Official Draft Public Notice Version: October 30, 2013
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# FACT SHEET STATEMENT OF BASIS
# CAPITOL REEF NATIONAL PARK
# DISCHARGE PERMIT
# UPDES PERMIT NUMBER: UT0025798
# MINOR INDUSTRIAL

## FACILITY CONTACTS

| | |
|---|---|
| Person Name: | Vivien Schuh |
| Position: | Facilities Manager |
| Facility Name: | Capitol Reef National Park |
| Mailing Address: | HC 70 Box 15<br>Torrey, UT 84775 |
| Telephone: | (435) 425-3791 |
| Actual Address: | 52 Scenic Drive<br>Torrey, UT 84775 |

## DESCRIPTION OF FACILITY

Capitol Reef National Park is using a reverse osmosis system to treat well water within the National Park to manage the hardness of water in their campgrounds, visitor's center, and employee housing. The peak treated water production from the system would be approximately 16,000 gallons per day. The well water will be pumped to the reverse osmosis system where it will be treated. Once treated, the water will be chlorinated and pumped to a drinking water storage tank. The reject water from the reverse osmosis system will be pumped to a sedimentation basin, then gravity flow to the Fremont River through a 4 in pipe at latitude 38°16'14" and longitude 111°16'55". The SIC code is 4941: Water Supply.

## SUMMARY OF CHANGES FROM PREVIOUS PERMIT

Capitol Reef National Park has conducted multiple samples and analysis for biological oxygen demand (BOD). The samples were taken to demonstrate that there is no BOD present in the water prior to treatment. As a result, BOD will be removed from the permit, and Capitol Reef will no longer need sample for BOD.

## DISCHARGE

### DESCRIPTION OF DISCHARGE

| Outfall | Description of Discharge Point |
|---|---|
| 001 | Located at latitude 38° 16' 14" and longitude 111° 16' 55". The discharge is through a 4-inch diameter pipe leading from the water treatment plant to the Fremont River. |

### RECEIVING WATERS AND STREAM CLASSIFICATION

The final discharge is to the Fremont River, which is classified as 1C, 2B, 3A, and 4.

Class1C -Protected for domestic purposes with prior treatment by treatment processes as required by the Utah Division of Drinking Water.

Class 2B -Protected for secondary contact recreation such as boating, wading, or similar uses.

Class 3A -Protected for cold water species of game fish and other cold water aquatic life, 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

Limitations on total suspended solids (TSS), pH and based on current Utah Secondary Treatment Standards, *UAC R317-1-3.2*. Limitations for Total Dissolved Solids are based on the discharge from the best available treatment technology that is used, and verified by the Wasteload Analysis as not causing an exceedance of water quality standards. Discharges from the Capitol Reef facility could potentially reach the Colorado River, which places it under the requirements of the Colorado River Basin Salinity Control Forum (CRBSCF). In accordance with the CRBSCF the effluent will be limited to a maximum discharge of 1.0 ton per day or 366 tons per year. The permit limitations are:

| Parameter | Effluent Limitations | | | |
|---|---|---|---|---|
| | 30 - Day Average | Maximum 7 - Day Average | Daily Minimum | Daily Maximum |
| Total Suspended Solids, mg/L | 25 | 35 | NA | NA |
| Total Dissolved Solids, mg/L | NA | NA | NA | 4000 |
| Total Dissolved Solids, tons/day | NA | NA | NA | 1.0 |
| pH, Standard Units | NA | NA | 6.5 | 9.0 |

NA – Not Applicable.

## SELF-MONITORING AND REPORTING REQUIREMENTS

The following self-monitoring requirements are the same as in the previous permit. The permit will require reports to be submitted monthly and quarterly, 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.

Table 2. Self-Monitoring and Reporting Requirements

| Parameter | Frequency | Sample Type | Units |
|---|---|---|---|
| Total Flow | Continuous | Recorder | gpd |
| Total Suspended Solids | Monthly | Composite | mg/L |
| Total Dissolved Solids | Monthly | Grab | mg/L, tons/day |
| pH | Monthly | Grab | SU |

## WASTE LOAD ANALYSIS AND ANTIDEGRADATION REVIEW

Effluent limitations are also derived using a waste load analysis (WLA), which is appended to this statement of basis as ADDENDUM. The WLA incorporates Secondary Treatment Standards, Water Quality Standards, Antidegradation Reviews (ADR), as appropriate and designated uses into a water quality model that projects the effects of discharge concentrations on receiving water quality. Effluent limitations are those that the model demonstrates are sufficient to meet State water quality standards in the receiving waters.

During the UPDES permit development, a WLA and ADR were performed. An ADR Level I review was performed and the conclusion was that an ADR level II review was required, because the receiving water or downstream water is a 1C drinking water source. Capitol Reef prepared a Level II ADR review report addressing all of the points required in R317-2, which was dated October 21, 2013. A copy of the ADR Level II is appended to this document.

## STORM WATER

The facility's SIC code is 4941: Water Supply, there is no bulk storage of any contaminants at the facility. Therefore, a storm water industrial UPDES permit is not required. A storm water re-opener provision is included in the permit should storm water requirements become necessary in the future.

## PRETREATMENT REQUIREMENTS

Although the permittee does not have to develop a State-approved pretreatment program, any discharges to the sanitary sewer are subject to Federal, State and local regulations. Pursuant to *Section 307* of the *Clean Water Act*, the permittee shall comply with all applicable Federal

General Pretreatment Regulations promulgated, found in *40 CFR 403* and the State Pretreatment Requirements found in *UAC R317-8-8*. No discharges from this system to sanitary sewers are planned.

## 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*.

The permittee is classified as a minor industrial facility that will discharge a relatively small volume of effluent when compared to flows of the receiving stream. The receiving stream water quality monitoring data indicate no impairment of the stream. Based on these considerations, there is no reasonable potential for toxicity in the proposed 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.

Drafted by
Matthew Garn
Utah Division of Water Quality
October 24, 2013

## PUBLIC NOTICE

Began:
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