Utah Division of Water Quality
Statement of Basis
ADDENDUM
Wasteload Analysis and Antidegradation Level I Review

Date: **July 10, 2018**

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Standards and Technical Services

Facility: **Ephraim WW Lagoons**
UPDES No. UT 0025984

Receiving water: **Ditch => San Pitch River**

This addendum summarizes the wasteload analysis that was performed to determine water quality based effluent limits (WQBEL) for this discharge. Wasteload analyses are performed to determine point source effluent limitations necessary to maintain designated beneficial uses by evaluating projected effects of discharge concentrations on in-stream water quality. The wasteload analysis also takes into account downstream designated uses (UAC R317-2-8). Projected concentrations are compared to numeric water quality standards to determine acceptability. The numeric criteria in this wasteload analysis may be modified by narrative criteria and other conditions determined by staff of the Division of Water Quality.

Discharge

001 Lagoon discharge 1.94 MGD (3 cfs)

Receiving Water

Ephraim City's Lagoons discharge into a ditch that runs for approximately one mile before reaching the San Pitch River. As per R317-2-13.6(a), the designated beneficial uses of San Pitch River and tributaries, from confluence with Sevier River to Highway U-132 crossing (with tributary exceptions) are 2B, 3C, 3D, 4.

- *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 3C - Protected for nongame fish and other aquatic life, including the necessary aquatic organisms in their food chain.*

- *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.*

Typically, the critical flow for the wasteload analysis is considered the lowest stream flow for seven consecutive days with a ten year return frequency (7Q10). Due to a lack of flow records, the 20th percentile of available flow measurements from DWQ Monitoring Station 4946450, *San Pitch River W of Manti AB Gunnison Res at CR Xing*, was calculated for the period 1996-2016 (December-February) to approximate the 7Q10 low flow condition.

The calculated critical low flow condition is 6.9 cfs.

The receiving water quality was characterized based on samples collected from the same station and season. Applicable Water Quality Standards are presented in the WLA Addendum.

TMDL

According to the Utah's 2016 303(d) Water Quality Assessment, the assessment unit for this section of the San Pitch River (UT16030004-005) was listed as impaired for E. coli (class 2B use), total ammonia (class 3C and 3D uses) and total dissolved solids (class 4 use).

A TMDL was completed for total dissolved solids (TDS) on the Middle San Pitch River (HUC #16030004) on November 18th 2003 (UDWQ 2003). The TMDL identified a critical season of March 1 - September 30 where the loading capacity was exceeded and load limitations apply. As a result, Ephraim's discharge can only be allowed during the non-critical season (October-February.

The ammonia listing was based on samples collected at DEQ monitoring station #4946980, *San Pitch R. at Bridge BL Moroni WWTP* which is located at the top of the assessment unit. No ammonia impairments are noted at any of the 5 downstream DWQ monitoring stations. As a result, available assimilative capacity was assumed.

Mixing Zone

The maximum allowable mixing zone is 15 minutes of travel time for acute conditions, not to exceed 50% of stream width, and for chronic conditions, per UAC R317-2-5. Water quality standards must be met at the end of the mixing zone. The mixing zone model showed complete mixing within 2,500 feet for chronic conditions. Acute limits were calculated using 50% of the seasonal critical low flow.

Parameters of Concern

The potential parameters of concern identified for the discharge were TDS and ammonia as determined by the impairment status of the receiving water and review of the previous permit.

WET Limits

The percent of effluent in the receiving water in a fully mixed condition, and acute and chronic dilution in a not fully mixed condition are calculated in the WLA in order to generate WET

limits. The LC_{50} (lethal concentration, 50%) percent effluent for acute toxicity and the IC_{25} (inhibition concentration, 25%) percent effluent for chronic toxicity, as determined by the WET test, needs to be below the WET limits, as determined by the WLA. The WET limit for LC_{50} is typically 100% effluent and does not need to be determined by the WLA.

IC25 WET limits for Outfall 001 30.3% effluent.

Wasteload Allocation Methods

Effluent limits were determined for conservative constituents using a simple mass balance mixing analysis (UDWQ 2012). The mass balance analysis is summarized in the Wasteload Addendum.

The water quality standard for chronic ammonia toxicity is dependent on temperature and pH, and the water quality standard for acute ammonia toxicity is dependent on pH. The AMMTOX Model developed by University of Colorado and adapted by Utah DWQ and EPA Region VIII was used to determine ammonia effluent limits (Lewis et al. 2002). The analysis is summarized in the Wasteload Addendum.

Models and supporting documentation are available for review upon request.

Antidegradation Level I Review

The objective of the Level I ADR is to ensure the protection of existing uses, defined as the beneficial uses attained in the receiving water on or after November 28, 1975. No evidence is known that the existing uses deviate from the designated beneficial uses for the receiving water. Therefore, the beneficial uses will be protected if the discharge remains below the WQBELs presented in this wasteload.

A Level II Antidegradation Review (ADR) is not required for this facility. The proposed permit is a simple renewal of an existing UPDES permit. No increase in flow or concentration of pollutants over those authorized in the the existing permit is being requested.

Documents:

WLA Document: *Ephriam_WLADoc_7-10-18.docx*
Wasteload Analysis and Addendums: Ephriam_WLA_1-31-19.xls

References:

Utah Division of Water Quality. 2012. *Utah Wasteload Analysis Procedures Version 1.0.*
Utah Division of Water Quality. 2003. Middle San Pitch River TMDL.

WASTELOAD ANALYSIS [WLA]
Addendum: Statement of Basis
SUMMARY

Discharging Facility:	**Ephraim City Lagoons**		
UPDES No:	UT-25984		
Current Flow:	1.94	MGD	Design Flow
Design Flow	1.94	MGD	

Receiving Water:	**Ditch => San Pitch River**		
Stream Classification:	2B, 3C, 3D, 4		
Stream Flows [cfs]:			
	6.9	Winter (Dec-Feb)	20th Percentile Winter
Stream TDS Values:			
	978.5	Winter (Dec-Feb)	Winter Average

Effluent Limits:				**WQ Standard:**
Flow, MGD:	1.94	MGD	Design Flow	
BOD, mg/l:	25.0	Winter	5.0	Indicator
Dissolved Oxygen, mg/l	4.0	Winter	5.0	30 Day Average
TNH3, Chronic, mg/l:	21.5	Winter	Varies	Function of pH and Temperature
TDS, mg/l:	1709.2	Winter	1200.0	

Modeling Parameters:	
Acute River Width:	50.0%
Chronic River Width:	100.0%

Level II Review Not required.

