

Official Draft Public Notice Version **January 17, 2024**

The findings, determinations, and assertions contained in this document are not final and subject to change following the public comment period.

**FACT SHEET AND STATEMENT OF BASIS  
ATI TITANIUM ROWLEY OPERATION  
RENEWAL PERMIT: DISCHARGE  
UPDES PERMIT NUMBER: UT0025755  
MAJOR INDUSTRIAL**

**FACILITY CONTACTS**

Person Name: Michael Riley  
Position: Manager, Environmental Operations and Compliance

Person Name: Danny Aragon  
Position: Operator

Facility Name: ATI Titanium  
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North Skull Valley, Utah 84029

**DESCRIPTION OF FACILITY**

The ATI Titanium – Rowley Operation produces titanium sponge for use in airline manufacturing and other industries. The facility uses titanium tetrachloride (TiCl<sub>4</sub>) as a raw material. The TiCl<sub>4</sub> will be reacted with molten magnesium metal. The magnesium chloride produced in the reduction will be transferred to a transportable vessel or holding furnace by argon pressurization to be sent back to US Magnesium. The reduction vessel will be allowed to cool before being cut open to remove the titanium. The vessel will then be welded back together and returned to service. The titanium sponge will then be mechanically sized and sorted for offsite shipment. ATI Titanium has not been operating since December 2016.

ATI Titanium is part of a water group that supplies water to both US Magnesium and ATI Titanium. The water is obtained from wells in Skull Valley. The water is treated by reverse osmosis (RO) and distributed to the facilities. At ATI Titanium, the water is used in four major areas. The areas are; scrubber blow down, equipment wash water, non-contact cooling water, and pump seal water/miscellaneous use. Pump seal water/miscellaneous use includes any water to be used onsite for drinking water and sanitation purposes. The blow down from the RO unit will be sent to the ATI Titanium wastewater treatment system.

When the facility operates at full production ATI Titanium anticipates average effluent flows from the titanium metal sponge manufacturing plant at 750,000 gallons per day (gpd) of treated effluent. The wastewater consists of approximately 440,000 gpd of non-contact sources and 290,000 gpd of contact water.

All wastewater, except sanitary wastewater and storm water, is treated in the on-site wastewater treatment system prior to discharge. The equipment for treating ATI Titanium effluent is designed to adjust pH, remove metals, oil, and grease. The treatment facility design, performance standard, and layout were presented in the wastewater treatment system report from Siemens Water Technologies Corp. Sanitary wastewater is treated and discharged to an onsite treatment system.

**Treatment description**

An oil water separator is used to remove trace oils that may be present in wastewater from equipment washing and cleaning. The effluent is transferred to a two-stage reaction tank system to adjust pH. By raising the pH, the metallic hydroxide compounds become less soluble and precipitate from solution. Polymer may be added to enhance the clarification process. Clarification is achieved by gravity settling. The metal solids are compressed in a filter press for ease of handling and offsite disposal. The effluent then undergoes a final pH adjustment prior to discharge to the Great Salt Lake.

The discharge is piped to the legal shoreline of the lake, and then released to the Great Salt Lake. Due to the nature of the lake and the great variability in the lakes physical shore line, the discharge is likely to create a freshwater wetland delta along the lake. Currently there are no metals numeric criteria for the lake. While ATI Titanium’s operations are exempt from New Source Performance Standards (NSPS) by rule, the NSPS do regulate other types of titanium production on seven pollutants or pollutant properties. These seven parameters identified by the Environmental Protection Agency (EPA) for Titanium Manufacturing Subcategory are chromium, lead, nickel, titanium, oil and grease, total suspended solids (TSS), and pH. For these parameters there is a reasonable expectation that they could be present in the discharge due to the manufacturing process, and are the basis of monitoring requirements in the industry without evidence of a reasonable expectation of the presence of additional contaminants.

In addition to the four metals (chromium, lead, nickel, and titanium), there is a reasonable expectation that arsenic could be present in the discharge. For the initial permit the Permittee performed an Ecological Risk Assessment (ERA) to assist in determining at what levels these five metals in the discharge might pose a risk to wildlife in the area. The resulting values proposed in the ERA are listed in the table below.

