

**FACT SHEET AND STATEMENT OF BASIS  
BLUE SKY RANCH AND RESORT  
RENEWAL PERMIT: DISCHARGE, BIOSOLIDS & STORM WATER  
UPDES PERMIT NUMBER: UT0025763  
UPDES BIOSOLIDS PERMIT NUMBER: UTL-025763  
MINOR INDUSTRIAL**

**FACILITY CONTACTS**

Person Name: Mike Gardner  
Position: General Manager  
Phone Number: (435) 252-0662

Person Name: Brandon Mason  
Position: Plant Manager  
Phone Number: 435-336-2648

Facility Name: Blue Sky Ranch and Resort  
Mailing and Facility Address: 175 East 400 South, Suite 402  
Salt Lake City, Utah 84111  
Telephone: (435) 336-2648  
Actual Address: 2071 State Road 32  
Wanship, Utah 84017

**DESCRIPTION OF FACILITY**

The Blue Sky Ranch and Resort (BSRR) is a 3,000 acre ranch owned and operated by Philips Edison and Company that will be used as a luxury conference center resort and will include lodging, restaurant, and outdoor recreation and fitness facilities located in Wanship, Utah. The property will also include a whiskey distillery operated under the name High West Distillery. Construction of the facilities was expected to be completed in 2008, then in the fall of 2013 but due to various reasons, was delayed until the summer 2019.

The facilities will accommodate 340 guests and 40 employees. A wastewater treatment plant was constructed to treat all of the wastewater generated from the resort as well as the batch process water from the distillery. The treatment plant is designed to treat 39,000 gallons per day and includes a Sequencing Batch Reactor (SBR) with tertiary filtration and UV disinfection. After disinfection, the water will be discharged via outfall 001 with latitude approximately 40°48'28" and longitude -111°26'52" to Alexander Creek which flows to Silver Creek, then to the Weber River and ultimately to Echo Reservoir.

**SUMMARY OF CHANGES FROM PREVIOUS PERMIT**

Water Quality adopted UAC R317-1-3.3, Technology-Based Phosphorus Effluent Limit (TBPEL) Rule in 2014. The TBPEL rule as it relates to "non-lagoon" wastewater treatment plants establishes new

regulations for the discharge of phosphorus to surface waters and is self-implementing. The TBPEL rule includes the following requirements for non-lagoon wastewater treatment plants:

The TBPEL requires that all non-lagoon wastewater treatment works discharging wastewater to surface waters of the state shall provide treatment processes which will produce effluent less than or equal to an annual mean of 1.0 mg/L for total phosphorus. This TBPEL shall be achieved by January 1, 2020.

The TBPEL discharging treatment works are required to implement, at a minimum, monthly monitoring of the following beginning July 1, 2015:

- R317-1-3.3, D, 1 Influent for total phosphorus (as P) and total Kjeldahl nitrogen (as N) concentrations;
- R317-1-3.3, D, 2. Effluent for total phosphorus and orthophosphate (as P), ammonia, nitrate-nitrite and total Kjeldahl nitrogen (an N);

In R317-1-3.3, D, 3 the rule states that all monitoring shall be based on 24-hour composite samples by use of an automatic sampler or a minimum of four grab samples collected a minimum of two hours apart.

A variance from a TBPEL based on Section R317-1-3.3.C is granted, because the TMDL has allocated a total phosphorus load to this treatment works. All monitoring shall be conducted based on the requirements of the facility's UPDES permit.

## **DISCHARGE**

### **DESCRIPTION OF DISCHARGE**

Blue Sky Ranch and Resort has been reporting self-monitoring results on Discharge Monitoring Reports on a monthly basis.

<u>Outfall</u>	<u>Description of Discharge Point</u>
001	Located approximately at latitude 40°48'28" and longitude 111°26'52". The discharge is to Alexander Creek then hence to Silver Creek.