WASTELOAD ANALYSIS [WLA]
Addendum: Statement of Basis

10-Jul-18
4:00 PM

Facilities: **Ephraim City Lagoons** **UPDES No: UT-25984**
Discharging to: **Ditch => San Pitch River**

THIS IS A DRAFT DOCUMENT

I. Introduction

Wasteload analyses are performed to determine point source effluent limitations necessary to maintain designated beneficial uses by evaluating projected effects of discharge concentrations on in-stream water quality. The wasteload analysis also takes into account downstream designated uses [R317-2-8, UAC]. Projected concentrations are compared to numeric water quality standards to determine acceptability. The anti-degradation policy and procedures are also considered. The primary in-stream parameters of concern may include metals (as a function of hardness), total dissolved solids (TDS), total residual chlorine (TRC), un-ionized ammonia (as a function of pH and temperature, measured and evaluated interms of total ammonia), and dissolved oxygen.

Mathematical water quality modeling is employed to determine stream quality response to point source discharges. Models aid in the effort of anticipating stream quality at future effluent flows at critical environmental conditions (e.g., low stream flow, high temperature, high pH, etc).

The numeric criteria in this wasteload analysis may always be modified by narrative criteria and other conditions determined by staff of the Division of Water Quality.

II. Receiving Water and Stream Classification

Ditch => San Pitch River:	2B, 3C, 3D, 4
Antidegradation Review:	Level I review completed. Level II review not required.

III. Numeric Stream Standards for Protection of Aquatic Wildlife

Total Ammonia (TNH3)	Varies as a function of Temperature and pH Rebound. See Water Quality Standards
Chronic Total Residual Chlorine (TRC)	0.011 mg/l (4 Day Average) 0.019 mg/l (1 Hour Average)
Chronic Dissolved Oxygen (DO)	5.00 mg/l (30 Day Average) N/A mg/l (7Day Average) 3.00 mg/l (1 Day Average
Maximum Total Dissolved Solids	1200.0 mg/l

Acute and Chronic Heavy Metals (Dissolved)

Parameter	4 Day Average (Chronic) Standard Concentration		Load*		1 Hour Average (Acute) Standard Concentration		Load*	
Aluminum	87.00	ug/l**	1.410	lbs/day	750.00	ug/l	12.156	lbs/day
Arsenic	190.00	ug/l	3.079	lbs/day	340.00	ug/l	5.511	lbs/day
Cadmium	0.95	ug/l	0.015	lbs/day	11.92	ug/l	0.193	lbs/day
Chromium III	344.72	ug/l	5.587	lbs/day	7212.20	ug/l	116.893	lbs/day
ChromiumVI	11.00	ug/l	0.178	lbs/day	16.00	ug/l	0.259	lbs/day
Copper	39.63	ug/l	0.642	lbs/day	68.98	ug/l	1.118	lbs/day
Iron					1000.00	ug/l	16.208	lbs/day
Lead	27.44	ug/l	0.445	lbs/day	704.26	ug/l	11.415	lbs/day
Mercury	0.0120	ug/l	0.000	lbs/day	2.40	ug/l	0.039	lbs/day
Nickel	218.41	ug/l	3.540	lbs/day	1964.46	ug/l	31.839	lbs/day
Selenium	4.60	ug/l	0.075	lbs/day	20.00	ug/l	0.324	lbs/day
Silver	N/A	ug/l	N/A	lbs/day	69.57	ug/l	1.128	lbs/day
Zinc	502.78	ug/l	8.149	lbs/day	502.78	ug/l	8.149	lbs/day

* Allowed below discharge

**Chronic Aluminum standard applies only to waters with a pH < 7.0 and a Hardness < 50 mg/l as $CaCO_3$

Metals Standards Based upon a Hardness of 543.4 mg/l as $CaCO_3$

Organics [Pesticides]

Parameter	4 Day Average (Chronic) Standard Concentration		Load*		1 Hour Average (Acute) Standard Concentration		Load*	
Aldrin					1.500	ug/l	0.024	lbs/day
Chlordane	0.004	ug/l	0.128	lbs/day	1.200	ug/l	0.019	lbs/day
DDT, DDE	0.001	ug/l	0.030	lbs/day	0.550	ug/l	0.009	lbs/day
Dieldrin	0.002	ug/l	0.056	lbs/day	1.250	ug/l	0.020	lbs/day
Endosulfan	0.056	ug/l	1.660	lbs/day	0.110	ug/l	0.002	lbs/day
Endrin	0.002	ug/l	0.068	lbs/day	0.090	ug/l	0.001	lbs/day
Guthion					0.010	ug/l	0.000	lbs/day
Heptachlor	0.004	ug/l	0.113	lbs/day	0.260	ug/l	0.004	lbs/day
Lindane	0.080	ug/l	2.372	lbs/day	1.000	ug/l	0.016	lbs/day
Methoxychlor					0.030	ug/l	0.000	lbs/day
Mirex					0.010	ug/l	0.000	lbs/day
Parathion					0.040	ug/l	0.001	lbs/day
PCB's	0.014	ug/l	0.415	lbs/day	2.000	ug/l	0.032	lbs/day
Pentachlorophenol	13.00	ug/l	385.468	lbs/day	20.000	ug/l	0.324	lbs/day
Toxephene	0.0002	ug/l	0.006	lbs/day	0.7300	ug/l	0.012	lbs/day

