Official Draft Public Notice Version **March 29, 2023**
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**
**CEDAR CITY CORPORATION REGIONAL WASTEWATER TREATMENT FACILITY**
**RENEWAL PERMIT: DISCHARGE, PRETREATMENT & BIOSOLIDS**
**UPDES PERMIT NUMBER: UT0024970**
**UPDES BIOSOLIDS PERMIT NUMBER: UTL-024970**
**MAJOR MUNICIPAL FACILITY**

## FACILITY CONTACTS

| | |
|---|---|
| Operator Name: | Eric N. Bonzo |
| Position: | Wastewater Superintendent |
| Facility Name: | Cedar City Regional Wastewater Treatment Facility |
| Mailing Address: | Cedar City Corporation<br>10 N. Main<br>Cedar City, UT 84720 |
| Phone Number: | (435) 867-9426 |
| Facility Location: | 7218 N. 2300 W.<br>Cedar City, UT 84720 |

## DESCRIPTION OF FACILITY

The Cedar City Regional Wastewater Treatment Facility (CCRWTF) is a Publicly Owned Treatment Works (POTW), with *Standard Industrial Classification code #4952 – for Sewerage Systems,* that receives and treats domestic wastewater. Treatment at CCRWTF consists of two mechanical fine screens, two aerated grit chambers, two primary clarifiers, two oxidation ditches, three final clarifiers, two anaerobic digesters, two chlorine contact chambers, along with nine drying beds and one dewatering screw press for processing biosolids. The CCRWTF has an influent design flow of 4.8 million gallons per day (MGD) and services Cedar City, Enoch City, and other parts of Iron County, Utah. Over the past few years, CCRWTF has had an annual average flow of ~3.0 MGD. CCRWTF is located in the northern most part of Cedar City at latitude 37° 48’ 36” North and longitude 113° 05’ 25” West.

## SUMMARY OF CHANGES FROM PREVIOUS PERMIT

The only proposed permit change is that the Storm Water provisions have been removed as part of a Division of Water Quality (DWQ) programmatic separation of the previously combined UPDES industrial permits. CCRWTF may now be required to apply for and obtain separate UPDES Industrial Storm Water Permit coverage under the UPDES MSGP No. UTR000000, or an applicable exemption, as described further in the Storm Water section of this Fact Sheet. All other permit provisions and limitations remain unchanged.

## DISCHARGE INFORMATION

### DESCRIPTION OF DISCHARGE

The CCRWTF does not discharge to any surface waters of the State. The CCRWTF discharges to an adjacent authorized land application site partially owned by Cedar City and by private individuals with whom there is an agreement to discharge onto the property for infiltration. Although the CCRWTF does not discharge to surface waters of the State, a UPDES permit was originally issued at the request of Cedar City in order to allow them to administer the Utah Model Industrial Pretreatment Program, as well as for the management of Biosolids. This permit is a continuation of that authorization.

### RECEIVING WATERS AND STREAM CLASSIFICATION

The CCRWTF does not discharge to surface waters of the State and therefore, no receiving waters are applicable.

### TOTAL MAXIUM DAILY LOAD (TMDL) REQUIREMENTS

According to the Utah's 2022 303(d) Water Quality Assessment Report, there are no defined assessment units and no listed impairments for the watershed proximal to CCRWTF, which is the West Desert Region of the Lower Sevier River Basin. There have been no TMDL studies completed for this watershed and therefore, no TMDL implementation requirements at this time.

### BASIS FOR EFFLUENT LIMITATIONS

During a previous UPDES permit modification in 2016, the CCRWTF permit first included an effluent limit for total inorganic nitrogen to be more protective of the ground water quality upon the land application discharges. The remains as the only applicable effluent limit in the permit.

### REASONABLE POTETNTIAL ANALYSIS

Since January 1, 2016, DWQ has conducted reasonable potential analysis (RP) on all new and renewal applications received after that date following DWQ's September 10, 2015 Reasonable Potential Analysis Guidance (RP Guidance). RP analyses are typically conducted to evaluate the potential for discharges to exceed the applicable water quality standards of the receiving waters. A formal RP for this permit renewal was not conducted because there have been no discharges to receiving waters and the CCRWTF is prohibited from discharging to any surface waters in the future. Therefore, routine monitoring requirements are being maintained as they are in the permit and further RP evaluations are not applicable at this time. Additional RP evaluation information can be found as an attachment to this Fact Sheet.