### **RECEIVING WATERS AND STREAM CLASSIFICATION**

The final discharge is to Alexander Creek which is classified as 1C, 2B, 3A, and 4 (in that segment) according to *Utah Administrative Code (UAC) R317-2-6 and R317-2-13.4*:

- Class 1C -Protected for domestic purposes with prior treatment by treatment processes as required by the Utah Division of Drinking Water.
- 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 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), biochemical oxygen demand (BOD<sub>5</sub>), E. coli, pH and percent removal for BOD<sub>5</sub> and TSS are based on current Utah Secondary Treatment Standards, *UAC R317-1-3.2*. The limits for total phosphorous, total ammonia and total nitrogen are based on the Rockport Reservoir and Echo Reservoir TMDL. The oil and grease effluent limit is based on best professional judgment (BPJ). The limits for total dissolved solids and dissolved oxygen are based on the wasteload analysis.

**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

Based on the RP analysis, no parameters exceeded the most stringent chronic water quality standard or were determined to have a reasonable potential to exceed the standard.

The permit limitations are:

Parameter	Effluent Limitations				
	Monthly Average	Weekly Average	Daily Minimum	Daily Maximum	Load Limit
Total Flow, MGD	0.039	--	--	--	--
BOD <sub>5</sub> , mg/L	25	35	--	--	--
BOD <sub>5</sub> Min. % Removal	85	--	--	--	--
TSS, mg/L	25	35	--	--	--
TSS Min % Removal	85	--	--	--	--
E. coli, No./100mL	126	157	--	--	--
TDS, mg/L	--	--	--	1200	--
Total Ammonia, as N, mg/L	1.0	--	--	--	--
Total Phosphorus, (kg)					
Summer: April-Sept.	--	--	--	--	21
Annual Limit	--	--	--	--	42
Total Nitrogen, (kg)					
Summer: April-Sept.	--	--	--	--	115
Annual Limit	--	--	--	--	208
Dissolved Oxygen, mg/L	--	--	5.0	--	--
Oil & Grease, mg/L	--	--	--	10.0	--
pH, Standard Units	--	--	6.5	9.0	--

**SELF-MONITORING AND REPORTING REQUIREMENTS**

The following self-monitoring requirements are the same as in the previous permit with the addition of yearly metal sampling. 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/, c/	Continuous	Recorder	MGD
BOD <sub>5</sub> , Influent d/	Monthly	Composite	mg/L
Effluent	Monthly	Composite	mg/L
TSS, Influent d/	Monthly	Composite	mg/L
Effluent	Monthly	Composite	mg/L
<i>E. coli</i>	Monthly	Grab	No./100mL
pH	Monthly	Grab	SU
Total Ammonia (as N)	Monthly	Grab	mg/L
Total Nitrogen	Monthly	Grab	mg/L
DO	Monthly	Grab	mg/L
WET, Acute Biomonitoring	Quarterly	Composite	Pass/Fail
Oil & Grease e/	When Observed	Sheen Grab	mg/L
Orthophosphate, (as P) Effluent	Monthly	Composite	mg/L
Phosphorus, Total, Influent	Monthly	Composite	mg/L
Effluent	Monthly	Composite	mg/L
Total Kjeldahl Nitrogen, TKN (as N) Influent	Monthly	Composite	mg/L
Effluent	Monthly	Composite	mg/L
Nitrate, NO <sub>3</sub>	Monthly	Composite	mg/L
Nitrite, NO <sub>2</sub>	Monthly	Composite	mg/L
TDS	Monthly	Composite	mg/L
Metals	Yearly	Grab/Composite	mg/L
Annual Certification Phosphorous offset has been maintained e/	Yearly March 31	--	--

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

b/ Flow measurements of influent/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.

d/ In addition to monitoring the final discharge, influent samples shall be taken and analyzed for this constituent at the same frequency as required for this constituent in the discharge.

e/ Sample only if sheen is visible.

f/ Phosphorus Abatement Certification.

Within 30 days of the effective date of this permit, BSRR shall submit certification that the approved phosphorous abatement program has been implemented.

Blue Sky Ranch and Resort shall also certify *annually* that the phosphorous offset has been maintained. This certification shall be submitted in the calendar year by March 31<sup>st</sup> and will be required annually until the expiration date of this permit.