IV. Numeric Stream Standards for Protection of Agriculture

	4 Day Average (Chronic) Standard		1 Hour Average (Acute) Standard	
	Concentration	Load*	Concentration	Load*
Arsenic			100.0 ug/l	lbs/day
Boron			750.0 ug/l	lbs/day
Cadmium			10.0 ug/l	0.08 lbs/day
Chromium			100.0 ug/l	lbs/day
Copper			200.0 ug/l	lbs/day
Lead			100.0 ug/l	lbs/day
Selenium			50.0 ug/l	lbs/day
TDS, Summer			1200.0 mg/l	9.72 tons/day

V. Numeric Stream Standards for Protection of Human Health (Class 1C Waters)

	4 Day Average (Chronic) Standard		1 Hour Average (Acute) Standard	
Metals	Concentration	Load*	Concentration	Load*
Arsenic			ug/l	lbs/day
Barium			ug/l	lbs/day
Cadmium			ug/l	lbs/day
Chromium			ug/l	lbs/day
Lead			ug/l	lbs/day
Mercury			ug/l	lbs/day
Selenium			ug/l	lbs/day
Silver			ug/l	lbs/day
Fluoride (3)			ug/l	lbs/day
to			ug/l	lbs/day
Nitrates as N			ug/l	lbs/day
Chlorophenoxy Herbicides				
2,4-D			ug/l	lbs/day
2,4,5-TP			ug/l	lbs/day
Endrin			ug/l	lbs/day
ocyclohexane (Lindane)			ug/l	lbs/day
Methoxychlor			ug/l	lbs/day
Toxaphene			ug/l	lbs/day

VI. Numeric Stream Standards the Protection of Human Health from Water & Fish Consumption [Toxics]

	Maximum Conc., ug/l - Acute Standards			
	Class 1C		Class 3A, 3B	
Toxic Organics	[2 Liters/Day for 70 Kg Person over 70 Yr.]		[6.5 g for 70 Kg Person over 70 Yr.]	
Acenaphthene	ug/l	lbs/day	2700.0 ug/l	80.06 lbs/day
Acrolein	ug/l	lbs/day	780.0 ug/l	23.13 lbs/day
Acrylonitrile	ug/l	lbs/day	0.7 ug/l	0.02 lbs/day
Benzene	ug/l	lbs/day	71.0 ug/l	2.11 lbs/day
Benzidine	ug/l	lbs/day	0.0 ug/l	0.00 lbs/day
Carbon tetrachloride	ug/l	lbs/day	4.4 ug/l	0.13 lbs/day
Chlorobenzene	ug/l	lbs/day	21000.0 ug/l	622.68 lbs/day
1,2,4-Trichlorobenzene				
Hexachlorobenzene	ug/l	lbs/day	0.0 ug/l	0.00 lbs/day
1,2-Dichloroethane	ug/l	lbs/day	99.0 ug/l	2.94 lbs/day

1,1,1-Trichloroethane						
Hexachloroethane	ug/l	lbs/day	8.9	ug/l	0.26	lbs/day
1,1-Dichloroethane						
1,1,2-Trichloroethane	ug/l	lbs/day	42.0	ug/l	1.25	lbs/day
1,1,2,2-Tetrachloroetha	ug/l	lbs/day	11.0	ug/l	0.33	lbs/day
Chloroethane			0.0	ug/l	0.00	lbs/day
Bis(2-chloroethyl) ether	ug/l	lbs/day	1.4	ug/l	0.04	lbs/day
2-Chloroethyl vinyl ether	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
2-Chloronaphthalene	ug/l	lbs/day	4300.0	ug/l	127.50	lbs/day
2,4,6-Trichlorophenol	ug/l	lbs/day	6.5	ug/l	0.19	lbs/day
p-Chloro-m-cresol			0.0	ug/l	0.00	lbs/day
Chloroform (HM)	ug/l	lbs/day	470.0	ug/l	13.94	lbs/day
2-Chlorophenol	ug/l	lbs/day	400.0	ug/l	11.86	lbs/day
1,2-Dichlorobenzene	ug/l	lbs/day	17000.0	ug/l	504.07	lbs/day
1,3-Dichlorobenzene	ug/l	lbs/day	2600.0	ug/l	77.09	lbs/day
1,4-Dichlorobenzene	ug/l	lbs/day	2600.0	ug/l	77.09	lbs/day
3,3'-Dichlorobenzidine	ug/l	lbs/day	0.1	ug/l	0.00	lbs/day
1,1-Dichloroethylene	ug/l	lbs/day	3.2	ug/l	0.09	lbs/day
1,2-trans-Dichloroethyle	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
2,4-Dichlorophenol	ug/l	lbs/day	790.0	ug/l	23.42	lbs/day
1,2-Dichloropropane	ug/l	lbs/day	39.0	ug/l	1.16	lbs/day
1,3-Dichloropropylene	ug/l	lbs/day	1700.0	ug/l	50.41	lbs/day
2,4-Dimethylphenol	ug/l	lbs/day	2300.0	ug/l	68.20	lbs/day
2,4-Dinitrotoluene	ug/l	lbs/day	9.1	ug/l	0.27	lbs/day
2,6-Dinitrotoluene	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
1,2-Diphenylhydrazine	ug/l	lbs/day	0.5	ug/l	0.02	lbs/day
Ethylbenzene	ug/l	lbs/day	29000.0	ug/l	859.89	lbs/day
Fluoranthene	ug/l	lbs/day	370.0	ug/l	10.97	lbs/day
4-Chlorophenyl phenyl ether						
4-Bromophenyl phenyl ether						
Bis(2-chloroisopropyl) e	ug/l	lbs/day	170000.0	ug/l	5040.73	lbs/day
Bis(2-chloroethoxy) met	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Methylene chloride (HM	ug/l	lbs/day	1600.0	ug/l	47.44	lbs/day
Methyl chloride (HM)	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Methyl bromide (HM)	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Bromoform (HM)	ug/l	lbs/day	360.0	ug/l	10.67	lbs/day
Dichlorobromomethane	ug/l	lbs/day	22.0	ug/l	0.65	lbs/day
Chlorodibromomethane	ug/l	lbs/day	34.0	ug/l	1.01	lbs/day
Hexachlorobutadiene(c)	ug/l	lbs/day	50.0	ug/l	1.48	lbs/day
Hexachlorocyclopentadi	ug/l	lbs/day	17000.0	ug/l	504.07	lbs/day
Isophorone	ug/l	lbs/day	600.0	ug/l	17.79	lbs/day
Naphthalene						
Nitrobenzene	ug/l	lbs/day	1900.0	ug/l	56.34	lbs/day
2-Nitrophenol	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
4-Nitrophenol	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
2,4-Dinitrophenol	ug/l	lbs/day	14000.0	ug/l	415.12	lbs/day
4,6-Dinitro-o-cresol	ug/l	lbs/day	765.0	ug/l	22.68	lbs/day
N-Nitrosodimethylamine	ug/l	lbs/day	8.1	ug/l	0.24	lbs/day
N-Nitrosodiphenylamine	ug/l	lbs/day	16.0	ug/l	0.47	lbs/day
N-Nitrosodi-n-propylami	ug/l	lbs/day	1.4	ug/l	0.04	lbs/day
Pentachlorophenol	ug/l	lbs/day	8.2	ug/l	0.24	lbs/day

