

**FACT SHEET AND STATEMENT OF BASIS  
CASTLE VALLEY SPECIAL SERVICE DISTRICT, FERRON LAGOONS  
RENEWAL PERMIT: DISCHARGE  
UPDES PERMIT NUMBER: UT0020052  
MINOR MUNICIPAL**

**FACILITY CONTACTS**

Person Name:	Mr. Jacob Sharp, P.E.,
Position:	District Manager
Phone Number:	(435) 384-5333
Facility Name:	Castle Valley Special Service District, Ferron Lagoons
Mailing and Facility Address:	PO Box 877 20 South 100 East Castle Dale, Utah 84513
Telephone:	(435) 384-5333
Actual Address:	~5 miles east along 500 South Street off Hwy 10 in Emery County

**DESCRIPTION OF FACILITY**

The City of Ferron and the Castle Valley Special Service District (CVSSD) constructed a new lagoon system in 2005 to handle domestic sewage for the City of Ferron. The Ferron Lagoons system is located approximately 2.25 miles east of the City of Ferron off Highway 10 in Emery County, Utah. The Ferron Lagoons consists of four cells totaling 33 acres in area with a chlorination pond for disinfection and also provides for the addition of a future cell if needed. To date there has been no discharge from this facility and none are anticipated for at least the next five years. The Ferron Lagoons have a design flow of 0.5 million gallons per day (MGD) with a single discharge point of Outfall 001, which is located at north latitude of 39° 04' 43.75" and west longitude of 111° 03' 42.61".

For the renewal in 2018, a new model was used by Water Quality to develop a waste load allocation (WLA) for dischargers to Waters of the State. Also, there has been more data gathered on the receiving stream and discharge since the permit was first issued. This resulted in changes to the possible water quality based effluent limits (WQBEL) from the WLA. As a result of the new WLA, the ammonia limits have increased and the TRC has decreased. The increase in the acute ammonia limits is due to the pH used to calculate the criteria. In the previous permit, due to a lack of data in the receiving water, the maximum pH for each season was used. For this permit, with the additional data for the receiving water, the 80<sup>th</sup> percentile of the pH for each season was used per standard procedure. There is no proposed change in operation of the Ferron Lagoons, and there has not been a discharge from the Ferron Lagoon system to establish the loading conditions.

**TBPEL Rule**

Water Quality adopted UAC R317-1-3.3, Technology-Based Phosphorus Effluent Limit (TBPEL) Rule on December 16, 2014. No TBPEL will be instituted for discharging treatment lagoons. Instead, each discharging lagoon was evaluated to determine the current annual average total phosphorus load measured in pounds per year based on monthly average flow rates and concentrations. Absent field data to determine

these loads, and in case of intermittent discharging lagoons, the phosphorus load cap will be estimated by the Director

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

In R317-1-3.3, E, 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 cap of 125% of the current annual total phosphorus load has been established and is referred to as the phosphorus loading cap. It is the intent of UAC R317-3.3.B to provide capacity for growth within the facility's service area by setting the loading cap at 125 percent of the current annual total phosphorus load. The phosphorus loading cap went into effect July 1, 2018. A discharge from the Ferron Lagoons has not occurred during the time frame that the loading cap would be developed. As a result, no cap could be implemented. To address this, when a discharge does become consistent and data can be obtained, the loading cap will be calculated and implemented. Currently, there is no estimate on when this might happen. Once the lagoon's phosphorus loading cap has been reached, the owner of the facility will have five years to construct treatment processes or implement treatment alternatives to prevent the total phosphorus loading cap from being exceeded.

### **SUMMARY OF CHANGES FROM PREVIOUS PERMIT**

The purpose of the modification is to adjust the permit expiration date so it coincides with the other discharge permits overseen by the CVSSD. By aligning all the expiration dates it is hoped that we can improve the quality and efficiency of renewing the permits. Since the permit was renewed the DWQ has changed how the manage the Storm Water Permitting for individual dischargers.

The only change from this modification will be to extend the original expiration date for one (1) year from September 30, 2024 to September 30, 2025. In order to modify the date the whole permit must be public noticed. There will be no changes to any limits or conditions as a result of this modification. The Ferron Lagoons have still not discharged.

### **DISCHARGE**

#### **DESCRIPTION OF DISCHARGE**

Ferron Lagoons has been reporting self-monitoring results on Discharge Monitoring Reports on a monthly basis. Ferron Lagoons have not discharged since they were first completed and permitted.

Outfall

Description of Discharge Point

001 Discharge to Ferron Creek from the final lagoon cell is located at latitude 39°04'43.75" and longitude 111°13'42.61".