**BIOSOLIDS**

For clarification purposes, sewage sludge is considered solids, until treatment or testing shows that the solids are safe, and meet beneficial use standards. After the solids are tested or treated, the solids are then known as biosolids. Class A biosolids may be used for high public contact sites, such as home lawns and gardens, parks, or playing fields, etc. Class B biosolids may be used for low public contact sites, such as farms, rangeland, or reclamation sites, etc.

**DESCRIPTION OF TREATMENT AND DISPOSAL**

The solids wasted from the Blue Sky Ranch and Resort (BSRR) treatment system are dewatered by in a small belt press and loaded into a dumpster. The solids are then transferred to the Summit County Three Mile Canyon Landfill for disposal. The volume of the dumpster is two cubic yards (2yd<sup>3</sup>) and they transferred seven (7) loads at the landfill.

**SELF-MONITORING REQUIREMENTS**

Under *40 CFR 503.16(a)(1)*, the self-monitoring requirements are based upon the amount of biosolids disposed per year and shall be monitored according to the chart below.

Minimum Frequency of Monitoring (40 CFR Part 503.16, 503.26. and 503.46)		
Amount of Biosolids Disposed Per Year		Monitoring Frequency
Dry US Tons	Dry Metric Tons	Per Year or Batch
> 0 to < 320	> 0 to < 290	Once Per Year or Batch
> 320 to < 1650	> 290 to < 1,500	Once a Quarter or Four Times
> 1,650 to < 16,500	> 1,500 to < 15,000	Bi-Monthly or Six Times
> 16,500	> 15,000	Monthly or Twelve Times

Accordingly, the volume of the dumpster BSRR dewater solids into is two cubic yards (2 yd<sup>3</sup>) and they transferred seven (7) loads at the landfill, or a maximum of 28 yd<sup>3</sup>. This volume is consistent with a biosolids mass between 0 and 290 Dry Metric Tons (DMT) indicating they shall monitor biosolids at least once a year.

Landfill Monitoring

Under *40 CFR 258*, the landfill monitoring requirements include a paint filter test. If the biosolids do not pass a paint filter test, the biosolids cannot be disposed in the sanitary landfill (*40 CFR 258.28(c)(1)*).

**BIOSOLIDS LIMITATIONS**

Heavy Metals

Class A Biosolids for Home Lawn and Garden Use

The intent of the heavy metals regulations of Table 3, *40 CFR 503.13* is to ensure the heavy metals do not build up in the soil in home lawn and gardens to the point where the heavy metals become phytotoxic to plants. The permittee will be required to produce an information sheet (see *Part III. C.* of the permit) to made available to all people who are receiving and land applying Class A biosolids to their lawns and gardens. If the instructions of the information sheet are followed to any reasonable degree, the Class A biosolids will be able to be land applied year after year, to the same lawns and garden plots without any deleterious effects to the environment. The information sheet must be provided to the public, because the permittee is not required, nor able to track the quantity of Class A biosolids that are land applied to home lawns and gardens.

Class A Requirements With Regards to Heavy Metals

If the biosolids are to be applied to a lawn or home garden, the biosolids shall not exceed the maximum heavy metals in Table 1 and the monthly average pollutant concentrations in Table 3 (see Table 1 and Table 3 below). If the biosolids do not meet these requirements, the biosolids cannot be sold or given away for applications to home lawns and gardens.

Class B Requirements for Agriculture and Reclamation Sites

The intent of the heavy metals regulations of Tables 1, 2 and 3, of *40 CFR 503.13* is to ensure that heavy metals do not build up in the soil at farms, forest land, and land reclamation sites to the point where the heavy metals become phytotoxic to plants. The permittee will be required to produce an information sheet (see *Part III. C.* of the permit) to be handed out to all people who are receiving and land applying Class B biosolids to farms, ranches, and land reclamation sites (if biosolids are only applied to land owned by the permittee, the information sheet requirements are waived). If the biosolids are land applied according to the regulations of *40 CFR 503.13*, to any reasonable degree, the Class B biosolids will be able to be land applied year after year, to the same farms, ranches, and land reclamation sites without any deleterious effects to the environment.