Phenol	ug/l	lbs/day	4.6E+06	ug/l	1.36E+05	lbs/day
Bis(2-ethylhexyl)phthala	ug/l	lbs/day	5.9	ug/l	0.17	lbs/day
Butyl benzyl phthalate	ug/l	lbs/day	5200.0	ug/l	154.19	lbs/day
Di-n-butyl phthalate	ug/l	lbs/day	12000.0	ug/l	355.82	lbs/day
Di-n-octyl phthlate						
Diethyl phthalate	ug/l	lbs/day	120000.0	ug/l	3558.16	lbs/day
Dimethyl phthlate	ug/l	lbs/day	2.9E+06	ug/l	8.60E+04	lbs/day
Benzo(a)anthracene (P/	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Benzo(a)pyrene (PAH)	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Benzo(b)fluoranthene (F	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Benzo(k)fluoranthene (F	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Chrysene (PAH)	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Acenaphthylene (PAH)						
Anthracene (PAH)	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Dibenzo(a,h)anthracene	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Indeno(1,2,3-cd)pyrene	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Pyrene (PAH)	ug/l	lbs/day	11000.0	ug/l	326.16	lbs/day
Tetrachloroethylene	ug/l	lbs/day	8.9	ug/l	0.26	lbs/day
Toluene	ug/l	lbs/day	200000	ug/l	5930.27	lbs/day
Trichloroethylene	ug/l	lbs/day	81.0	ug/l	2.40	lbs/day
Vinyl chloride	ug/l	lbs/day	525.0	ug/l	15.57	lbs/day
						lbs/day
Pesticides						lbs/day
Aldrin	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Dieldrin	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Chlordane	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
4,4'-DDT	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
4,4'-DDE	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
4,4'-DDD	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
alpha-Endosulfan	ug/l	lbs/day	2.0	ug/l	0.06	lbs/day
beta-Endosulfan	ug/l	lbs/day	2.0	ug/l	0.06	lbs/day
Endosulfan sulfate	ug/l	lbs/day	2.0	ug/l	0.06	lbs/day
Endrin	ug/l	lbs/day	0.8	ug/l	0.02	lbs/day
Endrin aldehyde	ug/l	lbs/day	0.8	ug/l	0.02	lbs/day
Heptachlor	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Heptachlor epoxide						
PCB's						
PCB 1242 (Arochlor 12	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
PCB-1254 (Arochlor 12	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
PCB-1221 (Arochlor 12	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
PCB-1232 (Arochlor 12	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
PCB-1248 (Arochlor 12	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
PCB-1260 (Arochlor 12	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
PCB-1016 (Arochlor 10	ug/l	lbs/day	0.0	ug/l	0.00	lbs/day
Pesticide						
Toxaphene	ug/l		0.0	ug/l	0.00	lbs/day
Dioxin						
Dioxin (2,3,7,8-TCDD)	ug/l	lbs/day				

Metals				
Antimony	ug/l	lbs/day		
Arsenic	ug/l	lbs/day	4300.00 ug/l	127.50 lbs/day
Asbestos	ug/l	lbs/day		
Beryllium				
Cadmium				
Chromium (III)				
Chromium (VI)				
Copper				
Cyanide	ug/l	lbs/day	2.2E+05 ug/l	6523.30 lbs/day
Lead	ug/l	lbs/day		
Mercury			0.15 ug/l	0.00 lbs/day
Nickel			4600.00 ug/l	136.40 lbs/day
Selenium	ug/l	lbs/day		
Silver	ug/l	lbs/day		
Thallium			6.30 ug/l	0.19 lbs/day
Zinc				

There are additional standards that apply to this receiving water, but were not considered in this modeling/waste load allocation analysis.

VII. Mathematical Modeling of Stream Quality

Model configuration was accomplished utilizing standard modeling procedures. Data points were plotted and coefficients adjusted as required to match observed data as closely as possible.

The modeling approach used in this analysis included one or a combination of the following models.

(1) The Utah River Model, Utah Division of Water Quality, 1992. Based upon STREAMDO IV (Region VIII) and Supplemental Ammonia Toxicity Models; EPA Region VIII, Sept. 1990 and QUAL2E (EPA, Athens, GA).

(2) Utah Ammonia/Chlorine Model, Utah Division of Water Quality, 1992.

(3) AMMTOX Model, University of Colorado, Center of Limnology, and EPA Region 8

(4) Principles of Surface Water Quality Modeling and Control. Robert V. Thomann, et.al. Harper Collins Publisher, Inc. 1987, pp. 644.

Coefficients used in the model were based, in part, upon the following references:

(1) Rates, Constants, and Kinetics Formulations in Surface Water Quality Modeling. Environmental Research Laboratory, Office of Research and Development, U.S. Environmental Protection Agency, Athens Georgia. EPA/600/3-85/040 June 1985.

(2) Principles of Surface Water Quality Modeling and Control. Robert V. Thomann, et.al. Harper Collins Publisher, Inc. 1987, pp. 644.

