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

Date:	October 22, 2018
Prepared by:	Dave Wham Standards and Technical Services Section
Facility:	Canyon Fuels Company, Fossil Rock Mine (previously Trail Mountain Mine) UPDES No. UT0023728
Receiving water:	Cottonwood Canyon Creek (1C, 3A, 2B, 4)

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

Outfall 001	Sedimentation pond
Outfall 002	Continuous mine water discharge
Outfall 003	Sedimentation pond

Combined Flow .5 MGD

Receiving Water

The receiving water for Outfalls 001 and 002 is Cottonwood Canyon Creek, an intermittent tributary of Cottonwood Creek. The receiving water for outfall 003 is Grimes Wash, an intermittent tributary of Cottonwood Creek.

Per UAC R317-2-13.1(b), the designated beneficial uses for Cottonwood Creek and tributaries from Highway U-57 crossing to headwaters are:

- 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.

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- 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.

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). Cottonwood Canyon Creek is an intermittent stream that has no flow for large parts of the year. As a result, the annual critical low flow was determined to be zero. As a result, water quality based effluent limits revert to end-of-pipe water quality standards.

Cottonwood Canyon Creek and Grimes Wash water quality inputs were estimated due to a lack of available data.

<u>TMDL</u>

According to DWQ's 2016 303(d) Assessment, upper Cottonwood Creek and tributaries (UT14060009-007_00) is listed as impaired for pH (1C, 2B and 3A use classes), temperature (3A), and total dissolved solids (4).

A Total Maximum Daily Load (TMDL) addressing the TDS impairment for the Price River and tributaries was completed as part of the West Colorado River Watershed TMDL in August of 2004. As part of the TMDL, site specific standards were developed for a number of stream segments in the watershed. A site specific standard of 3,500 mg/l TDS was developed for Cottonwood Creek (and has since been incorporated into the Utah Water Quality Standards) from the confluence with Huntington Creek to Highway 57.

The Trail Mountain Mine (now Fossil Rock Mine) as well as Wilburg-Cottonwood 001 discharge to Cottonwood Creek approximately 8 miles above this stream segment. The TMDL indicated a TDS permit limit of 1136 mg/l for the Trail Mountain Mine in order to be protective of downstream uses. The Approved TMDL is silent on the Wilburg-Cottonwood 001 discharge, but because mine discharges to the same segment as the Trail Mountain Mine, a 1,136 mg/l TDS permit limit is also recommended for this discharge to protect downstream water uses.

Mixing Zone

The maximum allowable mixing zone is 15 minutes of travel time for acute conditions, not to exceed 50% of stream width, and 2,500 feet for chronic conditions, per UAC R317-2-5. Water quality standards must be met at the end of the mixing zone.

Because the critical low flow for the receiving water is zero, no mixing zone was considered.

Parameters of Concern

The potential parameters of concern identified for the discharge/receiving water were TDS, pH, and iron based on review of the past permit and the impairment status of the receiving water.

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Addition parameters of concern may become apparent as a result of reasonable potential analysis, technology based standards, or other factors as determined by the UPDES Permit Writer.

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 LC₅₀ (lethal concentration, 50%) percent effluent for acute toxicity and the IC₂₅ (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 LC₅₀ is typically 100% effluent and does not need to be determined by the WLA.

Because the critical low flow of the receiving water was determined to be zero, WET limits for Outfall 001 for IC₂₅ should be based on 100% 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 Appendix A.

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).

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, with no increase in flow or concentration over that which was approved in the existing permit.

Documents:

WLA Document: FossilRockMine_WLADoc10-23-18.docx Wasteload Analysis: FossilRockMine_WLADoc10-23-18.xlsm

References:

Utah Division of Water Quality. 2012. Utah Wasteload Analysis Procedures Version 1.0.

Utah Division of Water Quality. 2004. Price River, San Rafael River, and Muddy Creek TMDLs for Total Dissolved Solids, West Colorado Management Unit.

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Lewis, B., J. Saunders, and M. Murphy. 2002. Ammonia Toxicity Model (AMMTOX, Version2): A Tool for Determining Effluent Ammonia Limits. University of Colorado, Center for Limnology.