Class B Requirements With Regards to Heavy Metals

If the biosolids are to be land applied to agricultural land, forest land, a public contact site or a reclamation site it must meet at all times:

The maximum heavy metals listed in *40 CFR Part 503.13(b) Table 1* and the heavy metals loading rates in *40 CFR Part 503.13(b) Table 2*; or

The maximum heavy metals in *40 CFR Part 503.13(b) Table 1* and the monthly heavy metals concentrations in *40 CFR Part 503.13(b) Table 3*.

Tables 1, 2, and 3 of Heavy Metal Limitations

Pollutant Limits, (40 CFR Part 503.13(b)) Dry Mass Basis				
Heavy Metals	Table 1	Table 2	Table 3	Table 4
	Ceiling Conc. Limits, (mg/kg)	CPLR <sup>1</sup> , (mg/ha)	Pollutant Conc. Limits, (mg/kg)	APLR <sup>2</sup> , (mg/ha-yr)
Total Arsenic	75	41	41	41
Total Cadmium	85	39	39	39
Total Copper	4300	1500	1500	1500
Total Lead	840	300	300	300
Total Mercury	57	17	17	17
Total Molybdenum	75	N/A	N/A	N/A
Total Nickel	420	420	420	420
Total Selenium	100	100	100	100
Total Zinc	7500	2800	2800	2800

Any violation of these limitations shall be reported in accordance with the requirements of Part III.F.1. of the permit .If the biosolids do not meet these requirements they cannot be land applied.

Pathogens

The Pathogen Control class listed in the table below must be met;

Pathogen Control Class	
Class A	Class B
B Salmonella species –less than three (3) MPN <sup>3</sup> per four (4) grams total solids (or less than 1,000 fecal coliforms per gram total solids). or	Fecal Coliforms – less than 2,000,000 MPN per gram total solids. or
Fecal Coliforms – less than 1,000 MPN per gram total solids.	Fecal Coliforms – less than 2,000,000 CFU <sup>4</sup> per gram total solids.
And - Enteric viruses –less than one (1) MPN (or plaque forming unit) per four (4) grams total solids	
And - Viable helminth ova –less than one (1) MPN per four (4) grams total solids	

Class A Requirements for Home Lawn and Garden Use

If biosolids are land applied to home lawns and gardens, the biosolids need to be treated by a specific process to further reduce pathogens (PFRP), and meet a microbiological limit of less than less than 3 most probable number (MPN) of *Salmonella* per 4 grams of total solids (or less than 1,000 most probable number (MPN/g) of fecal coliform per gram of total solids) to be considered Class A biosolids.

The BSRR does not intend to give away biosolids for land application on home lawns or gardens, and will therefore not be required to meet PFRP. If the permittee changes their intentions in the future, they will

<sup>1</sup> CPLR -- Cumulative Pollutant Loading Rate

<sup>2</sup> APLR – Annual Pollutant Loading Rate

<sup>3</sup> MPN – Most Probable Number

<sup>4</sup> CFU – Colony Forming Units

need to meet a specific PFRP, the Director and the EPA must be informed at least thirty (30) days prior to its use. This change may be made without additional public notice

The practice of sale or giveaway to the public is an acceptable use of biosolids of this quality as long as the biosolids continue to meet Class A standards with respect to pathogens. If the biosolids do not meet Class A pathogen standards the biosolids cannot be sold or given away to the public, and the permittee will need find another method of beneficial use or disposal.

#### Pathogens Class B

If biosolids are to be land applied for agriculture or land reclamation the solids need to be treated by a specific process to significantly reduce pathogens (PSRP). The BSRR does not intend to land apply the biosolids and will therefore not be required to meet PSRP. If the permittee intends to land apply in the future, they will need to meet a specific PSRP, the Director and the EPA must be informed at least thirty (30) days prior to its use. This change may be made without additional public notice.