	Lowest Observed Adverse Effect Level, LOAEL	No Observed Adverse Effect Level, NOAEL	Acute Water Quality Standard	Chronic Water Quality Standard
Proposed	Acute Limit	Chronic Limit	R317-2-14	
	mg/l	mg/l	mg/l	mg/l
Arsenic	3.05	0.76	0.34	0.15
Iron	27.29	9.55	1	1
Chromium	3.6	0.89	0.57	0.074
Nickel	7.67	5.55	0.468	0.052
Titanium	218.03	90.86		

At that time, there was no reasonable expectation of the presence of other metals in the discharge due to the manufacturing process, and for this reason there was no discharge limit associated with them. Monitoring for those metals was done on a quarterly basis to help verify at what concentration they might be present in the discharge, and to establish discharge concentration levels for the facility in the event that there are changes to the water quality standards on the Great Salt Lake, or if it is determined that a problem does exist.

Chromium, arsenic, and nickel had effluent limits in a previous permit which were not included in this permit because the effluent data continues to demonstrate a lack of reasonable potential. The limits were removed for the 2013 renewal. This permit still includes monthly average effluent limits for iron and titanium.

### **Permit History**

During the 2013 renewal the effluent concentrations for mercury were evaluated and it was determined that the frequency for monitoring could be reduced but a more sensitive method should be used. As a result, the mercury monitoring frequency dropped to quarterly and ATI started having the samples analyzed using the EPA Method 1631 for mercury. This requirement was conserved with this 2018 permit, and will again remain.

A numeric criterion for selenium in bird eggs is applicable to the open waters of Gibert Bay (Class 5A). Consistent with the 2013 permit renewal, the daily maximum effluent limit for selenium is 0.015 mg/l.

In the event that it is determined that there has been an adverse impact to the lake, a reopener provision (Water Quality Reopener Provision Permit *Part V. O*) in the permit will allow the reopening and modification of the permit.

Due to the constant nature of the discharge effluent, within a few years a Great Salt Lake marsh was expected to develop. After several years the dominant emergent species within the 0.5-acre discharge area was anticipated to be cattails and bulrush (tules), with pond weeds and smart weeds emerging as dominant macrophytes. Salicornia and saltgrass were expected to populate the margins of the inundated area. However, since ATI has not been operating, the vegetation has not developed absent a consistent discharge. The outfall area continues to be relatively poor bird habitat because of the lack of vegetative cover.

An evaluation of each facility that applies for a permit is done to determine whether it should be rated as a major or minor UPDES facility. The evaluation determined it qualified to be rated as a minor UPDES facility. However, due to the present and ongoing changes in the water quality standards for, and how discharges are being handled to the Great Salt Lake, the facility rating was elevated to major UPDES facility. By elevating the rating to major, the facility will receive greater oversight through inspections and monitoring by the State of Utah. This rating and all other discharge limits are reevaluated at the time of permit renewal to insure they are still appropriate for the permit at that time.

Unchanged for this permit, ATI is required to monitor the effluent for chronic whole effluent toxicity (WET). Consistent with the 2018 Utah Permit and Enforcement Guidance for Whole Effluent Toxicity, chronic WET testing is recommended because dilution is less than 20:1 in the receiving waters. When chronic WET testing is indicated for discharges to Class 5 Great Salt Lake, both acute and chronic testing are conducted. The acute test results are interpreted consistent with Utah and USEPA requirements and the chronic test results are interpreted as an indicator using the Utah-specific methods described in the guidance. However, absent acute WET testing for this permit cycle, the interpretation of the chronic WET test results must be consistent with both Utah and USEPA requirements. Therefore, the results of the (only) chronic WET testing required by this permit are interpreted consistent with both USEPA and Utah requirements. This deviation from the Great Salt Lake WET policy is appropriate because the requirements are more stringent than if both acute WET testing and chronic WET testing as an indicator were implemented.

Upon further evaluation, the existing concentrations of sodium, potassium and bicarbonate ions in the receiving waters would likely prohibit utilizing an approved marine organism, in any WET testing, as these concentrations are up to ten times higher than seawater. The Great Salt Lake is a unique inland and highly

saline environment. The freshwater species used in WET monitoring in Utah are not considered appropriate for the Great Salt Lake and due to the high salinity a different species was chosen, the sheepshead minnow (*Cyprinodon variegatus*). Other USEPA approved marine species, such as *Mysidopsis*, are unlikely to be suitable because of the potential for ion imbalance (sodium, potassium and bicarbonate) in the effluent. The potential ion imbalance is unlikely to be a threat to the biota of Great Salt Lake because these organisms are adapted to much higher ion concentrations due to the high salinity of Great Salt Lake. The effluent typically has a salinity of less than 2% and the salinity of Gilbert Bay is 10-15%.