WASTELOAD ANALYSIS [WLA] Addendum: Statement of Basis

Facilities:	Fossil Rock Mine			
Discharging to:	Cottony	vood Canyon Creek		
Design Flow:	0.5	MGD		

23-Oct-18

UPDES No: UT-0023728

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

Cottonwood Canyon Creek:	1C, 2B, 3A, 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)	6.50 mg/l (30 Day Average) 5.00 mg/l (7Day Average) 4.00 mg/l (1 Day Average				

Maximum Total Dissolved Solids

1200.0 mg/l

Acute and Chronic Heavy Metals (Dissolved)

	4 Day Average (Chronic)	Standard	1 Hour Aver	age (Acut	e) Standard
Parameter	Concentration	Load*	Concentration		Load*
Aluminum	87.00 ug/l**	0.363 lbs/day	750.00	ug/l	3.133 lbs/day
Arsenic	190.00 ug/l	0.794 lbs/day	340.00	ug/l	1.420 lbs/day
Cadmium	0.97 ug/l	0.004 lbs/day	12.26	ug/l	0.051 lbs/day
Chromium III	352.63 ug/l	1.473 lbs/day	7377.72	ug/l	30.819 lbs/day
ChromiumVI	11.00 ug/l	0.046 lbs/day	16.00	ug/l	0.067 lbs/day
Copper	40.58 ug/l	0.169 lbs/day	70.81	ug/l	0.296 lbs/day
Iron			1000.00	ug/l	4.177 lbs/day
Lead	28.43 ug/l	0.119 lbs/day	729.55	ug/l	3.047 lbs/day
Mercury	0.0120 ug/l	0.000 lbs/day	2.40	ug/l	0.010 lbs/day
Nickel	223.59 ug/l	0.934 lbs/day	2011.05	ug/l	8.401 lbs/day
Selenium	4.60 ug/i	0.019 lbs/day	20.00	ug/l	0.084 lbs/day
Silver	N/A ug/i	N/A lbs/day	72.96	ug/l	0.305 lbs/day
Zinc	514.73 ug/l	2.150 lbs/day	514.73	ug/l	2.150 lbs/day
* Allow	ed below discharge	anara arrange arrange 1940 - 1940 - 1940 - 1940 - 1940 - 1940 - 1940 - 1940 - 1940 - 1940 - 1940 - 1940 - 1940			A CONTRACTOR CONTRACTOR AND A

**Chronic Aluminum standard applies only to waters with a pH < 7.0 and a Hardness < 50 mg/l as CaCO3

Metals Standards Based upon a Hardness of 558.67 mg/l as CaCO3

Organics [Pesticides]

	4 Day Averag	ge (Chronic)	Standard		1 Hour Av	verage (Acute	e) Standard	ł
Parameter	Concen	tration	Loa	ıd*	Concentration	n - Alla Martina - Alla Alla Alla Alla Alla Alla Alla A	Load*	
Aldrin					1.500	ug/l	0.006	lbs/day
Chlordane	0.004	ug/l	0.018	lbs/day	1.200	ug/l	0.005	lbs/day
DDT, DDE	0.001	ug/l	0.004	lbs/day	0.550	ug/l	0.002	lbs/day
Dieldrin	0.002	ug/l	0.008	lbs/day	1.250	ug/l	0.005	lbs/day
Endosulfan	0.056	ug/l	0.234	lbs/day	0.110	ug/l	0.000	lbs/day
Endrin	0.002	ug/l	0.010	lbs/day	0.090	ug/l	0.000	lbs/day
Guthion					0.010	ug/l	0.000	lbs/day
Heptachlor	0.004	ug/l	0.016	lbs/day	0.260	ug/l	0.001	lbs/day
Lindane	0.080	ug/l	0.334	ibs/day	1.000	ug/l	0.004	lbs/day
Methoxychlor				254	0.030	ug/l	0.000	lbs/day
Mirex					0.010	ug/l	0.000	lbs/day
Parathion					0.040	ug/l	0.000	lbs/day
PCB's	0.014	ug/l	0.058	lbs/day	2.000	ug/l	0.008	lbs/day
Pentachlorophenol	13.00	ug/l	54.269	lbs/day	20.000	ug/l	0.084	lbs/day
Toxephene	0.0002	ug/l	0.001	lbs/day	0.7300	ug/l	0.003	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	ibs/day	
Boron			750.0 ug/l	lbs/day	
Cadmium			10.0 ug/ł	0.02 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	2.51 tons/day	

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

4	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 Herbicid	es				
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]

	Ma	ximum Conc., ug/l - /	Acute Stand	dards		
	Class 1C		Class 3A, 3B			
Toxic Organics	[2 Liters/Day for 70 Kg P	erson over 70 Yr.]	[6.5 g for 70 Kg Person over 70 Yr.			
Acenaphthene	ug/l	lbs/day	2700.0	ug/l	11.27 lbs/day	
Acrolein	ug/l	lbs/day	780.0	ug/l	3.26 lbs/day	
Acrylonitrile	ug/l	lbs/day	0.7	ug/l	0.00 lbs/day	
Benzene	ug/l	lbs/day	71.0	ug/l	0.30 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	0.02 lbs/day	
Chlorobenzene	ug/l	lbs/day	21000.0	ug/l	87.67 lbs/day	
1,2,4-Trichlorobenzene						
Hexachlorobenzene	ug/i	lbs/day	0.0	ug/l	0.00 lbs/day	
1,2-Dichloroethane	ug/l	lbs/day	99.0	ug/l	0.41 lbs/day	

