

Request for Site Specific Standard: South Fork Spring Creek/Spring Creek, Cache County, Utah

The Division of Water Quality is proposing (June 2008 Triennial Review) that the TDS standard be returned to 2003 standard of 1,200 mg/l for agricultural uses as follows:

Total Dissolved Solids

~~[Irrigation]—————1200~~
~~[Stock Watering]—————2000]~~

Included with the proposed change is an accompanying footnote. The controlling phrase under which a less stringent site specific standard could be granted to a discharger is:

Site-specific criteria for total dissolved solids may be adopted by rulemaking where it is demonstrated that:

(b) a less stringent, site-specific criterion and/or data-specified criterion is protective of existing and attainable agricultural uses

Swift & Company in correspondence (letter dated February 5, 2008 to William O. Moellmer and a non-dated letter to the Board) is asking for a site specific standard for South Fork of Spring Creek and Spring Creek to Cutler Reservoir.

The salient points in their request are:

- “.. it was our understanding that the parties agreed during negotiations over the new compliance plan that the existing irrigation stock watering TDS limits would remain the same. As a result our new treatment processes were designed without consideration of their effects on TDS.’
- “Currently our wastewater treatment plant’s seasonal TDS discharge limits are 3,400 ppm in the summer and 3,600 ppm in the winter.”
- “Our effluent is diluted by other flows before it gets to US 89.” *[DWQ comment: The point of compliance is at US89].*
- “This allows us to meet the current 1200 ppm TDS limit then[during irrigation season] and the 2000 ppm limit during the non-irrigation season. *[DWQ comment: The point of compliance is at US89].*
- “Additionally we are requesting a 400 ppm increase to the standard to facilitate the increased TDS that will result from the approved treatment of phosphorus enabling us to meet the phosphorus limits contained in our UPDES Permit”

Swift & Company is formally asking that a site specific standard be as follows:

<u>South Fork Spring Creek and Spring Creek from the</u>	
<u>confluence with Cutler Reservoir to US 89:¹</u>	<u>1,600 mg/l (March-Sept.)</u>
	<u>2,400 mg/l (Oct.-Feb)</u>

¹ Recent communication from Swift & Company corrects the only stream segment where the site specific standard is requested is the South Fork of Spring Creek itself. Spring Creek from the confluence with Cutler Reservoir to US 89 may be removed from the request. [WOM July 2, 2008]