

Official Draft Public Notice Version **February 12, 2016**

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

**FACT SHEET STATEMENT OF BASIS
ANDERSON GENEVA
RENEWAL PERMIT
UPDES PERMIT NUMBER: UT0000361
MAJOR INDUSTRIAL**

FACILITY CONTACTS

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Facility Address: 900 North Geneva Road
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DESCRIPTION OF FACILITY

The Geneva facility is a now defunct integrated steel mill located in the town of Vineyard Utah, east of Utah Lake at latitude 40°18'02" and longitude 111°44'28". As of June 2010, the steel making machinery has been dismantled and shipped off site, and all of the buildings on the property have been demolished.

As of September 2015, the only treatment unit currently in operation is the RCRA Granular Activated Carbon Treatment Unit which discharges from Outfall 005. The discharge of groundwater and storm water occurs at Outfall 001.

Geneva's current operation falls under two Standard Industrial Classification (SIC) Codes. They are: 4953 – Refuse Systems and 5093 – Scrap and Waste Materials. From these classifications Anderson Geneva's effluent limitations are subject to the Utah Secondary Treatment Standards.

All wastewater, groundwater, and storm-water generated at the facility is discharged to Utah Lake through a 1500 foot long, 24 inch diameter diffuser with 20, 6" portals.

SUMMARY OF CHANGES FROM PREVIOUS PERMIT

DWQ has worked to improve our reasonable potential analysis (RP) for the inclusion of limits for parameters in the permit by using an EPA provided RP model. Since the Geneva facility no longer has any active processes contributing to Outfall 001 an RP initial screening check was run for Cyanide, Lead, Zinc, and Ammonia. The RP analysis showed that there is no potential to violate water quality standards for Cyanide, Zinc, and Ammonia; as a result, this permit will not include limits for these parameters.

DISCHARGE

DESCRIPTION OF DISCHARGE

Anderson Geneva has been reporting self-monitoring results on discharge monitoring reports on a monthly basis. There have not been significant violations during the previous 5 years.

<u>Outfall</u>	<u>Description of Discharge Point</u>
001	Discharge of storm water and groundwater to the retention pond and then to Utah Lake through a 1500-foot long, 24-inch diameter diffuser at latitude 40°19'25" and longitude 111° 45' 42".
005	Internal discharge from the carbon filtration treatment unit that treats groundwater from a RCRA site groundwater collection system.

RECEIVING WATERS AND STREAM CLASSIFICATION

The discharge flows into the Utah Lake. Utah Lake is Class 2B, 3B, 3D, and 4, according to *Utah Administrative Code (UAC) R317-2-13*:

- 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.
- Class 3B - Protected for warm water species of game fish and other warm water aquatic life, including the necessary aquatic organisms in their food chain.
- Class 3D - Protected for waterfowl, shore birds and other water-oriented wildlife not included in Classes 3A, 3B, or 3C, including the necessary aquatic organisms in their food chain.
- Class 4 - Protected for agricultural uses including irrigation of crops and stock watering.

BASIS FOR EFFLUENT LIMITATIONS

Limitations on total suspended solids (TSS), biochemical oxygen demand (BOD₅), total dissolved solids, and pH are based on current Utah Secondary Treatment Standards, UAC R317-1-3.2. The limit for lead is based upon water quality standards obtained from the waste load analysis (WLA). The WLA indicates that these limitations should be sufficiently protective of water quality, in order to meet State water quality standards in the receiving waters. The oil and grease is based on best

professional judgment (BPJ). The effluent limits for Outfall 005 have been the same since the RCRA site was designated. The permit limitations are:

Outfall 001

Effluent Limitations				
Parameter	Maximum Monthly Average	Maximum Weekly Average	Daily Minimum	Daily Maximum
BOD ₅ , mg/L	25	35	NA	NA
TSS, mg/L	25	35	NA	NA
Lead, mg/L	0.151	NA	NA	0.844
Total Dissolved Solids, mg/L	NA	NA	NA	1200
Oil & Grease, mg/L	NA	NA	NA	10.0
PH, Standard Units	NA	NA	6.5	9.0

Outfall 005

Effluent Limitations				
Parameter	Maximum Monthly Average	Maximum Weekly Average	Daily Minimum	Daily Maximum
Ammonia, lbs/day	62	NA	NA	210
Phenols (4AAP), lbs/day	0.12	NA	NA	0.25
Benzene, lbs/day	NA	NA	NA	0.12
Naphthalene, lbs/day	NA	NA	NA	0.12
Benzo(a)pyrene, lbs/day	NA	NA	NA	0.12

NA – Not Applicable.

SELF-MONITORING AND REPORTING REQUIREMENTS

The following self-monitoring requirements are similar to the previous permit. The permit will require reports to be submitted monthly and annually, as applicable, on Discharge Monitoring Report or NetDMR (DMR) no later than the 28th day of the month following the completed reporting period. Lab sheets for biomonitoring must be attached to the biomonitoring DMR.