VIII. Modeling Information

The required information for the model may include the following information for both the upstream conditions at low flow and the effluent conditions:

Flow, Q, (cfs or MGD)	D.O. mg/l
Temperature, Deg. C.	Total Residual Chlorine (TRC), mg/l
pH	Total NH3-N, mg/l
BOD5, mg/l	Total Dissolved Solids (TDS), mg/l
Metals, ug/l	Toxic Organics of Concern, ug/l

Other Conditions

In addition to the upstream and effluent conditions, the models require a variety of physical and biological coefficients and other technical information. In the process of actually establishing the permit limits for an effluent, values are used based upon the available data, model calibration, literature values, site visits and best professional judgement.

Model Inputs

The following is upstream and discharge information that was utilized as inputs for the analysis. Dry washes are considered to have an upstream flow equal to the flow of the discharge.

Current Upstream Information

	Stream Critical Low Flow cfs	Temp. Deg. C	pH	T-NH3 mg/l as N	BOD5 mg/l	DO mg/l	TRC mg/l	TDS mg/l
Summer (Irrig. Season)	2.50	1.8	8.1	1.00	0.10	10.29	0.00	978.5
Fall	2.50	1.8	8.1	1.00	0.10	---	0.00	978.5
Winter	2.50	1.8	8.1	1.00	0.10	---	0.00	978.5
Spring	2.50	1.8	8.1	1.00	0.10	---	0.00	978.5

Dissolved	Al	As	Cd	CrIII	CrVI	Copper	Fe	Pb
Metals	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
All Seasons	1.59*	0.53*	0.053*	0.53*	2.65*	0.53*	0.83*	0.53*

Dissolved	Hg	Ni	Se	Ag	Zn	Boron
Metals	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
All Seasons	0.0000	0.53*	1.06*	0.1*	0.053*	10.0

* 1/2 MDL

Projected Discharge Information

Season	Flow, MGD	Temp.
Winter (Dec-Mar)	1.94000	4.0

All model numerical inputs, intermediate calculations, outputs and graphs are available for discussion, inspection and copy at the Division of Water Quality.

IX. Effluent Limitations

Current State water quality standards are required to be met under a variety of conditions including in-stream flows targeted to the 7-day, 10-year low flow (R317-2-9).

Other conditions used in the modeling effort coincide with the environmental conditions expected at low stream flows.

Effluent Limitation for Flow based upon Water Quality Standards

In-stream criteria of downstream segments will be met with an effluent flow maximum value as follows:

Season	Daily Average	
Winter	1.940 MGD	3.001 cfs

Flow Requirement or Loading Requirement

The calculations in this wasteload analysis utilize the maximum effluent discharge flow of MGD. If the discharger is allowed to have a flow greater than MGD during 7Q10 conditions, and effluent limit concentrations as indicated, then water quality standards will be violated. In order to prevent this from occuring, the permit writers must include the discharge flow limititation as indicated above; or, include loading effluent limits in the permit.

Effluent Limitation for Whole Effluent Toxicity (WET) based upon WET Policy

Effluent Toxicity will not occur in downstream segements if the values below are met.

WET Requirements	LC50 >	EOP Effluent	[Acute]
	IC25 >	54.6% Effluent	[Chronic]

Effluent Limitation for Biological Oxygen Demand (BOD) based upon Water Quality Standards or Regulations

In-stream criteria of downstream segments for Dissolved Oxygen will be met with an effluent BOD limitation as follows:

Season	Concentration	
Summer	25.0 mg/l as BOD5	0.0 lbs/day
Fall	25.0 mg/l as BOD5	0.0 lbs/day
Winter	25.0 mg/l as BOD5	0.0 lbs/day
Spring	25.0 mg/l as BOD5	0.0 lbs/day

Effluent Limitation for Dissolved Oxygen (DO) based upon Water Quality Standards

In-stream criteria of downstream segments for Dissolved Oxygen will be met with an effluent D.O. limitation as follows:

Season	**Concentration**
Winter	5.00

Effluent Limitation for Total Ammonia based upon Water Quality Standards

In-stream criteria of downstream segments for Total Ammonia will be met with an effluent limitation (expressed as Total Ammonia as N) as follows:

Season		**Concentration**		**Load**	
Winter	4 Day Avg. - Chronic	2.8	mg/l as N	45.7	lbs/day
(Dec-Mar)	1 Hour Avg. - Acute	9.4	mg/l as N	151.6	lbs/day

Acute limit calculated with an Acute Zone of Initial Dilution (ZID) to be equal to 100.%.

Effluent Limitation for Total Residual Chlorine based upon Water Quality Standards

In-stream criteria of downstream segments for Total Residual Chlorine will be met with an effluent limitation as follows:

Season		Concentration		Load	
Winter (Dec - Mar)	4 Day Avg. - Chronic	0.019	mg/l	0.31	lbs/day
	1 Hour Avg. - Acute	0.034	mg/l	0.55	lbs/day

Effluent Limitations for Total Dissolved Solids based upon Water Quality Standards

Season		Concentration		Load	
Winter (Dec - Mar)	Maximum, Acute	1384.5	mg/l	11.20	tons/day
Colorado Salinity Forum Limits		Determined by Permitting Section			

Effluent Limitations for Total Recoverable Metals based upon Water Quality Standards

In-stream criteria of downstream segments for Dissolved Metals will be met with an effluent limitation as follows (based upon a hardness of 543.4 mg/l):