## SELF-MONITORING & REPORTING REQUIREMENTS

The self-monitoring and reporting requirements remain unchanged and are the same as the previous permit. CCRWTF is required to continually monitor the plant influent and effluent flows, as well as monitor the influent and effluent on a monthly or quarterly basis as detailed in the permit and herein. The Biological Oxygen Demand 5-day test (BOD5), Total Suspended Solids (TSS) and pH shall be monitored monthly. The oil & grease, total metals and cyanide shall be monitored quarterly. In addition, CCRWTF is also required to continue monthly monitoring the effluent only for E-coli and Total Inorganic Nitrogen, which was initially part of the 2016 permit modification. The self-monitoring reports are to be submitted electronically via the NetDMR system and entered into NetDMR no later than the 28th day of the month following the completed reporting period.

In addition, the permit requires CCRWTF to analyze the influent and effluent for the presence of the toxic pollutants listed in 40 CFR 122 Appendix D Table II (Organic Toxic Pollutants) at least once per year. The pesticides fraction of Appendix D, Table II is suspended unless pesticides are expected to be present. The results of the analyses of metals, cyanide, and organic toxics shall be submitted along with the NetDMR information at the end of the earliest possible reporting period.

The permittee is expected to continue complying with the effluent limit and to continue monitoring the influent and effluent as indicated in the following tables as required.

| **Effluent Limitation** | |
|---|---|
| Parameter, Units | Daily Maximum |
| Total Inorganic Nitrogen, mg/L | 10.0 |

| **Self-Monitoring and Reporting Requirements for the Influent and Effluent** *a | | | |
|---|---|---|---|
| Parameter | Frequency | Sample Type | Units |
| Flow *b, *c | Continuous | Recorder | MGD |
| BOD5 | Monthly | Composite | mg/L |
| TSS | Monthly | Composite | mg/L |
| *E coli* (effluent only) | Monthly | Grab | No./100mL |
| pH | Monthly | Grab | SU |
| Total Inorganic Nitrogen (effluent only) | Monthly | Grab | mg/L |
| Oil & Grease | Quarterly | Grab | mg/L |
| Total Arsenic | Quarterly | Composite | mg/L |
| Total Cadmium | Quarterly | Composite | mg/L |
| Total Chromium | Quarterly | Composite | mg/L |
| Total Copper | Quarterly | Composite | mg/L |
| Total Cyanide | Quarterly | Grab | mg/L |
| Total Lead | Quarterly | Composite | mg/L |
| Total Mercury | Quarterly | Grab/Composite | mg/L |
| Total Molybdenum | Quarterly | Composite | mg/L |
| Total Nickel | Quarterly | Composite | mg/L |
| Total Selenium | Quarterly | Composite | mg/L |
| Total Silver | Quarterly | Composite | mg/L |
| Total Zinc | Quarterly | Composite | mg/L |
| Total Toxic Organics *d | Yearly | Grab/Composite | mg/L |

*a See Permit Definitions, *Part VIII*, for definition of terms.

*b Flow measurement of influent/effluent volume shall be made in such a manner that the permittee can affirmatively demonstrate that representative values are being obtained.

*c If the rate of discharge is controlled, the rate and duration of discharge shall be reported.

*d In addition, the permittee shall analyze the treatment facility influent and effluent for the presence of the toxic pollutants listed in *40 CFR 122 Appendix D Table II (Organic Toxic Pollutants)* yearly. The pesticides fraction of *Appendix D, Table II* is suspended unless pesticides are expected to be present. The results of the analyses of metals, cyanide and toxic organics shall be submitted along with the Discharge Monitoring Report (via NetDMR) at the end of the earliest possible reporting period and also shall be submitted to the DWQ Pretreatment Coordinator.

## BIOSOLIDS INFORMATION

For clarification purposes, sewage sludge is considered solids, until treatment or testing shows that the solids are safe, and meet beneficial use standards. After the solids are tested or treated, the solids are then known as biosolids. Class A biosolids, may be used for high public contact sites, such as home lawns and gardens, parks, or playing fields, etc. Class B biosolids may be used for low public contact sites, such as farms, rangeland, or reclamation sites, etc.

### SUBSTANTIAL BIOSOLIDS TREATMENT CHANGES

In 2022 it was shown that CCRWTF could achieve Class B standards, and might be able to achieve Class A after further testing. They may start distributing biosolids for beneficial use during the term of this renewed permit.