Outfall 001

Self-Monitoring and Reporting Requirements			
Parameter	Frequency	Sample Type	Units
Total Flow	Continuous	Recorder	MGD
BOD ₅	Monthly	Grab	mg/L
TSS	2 x Month	Grab	mg/L
Oil & Grease	2 x Month	Grab	mg/L
Total Lead	2 x Month	Grab	mg/L
Total Dissolved Solids	2 x Month	Grab	mg/L
Total Phosphorous	2 x Month	Grab	mg/L
pH	2 x Month	Grab	SU
WET, Acute Biomonitoring	Quarterly	Composite	Pass/Fail

Outfall 005

Self-Monitoring and Reporting Requirements			
Parameter	Frequency	Sample Type	Units
Total Flow	Continuous	Recorder	MGD
Ammonia	2 x Month	Grab	lbs/day
Phenols (4AAP)	2 x Month	Grab	lbs/day
Benzene	2 x Month	Grab	lbs/day
Naphthalene	2 x Month	Grab	lbs/day
Benzo(a)pyrene	2 x Month	Grab	lbs/day

WASTE LOAD ANALYSIS AND ANTIDegradation REVIEW

Effluent limitations are also derived using a waste load analysis (WLA), which is appended to this statement of basis. The WLA incorporates Secondary Treatment Standards, Water Quality Standards, Antidegradation Reviews (ADR), as appropriate and designated uses into a water quality model that projects the effects of discharge concentrations on receiving water quality. Effluent limitations are those that the model demonstrates are sufficient to meet State water quality standards in the receiving waters.

During the UPDES permit development, a WLA and ADR were performed. An ADR Level I review was performed and the conclusion was that an ADR level II review was not required. A copy of the ADR review form is appended to this document.

STORM WATER

STORMWATER REQUIREMENTS

Storm water provisions are included in this combined UPDES permit.

Storm water requirements are included in the permit. Geneva Steel is required to develop a storm water pollution prevention plan in compliance with the permit conditions.

The permit requires the preparation and implementation of a storm water pollution prevention plan for all areas within the confines of the plant. Elements of this plan are required to include:

1. The development of a pollution prevention team:
2. Development of drainage maps and materials stockpiles:
3. An inventory of exposed materials:
4. Spill reporting and response procedures:
5. A preventative maintenance program:
6. Employee training:
7. Certification that storm water discharges are not mixed with non-storm water discharges:
8. Compliance site evaluations and potential pollutant source identification, and:
9. Visual examinations of storm water discharges.

PRETREATMENT REQUIREMENTS

There is no discharge of process wastewater to any municipal wastewater treatment facility. Any process wastewater that the facility may discharge to the public sanitary sewer, either as direct discharge or as a hauled waste, is subject to federal, state 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 Section 403, the State Pretreatment Requirements found in UAC R317-8-8, and any specific local discharge limitations developed by the Publicly Owned Treatment Works (POTW) accepting the waste.

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.*

Since the permittee is a major discharger, the renewal permit will require Whole Effluent Toxicity (WET) testing. Acute toxicity tests will be conducted quarterly, alternating between Ceriodaphnia dubia and Pimephales promelas (fathead minnows) species, as detailed in the permit. The permit will contain the standard requirements for accelerated testing upon failure of a WET test, and a PTI (Preliminary Toxicity Investigation) and TRE (Toxicity Reduction Evaluation) as necessary. Since the effluent is dispersed into Utah Lake through a 1500-foot long diffuser, the potential for toxicity is not deemed sufficient to require chronic testing or more frequent biomonitoring in the permit.

The permit will contain the standard requirements for accelerated testing upon failure of a WET test and a PTI (Preliminary Toxicity Investigation) and TRE (Toxicity Reduction Evaluation) as necessary.

PERMIT DURATION

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

Drafted by
Matthew Garn, P.E.
Utah Division of Water Quality
January 11, 2016

PUBLIC NOTICE

Began:
Ended:
Public Noticed in The Daily Herald

DWQ-2016-001062

Preliminary RP Results

PNDRAFT

		Effluent				
		Parameter	Cyanide	Lead	Zinc	Ammonia
ARP Val		0.10861	0.49367	1.191	14.9	
CRP Val		0.02567	0.15146	46.228	202.94	
Metals, mg/L	2012	jan	0.005	0.1	0.1	7.2
		feb	0.005	0.1	0.1	5.2
		mar	0.005	0.1	0.1	4.1
		april	0.005	0.1	0.1	3.2
		may	<.005	0.1	0.1	2
		june	0.005	0.1	0.1	5.3
		july	0.005	0.1	0.1	5.4
		aug	0.005	0.05	0.05	5
		sept	0.01	0.1	0.1	1.1
		oct	0.005	0.1	0.1	0.2
		nov	0.005	0.1	0.1	1.1
		dec	0.005	0	0.1	1
	2013	jan	0.005	0.1	0.1	1.5
		feb	0.005	0.1	0.1	7.1
		mar	0.003	0	0.1	1.1
		april	0.003	0	0.1	0.3
		may	0.005	0	0.1	0.3
		june	0.003	0.025	0.1	1.1
		july	0.005	0	0	0.6
		aug	0.005	0	0.1	0.3
		sept	0.001	0.025	0.1	0.3
		oct	0.005	0	0	0.3
		nov	0.003	0	0	1.2
		dec	0.005	0	0	1.2
	2014	jan	0.005	0	0	1
		feb	0.003	0	0	0.6
		mar	0.003	0	0.1	0
		april	0.003	0	0.1	0.3
		may	0.005	0	0.1	0.3
		june	0.003	0	0.1	0.3
		july	0.005	0.025	0.2	0.7
		aug	0.005	0	0.1	0.3
		sept	0.01	0	0.4	5.6
		oct	0.005	0	0	0.3
		nov	0.005	0.025	0.025	0.3
		dec	0.005	0	0	1.5
	2015	jan	0.005	0	0	0.8
		feb	0.005	0.05	0.05	0.5
		mar	0	0	0.16	0.5
		april	0.005	0	0	0.3
		may	<.005	0.11	0.11	0.5
		june	0.005	0	0.1	0.3
		july	0.005	0	0.1	0.5
		aug	0.005	0.1	0.1	0.5
	ND Value		0	0	0	0
	Max		0.01	0.11	0.4	7.2
	Run A RP?		No	No	No	No
	Run C RP?		No	YES	No	No