	4 Day Average			1 Hour Average		
	Concentration		Load	Concentration		Load
Aluminum*	N/A		N/A	1,061.4	ug/l	17.2 lbs/day
Arsenic*	347.61	ug/l	3.6 lbs/day	481.3	ug/l	7.8 lbs/day
Cadmium	1.67	ug/l	0.0 lbs/day	16.9	ug/l	0.3 lbs/day
Chromium III	631.21	ug/l	6.6 lbs/day	10,215.8	ug/l	165.6 lbs/day
Chromium VI*	16.85	ug/l	0.2 lbs/day	21.0	ug/l	0.3 lbs/day
Copper	71.97	ug/l	0.8 lbs/day	97.4	ug/l	1.6 lbs/day
Iron*	N/A		N/A	1,416.0	ug/l	22.9 lbs/day
Lead	49.64	ug/l	0.5 lbs/day	997.3	ug/l	16.2 lbs/day
Mercury*	0.02	ug/l	0.0 lbs/day	3.4	ug/l	0.1 lbs/day
Nickel	399.68	ug/l	4.2 lbs/day	2,782.3	ug/l	45.1 lbs/day
Selenium*	7.11	ug/l	0.1 lbs/day	27.7	ug/l	0.4 lbs/day
Silver	N/A	ug/l	N/A lbs/day	98.5	ug/l	1.6 lbs/day
Zinc	921.54	ug/l	9.6 lbs/day	712.2	ug/l	11.5 lbs/day
Cyanide*	9.53	ug/l	0.1 lbs/day	31.2	ug/l	0.5 lbs/day

*Limits for these metals are based on the dissolved standard.

Effluent Limitations for Heat/Temperature based upon Water Quality Standards

Summer	23.8 Deg. C.	74.9 Deg. F
Fall	9.3 Deg. C.	48.7 Deg. F
Winter	26.1 Deg. C.	78.9 Deg. F
Spring	21.1 Deg. C.	70.0 Deg. F

Effluent Limitations for Organics [Pesticides] Based upon Water Quality Standards

In-stream criteria of downstream segments for Organics [Pesticides] will be met with an effluent limit as follows:

	4 Day Average		1 Hour Average		
	Concentration	Load	Concentration		Load
Aldrin			1.5E+00	ug/l	3.76E-02 lbs/day
Chlordane	4.30E-03 ug/l	6.96E-02 lbs/day	1.2E+00	ug/l	3.01E-02 lbs/day
DDT, DDE	1.00E-03 ug/l	1.62E-02 lbs/day	5.5E-01	ug/l	1.38E-02 lbs/day
Dieldrin	1.90E-03 ug/l	3.07E-02 lbs/day	1.3E+00	ug/l	3.13E-02 lbs/day
Endosulfan	5.60E-02 ug/l	9.06E-01 lbs/day	1.1E-01	ug/l	2.76E-03 lbs/day
Endrin	2.30E-03 ug/l	3.72E-02 lbs/day	9.0E-02	ug/l	2.26E-03 lbs/day
Guthion	0.00E+00 ug/l	0.00E+00 lbs/day	1.0E-02	ug/l	2.51E-04 lbs/day
Heptachlor	3.80E-03 ug/l	6.15E-02 lbs/day	2.6E-01	ug/l	6.52E-03 lbs/day
Lindane	8.00E-02 ug/l	1.29E+00 lbs/day	1.0E+00	ug/l	2.51E-02 lbs/day
Methoxychlor	0.00E+00 ug/l	0.00E+00 lbs/day	3.0E-02	ug/l	7.52E-04 lbs/day
Mirex	0.00E+00 ug/l	0.00E+00 lbs/day	1.0E-02	ug/l	2.51E-04 lbs/day
Parathion	0.00E+00 ug/l	0.00E+00 lbs/day	4.0E-02	ug/l	1.00E-03 lbs/day
PCB's	1.40E-02 ug/l	2.26E-01 lbs/day	2.0E+00	ug/l	5.01E-02 lbs/day
Pentachlorophenol	1.30E+01 ug/l	2.10E+02 lbs/day	2.0E+01	ug/l	5.01E-01 lbs/day
Toxephene	2.00E-04 ug/l	3.24E-03 lbs/day	7.3E-01	ug/l	1.83E-02 lbs/day

Effluent Targets for Pollution Indicators
Based upon Water Quality Standards

In-stream criteria of downstream segments for Pollution Indicators will be met with an effluent limit as follows:

	1 Hour Average	
	Concentration	Loading
Gross Beta (pCi/l)	50.0 pCi/L	
BOD (mg/l)	5.0 mg/l	81.0 lbs/day
Nitrates as N	4.0 mg/l	64.8 lbs/day
Total Phosphorus as P	0.05 mg/l	0.8 lbs/day
Total Suspended Solids	90.0 mg/l	1458.7 lbs/day

Note: Pollution indicator targets are for information purposes only.

Effluent Limitations for Protection of Human Health [Toxics Rule]
Based upon Water Quality Standards (Most stringent of 1C or 3A & 3B as appropriate.)

In-stream criteria of downstream segments for Protection of Human Health [Toxics] will be met with an effluent limit as follows:

	Maximum Concentration	
	Concentration	**Load**
Toxic Organics		
Acenaphthene	4.95E+03 ug/l	0.00E+00 lbs/day
Acrolein	1.43E+03 ug/l	0.00E+00 lbs/day
Acrylonitrile	1.21E+00 ug/l	0.00E+00 lbs/day
Benzene	1.30E+02 ug/l	0.00E+00 lbs/day
Benzidine	ug/l	lbs/day
Carbon tetrachloride	8.07E+00 ug/l	0.00E+00 lbs/day
Chlorobenzene	3.85E+04 ug/l	0.00E+00 lbs/day
1,2,4-Trichlorobenzene		
Hexachlorobenzene	1.41E-03 ug/l	0.00E+00 lbs/day
1,2-Dichloroethane	1.81E+02 ug/l	0.00E+00 lbs/day
1,1,1-Trichloroethane		
Hexachloroethane	1.63E+01 ug/l	0.00E+00 lbs/day
1,1-Dichloroethane		
1,1,2-Trichloroethane	7.70E+01 ug/l	0.00E+00 lbs/day
1,1,2,2-Tetrachloroethane	2.02E+01 ug/l	0.00E+00 lbs/day
Chloroethane		
Bis(2-chloroethyl) ether	2.57E+00 ug/l	0.00E+00 lbs/day
2-Chloroethyl vinyl ether		
2-Chloronaphthalene	7.88E+03 ug/l	0.00E+00 lbs/day
2,4,6-Trichlorophenol	1.19E+01 ug/l	0.00E+00 lbs/day
p-Chloro-m-cresol		
Chloroform (HM)	8.62E+02 ug/l	0.00E+00 lbs/day
2-Chlorophenol	7.33E+02 ug/l	0.00E+00 lbs/day
1,2-Dichlorobenzene	3.12E+04 ug/l	0.00E+00 lbs/day
1,3-Dichlorobenzene	4.77E+03 ug/l	0.00E+00 lbs/day