#### Vector Attraction Reduction (VAR)

If the biosolids are land applied BSRR will be required to meet VAR through the use of a method of listed under *40 CFR 503.33*. The BSRR does not intend to land apply the biosolids and will therefore not be required to meet VAR

If the permittee intends to use another one of the listed alternatives in *40 CFR 503.33*, the Director and the EPA must be informed at least thirty (30) days prior to its use. This change may be made without additional public notice. If the biosolids do not meet a method of VAR, the biosolids cannot be land applied.

#### Landfill Monitoring

Under *40 CFR 258*, the landfill monitoring requirements include a paint filter test to determine if the biosolids exhibit free liquid. If the biosolids do not pass a paint filter test, the biosolids cannot be disposed in the sanitary landfill (*40 CFR 258.28(c)(1)*).

#### Record Keeping

The record keeping requirements from *40 CFR 503.17* are included under *Part III.G.* of the permit. The amount of time the records must be maintained are dependent on the quality of the biosolids in regards to the metals concentrations. If the biosolids continue to meet the metals limits of *Table 3 of 40 CFR 503.13*, and are sold or given away the records must be retained for a minimum of five years. If the biosolids are disposed in a landfill the records must retained for a minimum of five years.

#### Reporting

BSRR must report annually as required in *40 CFR 503.18*. This report is to include the results of all monitoring performed in accordance with *Part III.B* of the permit, information on management practices, biosolids treatment, and certifications. This report is due no later than February 19 of each year. Each report is for the previous calendar year.

### **MONITORING DATA**

#### Metals Monitoring Data

The BSRR was required to sample for metals at least once a year, and has done so. All biosolids produced and disposed of met *Table 3 of 40 CFR 503.13*, therefore the BSRR biosolids qualify as EQ with regards to metals. The monitoring data is below.

BSRR Metals Monitoring Data:



Blue Sky Ranch and Resort Metals Monitoring Data			
Parameter	Table 3, mg/kg (Exceptional Quality)	Average, mg/kg	Maximum, mg/kg
Arsenic	41.0	4.52	4.95
Cadmium	39.0	0.59	0.90
Copper	1,500.0	498	662
Lead	300.0	6.22	9.45
Mercury	17.0	0.10	0.1
Molybdenum	75.0	5.10	6.8
Nickel	400.0	16.7	20.9
Selenium	36.0	5.86	9.5
Zinc	2,800.0	244.5	359

Pathogen Monitoring Data

The BSRR has sampled for required to monitor the composted biosolids for pathogens at least one time per year. The monitoring data is below.

BSRR Fecal Coliform Monitoring Data:

Fecal Coliforms–MPN per Gram Total Solids	
Geometric Mean	Maximum
7684	8200

**STORM WATER**

**STORMWATER REQUIREMENTS**

Waste water treatment facilities are required to comply with storm water permit requirements if they meet one or both of the following criteria:

1. wastewater treatment facilities with a design flow of 1.0 MGD or greater, and/or,
2. wastewater treatment facilities with an approved pretreatment program as described in *40CFR Part 403*.

The Blue Sky Ranch and Resort does not meet one of the above criteria; therefore this permit does not include storm water provisions.

**PRETREATMENT REQUIREMENTS**

Any wastewaters discharged to the sanitary sewer, either as a direct discharge or as a hauled waste, are subject to Federal, State and local pretreatment regulations. Pursuant to Section 307 of *The Water Quality Act of 1987*, the permittee shall comply with all applicable federal General Pretreatment Regulations promulgated at *40 CFR 403*, the State Pretreatment Requirements at *UAC R317-8-8*, and any specific local discharge limitations developed by the Publicly Owned Treatment Works (POTW) accepting the wastewaters.

In addition, in accordance with *40 CFR 403.12(p)(1)*, the permittee must notify the POTW, the EPA Regional Waste Management Director, and the State hazardous waste authorities, in writing, if they

discharge any substance into a POTW which 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 *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*.