4 4 4 Trichlessethers						
1,1,1-Trichloroethane Hexachloroethane	110/1	lbalday	80	110/	0.04	lhaldau
1,1-Dichloroethane	ug/l	lbs/day	0.9	ug/l	0.04	lbs/day
1,1,2-Trichloroethane	10/	lbs/day	42.0	ug/l	0.19	lbc/day
1,1,2,2-Tetrachloroethai	ug/l	lbs/day	11.0	0.55		lbs/day lbs/day
Chloroethane	ug/l	105/uay	0.0	ug/l ug/l		lbs/day
Bis(2-chloroethyl) ether	ug/l	lbs/day	1.4	ug/l		lbs/day
2-Chloroethyl vinyl ether	ug/l	lbs/day	0.0	ug/l		lbs/day
2-Chloronaphthalene	ug/l	lbs/day	4300.0	ug/l		lbs/day
2,4,6-Trichlorophenol	ug/l	lbs/day	4300.0	ug/l		lbs/day
p-Chloro-m-cresol	ugn	ibs/uay	0.0	ug/l		lbs/day
Chloroform (HM)	ug/l	lbs/day	470.0	ug/l		lbs/day
2-Chlorophenol	ug/l	lbs/day	400.0	ug/l		lbs/day
1,2-Dichlorobenzene	ug/l	lbs/day	17000.0	ug/l		lbs/day
1,3-Dichlorobenzene	ug/l	lbs/day	2600.0	ug/l		lbs/day
1,4-Dichlorobenzene	ug/l	lbs/day	2600.0			1017930000000000000000000000000000000000
3,3'-Dichlorobenzidine	ug/t	lbs/day	2000.0	ug/l		lbs/day lbs/day
1,1-Dichloroethylene	ug/l	lbs/day	3.2	ug/ł		lbs/day
1,2-trans-Dichloroethyle	ug/i	lbs/day	0.0			1193
2,4-Dichlorophenol	ug/l	lbs/day	790.0			lbs/day lbs/day
1,2-Dichloropropane	ug/l	lbs/day	39.0	-		lbs/day
1,3-Dichloropropylene	ug/l	lbs/day	1700.0			
2,4-Dimethylphenol	ug/l	lbs/day	2300.0	1175 C		lbs/day lbs/day
2,4-Dinitrotoluene	ug/l	lbs/day	2300.0	ug/l		and the second second
2,6-Dinitrotoluene	ug/l	lbs/day	0.0	ug/l		lbs/day
1,2-Diphenylhydrazine	Card and a second se	lbs/day	0.5	ug/l		lbs/day
Ethylbenzene	ug/l ug/l	lbs/day	29000.0	ug/l		lbs/day lbs/day
Fluoranthene	ug/l	lbs/day	370.0	ug/l		976
4-Chlorophenyl phenyl ether	ugn	ibs/uay	570.0	ugn	1.04	lbs/day
4-Bromophenyl phenyl ether						
Bis(2-chloroisopropyl) e	ug/l	lbs/day	170000.0	ug/l	700 67	lbs/day
Bis(2-chloroethoxy) met	ug/l	lbs/day	0.0	ug/l		and an an and
Methylene chloride (HM	ug/l	lbs/day	1600.0			lbs/day
Methyl chloride (HM)	ug/l	lbs/day	0.0	ug/l		lbs/day
Methyl bromide (HM)	ug/l	lbs/day		ug/l		lbs/day
Bromoform (HM)				ug/l		lbs/day
Dichlorobromomethane	ug/l ug/l	lbs/day lbs/day	360.0 22.0			lbs/day
Chlorodibromomethane	ug/l	lbs/day	34.0	ug/l		lbs/day
Hexachlorobutadiene(c)	ug/l	lbs/day	50.0	10000		lbs/day
Hexachlorocyclopentadi	ug/l	lbs/day	17000.0	ug/l ug/l		lbs/day
Isophorone	ug/l	lbs/day	600.0	in a subscription of the		lbs/day lbs/day
Naphthalene	ugn	IDS/day	000.0	uy/i	2.50	ios/day
Nitrobenzene	ug/l	lbs/day	1900.0	ual	7 02	lbo/dou
2-Nitrophenol	ug/l	lbs/day	0.0	_		lbs/day
4-Nitrophenol	ug/l	lbs/day	0.0	ug/l		lbs/day
2,4-Dinitrophenol	ug/l	1740 N. 10 N. 10		ug/l		lbs/day
4,6-Dinitro-o-cresol	ug/l	lbs/day lbs/day	14000.0	ug/l		lbs/day
N-Nitrosodimethylamine	ug/l	100	765.0	100 million (1990)		lbs/day
N-Nitrosodiphenylamine	ug/l	lbs/day	8.1	ug/l		lbs/day
N-Nitrosodi-n-propylami	ug/l	lbs/day	16.0			lbs/day
Pentachlorophenol	ug/l	lbs/day		ug/l		lbs/day
. endeneroprener	ugn	lbs/day	0.2	ug/l	0.03	lbs/day