### DESCRIPTION OF TREATMENT AND DISPOSAL

The Permittee submitted their 2021 annual biosolids report on January 7, 2022. The report states the Permittee produced 1299 dry metric tons (DMT) of solids. The biosolids were all disposed of at the local landfill.

Biosolids (sewage sludge) at the CCRWTF are anaerobically digested through primary and secondary digesters. The digesters had a solids retention time of at least 30 days. When the facility was upgraded in 2016, they started to produce more solids than they had capacity to treat and maintain the digestor holding times long enough to achieve Class A standards, but can achieve Class B standards.

Both digesters are mixed and the primary digester is heated to operate at a temperature of 98° F (36.6°C). The solids are dewatered in a screw press, then spread out and staged on drying beds for further drying, the weather impacts this drying on a seasonal basis. After they have dried further, the biosolids is loaded into a roll off dumpster for transfer to the landfill. During winter months they transfer up to three dumpster a week, during the summer months they are down to one load a week.

Under *40 CFR 503 (C)(6), Class A, Alternative 4(i)* the CCRWTF is allowed to do additional testing of pathogens in lieu of a process to further reduce pathogens (PFRP) to meet Class A standards. This additional testing requires the CCRWTF to monitor for viable helminth ova (tape worms and round worm eggs that are capable of reproduction), enteric viruses (viruses of the intestinal tract), as well as *fecal coliform* or *salmonella* bacteria.

The last inspection was conducted on April 11, 2022. The inspection showed that CCRWTF is in compliance with their biosolids management program.

**SELF-MONITORING REQUIREMENTS**

Under *40 CFR 503.16(a)(1),* the self-monitoring requirements are based upon the amount of biosolids disposed per year and shall be monitored according to the chart below.

| Minimum Frequency of Monitoring (40 CFR Part 503.16, 503.26. and 503.46) | | |
|---|---|---|
| Amount of Biosolids Disposed Per Year | | Monitoring Frequency |
| Dry US Tons | Dry Metric Tons | Per Year or Batch |
| > 0 to < 320 | > 0 to < 290 | Once Per Year or Batch |
| > 320 to < 1650 | > 290 to < 1,500 | Once a Quarter or Four Times |
| > 1,650 to < 16,500 | > 1,500 to < 15,000 | Bi-Monthly or Six Times |
| > 16,500 | > 15,000 | Monthly or Twelve Times |

In 2022, the CCRWTF disposed of 1299 DMT of biosolids, therefore they need to sample at least four times a year.

Landfill Monitoring

Under *40 CFR 258,* the landfill monitoring requirements include a paint filter test. If the biosolids do not pass a paint filter test, the biosolids cannot be disposed in the sanitary landfill *(40 CFR 258.28(c)(1).*

**BIOSOLIDS LIMITATIONS**

Heavy Metals

Class A Biosolids for Home Lawn and Garden Use

The intent of the heavy metals regulations of Table 3, *40 CFR 503.13* is to ensure the heavy metals do not build up in the soil in home lawn and gardens to the point where the heavy metals become phytotoxic to plants. The permittee will be required to produce an information sheet (see *Part III. C*. of the permit) to made available to all people who are receiving and land applying Class A biosolids to their lawns and gardens. If the instructions of the information sheet are followed to any reasonable degree, the Class A biosolids will be able to be land applied year after year, to the same lawns and garden plots without any deleterious effects to the environment. The information sheet must be provided to the public, because the permittee is not required, nor able to track the quantity of Class A biosolids that are land applied to home lawns and gardens.

Class A Requirements With Regards to Heavy Metals

If the biosolids are to be applied to a lawn or home garden, the biosolids shall not exceed the maximum heavy metals in Table 3 below. If the biosolids do not meet these requirements, the biosolids cannot be sold or given away for applications to home lawns and gardens.

Class B Requirements for Agriculture and Reclamation Sites

The intent of the heavy metals regulations of Tables 1, 2 and 3, of *40 CFR 503.13* is to ensure that heavy metals do not build up in the soil at farms, forest land, and land reclamation sites to the point where the heavy metals become phytotoxic to plants. The permittee will be required to produce an information sheet (see *Part III. C*. of the permit) to be handed out to all people who are receiving and land applying Class B

biosolids to farms, ranches, and land reclamation sites (if biosolids are only applied to land owned by the permittee, the information sheet requirements are waived). If the biosolids are land applied according to the regulations of *40 CFR 503.13*, to any reasonable degree, the Class B biosolids will be able to be land applied year after year, to the same farms, ranches, and land reclamation sites without any deleterious effects to the environment.