Since the permittee will be a new minor industrial discharger utilizing SBR technology, with no previous discharge to evaluate, the permit will require whole effluent toxicity (WET) biomonitoring testing. Based upon these facts and Best Professional Judgment of the permitting authority, the permittee will be required to conduct composite quarterly acute WET testing with alternating species and no acute WET limit requirements.

A review of the receiving stream's current water quality status indicate no further impairment of the stream other than phosphorous and dissolved oxygen, which are already included as monitoring requirements with the appropriate limitations as previously described. Therefore, there will be no numerical toxicity limitation and no chronic testing required at this time. The permit will however contain a toxicity limitation re-opener provision. This provision allows for modification of the permit to include WET limitations and/or increased WET monitoring, should additional information indicate the presence of toxicity in the discharge. The permit will contain the standard requirements for accelerated testing upon failure of a WET test as well as provisions for a Preliminary Toxicity Investigation and/or a Toxicity Reduction Evaluation as appropriate.

### **TOTAL MAXIMUM DAILY LOAD REQUIREMENTS**

BSRR discharges into the Alexander Creek and ultimately to Echo Reservoir. Echo Reservoir is 303(d) listed for total phosphorus and dissolved oxygen. A Total Maximum Daily Load (TMDL) has been drafted for Echo Reservoir that restricts the release of phosphorus into the watershed. In the draft TMDL, BSRR has been given an allocation of 15 kg/season total phosphorus and 148 kg/season total nitrogen (season is April 1<sup>st</sup> through September 30<sup>th</sup>). The approved phosphorus abatement project to offset the load generated by BSRR is to remove cattle from the watershed that formerly grazed on the land where the BSRR will be constructed. The removal of cattle from the watershed will reduce the amount of total phosphorus being discharged to the lake by a factor of 10 which is more than double what the Division of Water Quality requires. As indicated by an inspection dated January 18, 2018 by DWQ Surface Water and Watershed Coordinator, that in order to honor the agreement to reduce loads from cattle the landowner needs to fence the animals out of the stream channel, although a hardened stream crossing may be appropriate for the horses. Off-stream watering should be available for the cattle and horses. A management plan would be helpful for local landowners to help keep manure out of the stream, and funds are available through the Nonpoint Source/§319 grant program for off-stream watering systems. As part of its UPDES permit, BSRR will be required to complete and submit an annual certification that the offset has been maintained.

A TMDL is in place on Silver Creek for Cadmium and Zinc. However, it will not impact this facility due to the nature of the discharge quality.

**PERMIT DURATION**

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

Drafted by  
Kelsey Christiansen, Discharge  
Jennifer Robinson, Pretreatment  
Lisa Stevens, Storm Water  
Dan Griffon, Reasonable Potential Analysis  
Dave Wham, 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 Notice 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**

*Industrial Waste Survey*

PVNDraft

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# Industrial Pretreatment Wastewater Survey



Do you periodically experience any of the following treatment works problems:

- foam, floaties or unusual colors
- plugged collection lines caused by grease, sand, flour, etc.
- discharging excessive suspended solids, even in the winter
- smells unusually bad
- waste treatment facility doesn't seem to be treating the waste right

Perhaps the solution to a problem like one of these may lie in investigating the types and amounts of wastewater entering the sewer system from industrial users.

An industrial user (IU) is defined as a non-domestic user discharging to the waste treatment facility which meets any of the following criteria:

1. **has a lot of process wastewater (5% of the flow at the waste treatment facility or more than 25,000 gallons per work day.)**

Examples: Food processor, dairy, slaughterhouse, industrial laundry.

2. **is subject to Federal Categorical Pretreatment Standards;**

Examples: metal plating, cleaning or coating of metals, bluing of metals, aluminum extruding, circuit board manufacturing, tanning animal skins, pesticide formulating or packaging, and pharmaceutical manufacturing or packaging,

3. **is a concern to the POTW.**

Examples: septage hauler, restaurant and food service, car wash, hospital, photo lab, carpet cleaner, commercial laundry.

