



**UPDES Industrial Permit Application**

**Part X. Antidegradation Review *continued***

Effluent flow reviewed: *typically, this should be the maximum daily discharge at the design capacity of the facility. Exceptions should be noted.*

Typical max flow is 10 gallons per minute, with observed peak flows up to 50 gallons per minute.

What is the application for? (Check all that apply)

- A UPDES permit for a new facility, project, or outfall. Old permit is expiring.
- A UPDES permit renewal with an expansion of modification of an existing wastewater treatment works.
- A UPDES permit renewal requiring limits for a pollutant not covered by the previous permit and/or an increase to existing permit limits.
- A UPDES permit renewal with no charges in facility operations.

**Section B. Is a Level II ADR required?**

*This section of the form is intended to help applicants determine if a Level II ADR is required for specific permitted activities. In addition, the Executive Secretary may require a Level II ADR for an activity with the potential for major impact on the quality of waters of the state (R317-2-3.5a.1).*

**B1. The UPDES permit is new or is being renewed and the proposed effluent concentration and loading limits are higher than the concentration and loading limits in the previous permit and any previous antidegradation review(s).**

- YES – (Proceed to B3 of the Form)
- NO – No Level II ADR is required and there is no need to proceed further with the review questions. Continue to the Certification Statement and Signature page.

**B2. Will any pollutants use assimilative capacity of the receiving water, i.e. do the pollutant concentrations in the effluent exceed those in the receiving waters at critical conditions? For most pollutants, effluent concentrations that are higher than the ambient concentrations require an antidegradation review? For a few pollutants such as dissolved oxygen, and antidegradation review is required if the effluent concentrations are less than the ambient concentrations in the receiving water. (Section 3.3.3 of Implementation Guidance)**

- YES – (Proceed to B4 of the Form)
- NO – No Level II ADR is required and there is no need to proceed further with the review questions. Continue to the Certification Statement and Signature page.



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**B3. Are water quality impacts of the proposed project temporary and limited (Section 3.3.4 of Implementation Guidance)?** Proposed projects that will have temporary and limited effects on water quality can be exempted from a Level II ADR.

- YES – Identify the reason used to justify this determination if B4.1 and proceed to Section G. No Level II ADR is required.
- NO – A Level II ADR is required (Proceed to Section C)

**B3.1 Complete this question only if the applicant is requesting a Level II review exclusion for temporary and limited projects (See R317-2-3.5(b)(3) and R317-2-3.5(b)(4)). For projects requesting a temporary and limited exclusion please indicate the factor(s) used to justify this determination (check all that apply and provide details as appropriate) (Section 3.3.4 of Implementation Guidance):**

- Water quality impacts will be temporary and related exclusively to sediment or turbidity and fish spawning will not be impaired.

**Factors to be considered in determining whether water quality impacts will be temporary and limited:**

- a) The length of time during which water quality will be lowered:
- b) The perfect change in ambient concentrations of pollutants:
- c) Pollutants affected:
- d) Likelihood for long-term water quality benefits:
- e) Potential for any residual long-term influences on existing uses:
- f) Impairment of fish spawning, survival and development of aquatic fauna excluding fish removal efforts:


Additional justification, as needed:



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**Level II ADR**

*Section C, D, E, and F of the form constitute the Level II ADR Review. The applicant must provide as much detail as necessary for DWQ to perform the antidegradation review. Questions are provided for the convenience of applicants; however, for more complex permits it may be more effective to provide the required information in a separate report. Applicants that prefer a separate report should record the report name here and proceed to Section G of the form.*

**Option Report Name:** \_\_\_\_\_

**Section C. Is the degradation from the project socially and economically necessary to accommodate important social or economic development in the area in which the waters are located?** *The applicant must provide as much detail as necessary for DWQ to concur that the project is socially and economically necessary when answering the questions in the section. More information is available in Section 6.2 of the Implementation Guidance.*

**C1. Describe the social and economic benefits that would be realized through the proposed project, including the number and nature of jobs created and anticipated tax revenues.**

This project provided needed quality high density residential housing for Salt Lake City on a small foot print of land. The site is located in an area where most residential needs can be achieved within walking distance or using public transit. Over 100 jobs were created during construction, and the site would be taxed per applicable Utah tax code.

**C2. Describe any environmental benefits to be realized through implementation of the proposed project.**

Given the structure areal foot-print per number of homes, this apartment complex reduces the land area requirements to house numerous tenants. Also, there is less need for utilization of a vehicle as public transit is located near the project, thus reducing emissions to the environment.

**C3. Describe any social and economic losses that may result from the project, including impacts to recreation or commercial development.**

No known loss.