Class B Requirements With Regards to Heavy Metals

If the biosolids are to be land applied to agricultural land, forest land, a public contact site or a reclamation site it must meet at all times:

> The maximum heavy metals listed in *40 CFR Part 503.13(b) Table 1* and the heavy metals loading rates in *40 CFR Part 503.13(b) Table 2*; or
>
> The maximum heavy metals in *40 CFR Part 503.13(b) Table 1* and the monthly heavy metals concentrations in *40 CFR Part 503.13(b) Table 3*.

Tables 1, 2, and 3 of Heavy Metal Limitations

| Pollutant Limits, (40 CFR Part 503.13(b)) Dry Mass Basis | | | | |
|---|---|---|---|---|
| Heavy Metals | Table 1 | Table 2 | Table 3 | Table 4 |
| | Ceiling Conc. Limits [1], (mg/kg) | CPLR [2], (mg/ha) | Pollutant Conc. Limits [3] (mg/kg) | APLR [4], (mg/ha-yr) |
| Total Arsenic | 75 | 41 | 41 | 2.0 |
| Total Cadmium | 85 | 39 | 39 | 1.9 |
| Total Copper | 4300 | 1500 | 1500 | 75 |
| Total Lead | 840 | 300 | 300 | 15 |
| Total Mercury | 57 | 17 | 17 | 0.85 |
| Total Molybdenum | 75 | N/A | N/A | N/A |
| Total Nickel | 420 | 420 | 420 | 21 |
| Total Selenium | 100 | 100 | 100 | 5.0 |
| Total Zinc | 7500 | 2800 | 2800 | 140 |
| 1, If the concentration of any 1 (one) of these parameters exceeds the Table 1 limit, the biosolids cannot be land applied or beneficially used in any way. | | | | |
| 2, CPLR - Cumulative Pollutant Loading Rate - The maximum loading for any 1 (one) of the parameters listed that may be applied to land when biosolids are land applied or beneficially used on agricultural, forestry, or a reclamation site. | | | | |
| 3, If the concentration of any 1 (one) of these parameters exceeds the Table 3 limit, the biosolids cannot be land applied or beneficially used in on a lawn, home garden, or other high potential public contact site. If any 1 (one) of these parameters exceeds the Table 3 limit, the biosolids may be land applied or beneficially reused on an agricultural, forestry, reclamation site, or other high potential public contact site, as long as it meets the requirements of Table 1, Table 2, and Table 4. | | | | |
| 4, APLR - Annual Pollutant Loading Rate - The maximum annual loading for any 1 (one) of the parameters listed that may be applied to land when biosolids are land applied or beneficially reused on agricultural, forestry, or a reclamation site, when they do not meet Table 3, but do meet Table 1. | | | | |

Any violation of these limitations shall be reported in accordance with the requirements of Part III.F.1. of the permit. If the biosolids do not meet these requirements they cannot be land applied.

Pathogens

The Pathogen Control class listed in the table below must be met;

| Pathogen Control Class | |
|---|---|
| 503.32 (a)(1) - (5), (7), (8), Class A | 503.32 (b)(1) - (5), Class B |
| B Salmonella species –less than three (3) MPN[1] per four (4) grams total solids (DWB)[2] or Fecal Coliforms – less than 1,000 MPN per gram total solids (DWB). | Fecal Coliforms – less than 2,000,000 MPN or CFU[3] per gram total solids (DWB). |
| 503.32 (a)(6) Class A—Alternative 4 | |
| B Salmonella species –less than three (3) MPN per four (4) grams total solids (DWB) or less than 1,000 MPN Fecal Coliforms per gram total solids (DWB),<br>And - Enteric viruses –less than one (1) plaque forming unit per four (4) grams total solids (DWB)<br>And - Viable helminth ova –less than one (1) per four (4) grams total solids (DWB) | |
| 1 - MPN – Most Probable Number | |
| 2 - DWB – Dry Weight Basis | |
| 3 - CFU – Colony Forming Units | |

Class A Requirements for Home Lawn and Garden Use

If biosolids are land applied to home lawns and gardens, the biosolids need to be treated by a specific process to further reduce pathogens (PFRP), and meet a microbiological limit of less than less than 3 most probable number (MPN) of *Salmonella* per 4 grams of total solids (or less than 1,000 most probable number (MPN/g) of fecal coliform per gram of total solids) to be considered Class A biosolids. The CCRWTF may look into achieving PFRP through a method of Further Testing.