Phenol	ug/l	lbs/day	4.6E+06		1.92E+04 lbs/day
Bis(2-ethylhexyl)phthala	ug/l	lbs/day		ug/l	0.02 lbs/day
Butyl benzyl phthalate	ug/l	lbs/day	5200.0	ug/l	21.71 lbs/day
Di-n-butyl phthalate	ug/l	lbs/day	12000.0	ug/l	50.09 lbs/day
Di-n-octyl phthlate					
Diethyl phthalate	ug/l	lbs/day	120000.0		500.95 lbs/day
Dimethyl phthlate	ug/l	lbs/day	2.9E+06	-	1.21E+04 lbs/day
Benzo(a)anthracene (P/	ug/l	lbs/day		ug/l	0.00 lbs/day
Benzo(a)pyrene (PAH)	ug/ł	lbs/day	0.0	ug/l	0.00 lbs/day
Benzo(b)fluoranthene (F	ug/i	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	45.92 lbs/day
Tetrachloroethylene	ug/l	lbs/day		ug/l	0.04 lbs/day
Toluene	ug/l	lbs/day	200000	ug/l	834.91 lbs/day
Trichloroethylene	ug/l	lbs/day	81.0	ug/l	0.34 lbs/day
Vinyl chloride	ug/l	lbs/day	525.0		2.19 lbs/day
,	5				lbs/day
Pesticides					lbs/day
Aldrin	ug/l	lbs/day	0.0	ug/l	0.00 lbs/day
Dieldrin	ug/l	lbs/day		ug/l	0.00 lbs/day
Chlordane	ug/l	ibs/day		ug/l	0.00 lbs/day
4,4'-DDT	ug/l	lbs/day		ug/l	0.00 lbs/day
4,4'-DDE	ug/l	lbs/day		ug/l	0.00 lbs/day
4,4'-DDD	ug/l	lbs/day		ug/l	0.00 lbs/day
alpha-Endosulfan	ug/l	lbs/day		ug/l	rear were as been at the
beta-Endosulfan				and the second sec	0.01 lbs/day
Endosulfan sulfate	ug/l	lbs/day		ug/l	0.01 lbs/day
Endosunan sunate	ug/l	lbs/day		ug/l	0.01 lbs/day
	ug/i	lbs/day		ug/l	0.00 lbs/day
Endrin aldehyde	ug/l	lbs/day		ug/l	0.00 lbs/day
Heptachlor	ug/l	lbs/day	0.0	ug/l	0.00 lbs/day
Heptachlor epoxide					
PCB's					
		De se d'altaces	0.0	1 artes (12)	
PCB 1242 (Arochlor 124	ug/l	lbs/day		ug/l	0.00 lbs/day
PCB-1254 (Arochlor 12	ug/l	lbs/day		ug/l	0.00 lbs/day
PCB-1221 (Arochlor 122	ug/l	lbs/day		ug/l	0.00 lbs/day
PCB-1232 (Arochlor 12:	ug/l	lbs/day		ug/l	0.00 lbs/day
PCB-1248 (Arochlor 124	ug/l	lbs/day		ug/l	0.00 lbs/day
PCB-1260 (Arochlor 126	ug/I	lbs/day		ug/l	0.00 lbs/day
PCB-1016 (Arochior 10'	ug/l	lbs/day	0.0	ug/l	0.00 lbs/day
Pesticide					
Toxaphene	10/1		0.0	100/1	
rovahilelle	ug/l		0.0	ug/l	0.00 lbs/day
Dioxin					
Dioxin (2,3,7,8-TCDD)	ug/l	lbs/day			
	-3.	in a day			