**C4. Summarize any supporting information from the affected communities on preserving assimilative capacity to support future growth and development.**

Based on the analytical data of the discharge water, the impacts from this discharge would not affect the secondary contact recreational use of the downstream waters. Therefore, future project could also be apportioned to discharge to these waters as well. Also, Salt Lake City does not utilize shallow groundwater which is being extracted at the project.



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**C5. Please describe any structures or equipment associated with the project that will be placed within or adjacent to the receiving water.**

None.

**C6. Will the discharge potentially impact a drinking water source, e.g., Class 1C waters? Depending upon the locations of the discharge and its proximity to downstream drinking water diversions, additional treatment or more stringent effluent limits or additional monitoring, beyond that which may otherwise be required to meet minimum technology standards or in stream water quality standards, may be required by the Director in order to adequately protect public health and the environment (R317-2-3.5 d.).**

- YES
- NO

**Section D. Identify and rank (from increasing to decreasing potential threat to designated uses) the parameters of concern. Parameters of concern are parameters in the effluent at concentrations greater than ambient concentrations in the receiving water. The applicant is responsible for identifying parameter concentrations in the effluent and DWQ will provide parameter concentrations for the receiving water. More information is available in Section 3.3.3 of the Implementation Guidance.**

<b>Parameters of Concern:</b>			
<b>Rank</b>	<b>Pollutant</b>	<b>Ambient Concentration</b>	<b>Effluent Concentration</b>
1.	TDS	unknown	668 mg/L
2.	pH	unknown	8 to 8.5
3.	Copper	unknown	0.0014 mg.L
4.	TSS	unknown	4 mg/L
5.			



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**Pollutants Evaluated that are not Considered Parameters of Concern:**

Pollutant	Ambient Concentration	Effluent Concentration	Justification
1. MBTEXN	Unknown	Non-Detect	Lack of significant concentrations detected
2. TPH-GRO	Unknown	Non-Detect	Lack of significant concentrations detected
3. TPH-DRO	Unknown	Non-Detect	Lack of significant concentrations detected
4. Lead	Unknown	Non-Detect	Lack of significant concentrations detected
5. Zinc	Unknown	Non-Detect	Lack of significant concentrations detected

**Section E. Alternative Analysis Requirements of Level II Antidegradation Review. *Level II ADRs require the applicant to determine whether there are feasible less-degrading alternatives to the proposed project. More information is available in Section 5.5 and 5.6 of the Implementation Guidance.***

**E1. The UPDES permit is being renewed without any changes to flow or concentrations. Alternative treatment and discharge options including changes to operations and maintenance were considered and compared to the current processes. NO economically feasible treatment or discharge alternatives were identified that were not previously considered for any previous antidegradation review(s).**

- YES – (Proceed to Section F)
- NO or Does Not Apply (Proceed to E2)

**E2. Attach as an appendix to this form a report that describes that following factors for all alternative treatment options (see 1) a technical descriptions of the treatment process, including construction costs and continued operation and maintenance expenses, 2) the mass and concentration of discharge constituents, and 3) a description of the reliability of the system, including the frequency where recurring operation and maintenance may lead to temporary increases in discharged pollutants. Most of this information is typically available from a Facility Plan, if available.**

Report Name: Not applicable

**E3. Describe the proposed method and cost of the baseline treatment alternative. The baseline treatment alternative is the minimum treatment required to meet water quality based effluent limits (WQBEL) as determined by the preliminary or final wasteload analysis (WLC) and any secondary or categorical effluent limits.**

No baseline treatment



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**E4. Were any of the following alternatives feasible and affordable?**

Alternative	Feasible	Reason Not Feasible/Affordable
Pollutant Trading	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Water Recycling/Reuse	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Land Application	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Connection to Other Facilities	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Upgrade to Existing Facility	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Total Containment	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Improved O&M of Existing Systems	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
Seasonal or Controlled Discharge	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
New Construction	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	
No Discharge	<input type="checkbox"/> YES <input checked="" type="checkbox"/> NO	

**E5. From the applicant's perspective, what is the preferred treatment option?**

None as total contaminants on-site do not result in effluent exceeding previous permit limits. However, no reuse of the water is suggested.



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E6. Is the preferred option also the least polluting feasible alternative?

YES     NO

If No, what were less degrading feasible alternative(s)?

If No, provide a summary of the justification for not selecting the least polluting feasible alternative and if appropriate, provide a more detailed justification as an attachment.

Section F. Optional Information

F1. Does the applicant want to conduct optional public review(s) in addition to the mandatory public review? Level II ADRs are public noticed for a thirty day comment period. More information is available in Section 3.7.1 of the Implementation Guidance.

YES     NO

F2. Does the project include an optional mitigation plan to compensate for the proposed water quality degradation?

YES     NO

Report Name: \_\_\_\_\_