1,4-Dichlorobenzene	4.77E+03 ug/l	0.00E+00 lbs/day
3,3'-Dichlorobenzidine	1.41E-01 ug/l	0.00E+00 lbs/day
1,1-Dichloroethylene	5.87E+00 ug/l	0.00E+00 lbs/day
1,2-trans-Dichloroethylene1		
2,4-Dichlorophenol	1.45E+03 ug/l	0.00E+00 lbs/day
1,2-Dichloropropane	7.15E+01 ug/l	0.00E+00 lbs/day
1,3-Dichloropropylene	3.12E+03 ug/l	0.00E+00 lbs/day
2,4-Dimethylphenol	4.22E+03 ug/l	0.00E+00 lbs/day
2,4-Dinitrotoluene	1.67E+01 ug/l	0.00E+00 lbs/day
2,6-Dinitrotoluene		
1,2-Diphenylhydrazine	9.90E-01 ug/l	0.00E+00 lbs/day
Ethylbenzene	5.32E+04 ug/l	0.00E+00 lbs/day
Fluoranthene	6.78E+02 ug/l	0.00E+00 lbs/day
4-Chlorophenyl phenyl ether		
4-Bromophenyl phenyl ether		
Bis(2-chloroisopropyl) ether	3.12E+05 ug/l	0.00E+00 lbs/day
Bis(2-chloroethoxy) methane		
Methylene chloride (HM)	2.93E+03 ug/l	0.00E+00 lbs/day
Methyl chloride (HM)		
Methyl bromide (HM)		
Bromoform (HM)	6.60E+02 ug/l	0.00E+00 lbs/day
Dichlorobromomethane(HM)	4.03E+01 ug/l	0.00E+00 lbs/day
Chlorodibromomethane (HM)	6.23E+01 ug/l	0.00E+00 lbs/day
Hexachlorocyclopentadiene	3.12E+04 ug/l	0.00E+00 lbs/day
Isophorone	1.10E+03 ug/l	0.00E+00 lbs/day
Naphthalene		
Nitrobenzene	3.48E+03 ug/l	0.00E+00 lbs/day
2-Nitrophenol		
4-Nitrophenol		
2,4-Dinitrophenol	2.57E+04 ug/l	0.00E+00 lbs/day
4,6-Dinitro-o-cresol	1.40E+03 ug/l	0.00E+00 lbs/day
N-Nitrosodimethylamine	1.48E+01 ug/l	0.00E+00 lbs/day
N-Nitrosodiphenylamine	2.93E+01 ug/l	0.00E+00 lbs/day
N-Nitrosodi-n-propylamine	2.57E+00 ug/l	0.00E+00 lbs/day
Pentachlorophenol	1.50E+01 ug/l	0.00E+00 lbs/day
Phenol	8.43E+06 ug/l	0.00E+00 lbs/day
Bis(2-ethylhexyl)phthalate	1.08E+01 ug/l	0.00E+00 lbs/day
Butyl benzyl phthalate	9.53E+03 ug/l	0.00E+00 lbs/day
Di-n-butyl phthalate	2.20E+04 ug/l	0.00E+00 lbs/day
Di-n-octyl phthlate		
Diethyl phthalate	2.20E+05 ug/l	0.00E+00 lbs/day
Dimethyl phthlate	5.32E+06 ug/l	0.00E+00 lbs/day
Benzo(a)anthracene (PAH)	5.68E-02 ug/l	0.00E+00 lbs/day
Benzo(a)pyrene (PAH)	5.68E-02 ug/l	0.00E+00 lbs/day
Benzo(b)fluoranthene (PAH)	5.68E-02 ug/l	0.00E+00 lbs/day
Benzo(k)fluoranthene (PAH)	5.68E-02 ug/l	0.00E+00 lbs/day
Chrysene (PAH)	5.68E-02 ug/l	0.00E+00 lbs/day
Acenaphthylene (PAH)		
Anthracene (PAH)		
Dibenzo(a,h)anthracene (PAH)	5.68E-02 ug/l	0.00E+00 lbs/day
Indeno(1,2,3-cd)pyrene (PAH)	5.68E-02 ug/l	0.00E+00 lbs/day

Pyrene (PAH)	2.02E+04 ug/l	0.00E+00 lbs/day
Tetrachloroethylene	1.63E+01 ug/l	0.00E+00 lbs/day
Toluene	3.67E+05 ug/l	0.00E+00 lbs/day
Trichloroethylene	1.48E+02 ug/l	0.00E+00 lbs/day
Vinyl chloride	9.62E+02 ug/l	0.00E+00 lbs/day
Pesticides		
Aldrin	2.57E-04 ug/l	0.00E+00 lbs/day
Dieldrin	2.57E-04 ug/l	0.00E+00 lbs/day
Chlordane	1.08E-03 ug/l	0.00E+00 lbs/day
4,4'-DDT	1.08E-03 ug/l	0.00E+00 lbs/day
4,4'-DDE	1.08E-03 ug/l	0.00E+00 lbs/day
4,4'-DDD	1.54E-03 ug/l	0.00E+00 lbs/day
alpha-Endosulfan	3.67E+00 ug/l	0.00E+00 lbs/day
beta-Endosulfan	3.67E+00 ug/l	0.00E+00 lbs/day
Endosulfan sulfate	3.67E+00 ug/l	0.00E+00 lbs/day
Endrin	1.48E+00 ug/l	0.00E+00 lbs/day
Endrin aldehyde	1.48E+00 ug/l	0.00E+00 lbs/day
Heptachlor	3.85E-04 ug/l	0.00E+00 lbs/day
Heptachlor epoxide		
PCB's		
PCB 1242 (Arochlor 1242)	8.25E-05 ug/l	0.00E+00 lbs/day
PCB-1254 (Arochlor 1254)	8.25E-05 ug/l	0.00E+00 lbs/day
PCB-1221 (Arochlor 1221)	8.25E-05 ug/l	0.00E+00 lbs/day
PCB-1232 (Arochlor 1232)	8.25E-05 ug/l	0.00E+00 lbs/day
PCB-1248 (Arochlor 1248)	8.25E-05 ug/l	0.00E+00 lbs/day
PCB-1260 (Arochlor 1260)	8.25E-05 ug/l	0.00E+00 lbs/day
PCB-1016 (Arochlor 1016)	8.25E-05 ug/l	0.00E+00 lbs/day
Pesticide		
Toxaphene	1.37E-03 ug/l	0.00E+00 lbs/day
Metals		
Antimony	ug/l	lbs/day
Arsenic	ug/l	lbs/day
Asbestos	ug/l	lbs/day
Beryllium		
Cadmium		
Chromium (III)		
Chromium (VI)		
Copper	ug/l	lbs/day
Cyanide	ug/l	lbs/day
Lead		
Mercury	ug/l	lbs/day
Nickel	ug/l	lbs/day
Selenium		
Silver		
Thallium	ug/l	lbs/day
Zinc		