Metals				
Antimony	ug/l	lbs/day		
Arsenic	ug/l	lbs/day	4300.00 ug/l	17.95 lbs/day
Asbestos	ug/l	lbs/day		
Beryllium				
Cadmium				
Chromium (III)				
Chromium (VI)				
Соррег				
Cyanide	ug/l	lbs/day	2.2E+05 ug/l	918.40 lbs/day
Lead	ug/l	lbs/day		
Mercury			0.15 ug/l	0.00 lbs/day
Nickel			4600.00 ug/l	19.20 lbs/day
Selenium	ug/l	lbs/day	-	12
Silver	ug/l	lbs/day		
Thallium		No. No. And Annual Contraction of the Annual	6.30 ug/l	0.03 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								
	Stream							
	Critical Low							
	Flow	Temp.	рН	T-NH3	BOD5	DO	TRC	TDS
	cfs	Deg. C		mg/l as N	mg/l	mg/l	mg/l	mg/l
Summer (Irrig. Season)	0.00	18.0	8.2	0.10	1.00	9.88	0.00	800.0
Fall	0.00	12.0	8.0	0.10	1.00	1.00-00-00 10-00-00-00 10-00-00-00	0.00	800.0
Winter	0.00	6.0	8.0	0.10	1.00		0.00	800.0
Spring	0.00	12.0	8.1	0.10	1.00		0.00	800.0
Dissolved	AI	As	Cd	Crill	CrVI	Соррег	Fe	Pb
Metals	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l
All Seasons	2.385*	0.795*	0.0795*	0.795*	3.975*	0.8*	1.25*	0.795*
Dissolved	Hg	Ni	Se	Ag	Zn	Boron		
Metals	ug/l	ug/l	ug/l	ug/l	ug/l	ug/l		
All Seasons	0.0000	0.795*	1.59*	0.15*	0.0795*	1.59*	* ~8	0% MDL

Projected Discharge Information

Season	Flow, MGD	Temp.
Summer	0.50000	11.6
Fall	0.50000	11.6
Winter	0.50000	11.6
Spring	0.50000	11.6

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	je
Summer	0.500 MGD	0.774 cfs
Fall	0.500 MGD	0.774 cfs
Winter	0.500 MGD	0.774 cfs
Spring	0.500 MGD	0.774 cfs

Flow Requirement or Loading Requirement

The calculations in this wasteload analysis utilize the maximum effluent discharge flow of 0.5 MGD. If the discharger is allowed to have a flow greater than 0.5 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 >	100.0% Effluent	[Acute]
	IC25 >	99.9% Effluent	[Chronic]

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

Season

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

000000		
Summer	25.0 mg/l as BOD5	104.2 lbs/day
Fall	25.0 mg/l as BOD5	104.2 lbs/day
Winter	25.0 mg/l as BOD5	104.2 lbs/day
Spring	25.0 mg/l as BOD5	104.2 lbs/day

Concentration

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
Summer	5.00
Fall	5.00
Winter	5.00
Spring	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:

Seas	on			
	Concent	ation	Loa	d
Summer	4 Day Avg Chronic	4.33 mg/l as N	18.0	lbs/day
	1 Hour Avg Acute	11.7 mg/l as N	48.8	lbs/day
Fall	4 Day Avg Chronic	4.3 mg/las N	18.0	lbs/day
	1 Hour Avg Acute	11.7 mg/l as N	48.8	lbs/day
Winter	4 Day Avg Chronic	4.3 mg/l as N	18.0	lbs/day
	1 Hour Avg Acute	11.7 mg/l as N	48.8	lbs/day
Spring	4 Day Avg Chronic	4.3 mg/l as N	18.0	lbs/day
	1 Hour Avg Acute	11.7 mg/l as N	48.8	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		
Summer	4 Day Avg Chronic	0.011	mg/l	0.05	lbs/day	
	1 Hour Avg Acute	0.019	mg/l	0.08	lbs/day	
Fall	4 Day Avg Chronic	0.011	mg/l	0.05	lbs/day	
	1 Hour Avg Acute	0.019	mg/l	0.08	lbs/day	
Winter	4 Day Avg Chronic	0.011	mg/!	0.05	lbs/day	
	1 Hour Avg Acute	0.019	mg/l	0.08	lbs/day	
Spring	4 Day Avg Chronic	0.011	mg/l	0.05	lbs/day	
	1 Hour Avg Acute	0.019	mg/l	0.08	lbs/day	

Effluent Limitations for Total Dissolved Solids based upon Water Quality Standards

Season		Concentr	ation	Load	
Summer	Maximum, Acute	1200.5	mg/l	2.50	tons/day
Fall	Maximum, Acute	1200.5	mg/l	2.50	tons/day
Winter	Maximum, Acute	1200.5	mg/l	2.50	tons/day
Spring	Maximum, Acute	1200.5	mg/l	2.50	tons/day
Colorado S	alinity Forum Limits	Determine	d by Permit	ting 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 558.67 mg/l):