**RECEIVING WATERS AND STREAM CLASSIFICATION**

If a discharge were to occur, it would be pumped into an irrigation ditch, which is a Class 2B, 3C, 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 3C -- Protected for nongame fish and other 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), 5-day biochemical oxygen demand (BOD5), E. coli, pH and percent removal for TSS and BOD5 are based on current Utah Secondary Treatment Standards, UAC R317-1-3.2. The alternative effluent limits and percent removal requirements for TSS and BOD5 were previously requested by CVSSD and subsequently granted by the Utah Water Quality Board in 2001 and remains unchanged. Ammonia as Nitrogen (NH3-N), total residual chlorine (TRC), and dissolved oxygen (DO), are water quality based, and were derived by the waste load analysis attached to this fact sheet statement of basis. Flow limitations were developed from information included in the permit application.

Total dissolved solids (TDS) limitations are based upon Utah Water Quality Standards for concentration values and the Colorado River Basin Salinity Control Forum (CRBSCF) for mass loading values when applicable as authorized in *UAC R317-2-4*. CRBSCF has established a policy for the reasonable increase of salinity for municipal discharges to any portion of the Colorado River stream system that has an impact on the lower main stem. The CRBSCF Policy entitled "NPDES Permit Program Policy for Implementation of Colorado River Salinity Standards" (Policy), with the most current version dated October 2017, states that the incremental increase in salinity shall be 400 mg/L or less, which is considered to be a reasonable incremental increase above the flow weighted average salinity of the intake water supply.

The TDS concentration limit of 3500 mg/L is based upon the approved Total Maximum Daily Load (TMDL) study for the San Rafael River watershed (which includes Ferron Creek), in which a site specific criterion was developed for TDS and can be found in Table A-12 of the document entitled, "*Price River, San Rafael River, and Muddy Creek TMDLs for Total Dissolved Solids, West Colorado Watershed Management Unit, Utah*", EPA Approval Date: August 4, 2004.

**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 qualitative RP check was performed on the pollutants of concern to determine if there was enough data to perform a reasonable potential analysis on the outfall. The Ferron Lagoons did not discharge during the term of the expiring permit and as a result no monitoring results were submitted. This results in no changes to the monitoring requirements in the permit. A copy of the RP analysis is included at the end of this Fact Sheet.

The permit limitations are

Parameter	Effluent Limitations <sup>1</sup>				
	Maximum Monthly Avg	Maximum Weekly Avg	Maximum Monthly Avg	Daily Minimum	Daily Maximum
Total Flow, MGD	0.5	-	-	-	-
BOD <sub>5</sub> , mg/L	45	45	-	-	-
BOD <sub>5</sub> Min. % Removal	65	-	-	-	-
TSS, mg/L	45	65	-	-	-
TSS Min. % Removal	65	-	-	-	-
TRC, mg/L <sup>2</sup>	0.026	-	-	-	0.033
Total Ammonia (as N), mg/L					
Summer (Jul-Sep)	4.6	-	-	-	14.5
Fall (Oct-Dec)	8.9	-	-	-	14.0
Winter (Jan-Mar)	11.3	-	-	-	14.2
Spring (Apr-Jun)	3.9	-	-	-	6.1
Dissolved Oxygen, mg/L	-	-	-	5.0	-
<i>E. coli</i> , No./100mL	126	157	-	-	-
pH, Standard Units	-	-	-	6.5	9
TDS, mg/L	-	-	-	-	3500
TDS, Tons/Day <sup>3</sup>	-	-	-	-	1.0

### SELF-MONITORING AND REPORTING REQUIREMENTS

The following self-monitoring requirements are the same as in the previous permit with the exception of the inclusion of TBPEL Monitoring Requirements being added to the 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.

<sup>1</sup> See Definitions, Part VIII, for definition of terms.

<sup>2</sup> Analytical results less than 0.06 mg/l will not be considered out of compliance with the permit. For purposes of calculating averages and reporting on the Discharge Monitoring Report form, the following will apply:

- 1) Analytical values less than 0.02 mg/L shall be considered zero; and
- 2) Analytical values less than 0.06 mg/L and equal to or greater than 0.02 mg/L will be recorded as measured.

<sup>3</sup> The permittee requested a salt loading (TDS) of 1 ton/day, or 366 tons/year in lieu of the requirement that the effluent not exceeding the culinary source water intake by more than 400 mg/L of TDS.