1. Additional Testing - Under 40 CFR 503 (C)(6), Class A, Alternative 4 Cedar City is allowed to do additional testing of pathogens in lieu of a process to further reduce pathogens (PFRP) to meet Class A standards. This additional testing requires the Cedar City to monitor for viable helminth ova (tape worms and round worm eggs that are capable of reproduction), enteric viruses (viruses of the intestinal tract), as well as fecal coliform or salmonella bacteria.

The practice of sale or giveaway to the public is an acceptable use of biosolids of this quality as long as the biosolids continue to meet Class A standards with respect to pathogens. If the biosolids do not meet Class A pathogen standards the biosolids cannot be sold or given away to the public, and the permittee will need find another method of beneficial use or disposal.

Pathogens Class B

If biosolids are to be land applied for agriculture or land reclamation the solids need to be treated by a specific process to significantly reduce pathogens (PSRP). The CCRWTF has the ability to achieve PSRP through Anerobic Digestion.

1. Under *40 CFR 503.32 (b)(3)*, (Appendix B, A,1 Anaerobic Digestion) - solids are digested in an anaerobic digester with a retention time with a minimum retention time of 15 days at 95° F (35° C) or 60 days at 68° F (20°C).

Vector Attraction Reduction (VAR)
If the biosolids are land applied, The CCRWTF and/or the land applier will be required to meet VAR through the use of a method of listed under *40 CFR 503.33.* The CCRWTF has the ability to meet the vector attraction reduction requirements through one of the methods listed below. At this time CCRWTF does not distribute biosolids to the public for beneficial use, and will be disposing of them in a landfill. Under *40 CFR 503.33(b)(11).*

1. Under *40 CFR 503.33(b)(1),* the solids need to be treated through anaerobic digestion for at least 15 days at a temperature of a least 35° C (95° F) with a 38% reduction of volatile solids.

2. Under *40 CFR 503.33(b)(11)* Sewage sludge placed on an active sewage sludge unit shall be covered with soil or other material at the end of each operating day.

If the biosolids do not meet a method of VAR, the biosolids cannot be land applied.

If the permittee intends to use another one of the listed alternatives in *40 CFR 503.33*, the Director and the EPA must be informed at least thirty (30) days prior to its use. This change may be made without additional public notice

Landfill Monitoring
Under *40 CFR 258,* the landfill monitoring requirements include a paint filter test to determine if the biosolids exhibit free liquid. If the biosolids do not pass a paint filter test, the biosolids cannot be disposed in the sanitary landfill *(40 CFR 258.28(c)(1).*

Record Keeping
The record keeping requirements from *40 CFR 503.17* are included under *Part III.G*. of the permit. The amount of time the records must be maintained are dependent on the quality of the biosolids in regards to the metals concentrations. If the biosolids continue to meet the metals limits of *Table 3* of *40 CFR 503.13*, and are sold or given away the records must be retained for a minimum of five years. If the biosolids are disposed in a landfill the records must retained for a minimum of five years.

Reporting
CCRWTF must report annually as required in *40 CFR 503.18*. This report is to include the results of all monitoring performed in accordance with *Part III.B* of the permit, information on management practices, biosolids treatment, and certifications. This report is due no later than February 19 of each year. Each report is for the previous calendar year.

**MONITORING DATA**

The CCRWTF has been landfilling all biosolids produced at the facility, therefore they have not been required to monitor the anaerobic biosolids (sludge cake) for pathogens or metals. If they intend to change disposal practices in the future, they will be required to monitor the biosolids accordingly.

## STORM WATER

As mentioned previously, the Storm Water provisions have been omitted from this UPDES permit. However, based on the Standard Industrial Classification (SIC) code and the type of industrial activities at the facility, the permittee may be required to maintain separate permit coverage, or an appropriate exclusion, under the UPDES Multi-Sector General Permit (MSGP) for Storm Water Discharges Associated with Industrial Activities (UTR000000).
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. Previously storm water discharge requirements and coverage were combined in this individual permit. These have been separated to provide consistency among permittees, electronic reporting for storm water discharge monitoring reports, and increase flexibility to changing site conditions.