All users of the water treatment facility are **prohibited** from making the following types of discharges:

1. A discharge which creates a fire or explosion hazard in the collection system.
2. A discharge which creates toxic gases, vapor or fumes in the collection system.
3. A discharge of solids or thick liquids which creates flow obstructions in the collection system.
4. An acidic discharge (low pH) which causes corrosive damage to the collection system.
5. Petroleum oil, non-biodegradable cutting oil, or products of mineral oil origin in amounts that will cause problems in the collection system or at the waste treatment facility.
6. Waste haulers are prohibited from discharging without permission. (No midnight dumping!)

When the solution to a sewer system problem may be found by investigating the types and amounts of wastewater entering the sewer system discharged from IUs, it's appropriate to conduct an Industrial Waste Survey.

## An Industrial Waste Survey consists of:

### Step 1: Identify Industrial Users

Make a list of all the commercial and industrial sewer connections.

Sources for the list:

business license, building permits, water and wastewater billing, Chamber of Commerce, newspaper, telephone book, yellow pages.

Split the list into two groups:

domestic wastewater only--no further information needed  
everyone else (IUs)

### Step 2: Preliminary Inspection

Go visit each IU identified on the "everybody else" list.

Fill out the **Preliminary Inspection Form** during the site visit.

### Step 3: Informing the State

Please fax or send a copy of the Preliminary inspection form (both sides) to:

**Jennifer Robinson**  
Division of Water Quality  
195 North 1950 West  
PO Box 144870  
Salt Lake City, UT 84114-4870

Phone: (801) 536-4383  
Fax: (801) 536-4301  
E-mail: [jenrobinson@utah.gov](mailto:jenrobinson@utah.gov)



**PRELIMINARY INSPECTION FORM**

INSPECTION DATE \_\_\_ / \_\_\_ /

Name of Business \_\_\_\_\_ Person Contacted \_\_\_\_\_  
Address \_\_\_\_\_ Phone Number \_\_\_\_\_

Description of Business \_\_\_\_\_

Principal product or service: \_\_\_\_\_

Raw Materials used: \_\_\_\_\_

Production process is:  Batch  Continuous  Both

Is production subject to seasonal variation?  yes  no

If yes, briefly describe seasonal production cycle.

This facility generates the following types of wastes (check all that apply):

- |  |  |
|--|--|
| 1. <input type="checkbox"/> Domestic wastes              | (Restrooms, employee showers, etc.)                    |
| 2. <input type="checkbox"/> Cooling water, non-contact   | 3. <input type="checkbox"/> Boiler/Tower blow-down     |
| 4. <input type="checkbox"/> Cooling water, contact       | 5. <input type="checkbox"/> Process                    |
| 6. <input type="checkbox"/> Equipment/Facility wash-down | 7. <input type="checkbox"/> Air Pollution Control Unit |
| 8. <input type="checkbox"/> Storm water runoff to sewer  | 9. <input type="checkbox"/> Other describe             |

Wastes are discharged to (check all that apply):

- |   |                                       |
|---|---------------------------------------|
| <input type="checkbox"/> Sanitary sewer   | <input type="checkbox"/> Storm sewer  |
| <input type="checkbox"/> Surface water    | <input type="checkbox"/> Ground water |
| <input type="checkbox"/> Waste haulers    | <input type="checkbox"/> Evaporation  |
| <input type="checkbox"/> Other (describe) |                                       |

Name of waste hauler(s), if used

Is a grease trap installed? Yes No

Is it operational? Yes No

Does the business discharge a lot of process wastewater?

- More than 5% of the flow to the waste treatment facility? Yes No
- More than 25,000 gallons per work day? Yes No

Does the business do any of the following:

