FACT SHEET AND STATEMENT OF BASIS
CARGILL SALT
UTAH POLLUTION DISCHARGE ELIMINATION SYSTEM
PERMIT NO. UT0000639
Minor Industrial Facility

FACILITY CONTACT:
Responsible Official: Doug Fraiser,
15100 West Rowley Road
Grantsville, Utah 84029
Phone: (435) 884-4154

DESCRIPTION OF FACILITY:
Cargill Salt (Cargill) draws water from the Great Salt Lake, and by the process of evaporation, separates out the salt. Cargill Salt does not have the ability to discharge bitterns directly back to the Great Salt Lake, and all bitterns are currently sent to the U.S. Magnesium LLC for further processing. Cargill has not discharged bitterns directly to the Great Salt Lake since operations began at the Timpie location.

DESCRIPTION OF DISCHARGE:
There is one outfall from the facility. Outfall 002 is located at approximate latitude N 40° 46.963' and longitude W 112° 38.093'. This outfall discharges to a ditch which conveys water to the U.S. Magnesium LLC for 100% consumptive use by that facility. Neither Cargill Salt nor U.S. Magnesium LLC has the ability to discharge to the Great Salt Lake. As stated above Cargill Salt has not discharged bitterns directly to the Great Salt Lake since operations began at this location.

RECEIVING WATER CLASSIFICATION:
Outfall 002 discharges to unnamed ditch that flows to U.S. Magnesium. The ditch is Classified 2B, infrequent primary and secondary contact recreation, and 3E, severely habitat limited (UAC R317-2-13.10).

BASIS FOR EFFLUENT LIMITATIONS
Effluent limits are based on the more restrictive of protecting the uses (Level I antidegradation review UAC R313-2-3.5) or categorical limits for the specific industry and process. Effluent limits to protect the uses, called water quality-based effluent limits, are based on numeric criteria (UAC R317-2-14) and the Narrative Standards (UAC R317-2-7). The permit include effluent limits for pH to ensure compliance with secondary treatment standards which are the same as required to protect the Class 2B use, infrequent primary and secondary recreation. No numeric criteria have been established for the Class 3E severely habitat limited waters. As a result, a formal wasteload allocation was not necessary with respect to this discharge.

No water quality-based effluent limits are required because the discharge does not have reasonable potential to cause or contribute to an exceedance of a water quality standard. This conclusion is based on the lack of aquatic life in the ditch and the fact that the contents of the bitterns came from the lake and nothing is added.
ANTIDEGRADATION REVIEW

A Level II antidegradation review is not required because there are no increases in concentration or loading limits from the previous permit (UAC R317-2-3.b.1.).

SUMMARY OF EFFLUENT LIMITATIONS:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Effluent Limitations</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Maximum Monthly Average</td>
</tr>
<tr>
<td>Oil &amp; Grease, mg/L</td>
<td>NA</td>
</tr>
<tr>
<td>pH, Standard Units</td>
<td>NA</td>
</tr>
</tbody>
</table>

NA – Not Applicable

Self-Monitoring and Reporting Requirements a/ b/ c/:

<table>
<thead>
<tr>
<th>Parameter</th>
<th>Frequency</th>
<th>Sample Type</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Total Flow d/ e/ f/</td>
<td>Monthly</td>
<td>Measured</td>
<td>MGD</td>
</tr>
<tr>
<td>Oil &amp; Grease g/</td>
<td>Monthly</td>
<td>Visual/Grab</td>
<td>mg/L</td>
</tr>
<tr>
<td>pH</td>
<td>Monthly</td>
<td>Grab</td>
<td>SU</td>
</tr>
</tbody>
</table>

a/ This discharge shall contain only materials originally present in the Great Salt Lake waters or other intake waters. The permittee shall add nothing to the effluent prior to discharging.
b/ There shall be no visible sheen or floating solids or visible foam in other than trace amounts.
c/ There shall be no discharge of sanitary wastes.
d/ Flow measurements shall be made in such a manner that the permittee can affirmatively demonstrate that representative values are being obtained.
e/ If the rate of discharge is controlled, the rate and duration of discharge shall be reported.
f/ Flow monitoring will be required if the facility discharges directly to the Great Salt Lake.
g/ A sample for oil & grease shall be taken if a visual sheen is observed. If a sample is taken because a sheen is observed, it shall not exceed a daily maximum concentration of 10 mg/L.
WHOLE EFFLUENT TOXICITY (WET) TESTING REQUIREMENTS
A nationwide effort to control discharges where effluent toxicity is an existing or potential concern is regulated in accordance with the State of Utah’s Permitting and Enforcement Guidance Document for Whole Effluent Toxicity Control (Biomonitoring), February 15, 1991, which outlines guidance to be used by Utah Division of Water Quality staff and by permittees for implementation through the UPDES discharge permit program. 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.

Cargill is a minor industrial facility that discharges bitterns taken directly from the Great Salt Lake, in which no chemicals or other pollutants are introduced, thus returning any residual materials back to the highly saline Great Salt Lake. Based upon these facts, the permitting authority’s BPJ, and that the anticipated discharges are of relatively small volumes of effluent when compared to the existing water body of the Great Salt Lake, there is no reasonable potential for toxicity in Cargill’s discharge (per State of Utah Permitting and Enforcement Guidance Document for WET Control). As such, there will be no numerical WET limitations or WET monitoring requirements in this permit. However, the permit will contain a toxicity limitation re-opener provision that allows for modification of the permit should additional information indicate the presence of toxicity in the discharge.

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

PUBLIC NOTICE:
Drafted by Lonnie Shull
Environmental Scientist
Utah Division of Water Quality
February 23, 2015