Permit coverage under the Construction General Storm Water Permit (CGP) is required for any construction 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 pretreatment requirements remain the same as in the current permit, with the permittee administering an Approved POTW Pretreatment Program. Any changes to the program must be submitted to the Division of Water Quality (DWQ) as per 40 CFR 403.18.

Local Limits are developed to protect the Publicly Owned Treatment Works (POTW) from Pass Through, Interference and to ensure Industrial Users do not violate the Specific Prohibitions listed in the Cedar City Ordinance. To protect the POTW, Cedar City must submit a technical evaluation of the current Local Limits per the requirements of Part II.F.5. This evaluation may indicate that present Local Limits are sufficiently protective or that they must be revised. The review must be submitted to DWQ within twelve months of the effective date of the permit. Following the submittal, DWQ will advise Cedar City if modifications must occur. If modifications occur, the updated Local Limits and supporting information must be submitted to DWQ within twelve months. If additional time is needed for the development of Local Limits, this should be requested with the submittal of the evaluation with justification for the extra time.

In addition to the technical evaluation of the Local Limits, an annual evaluation of the Local Limits must be completed as part of the annual report. Cedar City must complete the information in the report regarding the sampling and if exceedances occurred. The annual report is due by March 28 every year.

The permit requires influent and effluent monitoring for metals and the organic toxics listed in *R317-8-7.6* and sludge monitoring for potential pollutants listed in *40 CFR 503.* These samples are to support the development of Local Limits. Therefore, it is recommended that the most sensitive method be used for analysis.

Cedar City must report to the DWQ Pretreatment Coordinator any exceeds of the Maximum Allowable Headworks Load. The DWQ Pretreatment Coordinator will provide additional information if other requirements are needed. The information can be provided via email.

## BIOMONITORING REQUIREMENTS

A nationwide effort to control toxic discharges where whole effluent toxicity (WET) 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. Since the facility does not discharge to surface waters of the state, no biomonitoring is required. As such, there will be no numerical WET limitations or WET monitoring requirements in this permit. However, the permit will once again contain a toxicity limitation re-opener provision. This provision allows for modification of the permit at any time in the future to include WET limitations and/or monitoring, should discharge conditions change in the future.

## PERMIT DURATION

It is recommended that this permit be effective for a duration of five (5) years, as authorized in UAC R317-8-5.1(1).

## PERMIT DRAFTED & REVIEWED BY:

Jeff Studenka, Discharge Permit Writer
Daniel Griffin, Biosolids
Jennifer Robinson, Pretreatment
Lonnie Shull, Biomonitoring
Carl Adams, Storm Water
Amy Dickey, TMDL/Watershed
Utah Division of Water Quality
(801) 536-4300
February 15, 2023

## PUBLIC NOTICE INFORMATION (to be updated after)

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 Notice of the draft renewal permit shall be published on DWQ's website for at least 30 days as per Utah Administrative Code (UAC) R317-8-6.5. 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**

ATTACHMENTS (2): 1. Effluent Monitoring Data
2. RP Evaluation

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# ATTACHMENT 1

*Effluent Monitoring Data*

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# 2018-2022 Effluent Monitoring Data

| Flow, MGD | | pH, SU | | *E. coli, #/100 mL* | Total Inorganic Nitrogen, mg/L | | BOD, mg/L | | TSS, mg/L | | BOD % Removal | TSS % Removal |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| Avg | Max | Min | Max | Avg/Max | Avg | Max | Avg | Max | Avg | Max | | |
| 3.0 | 4.6 | 7.1 | 7.9 | 2.6/84 | 3.5 | 19.4 | 6 | 27 | 5.5 | 28 | 96.7 | 98.1 |

# ATTACHMENT 2

*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[1]. 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. |

Initial screening for CCRWTF monitoring values that were submitted through the discharge monitoring reports revealed that a closer look at any metals or other parameters is not required since there are no discharges to any receiving stream waters and further evaluation for RP is not applicable at this time. Therefore, the result of this limited RP is **Outcome C: No new effluent limitation. Routine monitoring requirements maintained as they are in the permit.**



[1] See Reasonable Potential Analysis Guidance for definitions of terms.

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