- |   |  |
|---|--|
| <input type="checkbox"/> Adhesives                                    | <input type="checkbox"/> Car Wash                  |
| <input type="checkbox"/> Aluminum Forming                             | <input type="checkbox"/> Carpet Cleaner            |
| <input type="checkbox"/> Battery Manufacturing                        | <input type="checkbox"/> Dairy                     |
| <input type="checkbox"/> Copper Forming                               | <input type="checkbox"/> Food Processor            |
| <input type="checkbox"/> Electric & Electronic Components             | <input type="checkbox"/> Hospital                  |
| <input type="checkbox"/> Explosives Manufacturing                     | <input type="checkbox"/> Laundries                 |
| <input type="checkbox"/> Foundries                                    | <input type="checkbox"/> Photo Lab                 |
| <input type="checkbox"/> Inorganic Chemicals Mfg. or Packaging        | <input type="checkbox"/> Restaurant & Food Service |
| <input type="checkbox"/> Industrial Porcelain Ceramic Manufacturing   | <input type="checkbox"/> Septage Hauler            |
| <input type="checkbox"/> Iron & Steel                                 | <input type="checkbox"/> Slaughter House           |
| <input type="checkbox"/> Metal Finishing, Coating or Cleaning         |  |
| <input type="checkbox"/> Mining                                       |  |
| <input type="checkbox"/> Nonferrous Metals Manufacturing              |  |
| <input type="checkbox"/> Organic Chemicals Manufacturing or Packaging |  |
| <input type="checkbox"/> Paint & Ink Manufacturing                    |  |
| <input type="checkbox"/> Pesticides Formulating or Packaging          |  |
| <input type="checkbox"/> Petroleum Refining                           |  |
| <input type="checkbox"/> Pharmaceuticals Manufacturing or Packaging   |  |
| <input type="checkbox"/> Plastics Manufacturing                       |  |
| <input type="checkbox"/> Rubber Manufacturing                         |  |
| <input type="checkbox"/> Soaps & Detergents Manufacturing             |  |
| <input type="checkbox"/> Steam Electric Generation                    |  |
| <input type="checkbox"/> Tanning Animal Skins                         |  |
| <input type="checkbox"/> Textile Mills                                |  |

Are any process changes or expansions planned during the next three years? Yes No  
If yes, attach a separate sheet to this form describing the nature of planned changes or expansions.

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Inspector

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Waste Treatment Facility

Please send a copy of the preliminary inspection form (both sides) to:

Jennifer Robinson  
Division of Water Quality  
PO Box 144870  
Salt Lake City, Utah 84114-4870

Phone: (801) 536-4383  
Fax: (801) 536-4301  
E-Mail: [jenrobinson@utah.gov](mailto:jenrobinson@utah.gov)

	<b>Industrial User</b>	<b>Jurisdiction</b>	<b>SIC Codes</b>	<b>Categorical Standard Number</b>	<b>Total Average Process Flow (gpd)</b>	<b>Total Average Facility Flow (gpd)</b>	<b>Facility Description</b>
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							

**ATTACHMENT 2**

*Wasteload Analysis*

PND Draft

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**ATTACHMENT 3**

*Reasonable Potential Analysis*

PND Draft

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## REASONABLE POTENTIAL ANALYSIS

Water Quality has worked to improve our reasonable potential analysis (RP) for the inclusion of limits for parameters in the permit by using an EPA provided model. As a result of the model, more parameters may be included in the renewal permit. A Copy of the Reasonable Potential Analysis Guidance (RP Guide) is available at water Quality. There are four outcomes for the RP Analysis<sup>5</sup>. They are;

- Outcome A: A new effluent limitation will be placed in the permit.
- Outcome B: No new effluent limitation. Routine monitoring requirements will be placed or increased from what they are in the permit,
- Outcome C: No new effluent limitation. Routine monitoring requirements maintained as they are in the permit,
- Outcome D: No limitation or routine monitoring requirements are in the permit.

Initial screening for effluent values that were submitted through the discharge monitoring reports showed that a closer look at the parameters was not required at this time. The facility currently is not required to monitor for heavy metals in the effluent due to the volume of the discharge and nature of the contributing sources for the wastewater, and the effluent limits associated with the permit are related to either current Utah Secondary Treatment Standards, UAC r. 317-1-3.2, or an approved phosphorus abatement project to create a zero net phosphorus discharge to the watershed. For this reason there will be no changes to the monitoring conditions or effluent limits as a result of the RP.

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<sup>5</sup> See Reasonable Potential Analysis Guidance for definitions of terms