Official Draft Public Notice Version **June 10, 2022 .** 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
RENEWAL PERMIT: DISCHARGE
UPDES PERMIT NUMBER: UT0024911
MINOR INDUSTRIAL

FACILITY CONTACTS

Person Name:	Fadi Al-Tigar
Position:	Plant Manager
Person Name:	Jeremy Speas
Position:	HSE Manager
Phone Number:	(385) 264-2814
Facility Name:	Autoliv ASP, Inc (Promontory Plant)
Mailing and Facility Address:	16700 West Highway 83 Promontory, Utah 84301

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 l.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 contaminates, 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 facility's 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.

DISCHARGE

DESCRIPTION OF DISCHARGE

Autoliv ASP, Inc has not discharged in 25 years, but maintains the permit in case there is excess water that cannot be recycled through the boiler system. If discharge is needed it will be discharged to Blue Creek; West of the Facility.

Outfall	Description of Discharge Point
001	Located at latitude 40°40'30.1"N and longitude 112°26'40.6"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

If a discharge were to occur, the facility would discharge to Blue Creek, which is a Class 2B, 3D, 4 according to *Utah Administrative Code (UAC) R317-2-13*:

Class 2B -- Protected for infrequent primary contact recreation. Also protected for secondary contact recreation where there is a low likelihood of ingestion of water or a low degree of bodily contact with the water. Examples include, but are not limited to, wading, hunting, and fishing.

Class 3D -- Protected for waterfowl, shore birds and other water-oriented wildlife not included in Classes 3A, 3B, or 3C, including the necessary aquatic organisms in their food chain.

Class 4 -- Protected for agricultural uses including irrigation of crops and stock watering.

TMDL REQUIREMENTS/CONCERNS

The facility discharges to Blue Creek. Blue Creek was listed on the 2020 303d list because of the following impairments: Boron, Total Dissolved Solids (TDS), pH, *E. coli* and Selenium. There is not an approved TMDL for Blue Creek for any of these impairments. As a result limits for Total Dissolved Solids and Selenium have been added to the permit.

BASIS FOR EFFLUENT LIMITATIONS

Based on the facility's SIC code 3714, the technological effluent limitations are based on *40 CFR Part 433 - Metal Finishing Point Source Category*. Specifically, *40 CFR § 433.13 Effluent limitations representing the degree of effluent reduction attainable by applying the best practicable control technology currently available (BPT)*. This effluent limitation guideline (ELG), regulates a variety of metals, however, since the facility is primarily dealing with copper oxide, the only metal limit in the permit will be copper. This is based on Best Professional Judgment, as this is the primary metal the facility uses in their process. The ELG will also set the limit for TSS, pH and oil and grease.

Limitations on biochemical oxygen demand (BOD5) are based on current Utah Secondary Treatment Standards, UAC R317-l-3.2. Limitations for dissolved oxygen based on the results of a Wasteload Analysis for this discharge into Blue Creek (Attachment l). It has been determined that this discharge will not cause a violation of water quality standards. An Antidegradation Level II review is not required since the Level I review shows that water quality impacts are minimal, the facility submitted a Level II ADR with their last permit application and has not increased their loads since that time. The permittee is expected to be able to comply with these limitations. The permit limitations are found in Table 1 below:

REASONABLE POTENTIAL ANALYSIS

Since January 1, 2016, DWQ has conducted reasonable potential analysis (RP) on all new and renewal applications received after that date. RP for this permit renewal was conducted following DWQ's September 10, 2015 Reasonable Potential Analysis Guidance (RP Guidance). There are four outcomes defined in the RP Guidance: Outcome A, B, C, or D. These Outcomes provide a frame work for what routine monitoring or effluent limitations are required. A quantitative RP analysis could not be conducted because the facility has not discharged and lacks the required metals data to preform the analysis.

SUMMARY OF CHANGES FROM PREVIOUS PERMIT

The permit was updated to place the facility under the appropriate ELG for their SIC code 3714. This includes a new limit for copper. Based upon the ELG and a rule change in *UAC R-317-3* the limit for Total Suspended Solids has increased from the previous permit.

The ammonia limit was removed from the previous permit because ammonia is not one of the pollutants listed on the ELG for the facility and the facility has no reasonable potential to produce ammonia based on their process.

The sampling of dissolved metals and total toxic organics are being added to this permit to help determine the reasonable potential to discharge these parameters at the next permit renewal.

The permit limitations are:

Parameter	Effluent Limitations *a			
	Maximum Monthly Avg	Maximum Weekly Avg	Daily Minimum	Daily Maximum
Total Flow, MGD	--	--	--	0.03
BOD_5, mg/L	25	35	--	--
Total Suspended Solids, mg/L	31	--	60	--
Dissolved Oxygen, mg/L	--	--	5.0	--
Copper (Dissolved), mg/L	0.426	--	0.229	
WET, Acute Biomonitoring	--	--	--	LC_{50}> 100% effluent RWC (from WLA)
pH, Standard Units	--	--	6.5	9
Oil and Grease, mg/L	26	--	52	--
Selenium, µg/L	--	--	--	66.9
Total Dissolved Solids, mg/L March-October November - February	 3,800 4,700	 -- --	 -- --	 4,900 6,300

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 annually, as applicable, on Discharge Monitoring Report (DMR) forms due 28 days after the end of the monitoring period. Effective January 1, 2017, monitoring results must be submitted using NetDMR unless the permittee has successfully petitioned for an exception. Lab sheets for biomonitoring must be attached to the biomonitoring DMR. Lab sheets for metals and toxic organics must be attached to the DMRs.