		4 Day Average		1 Hour	Average		
	Concen	tration	Load	Concentration		Load	
Aluminum*	N/A		N/A	751.0	ug/l	3.1	lbs/day
Arsenic*	190.24	ug/l	0.5 lbs/day	340.4	ug/ł	1.4	lbs/day
Cadmium	0.97	ug/l	0.0 lbs/day	12.3	ug/l	0.1	lbs/day
Chromium III	353.09	ug/l	1.0 lbs/day	7,387.3	ug/l	30.9	lbs/day
Chromium VI*	11.01	ug/l	0.0 lbs/day	16.0	ug/l	0.1	lbs/day
Copper	40.63	ug/l	0.1 lbs/day	70.9	ug/l	0.3	lbs/day
Iron*	N/A		N/A	774.5	ug/l	3.2	lbs/day
Lead	28.47	ug/l	0.1 lbs/day	730.5	ug/l	3.1	lbs/day
Mercury*	0.01	ug/i	0.0 lbs/day	2.4	ug/l	0.0	lbs/day
Nickel	223.88	ug/l	0.6 lbs/day	2,013.6	ug/l	8.4	lbs/day
Selenium*	4.60	ug/l	0.0 lbs/day	20.0	ug/l	0.1	lbs/day
Silver	N/A	ug/l	N/A lbs/day	73.1	ug/l	0.3	lbs/day

Zinc	515.39	ug/l	1.4 lbs/day	515.4	ug/l	2.2 lbs/day
Cyanide*	5.21	ug/l	0.0 lbs/day	22.0	ug/l	0.1 lbs/day

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

Effluent Limitations for Heat/Temperature based upon Water Quality Standards

Summer	20.0 Deg. C.	68.0 Deg. F
Fall	14.0 Deg. C.	57.2 Deg. F
Winter	8.0 Deg. C.	46.4 Deg. F
Spring	14.0 Deg. C.	57.2 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 Av		
	Concentration	Load	Concentration	-	Load
Aldrin			1.5E+00	ug/l	9.69E-03 lbs/day
Chlordane	4.30E-03 ug/l	1.79E-02 lbs/day	1.2E+00	ug/l	7.75E-03 lbs/day
DDT, DDE	1.00E-03 ug/l	4.17E-03 lbs/day	5.5E-01	ug/I	3.55E-03 lbs/day
Dieldrin	1.90E-03 ug/l	7.92E-03 lbs/day	1.3E+00	ug/l	8.08E-03 lbs/day
Endosulfan	5.60E-02 ug/l	2.33E-01 lbs/day	1.1E-01	ug/l	7.11E-04 lbs/day
Endrin	2.30E-03 ug/l	9.59E-03 lbs/day	9.0E-02	ug/I	5.82E-04 lbs/day
Guthion	0.00E+00 ug/l	0.00E+00 lbs/day	1.0E-02	ug/I	6.46E-05 lbs/day
Heptachlor	3.80E-03 ug/l	1.58E-02 lbs/day	2.6E-01	ug/ł	1.68E-03 lbs/day
Lindane	8.00E-02 ug/l	3.34E-01 lbs/day	1.0E+00	ug/l	6.46E-03 lbs/day
Methoxychlor	0.00E+00 ug/l	0.00E+00 lbs/day	3.0E-02	ug/l	1.94E-04 lbs/day
Mirex	0.00E+00 ug/l	0.00E+00 lbs/day	1.0E-02	ug/l	6.46E-05 lbs/day
Parathion	0.00E+00 ug/l	0.00E+00 lbs/day	4.0E-02	ug/l	2.58E-04 lbs/day
PCB's	1.40E-02 ug/l	5.84E-02 lbs/day	2.0E+00	ug/l	1.29E-02 lbs/day
Pentachlorophenol	1.30E+01 ug/l	5.42E+01 lbs/day	2.0E+01	ug/l	1.29E-01 lbs/day
Toxephene	2.00E-04 ug/l	8.34E-04 lbs/day	7.3E-01	ug/t	4.72E-03 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	20.9 lbs/day	
Nitrates as N	4.0 mg/l	16.7 lbs/day	
Total Phosphorus as P	0.05 mg/l	0.2 lbs/day	
Total Suspended Solids	90.0 mg/l	376.0 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	2.70E+03 ug/l	1.13E+01 lbs/day	
Acrolein	7.81E+02 ug/l	3.26E+00 lbs/day	
Acrylonitrile	6.61E-01 ug/l	2.76E-03 lbs/day	
Benzene	7.11E+01 ug/l	2.96E-01 lbs/day	
Benzidine	ug/l	lbs/day	
Carbon tetrachloride	4.41E+00 ug/l	1.84E-02 lbs/day	
Chlorobenzene	2.10E+04 ug/l	8.77E+01 lbs/day	
1,2,4-Trichlorobenzene			
Hexachlorobenzene	7.71E-04 ug/l	3.21E-06 lbs/day	
1,2-Dichloroethane	9.91E+01 ug/l	4.13E-01 lbs/day	
1,1,1-Trichloroethane			
Hexachloroethane	8.91E+00 ug/l	3.72E-02 lbs/day	
1,1-Dichloroethane			
1,1,2-Trichloroethane	4.21E+01 ug/l	1.75E-01 lbs/day	
1,1,2,2-Tetrachloroethane	1.10E+01 ug/l	4.59E-02 lbs/day	
Chloroethane			
Bis(2-chloroethyl) ether	1.40E+00 ug/l	5.84E-03 lbs/day	
2-Chloroethyl vinyl ether			
2-Chloronaphthalene	4.31E+03 ug/l	1.80E+01 lbs/day	
2,4,6-Trichlorophenol	6.51E+00 ug/l	2.71E-02 lbs/day	
p-Chloro-m-cresol			
Chloroform (HM)	4.71E+02 ug/l	1.96E+00 lbs/day	
2-Chlorophenol	4.01E+02 ug/l	1.67E+00 lbs/day	
1,2-Dichlorobenzene	1.70E+04 ug/l	7.10E+01 lbs/day	
1,3-Dichlorobenzene	2.60E+03 ug/l	1.09E+01 lbs/day	