The permit requires that samples for chronic WET testing be collected on Monday, Wednesday and Friday. The two-day progression requirement for sample collection is not included in this permit. The Director previously concluded that this is not practical for ATI Titanium because of the remote location and operating nature of the facility, the test species used to represent the receiving water, and lab constraints.

Since the 2013 permit was renewed ATI Titanium had idled the titanium production process and ceased discharging from the facility in December 2016. At the same time, they requested a waiver from the NetDMR reporting requirements and to have the outfall deactivated. The waiver was granted by letter May 22, 2017 (DWQ-2017-004295) noting that the waiver would be reevaluated during each renewal. The need for a waiver was reevaluated and is being granted for as long as the facility remains idle during the term of the renewed 2024 permit, and the outfall remains deactivated. ATI Titanium is required to notify the DWQ in writing at least 90 days prior to the need to discharge resumes to allow time for the outfall to be reactivated.

Water Quality has been working to standardize the way effluent limits for discharges to the Great Salt Lake are determined. To that goal, a wasteload analysis (WLA) was generated and used for this renewal. The values from the WLA were used when performing a Reasonable Potential (RP) Analysis on the effluent monitoring performed by ATI Titanium. As a result of the RP analysis there were no new effluent limitations added to the 2018 permit, but the monitoring frequency for aluminum was increased from quarterly to monthly.

The results of the 2018 RP Analysis indicated that there could be a requirement for a chronic mercury limit, but upon review of the methods used by ATI Titanium to collect the mercury sample, they think they were not following the proper Standard Operating Procedure (SOP) for the method, and it may have resulted in some contamination of the samples. Upon restart of the facility they will continue to use the EPA Method 1631 and make sure they are following the SOP for the method for one (1) year. After that year, if the results are all below 15 nanograms per liter ( $15 \text{ ng/L} = 0.000015 \text{ mg/L}$ ) they may switch to a less sensitive EPA approved method.

Water Quality adopted UAC R317-1-3.3, Technology-Based Phosphorus Effluent Limit (TBPEL) Rule on December 16, 2014. The TBPEL rule as it relates to "non-lagoon" wastewater treatment plants establishes new regulations for the discharge of phosphorus to surface waters and is self-implementing. The TBPEL rule includes the following requirements for non-lagoon wastewater treatment plants:

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

On July 1, 2015 ATI Titanium returned a DWQ distributed form (DWQ-2017-007637) requesting a variance from the requirements of the rule for these two reasons;

1. The annual average phosphorus concentrations of the effluent are expected to be below the 1 mg/L TBPEL requirement, therefore the facility is currently in compliance with the TBPEL rule
2. It can be demonstrated that application of the TBPEL rule at this facility is unnecessary to protect downstream water.

The variance is granted, and has been reevaluated for the 2023 permit renewal. The conditions did not change and a variance from the requirements of the rule was again granted.

Specific storm water requirements were removed and replaced with a requirement to maintain appropriate coverage under the Multi-Sector General Permit (MSGP) for Storm Water Discharges Associated with Industrial Activities or to have an active No Exposure exclusion. This change will allow ATI Titanium to switch between the two options as necessary as no exposure conditions may be present during long periods of inactivity, but might not be maintainable during operation.

Since December 2016, ATI Titanium has idled the titanium production process and ceased discharging from the facility. At the same time they requested a waiver from the NetDMR reporting requirements. The waiver was granted by letter May 22, 2017 (DWQ-2017-004295) noting that the waiver would be reevaluated during the renewal. The need for a waiver was again reevaluated for this renewal and is being granted for as long as the facility remains idle during the term of the renewed permit, and the outfall remains deactivated. ATI Titanium is required to notify the DWQ in writing at least 90 days prior to the need to discharge resumes to allow time for the outfall to be reactivated.