Self-Monitoring and Reporting Requirements *a			
Parameter	Frequency	Sample Type	Units
Total Flow *b	Continuous	Recorder	MGD
BOD_5	Monthly	Grab	mg/L
TSS	Monthly	Grab	mg/L
DO	Daily	Grab	mg/L
Copper	Monthly	Grab	mg/L
pH	Daily	Grab	SU
WET – Biomonitoring *c Ceriodaphnia - Acute Fathead Minnows - Acute	 1st & 3rd Quarter 2nd & 4th Quarter	 Composite Composite	 Pass/Fail Pass/Fail
Oil and Grease *d	Monthly	Visual/Grab	mg/L
Selenium	Monthly	Grab	µg/L
Total Dissolved Solids	Monthly	Grab	mg/L
Metals (Dissolved) *e	Quarterly	Grab	mg/L
Organic Toxics *e	Quarterly	Grab	mg/L

*a See Definitions, *Part VIII*, for definition of terms.
*b If the rate of discharge is controlled, the rate and duration of discharge shall be reported.
*c Acute Ceriodaphnia will be tested during the 1st and 3rd quarters and acute fathead minnows will be tested during the 2nd and 4th quarters.
*d Oil & Grease sampled when sheen is present or visible. If no sheen is present or visible, report NA.
*e Quarterly sampling or Metals and Total Toxic Organics will be required without effluent limits to help determine reasonable potential for these parameters at the next permit renewal. The list of Total Toxic Organics can be found in *40 CFR § 413.02 - General definitions.* The following metals shall be monitored for RP:

Metals to be Monitored for RP		
Parameter	Sample Type	Units
Total Arsenic	Grab	mg/L
Total Cadmium	Grab	mg/L
Total Chromium	Grab	mg/L
Total Cyanide	Grab	mg/L
Total Lead	Grab	mg/L
Total Mercury	Grab	mg/L
Total Nickel	Grab	mg/L
Total Silver	Grab	mg/L
Total Zinc	Grab	mg/L

BIOSOLIDS

The State of Utah has adopted the 40 CFR 503 federal regulations for the disposal of sewage sludge (biosolids) by reference. However, this facility does not receive, generate, treat or dispose of biosolids. Therefore 40 CFR 503 does not apply. As a result, there are no specific biosolids requirements in this permit.

STORM WATER

Separate storm water permits may be required based on the types of activities occurring on site.

Permit coverage under the Multi Sector General Permit (MSGP) for Storm Water Discharges from Industrial Activities is required based on the Standard Industrial Classification (SIC) code for the facility and the types of industrial activities occurring. If the facility is not already covered, it has 30 days from when this permit is issued to submit the appropriate Notice of Intent (NOI) for the MSGP or exclusion documentation. Previously storm water discharge requirements and coverage were combined in this individual permit. These have been separated to provide consistency among permittees, electronic reporting for storm water discharge monitoring reports, and increase flexibility to changing site conditions.

Permit coverage under the Construction General Storm Water Permit (CGP) is required for any construction at the facility which disturb an acre or more, or is part of a common plan of development or sale that is an acre or greater. A Notice of Intent (NOI) is required to obtain a construction storm water permit prior to the period of construction.

Information on storm water permit requirements can be found at http://stormwater.utah.gov

PRETREATMENT REQUIREMENTS

Autoliv does not discharge process wastewater to a Publicly Owned Treatment Works (POTW). Any process wastewater that Autoliv may discharge to a POTW, either as a direct discharge or as a hauled waste, is subject to federal, state, and local pretreatment regulations. Pursuant to section 307 of the Clean Water Act, Autoliv shall comply with all applicable federal general pretreatment regulations promulgated, found in 40 CFR 403, the pretreatment requirements found in UAC R317-8-8, and any specific local discharge limitations developed by the POTW accepting the waste.

In addition, in accordance with 40 CFR 403.12(p)(1), Autoliv must notify the POTW, the EPA Regional Waste Management Director, the DWQ Director and the State hazardous waste authorities in writing if Autoliv discharges any substance into a POTW that if otherwise disposed of would be considered a hazardous waste under 40 CFR 261. This notification must include the name of the hazardous waste, the EPA hazardous waste number and the type of discharge (continuous or batch).

BIOMONITORING REQUIREMENTS

A nationwide effort to control toxic discharges where effluent toxicity is an existing or potential concern is regulated in accordance with the Utah Pollutant Discharge Elimination System Permit and Enforcement Guidance Document for Whole Effluent Toxicity Control (biomonitoring), dated February 2018. 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. Since the facility was new at the last permit issuance, a year of quarterly WET testing was required in the previous permit.

However, since the facility did not discharge during the previous permit cycle, quarterly monitoring for acute WET will again 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. The permit will also 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
Lonnie Shull, Discharge, Biomonitoring
Jennifer Robinson, Pretreatment
Carl Adams, Storm Water
Chris Shope, Wasteload Analysis
Utah Division of Water Quality, (801) 536-4300

PUBLIC NOTICE

Began: Month Day, Year
Ended: Month Day, Year

Comments will be received at: 195 North 1950 West
PO Box 144870
Salt Lake City, UT 84114-4870

The Public Noticed of the draft permit was published in the (NEWSPAPER OF RECORD FOR AREA).

During the public comment period provided under R317-8-6.5, any interested person may submit written comments on the draft permit and may request a public hearing, if no hearing has already been scheduled. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. All comments will be considered in making the final decision and shall be answered as provided in R317-8-6.12.

ADDENDUM TO FSSOB

During finalization of the Permit certain dates, spelling edits and minor language corrections were completed. Due to the nature of these changes they were not considered Major and the permit is not required to be re Public Noticed.

RESPONSIVENESS SUMMARY

(Explain any comments received and response sent. Actual letters can be referenced, but not required to be included).

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ATTACHMENT 1

Wasteload Analysis

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