIMITATIONS

There are no technology-based effluent limits associated with the facility's SIC code. Limitations on total suspended solids (TSS), biochemical oxygen demand (BOD₅) and pH are based on current Utah Secondary Treatment Standards, UAC R317-1-3.2. Limitations for ammonia are based on the results of a Wasteload Analysis for this discharge into Blue Creek (Attachment 1). A Level II Antidegradation Review (ADR) was required because this facility is newly permitted. The results of the ADR (Attachment 2) found that the treatment process is the least degrading reasonable alternative and that water quality impacts associated with the discharge are expected to be minimal. The permit limitations are:

Parameter	Effluent Limitations a/			
	Maximum Monthly Avg	Maximum Weekly Avg	Daily Minimum	Daily Maximum
Flow (MGD)	NA	NA	NA	.03
BOD ₅ , mg/L	25	35	NA	NA
TSS, mg/L	25	35	NA	NA
Total Ammonia, mg/L				
Summer (Jul-Aug)	5	14		
Fall (Oct-Dec)	9	15	NA	NA
Winter (Jan-Mar)	11	13		
Spring (Apr-Jun)	6	16		
pH, Standard Units	NA	NA	6.5	9

NA – Not Applicable.

SELF-MONITORING AND REPORTING REQUIREMENTS

The permit will require reports to be submitted monthly and annually, as applicable, on Discharge Monitoring Report (DMR) forms due 28 days after the end of the monitoring period. Lab sheets for biomonitoring must be attached to the biomonitoring DMR.

Self-Monitoring and Reporting Requirements a/			
Parameter	Frequency	Sample Type	Units
Total Flow <u>b/ c/</u>	Monthly	Instantaneous	MGD
BOD ₅	Monthly	Grab	mg/L
TSS	Monthly	Grab	mg/L
PH	Monthly	Grab	SU
Ammonia	Monthly	Grab	mg/L
WET, Acute Biomonitoring	Quarterly	Composite	Pass/Fail

*a See Definitions, *Part VIII*, for definition of terms.

*b Flow measurements of effluent volume shall be made in such a manner that the permittee can affirmatively demonstrate that representative values are being obtained.

*c If the rate of discharge is controlled, the rate and duration of discharge shall be reported.

STORM WATER

STORMWATER REQUIREMENTS

Storm water provisions are included in this combined UPDES permit. The storm water requirements are based on the UPDES Multi-Sector General Permit for Storm Water Discharges for Industrial Activity, General Permit No. UTR000566 (MSGP). The permit requires the preparation and implementation of a storm water pollution prevention plan for all areas within the confines of the plant. Elements of this plan are required to include:

1. The development of a pollution prevention team:
2. Development of drainage maps and materials stockpiles:
3. An inventory of exposed materials:
4. Spill reporting and response procedures:
5. A preventative maintenance program:
6. Employee training:
7. Certification that storm water discharges are not mixed with non-storm water discharges:
8. Compliance site evaluations and potential pollutant source identification, and:
9. Visual examinations of storm water discharges.

Prior to the issuance of this combined permit, Autoliv had been covered under the UPDES Multi Sector General Stormwater Permit for Industrial Activities.

BIOMONITORING REQUIREMENTS

A nationwide effort to control toxic discharges where effluent toxicity is an existing or potential concern is regulated in accordance with the State of Utah Permitting and Enforcement Guidance Document for Whole Effluent Toxicity Control (biomonitoring). Authority to require effluent biomonitoring is provided in Permit Conditions, UAC R317-8-4.2, Permit Provisions, UAC R317-8-5.3 and Water Quality Standards, UAC R317-2-5 and R317 -2-7.2.

Autoliv is a minor industrial facility that discharges effluent in which toxicity is not likely to be present. Based on the high level of treatment, the absence of measurable concentrations of toxic pollutants in the effluent, and the relatively small discharge volume in relation to the receiving water, the effluent was determined not to have reasonable potential for toxicity and WET limits are not required. However, since this is a new permit, quarterly monitoring for acute WET will be required for a minimum of one year. If the results for one year of testing indicate no toxicity, the permittee may request an elimination of testing or a reduction in testing frequency and/or reduction to one species.

ANTIDegradation REVIEWS

Antidegradation Reviews are intended to ensure that waters that have better quality than required by the standards are not degraded unless the degradation is necessary for important social or economic reasons. An ADR Level I review was performed and the conclusion was that an ADR Level II review was required, because this is a new facility. Autoliv has completed an Antidegradation Level II Review. Copies of both ADR documents are appended to this document.

The DWQ concurs with the findings of the Level I (compliance with water quality standards) and Level II Reviews.

PERMIT DURATION

It is recommended that this permit be effective for a duration of five (5) years.

Drafted by
David Wham, Discharge
Michael George, Storm Water
Michael Herkimer, WET
Utah Division of Water Quality

PUBLIC NOTICE

Began:
Ended:
Public Noticed in the Box Elder News Journal