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

Utah Secondary Treatment Standards; It was clarified in August 2020 through a rule change that the Utah Secondary Treatment Standards, UAC R317-1-3.2 for total suspended solids (TSS), biochemical oxygen demand (BOD5) only apply to Publicly Owned Treatment Works. As a result of this rule change the effluent limitations in the previous permits for these pollutants are no longer applicable and may be removed from the permit.

The ATI Titanium facility is exempt from the NSPS under 40 CFR Part 421.300, Nonferrous Metals Manufacturing Point Source Category, Subpart AB—Primary and Secondary Titanium Subcategory, which results in no TSS Effluent Limitation Guideline (ELG) to base a limit on. The facility has not been discharging since 2016, and no changes have been made since then. As a result, any RP analysis would be conducted on old data, and could not reflect the facility operations when the system is restarted.

As a result, the TSS effluent limits will be removed from the permit, but monitoring will remain. This can be reviewed at the next renewal.

Total dissolved solids (TDS) monitoring has been added to this permit.

### **DISCHARGE**

#### **DESCRIPTION OF DISCHARGE**

ATI Titanium discharged from 2010 to 2016. There have been no discharges since the 2016.

Outfall

Description of Discharge Point

001 Located at latitude 40°56'19" and longitude 112°42'12".  
The discharge is through a 12-inch HDPE pipe to an unnamed ditch to the Great Salt Lake.

**RECEIVING WATERS AND STREAM CLASSIFICATION**

The final discharge flows into the Great Salt Lake. The receiving water the effluent discharges to has been classified as 5A and 5E (Great Salt Lake) according to *Utah Administrative Code (UAC) R317-2-13*:

Class 5A Gilbert Bay  
Geographical Boundary -- All open waters at or below approximately 4,208-foot elevation south of the Union Pacific Causeway, excluding all of the Farmington Bay south of the Antelope Island Causeway and salt evaporation ponds.  
Beneficial Uses -- Protected for frequent primary and secondary contact recreation, waterfowl, shore birds and other water-oriented wildlife including their necessary food chain.

Class 5E Transitional Waters along the Shoreline of the Great Salt Lake Geographical Boundary  
Geographical Boundary -- All waters below approximately 4,208-foot elevation to the current lake elevation of the open water of the Great Salt Lake receiving their source water from naturally occurring springs and streams, impounded wetlands, or facilities requiring a UPDES permit. The geographical areas of these transitional waters change corresponding to the fluctuation of open water elevation.  
Beneficial Uses -- Protected for infrequent primary and secondary contact recreation, waterfowl, shore birds and other water-oriented wildlife including their necessary food chain.

**TOTAL MAXIMUM DAILY LOAD (TMDL) REQUIREMENTS**

According to DWQ’s 2022 303(d) Assessment, Gilbert Bay (Gilbert Bay open water south of the Union Pacific Causeway and below 4208 feet, excluding all of Farmington Bay, transitional wetlands below 4208 feet, and State Waterfowl Management Areas, UT-L-16020310-001\_00) supports all assessed uses.

**BASIS FOR EFFLUENT LIMITATIONS**

Limitations on pH are based on current Utah Secondary Treatment Standards, UAC R317-1-3.2. The oil and grease limitation is based on best professional judgment (BPJ). Limitations on Selenium and Titanium were developed in the previous permits and are retained for the renewal permit. The Permittee is expected to be able to comply with these limitations.

**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

There have been no discharges since December 2016, so there is no data to run an RP on.

The permit limitations are:

Parameter	Effluent Limitations <sup>1</sup>
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	Maximum Monthly Avg	Maximum Weekly Avg	Annual Loading	Daily Minimum	Daily Maximum
Total Flow, MGD	-	-	-	-	1.0
Iron, mg/L	4.7	-	-	-	-
Selenium, mg/L	0.015	-	-	-	-
Selenium, lbs/year	-	-	45.6	-	-
Titanium, mg/L	12.1	-	-	-	-
Oil & Grease, mg/L	-	-	-	-	10.0
pH, Standard Units	-	-	-	6.5	9
WET, Chronic Biomonitoring <sup>2</sup>	-	-	-	-	IC25> 100% effluent

1. See Definitions, Part VIII, for definition of terms
2. The WET Requirements are for Ceriodaphnia variegatus (sheep head minnows), and are monitoring only. There is no limit associated with this testing.

