

**STATEMENT OF BASIS & FACT SHEET**  
**NRP JONES, LLC**  
**UTAH POLLUTANT DISCHARGE ELIMINATION SYSTEM (UPDES)**  
**MINOR INDUSTRIAL FACILITY PERMIT RENEWAL**  
**UPDES PERMIT NUMBER: UT0025097**

Official Draft Public Notice Version **March 15, 2013**

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

**FACILITY CONTACT INFORMATION**

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**DESCRIPTION OF FACILITY**

NRP Jones, LLC (NRP) facility produces approximately 7800 pounds of finished, high pressure rubber hose per day including hose wrapped with nylon fabric and wire cable. The standard industrial classification (SIC) codes for NRP is 3052 for rubber and plastics hose and belting, and 5085 for industrial supplies.

**DESCRIPTION OF DISCHARGE**

The effluent discharge is conveyed to Outfall 001 by an irrigation grade plastic 8 inch pipe on the northwest corner of the facility property at latitude 39° 43' 31.11" N and longitude 111° 50' 30.76" W. Outfall 001 represents the only UPDES permitted discharge point. Approximately 90% of the water being routed to this discharge is non-contact, once through cooling water used in the rubber mill rolling process. A smaller contribution of approximately 10% comes from once through, contact cooling water used in the hot feed extrusion process. NRP utilizes culinary water from Nephi City as the only source of their cooling water. Both cooling processes have been evaluated and determined not to significantly impact the quality of the original cooling water (i.e., drinking water). The boiler condensate, floor drains, steam tunnels and any discharge which may contain traces of toluene or other contaminants are routed into the sanitary sewer. The volume of the discharge at Outfall 001 is approximately 58,000 gallons per day (0.058 MGD). Facility personnel have requested that DWQ use 80,000 gallons per day (0.08) as the daily maximum flow. The facility has made some significant improvements since issuance of the last permit. These are:

- The pH reported on the discharge monitoring report is taken on-site using a portable pH meter. A laboratory consultant is providing calibration support and other assistance with pH analysis if needed
- The weir box measuring flow has been modified so that flow could be more accurately measured.

- As part of the storm water pollution prevention plan (SWPPP) the Company is in process of completing a berm around the entire facility and associated grounds to prevent storm water runoff. There is presently a berm, around most of the facility except the southwest corner. The DWQ will track this process until complete.

Discharge monitoring reports have been reviewed for the past three years and indicated no permit violations.

NRP uses three sources of rubber as a raw material for manufacture of its high pressure hoses. It uses natural rubber, nitrile and neoprene. No lead sheathed hose is produced.

### **RECEIVING WATERS AND STREAM CLASSIFICATION**

The discharge flows directly into Nephi City Irrigation Canal, which does not discharge to any surface water body. All of the flow is used by local farmers for irrigation and stock watering. Any water not used for irrigation soaks into the ground or evaporates. Nephi City Irrigation Canal is a Class 4 water.

Class 4 -protected for agricultural uses including irrigation of crops and stock watering.

### **WASTE LOAD ANALYSIS AND ANTIDegradation REVIEW**

Effluent limitations are derived using a waste load analysis (WLA), which is appended to this statement of basis as ADDENDUM. 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 this UPDES renewal permit development, a WLA and ADR were performed. An ADR Level I review was performed and concluded that an ADR Level II review was not required. The discharge was evaluated and determined not to cause a violation of State Water Quality Standards in downstream receiving waters.

### **BASIS FOR EFFLUENT LIMITATIONS**

Applicable technology based standards for total suspended solids (TSS), oil and grease (O&G), and pH are found in *40 CFR 428.3 (Small-Sized General, Molded, Extruded and Fabricated Rubber Plants Subcategory)*. Since no lead sheathed hose is produced at this facility lead is not considered as a parameter in the permit. Approximately 90% of the permitted discharge consists of non-contact cooling water with the remainder being contact cooling water. Therefore the TSS and pH limitations are based on State Secondary Treatment Requirements, *Utah Administrative Code (UAC) R317-1-3.2*. The O&G limitations are based on best professional judgment (BPJ). It is anticipated that the permittee will be able to continue to comply with all required effluent limitations.

Effluent Limitations

<u>Parameter</u>	<u>30-Day Avg.</u>	<u>7-Day Avg.</u>	<u>Daily Min.</u>	<u>Daily Max.</u>
Flow, GPD	N.A.	N.A.	N.A.	80,000
TSS, mg/L	25	35	N.A.	N.A.
Oil & Grease, mg/L	N.A.	N.A.	N.A.	10
pH, S.U.	N.A.	N.A.	6.5.	9.0

**SELF-MONITORING AND REPORTING REQUIREMENTS**

The permittee is required to monitor and report total flow, TSS, oil & grease, and pH each month. This reporting requirement will be submitted on Discharge Monitoring Report (DMR) forms, as required and are due 28 days after the end of each monthly reporting period.

Self-Monitoring and Reporting Requirements

<u>Parameter</u>	<u>Frequency</u>	<u>Sample Type</u>	<u>Units</u>
Total Flow	Monthly	Instantaneous	gal/day
TSS	Monthly	Grab	mg/L
Oil & Grease	Sheen observation/Monthly	Visual/Grab	mg/L
pH	Monthly	Grab	S.U.

**SUMMARY OF CHANGES FROM PREVIOUS PERMIT**

A daily maximum flow of 80,000 gallons per day (0.08 MGD) has been included in this permit renewal.

**STORM WATER**

The storm water requirements are based on the UPDES Multi-Sector General Permit (MSGP) for Storm Water Discharges for Industrial Activity, General Permit No. UTR000000. All sections of the MSGP that pertain to discharges from the NRP facility have been included and sections which are redundant or do not pertain have been deleted. The permit requires the preparation and implementation of a Storm Water Pollution Prevention Plan (SWPPP) for all areas within the confines of the facility. The NRP facility has developed a SWPPP and is presently in the process of revising this plan.

**PRETREATMENT**

Nephi Rubber discharges approximately 20,000 gallons per month process wastewater to the Nephi sanitary sewer system. Any process wastewater that the facility may discharge to the 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, found 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*.

NRP is categorized as a minor industrial facility. Most of the water being discharged is culinary water utilized for non-contact, once through cooling processes. Also, 100% of the discharge has been utilized by local farmers and ranchers for many years with no observable ill effects reported. For these reasons and based upon BPJ, a reasonable potential for toxicity does not exist and therefore, biomonitoring is not included as part of the effluent monitoring program. In the event of any unforeseen toxicity occurring at the facility, the permit does contain a toxicity limitation-reopener provision, where WET testing and limitation requirements can be included at any time if found to be appropriate in the future.

### **PERMIT DURATION**

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

Drafted by Mike Herkimer  
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