Self-Monitoring and Reporting Requirements			
Parameter	Frequency	Sample Type	Units
Total Flow <sup>4, 5</sup>	Continuous	Recorder	MGD
BOD <sub>5</sub> , Influent <sup>6</sup>	Monthly	Grab	mg/L
Effluent	Monthly	Grab	mg/L
TSS, Influent <sup>6</sup>	Monthly	Grab	mg/L
Effluent	Monthly	Grab	mg/L
<i>E. coli</i>	Monthly	Grab	No./100mL
pH	Monthly	Grab	SU
Ammonia (as N)	Monthly	Composite	mg/L
DO	Monthly	Grab	mg/L
TRC, mg/L <sup>7</sup>	5 x Week	Grab	mg/L
Orthophosphate, (as P) <sup>8</sup>			
Effluent	Monthly	Composite	mg/L
Phosphorus, Total <sup>9</sup>			
Influent	Monthly	Composite	mg/L
Effluent	Monthly	Composite	mg/L
Total Kjeldahl Nitrogen, TKN (as N) <sup>9</sup>			
Influent	Monthly	Composite	mg/L
Effluent	Monthly	Composite	mg/L
Nitrate, NO <sub>3</sub> <sup>9</sup>	Monthly	Composite	mg/L
Nitrite, NO <sub>2</sub> <sup>9</sup>	Monthly	Composite	mg/L
TDS, mg/L	Quarterly	Composite	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, since this facility is a lagoon, there is not any regular sludge production. Therefore 40 CFR 503 does not apply at this time. In the future, if the sludge needs to be removed from the lagoons and is disposed in some way, the Division of Water Quality must be contacted prior to the removal of the sludge to ensure that all applicable state and federal regulations are met.

### STORM WATER

#### **STORMWATER REQUIREMENTS**

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

Permit coverage under the Construction General Storm Water Permit (CGP) is required for any construction

<sup>4</sup> 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.

<sup>5</sup> If the rate of discharge is controlled, the rate and duration of discharge shall be reported

<sup>6</sup> 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

<sup>7</sup> Sample Only when Disinfection

<sup>8</sup> These parameters reflect changes required with the adoption of UCA R317-1-3.3, Technology-Based Phosphorus Effluent Limits rule.

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**

The permittee has not been designated for pretreatment program development because it does not meet conditions which necessitate a full program. The flow through the plant is less than five (5) MGD, there are no known categorical industries discharging to the treatment facility, and there is no indication of pass through or interference with the operation of the treatment facility such as upsets or violations of the POTW's UPDES permit limits.

Although the permittee does not have to develop a State-approved Pretreatment Program, any wastewater 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.

An industrial waste survey (IWS) is required of the permittee as stated in Part II of the permit. The IWS is to assess the needs of the permittee regarding pretreatment assistance. The IWS is required to be submitted within sixty (60) days after the issuance of the permit. If an Industrial User begins to discharge or an existing Industrial User changes their discharge the permittee must resubmit an IWS no later than sixty days following the introduction or change as stated in Part II of the permit.

It is required that the permittee submit for review any local limits that are developed to the Division of Water Quality for review. If local limits are developed it is required that the permittee perform an annual evaluation of the need to revise or develop technically based local limits for pollutants of concern, to implement the general and specific prohibitions *40 CFR, Part 403.5(a)* and *Part 403.5(b)*. This evaluation may indicate that present local limits are sufficiently protective, need to be revised or should be developed.

### **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.

The permittee is a minor municipal facility that will be infrequently discharging a minimal amount of effluent, in which toxicity is neither an existing concern, nor likely to be present. Based on these considerations there is no reasonable potential for toxicity in the permittee's discharge (per State of Utah Permitting and Enforcement Guidance Document for WET Control). As such, there will be no numerical WET limitations or WET monitoring requirements in this permit. However, the permit will contain a toxicity limitation re-opener provision that allows for modification of the permit should additional information indicate the presence of toxicity in the discharge.

**PERMIT DURATION**

It is recommended that this permit be effective for a duration of less than five (5) years, and expire on September 30, 2025.

Drafted by  
Daniel Griffin, Discharge, Biosolids, Reasonable Potential Analysis  
Jennifer Robinson, Pretreatment  
Lonnie Shull, Biomonitoring  
Lisa Stevens, Storm Water  
Nick von Stackelberg, Waste-load Analysis  
Utah Division of Water Quality, (801) 536-4300

**PUBLIC NOTICE**

Began: Month Day, 2020  
Ended: Month Day, 2021

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 Emery County Progress.

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.

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

Addendum to FSSOB

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**ATTACHMENT 1**

*Industrial Waste Survey*



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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							
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10							
11							

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**ATTACHMENT 2**

*Wasteload Analysis*



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**ATTACHMENT 3**

*Reasonable Potential Analysis*

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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>9</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.

### **(REASONABLE POTENTIAL LANGUAGE)**

Ferron Lagoons did not discharge during the lifetime of the previous permit. As a result of this there is no data to use in a Reasonable Potential Analysis. During the next permit renewal, RP will be attempted again.

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<sup>9</sup> See Reasonable Potential Analysis Guidance for definitions of terms