

**STATEMENT OF BASIS
SKF SALT LAKE CITY
INDUSTRIAL USER
UTAH POLLUTANT DISCHARGE ELIMINATION SYSTEM (UPDES)
PRETREATMENT PERMIT NO. UTP000057**

FACILITY CONTACT

Designated Facility Contact
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DESCRIPTION OF FACILITY

SKF Salt Lake City manufactures seals made from various materials including rubber and plastic. The facility has three shifts working Sunday through Friday. The facility starts up the operation on Sunday at 22:00 and shuts down the operation on Friday at 22:00. The operation is continuous throughout the year without seasonal or scheduled closures, other than holidays.

SKF has been classified as a significant industrial user due the determination that the facility is covered by the categorical standard based on *40 CFR §428.56*. Additional information regarding the categorical standard can be found in *40 CFR §428*— Rubber Manufacturing Point Source Category. Limitations will be based on *40 CFR §428.56 (a)* and the specific and general pretreatment standards. The limitations stated in *40 CFR §428.56 (b)* are not applicable due to the facility not producing lead-sheathed hose products.

DESCRIPTION OF DISCHARGE

The process wastewater discharge is from the contact water wet deck with an estimated discharge to the POTW of 480 gallons per day (gpd). The facility also has an additional 10,000 gpd of non-contact water and sanitary sewer wastewater which will be discharged to the POTW. The non-contact water and sanitary sewer wastewater will not commingle with the process wastewater from the wet deck. The wastewater which is regulated by the UPDES Permit for the wet deck will be discharged into a drain in the north janitorial closet following the filtration unit.

EFFLUENT LIMITATIONS

Utah Administrative Code (UAC) R317-8-8.5 contains general and specific prohibitions which must be achieved by all non-domestic sources of pollutants. Pollutants introduced into a POTW by a non-domestic source shall not pass through the POTW or interfere with the operation or performance of the POTW.

A reasonable potential analysis was not completed for this facility because the facility does not discharge directly to waters of the State, instead, the facility discharges to a POTW and is regulated by pretreatment standards.

The daily minimum limit for pH is based on the prohibited standard found in *R317-8-8.5(3)(b)*. The daily maximum limit for pH is based on the not allow waste that would otherwise be classified as hazardous waste from being discharge to the POTW, *40 CFR 261.22*. The limit is slightly more stringent than stated in *40 CFR 261.22(a)(1)* this is to protect the POTW and POTW personnel from wastewater that could be corrosive.

Limits for oil and grease are based on the categorical standard found in *40 CFR §428.56 (a)*.

At this time, additional limitations and monitoring will not be required due to the publicly owned treatment works (POTW) meeting limits for BOD, TSS and metals. Sampling in the future for these parameters may need to occur based on the needs of the POTW and the development of technically based local limits.

The effluent limitations listed in the Effluent Limitations Table will apply to the discharge from the facility as end of process standards.

Parameter	Effluent Limitations Table		
	Maximum Monthly Avg	Daily Minimum	Daily Maximum
pH, SU	NA	5.0	12.0
Oil and Grease, mg/L	NA	NA	100

NA – Not Applicable

MONITORING AND REPORTING REQUIREMENTS

Monitoring requirements, measurement frequencies and sample types were adapted from guidance documents for pretreatment permitting. The wastewater discharge shall be sampled as specified in the Self-Monitoring and Reporting Requirements Table.

Samples must be collected utilizing flow proportioned composite samples for the oil and grease. Samples for pH must be collected utilizing a grab sample.

Self-Monitoring and Reporting Requirements Table			
Parameter	Frequency	Sample Type	Units
Total Flow	Continuous	Recorder	gpd
pH	Monthly	Grab	SU
Oil and Grease	2 X Yearly	Composite	mg/L

Categorical parameters will be required to be sampled within 90 days of the permit being issued.

All monitoring results and observations shall be summarized on a discharge monitoring report (DMR) form each month. DMRs must be submitted no later than the 28th day of the month following the end of the reporting period. DMRs must either be submitted with monitoring data included or indicate that no discharge occurred for the monitoring month. DMRs shall be submitted via netDMR.