**SELF-MONITORING AND REPORTING REQUIREMENTS**

The following self-monitoring requirements are the same as in the previous permit, with the addition of TDS monitoring. The permit will require reports to be submitted monthly and annually, as applicable, on Discharge Monitoring Report (DMR) forms due 28 days after the end of the monitoring period. Effective January 1, 2017, monitoring results must be submitted using NetDMR unless the Permittee has successfully petitioned for an exception. Lab sheets for biomonitoring must be attached to the biomonitoring DMR. Lab sheets for metals and toxic organics must be attached to the DMRs.

Self-Monitoring and Reporting Requirements <sup>1, 2</sup>			
Parameter	Frequency	Sample Type	Units
Total Flow <sup>3, 4</sup>	Continuous	Recorder	MGD
TSS, Effluent	Weekly	Grab	mg/L
pH	Weekly	Grab	SU
Oil & Grease	Monthly	Grab	mg/L
WET – Chronic Biomonitoring <sup>5</sup>	Quarterly	Composite	Pass/Fail
TDS	Monthly	Grab	mg/L
Metals <sup>6</sup>			
Iron, Effluent	Weekly	Composite	mg/L
Selenium, Effluent	Weekly	Composite	mg/L
Titanium, Effluent	Weekly	Composite or Grab	mg/L
Aluminum, Effluent	Monthly	Composite	mg/L
Arsenic, Effluent	Quarterly	Composite	mg/L
Chromium, Effluent	Quarterly	Composite	mg/L
Arsenic, Effluent	Quarterly	Composite	mg/L
Cadmium, Effluent	Quarterly	Composite	mg/L
Copper, Effluent	Quarterly	Composite	mg/L
Lead, Effluent	Quarterly	Composite	mg/L
Nickel, Effluent	Quarterly	Composite	mg/L
Silver, Effluent	Quarterly	Composite	mg/L
Zinc, Effluent	Quarterly	Composite	mg/L

Self-Monitoring and Reporting Requirements <sup>1, 2</sup>			
Parameter	Frequency	Sample Type	Units
Mercury Effluent <sup>7</sup>	Quarterly	Grab	mg/L
Cyanide, Effluent	Quarterly	Grab	mg/L
1. See Definitions, Part VIII, for definition of terms.			
2. While the outfall is deactivated and not discharging, the Permittee (ATI Titanium) is not required to monitor the effluent. Upon resumption of the discharge, monitoring is required.			
3. 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.			
4. If the rate of discharge is controlled, the rate and duration of discharge shall be reported.			
5. The WET Requirements are for Ceriodaphnia variegatus (sheep head minnows), and are monitoring only. There is no limit associated with this testing.			
6. Metals samples should be analyzed using a method that meets Method Detection Limits (MDL) requirements. If a test method is not available the Permittee must submit documentation to the Director regarding the method that will be used. The sample type (composite or grab) should be performed according to the methods requirements.			
7. Upon restart of the facility they will continue to use the EPA Method 1631 and make sure they are following the SOP for the method for one (1) year. After that year, if the results are all below 15 nanograms per liter (15 ng/L = 0.000015 mg/L) they may switch to a less sensitive EPA approved method.			

### BIOSOLIDS

The State of Utah has adopted the 40 CFR 503 federal regulations for the disposal of sewage sludge (biosolids) by reference. However, this facility does not receive, generate, treat or dispose of biosolids. Therefore 40 CFR 503 does not apply.

### STORM WATER

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

Permit coverage under the Multi Sector General Permit (MSGP) for Storm Water Discharges from Industrial Activities is required based on the Standard Industrial Classification (SIC) code for the facility and the types of industrial activities occurring. If the facility is not already covered, it has 30 days from when this permit is issued to submit the appropriate Notice of Intent (NOI) for the MSGP or exclusion documentation.

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

### PRETREATMENT REQUIREMENTS

The Permittee does not discharge to a Publicly Owned Treatment Works (POTW). The Permittee treats and discharges all of the facility's process wastewater. However, any wastewater discharged to a publicly owned sanitary sewer, either as a direct discharge or as a hauled waste, is subject to Federal, State and local pretreatment regulations. Pursuant to Section 307 of *The Water Quality Act of 1987*, the Permittee shall comply with all applicable federal Pretreatment Regulations promulgated at *40 CFR 403*, the State Pretreatment Requirements at *UAC R317-8-8*, and any specific local discharge limitations developed by the POTW accepting the wastewater.