Dioxin

Dioxin (2,3,7,8-TCDD)	2.57E-08 ug/l	0.00E+00 lbs/day

Metals Effluent Limitations for Protection of All Beneficial Uses
Based upon Water Quality Standards and Toxics Rule

	Class 4 Acute Agricultural ug/l	Class 3 Acute Aquatic Wildlife ug/l	Acute Toxics Drinking Water Source ug/l	Acute Toxics Wildlife ug/l	1C Acute Health Criteria ug/l	Acute Most Stringent ug/l	Class 3 Chronic Aquatic Wildlife ug/l
Aluminum		1061.4				1061.4	N/A
Antimony				7881.9		7881.9	
Arsenic	183.3	481.3			0.0	183.3	347.6
Barium						0.0	
Beryllium						0.0	
Cadmium	18.3	16.9			0.0	16.9	1.7
Chromium (III)		10215.8			0.0	10215.8	631.2
Chromium (VI)	182.6	21.0			0.0	21.01	16.85
Copper	365.9	97.4				97.4	72.0
Cyanide		31.2	403261.3			31.2	9.5
Iron		1416.0				1416.0	
Lead	182.6	997.3			0.0	182.6	49.6
Mercury		3.40		0.27	0.0	0.27	0.022
Nickel		2782.3		8431.8		2782.3	399.7
Selenium	90.3	27.7			0.0	27.7	7.1
Silver		98.5			0.0	98.5	
Thallium				11.5		11.5	
Zinc		712.2				712.2	921.5
Boron	1374.8					1374.8	

Summary Effluent Limitations for Metals [Wasteload Allocation, TMDL]
[If Acute is more stringent than Chronic, then the Chronic takes on the Acute value.]

	WLA Acute ug/l	WLA Chronic ug/l	
Aluminum	1061.4	N/A	
Antimony	7881.92		
Arsenic	183.3	347.6	Acute Controls
Asbestos	0.00E+00		
Barium			
Beryllium			
Cadmium	16.9	1.7	
Chromium (III)	10215.8	631	
Chromium (VI)	21.0	16.9	
Copper	97.4	72.0	

Cyanide	31.2	9.5	
Iron	1416.0		
Lead	182.6	49.6	
Mercury	0.275	0.022	
Nickel	2782.3	400	
Selenium	27.7	7.1	
Silver	98.5	N/A	
Thallium	11.5		
Zinc	712.2	921.5	Acute Controls
Boron	1374.75		

Other Effluent Limitations are based upon R317-1.

E. coli	126.0	organisms per 100 ml

X. Antidegradation Considerations

The Utah Antidegradation Policy allows for degradation of existing quality where it is determined that such lowering of water quality is necessary to accommodate important economic or social development in the area in which the waters are protected [R317-2-3]. It has been determined that certain chemical parameters introduced by this discharge will cause an increase of the concentration of said parameters in the receiving waters. Under no conditions will the increase in concentration be allowed to interfere with existing instream water uses.

The antidegradation rules and procedures allow for modification of effluent limits less than those based strictly upon mass balance equations utilizing 100% of the assimilative capacity of the receiving water. Additional factors include considerations for "Blue-ribbon" fisheries, special recreational areas, threatened and endangered species, and drinking water sources.

An Antidegradation Level I Review was conducted on this discharge and its effect on the receiving water. Based upon that review, it has been determined that an Antidegradation Level II Review is NOT required.

XI. Colorado River Salinity Forum Considerations

Discharges in the Colorado River Basin are required to have their discharge at a TDS loading of less than 1.00 tons/day unless certain exemptions apply. Refer to the Forum's Guidelines for additional information allowing for an exceedence of this value.

XII. Summary Comments

The mathematical modeling and best professional judgement indicate that violations of receiving water beneficial uses with their associated water quality standards, including important downstream segments, will not occur for the evaluated parameters of concern as discussed above if the effluent limitations indicated above are met.

XIII. Notice of UPDES Requirement

This Addendum to the Statement of Basis does not authorize any entity or party to discharge to the waters of the State of Utah. That authority is granted through a UPDES permit issued by the Utah Division of Water Quality. The numbers presented here may be changed as a function of other factors. Dischargers are strongly urged to contact the Permits Section for further information. Permit writers may utilize other information to adjust these limits and/or to determine other limits based upon best available technology and other considerations provided that the values in this wasteload analysis [TMDL] are not compromised. See special provisions in Utah Water Quality Standards for adjustments in the Total Dissolved Solids values based upon background concentration.

Antidegredation Review

An antidegradation review (ADR) was conducted to determine whether the proposed activity complies with the applicable antidegradation requirements for receiving waters that may be affected. The Level I ADR evaluated the criteria of R317-2-3.5(b) and determined that the proposed discharge will not require a Level II Antidegradation Review.