1,4-Dichlorobenzene	2.60E+03 ug/l	1.09E+01 lbs/day
3,3'-Dichlorobenzidine	7.71E-02 ug/l	3.21E-04 lbs/day
1,1-Dichloroethylene	3.20E+00 ug/l	1.34E-02 lbs/day
1,2-trans-Dichloroethylene1		
2,4-Dichlorophenol	7.91E+02 ug/l	3.30E+00 lbs/day
1,2-Dichloropropane	3.91E+01 ug/l	1.63E-01 lbs/day
1,3-Dichloropropylene	1.70E+03 ug/l	7.10E+00 lbs/day
2,4-Dimethylphenol	2.30E+03 ug/l	9.60E+00 lbs/day
2,4-Dinitrotoluene	9.11E+00 ug/l	3.80E-02 lbs/day
2,6-Dinitrotoluene		
1,2-Diphenylhydrazine	5.41E-01 ug/l	2.25E-03 lbs/day
Ethylbenzene	2.90E+04 ug/l	1.21E+02 lbs/day
Fluoranthene	3.70E+02 ug/l	1.54E+00 lbs/day
4-Chlorophenyl phenyl ether		
4-Bromophenyl phenyl ether		
Bis(2-chloroisopropyl) ether	1.70E+05 ug/l	7.10E+02 lbs/day
Bis(2-chloroethoxy) methane		
Methylene chloride (HM)	1.60E+03 ug/l	6.68E+00 lbs/day
Methyl chloride (HM)		
Methyl bromide (HM)		
Bromoform (HM)	3.60E+02 ug/l	1.50E+00 lbs/day
Dichlorobromomethane(HM)	2.20E+01 ug/l	9.18E-02 lbs/day
Chlorodibromomethane (HM)	3.40E+01 ug/l	1.42E-01 lbs/day
Hexachlorocyclopentadiene	1.70E+04 ug/l	7.10E+01 lbs/day
Isophorone	6.01E+02 ug/l	2.50E+00 lbs/day
Naphthalene		
Nitrobenzene	1.90E+03 ug/l	7.93E+00 lbs/day
2-Nitrophenol		
4-Nitrophenol		
2,4-Dinitrophenol	1.40E+04 ug/l	5.84E+01 lbs/day
4,6-Dinitro-o-cresol	7.66E+02 ug/l	3.19E+00 lbs/day
N-Nitrosodimethylamine	8.11E+00 ug/l	3.38E-02 lbs/day
N-Nitrosodiphenylamine	1.60E+01 ug/l	6.68E-02 lbs/day
N-Nitrosodi-n-propylamine	1.40E+00 ug/l	5.84E-03 lbs/day
Pentachlorophenol	8.21E+00 ug/l	3.42E-02 lbs/day
Phenol	4.61E+06 ug/l	1.92E+04 lbs/day
Bis(2-ethylhexyl)phthalate	5.91E+00 ug/l	2.46E-02 lbs/day
Butyl benzyl phthalate	5.21E+03 ug/l	2.17E+01 lbs/day
Di-n-butyl phthalate	1.20E+04 ug/l	5.01E+01 lbs/day
Di-n-octyl phthlate		
Diethyl phthalate	1.20E+05 ug/l	5.01E+02 lbs/day
Dimethyl phthlate	2.90E+06 ug/l	1.21E+04 lbs/day
Benzo(a)anthracene (PAH)	3.10E-02 ug/l	1.29E-04 lbs/day
Benzo(a)pyrene (PAH)	3.10E-02 ug/l	1.29E-04 lbs/day
Benzo(b)fluoranthene (PAH)	3.10E-02 ug/l	1.29E-04 lbs/day
Benzo(k)fluoranthene (PAH)	3.10E-02 ug/l	1.29E-04 lbs/day
Chrysene (PAH)	3.10E-02 ug/l	1.29E-04 lbs/day
Acenaphthylene (PAH)		
Anthracene (PAH)		
Dibenzo(a,h)anthracene (PAH)	3.10E-02 ug/l	1.29E-04 lbs/day
Indeno(1,2,3-cd)pyrene (PAH)	3.10E-02 ug/l	1.29E-04 lbs/day