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

### **BIOMONITORING REQUIREMENTS**

A nationwide effort to control toxic discharges where effluent toxicity is an existing or potential concern is regulated in accordance with the State of Utah Permitting and Enforcement Guidance Document for Whole Effluent Toxicity Control (biomonitoring). Authority to require effluent biomonitoring is provided in Permit Conditions, UAC R317-8-4.2, Permit Provisions, UAC R317-8-5.3 and Water Quality Standards, UAC R317-2-5 and R317 -2-7.2.

The appropriateness of Biomonitoring requirements were evaluated in the development of this permit. The naturally high Total Dissolved Solids (TDS) concentrations in the ground water and proposed discharge water, as well as the receiving waters of the Great Salt Lake, would likely inhibit successful completion of any type of WET testing. With TDS concentrations of the discharge expected to be between 10,000 and 20,000 mg/L and the Great Salt Lake TDS concentrations proximal to the discharge around 150,000 mg/L, there is reasonable potential for toxicity from natural TDS in the Great Salt Lake to occur with traditional species.

The existing concentrations of sodium, potassium and bicarbonate ions in the receiving waters would likely prohibit utilizing an approved marine organism, such as *Mysidopsis bahia*, in any WET testing, as these concentrations are up to ten times higher than seawater. The Great Salt Lake is a unique inland and highly saline environment. A review of the receiving water's current water quality status does not indicate impairment of the water body.

Based upon these facts, the permitting authority's BPJ, and that the anticipated discharges are of relatively small volumes of effluent when compared to the existing water body of the Great Salt Lake, WET testing limit requirements will not be required, but monitoring has been requested. Chronic quarterly biomonitoring as described in the permit has been agreed to with the use of an alternative species being approved. The monitoring will be performed using *Cyprinodon variegatus* (sheepshead minnow) with the possibility to have the TDS in the sample increased to species appropriate levels.

However, the permit will contain a toxicity limitation re-opener provision that allows for modification of the permit to include WET testing requirements and/or alternative test methods should additional information indicate the presence of toxicity in future discharges that may cause harm to the receiving waters and limited aquatic wildlife of the Great Salt Lake.

In order to complete the WET test, a Permittee must collect a sample, and then transport it to the lab. The sample must be received by the lab within the testing methods allowed holding time, or the sample is not usable. For the Static Renewal 7 Day Chronic test, subsequent samples must be collected and shipped to provide renewal sample water for the testing. These subsequent samples must also be received within the methods allowed holding time, or the sample is not usable. If this happens, the process may have to be completely restarted, and run again. Due to the specific test requirements for a discharge to the Great Salt Lake, a lab located in Colorado Springs must be used.

ATI is not a continuously run operation, they operate Monday through Friday, so they are unable to sample over the weekend. This impacts the WET testing in that it the first composite sample collection must be started on Monday with the system startup, and finished on Tuesday, then immediately transported for shipping to the lab in Colorado Springs, the second sample is started Wednesday morning and completed Thursday morning, the final sample is started Friday morning and completed Saturday morning. During the fourth quarter of 2016 the shipping of the sample was interrupted multiple times and samples exceed their holding times.

The last attempted WET test was during the final week of titanium processing at the facility. When they were informed that the second sample for the last attempt failed to meet the holding times, there was no more time to collect a representative sample of the effluent during the week. Any sample that might be taken from then on would be unrepresentative of the effluent during the processing of titanium. For this reason there is a No Test reported for WET during the final quarter of 2016.

This was evaluated at the time and determined to not be a violation, but they were unable to complete the 10 required WET tests needed to petition for a reduction or elimination of WET Testing requirements in the permit. So WET testing will remain a requirement in the renewal permit.

**PERMIT DURATION**

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

Drafted and Reviewed by  
Daniel Griffin, Discharge Permit Writer  
Jennifer Robinson, Pretreatment  
Lonnie Shull, Biomonitoring  
Suzan Tahir, Wasteload Analysis  
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**PUBLIC NOTICE**

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

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

The Public Noticed of the draft permit was published on the Division of Water Quality Public Notice Webpage.

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

**ADDENDUM TO FSSOB**

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

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PND Draft

**ATTACHMENT 1**

*Wasteload Analysis*

PND Draft

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