The permittee must notify the Director of Water Quality and the POTW of any changes or violations of the permit. Notification to the POTW must be made to the public works director. If the POTW does not have a public works director at the time of notification; the notification must be made to the city manager and the direct responsible charge (DRC) for the wastewater treatment plant and collection system.

BIOMONITORING REQUIREMENTS

As part of a nationwide effort to control toxicity, biomonitoring requirements are being included in permits for facilities where effluent toxicity is an existing or potential concern. SKF discharges to a POTW therefore at this time biomonitoring will not be required. Biomonitoring of SKF's effluent will not be required unless a potential for toxicity is discovered. Authorization for requiring effluent biomonitoring is provided in *UAC R317-8-4.2* and *R317-8.5.3*.

PRETREATMENT REQUIREMENTS

Any wastewater that SKF discharges to the sanitary sewer, either as a direct discharge or as a hauled waste, is subject to Federal, state of Utah and local pretreatment regulations. Pursuant to Section 307 of the Clean Water Act, the permittee shall comply with all applicable Federal General Pretreatment Regulations promulgated in *40 CFR §403*, the state of Utah Pretreatment Requirements found in *UAC R317-8-8*, and any specific local discharge limitations developed by the POTW accepting the waste.

SLUG CONTROL PLAN

SKF has been evaluated for a slug control plan; based on the findings, the facility will not be required to develop a slug control plan at this time. A re-evaluation of the facility will be completed as part of inspections at the facility. If conditions change the facility will be required to develop a slug control plan and the permit will be modified to include the requirement to develop a slug control plan. The facility is required to immediately notify the Division of Water Quality and the POTW of changes to spill and/or slug potential which could impact the POTW.

A slug occurred during set up due to the filter not being installed. The slug was reported to the POTW. SKF has developed a procedure to ensure this does not occur again. If the filter is not installed correctly, has a failure or is not installed, the facility must contact the Division and the POTW. This must occur even if a slug has not occurred to the POTW. Normal replacement of the filter by trained maintenance staff, per the procedure implemented by SKF, is not required to be reported.

Raw materials are stored in an area that does not have floor drains. Waste and sludges are stored in 55 gallon drums. Liquid wastes are stored with secondary containment.

STORM WATER

This permit does not include storm water requirements. The industrial activities at the facility fall under an industrial storm water sector, NAISC Codes¹ 332991, 339991 and 334519, requiring permit coverage. The permittee has submitted a no exposure certification. This certification must be maintained and updated, if needed, per the requirements of the Utah Storm Water Rules. See Part IV of the permit for requirements. The following link provides additional information regarding the UPDES Industrial Stormwater Permit

<https://deq.utah.gov/water-quality/general-multi-sector-industrial-storm-water-permit-updes-permits>

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) for the It is required to obtain a construction storm water permit during the period of construction. The following link provides additional information regarding the UPDES Construction General Storm Water Permit

<https://deq.utah.gov/water-quality/general-construction-storm-water-updes-permits>

¹North American Industry Classification System (NAICS) Code

General UPDES Stormwater Permit requirements can be found at <http://stormwater.utah.gov>.

PERMIT DURATION

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

PUBLIC NOTICE INFORMATION

A public notice was completed, for public comment of this permit, which met the requirements of R317. No changes occurred and no comments were received therefore an additional notice was not provided due to the pretreatment requirements in R317.

GENERAL INFORMATION

Drafted by
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Lisa Stevens, Industrial Stormwater
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Permit DWQ-2020-019852
Fact Sheet/Statement of Basis DWQ-2020-019854
Permit Application DWQ-2019-015904
Pretreatment Categorical Information 40 CFR 428.56

https://www.ecfr.gov/cgi-bin/text-idx?SID=9b2ad535d533c8e67ed84ba64ff900de&mc=true&node=pt40.32.428&rgn=div5#se40.32.428_156