Pyrene (PAH)	1.10E+04 ug/l	4.59E+01 lbs/day
Tetrachloroethylene	8.91E+00 ug/l	3.72E-02 lbs/day
Toluene	2.00E+05 ug/l	8.35E+02 lbs/day
Trichloroethylene	8.11E+01 ug/l	3.38E-01 lbs/day
Vinyl chloride	5.26E+02 ug/l	2.19E+00 lbs/day
Pesticides		
Aldrin	1.40E-04 ug/l	5.84E-07 lbs/day
Dieldrin	1.40E-04 ug/ł	5.84E-07 lbs/day
Chlordane	5.91E-04 ug/l	2.46E-06 lbs/day
4,4'-DDT	5.91E-04 ug/l	2.46E-06 lbs/day
4,4'-DDE	5.91E-04 ug/l	2.46E-06 lbs/day
4,4'-DDD	8.41E-04 ug/l	3.51E-06 lbs/day
alpha-Endosulfan	2.00E+00 ug/l	8.35E-03 lbs/day
beta-Endosulfan	2.00E+00 ug/l	8.35E-03 lbs/day
Endosulfan sulfate	2.00E+00 ug/l	8.35E-03 lbs/day
Endrin	8.11E-01 ug/l	3.38E-03 lbs/day
Endrin aldehyde	8.11E-01 ug/l	3.38E-03 lbs/day
Heptachlor	2.10E-04 ug/l	8.77E-07 lbs/day
Heptachlor epoxide		
PCB's		
PCB 1242 (Arochlor 1242)	4.51E-05 ug/l	1.88E-07 lbs/day
PCB-1254 (Arochlor 1254)	4.51E-05 ug/l	1.88E-07 lbs/day
PCB-1221 (Arochlor 1221)	4.51E-05 ug/l	1.88E-07 lbs/day
PCB-1232 (Arochlor 1232)	4.51E-05 ug/l	1.88E-07 lbs/day
PCB-1248 (Arochlor 1248)	4.51E-05 ug/l	1.88E-07 lbs/day
PCB-1260 (Arochlor 1260)	4.51E-05 ug/l	1.88E-07 lbs/day
PCB-1016 (Arochlor 1016)	4.51E-05 ug/l	1.88E-07 lbs/day
Pesticide		
Toxaphene	7.51E-04 ug/l	3.13E-06 lbs/day
Metals		
Antimony	ug/l	lbs/day
Arsenic	ug/l	lbs/day
Asbestos	ug/i	lbs/day
Beryllium		
Cadmium		
Chromium (III)		
Chromium (VI)		
Copper	ug/ł	lbs/day
Cyanide	ug/l	lbs/day
Lead		
Mercury	ug/l	lbs/day
Nickel	ug/l	lbs/day
Selenium		
Silver		scan an in
Thallium	ug/l	lbs/day
Zinc		

Dioxin Dioxin (2,3,7,8-TCDD)

1.40E-08 ug/l

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		751.0		50.55c-177.47.30		751.0	N/A
Antimony				4305.6		4305.6	
Arsenic	100.1	340.4				100.1	190.2
Barium							
Beryllium						0.0	
Cadmium	10.0	12.3				10.0	1.0
Chromium (III)		7387.3				7387.3	353.1
Chromium (VI)	100.1	16.0				16.02	11.01
Copper	200.3	70.9				70.9	40.6
Cyanide		22.0	220284.4			22.0	5.2
Iron		774.5				774.5	
Lead	100.1	730.5				100.1	28.5
Mercury		2.40		0.15		0.15	0.012
Nickel		2013.6		4605.9		2013.6	223.9
Selenium	50.1	20.0				20.0	4.6
Silver		73.1				73.1	
Thallium				6.3		6.3	
Zinc		515.4				515.4	515.4
Boron	751.0					751.0	
Sulfate	2002.6					2002.6	

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	751.0	N/A	
Antimony	4305.56		
Arsenic	100.1	190.2	Acute Controls
Asbestos			
Barium			
Beryllium			
Cadmium	10.0	1.0	
Chromium (III)	7387.3	353	
Chromium (VI)	16.0	11.0	
Copper	70.9	40.6	

Cyanide	22.0	5.2
Iron	774.5	
Lead	100.1	28.5
Мегсигу	0.150	0.012
Nickel	2013.6	224
Selenium	20.0	4.6
Silver	73.1	N/A
Thallium	6.3	
Zinc	515.4	515.4
Boron	750.97	
Sulfate	2002.6	

N/A at this Waterbody

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.

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. The proposed permit is a simple renewal, with no increase in flow or concentration over that which was approved in the existing permit. 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.