



Colorado Department  
of Public Health  
and Environment

**COLORADO DISCHARGE PERMIT SYSTEM (CDPS)  
FACT SHEET FOR PERMIT NUMBER CO0021075  
AVONDALE WATER AND SANITATION DISTRICT  
AVONDALE WWTF  
PUEBLO COUNTY**

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**I. TYPE OF PERMIT**

- A. Permit Type:** Domestic - Minor Municipal, Lagoon System, Sixth Renewal
- B. Discharge To:** Surface Water

**II. FACILITY INFORMATION**

- A. SIC Code:** 4952 Sewerage Systems
- B. Facility Location:** Latitude: 38.2411° N, Longitude: -104.307716° W
- C. Permitted Feature:** 001A, following disinfection and prior to mixing with the receiving stream. 38°14'29.5"N, 104°20'07.5"W

The location provided above will serve as the point of compliance for this permit and is appropriate as it is located after all treatment and prior to discharge to the receiving water.

- D. Facility Flows:** 0.1146 MGD

**E. Major Changes From Last Renewal:**

The Avondale WWTF is no longer permitted with Ft. Reynolds WWTF. The Avondale WWTF renewal permit includes limitations for *E.coli* in place of limitations for fecal coliform. Quarterly monitoring requirements for ammonia and semi-annual selenium monitoring requirements are included in the new permit.

**III. RECEIVING STREAM**

**A. Waterbody Identification:** COARLA02a, the Green Arroyo

**B. Water Quality Assessment:**

An assessment of the stream standards, low flow data, and ambient stream data has been performed to determine the assimilative capacities for the Green Arroyo for potential pollutants of concern. This information, which is contained in the Water Quality Assessment (WQA) for this receiving stream(s), also includes an antidegradation review, where appropriate. The Division's Permits Section has reviewed the assimilative capacities to determine the appropriate water quality-based effluent limitations as well as potential limits based on the antidegradation evaluation, where applicable. The limitations based on the assessment and other evaluations conducted as part of this fact sheet can be found in Part I.A of the permit.

Permitted Feature 001A will be the authorized discharge point to the receiving stream.

**IV. FACILITY DESCRIPTION**

**A. Infiltration/Inflow (I/I)**

No infiltration/inflow problems have been documented in the service area.

**B. Lift Stations**

There are no lift stations in the service area.

**C. Chemical Usage**

The permittee stated in the application that they utilize one chemical in their treatment process. The following chemical has been approved for use and is summarized in the following table.

**Table IV-2 – Chemical Additives**

<b>Chemical Name</b>	<b>Purpose</b>	<b>Constituents of Concern</b>
<i>Chlorine gas</i>	<i>Disinfection</i>	<i>TRC</i>

Chemicals deemed acceptable for use in waters that will or may be discharged to waters of the State are acceptable only when used in accordance with all state and federal regulations, and in strict accordance with the manufacturer's site-specific instructions.

**D. Treatment Facility, Facility Modifications and Capacities**

The facility consists of a three-cell non-aerated lagoon, three constructed wetland cells, and a chlorine contact chamber. The permittee has not performed any construction at this facility that would change the hydraulic capacity of 0.1146 MGD or the organic capacity of 211 lbs BOD<sub>5</sub>/day, which were specified in Site Approval 4187. That document should be referred to for any additional information.

Pursuant to Section 100.5.2 of the Water and Wastewater Facility Operator Certification Requirements, this facility will require a certified operator. If the facility has a question on the level of the certified operator it needs then the facility will need to contact the Engineering Section of the Division.

## E. Sludge Treatment and Disposal

Since the treatment facility consists of non-aerated lined (bentonite) lagoons, sludge removal will probably be infrequent (once every 5 to 10 years) and only take place if the ponds are drained and cleaned. If sludge is removed from the lagoons for any reason, it must be disposed of in accordance with local, State and Federal regulations.

### 1. EPA General Permit

EPA Region 8 issued a General Permit (effective October 19, 2007) for Colorado facilities whose operations generate, treat, and/or use/dispose of sewage sludge by means of land application, landfill, and surface disposal under the National Pollutant Discharge Elimination System. All Colorado facilities are required to apply for and to obtain coverage under the EPA General Permit.

### 2. Biosolids Regulation (Regulation No. 64, Colorado Water Quality Control Commission)

While the EPA is now the issuing agency for biosolids permits, Colorado facilities that land apply biosolids must comply with requirements of Regulation No. 64, such as the submission of annual reports as discussed later in this rationale.

## V. PERFORMANCE HISTORY

### A. Monitoring Data

- Discharge Monitoring Reports – The following tables summarize the effluent data reported on the Discharge Monitoring Reports (DMRs) for the previous permit term, from December 2008 through December 2013.

**Table V-1 – Summary of DMR Data for Permitted Feature 001A**

<i>Parameter</i>	<i># Samples or Reporting Periods</i>	<i>Reported Average Concentrations Avg/Min/Max</i>	<i>Reported Maximum Concentrations Avg/Min/Max</i>	<i>Previous Avg/Max/AD Permit Limit</i>	<i>Number of Limit Excursions</i>
<i>Effluent Flow (MGD)</i>	37	0.055/0.002/0.11	0.061/0.01/0.13	0.1146/Report	
<i>pH (su)</i>	37	7.8/6.8/8.3	8.3/7/8.7	6.5 – 9	
<i>Fecal Coliform (#/100 ml)</i>	37	27/1/189	27/1/360	200/400	
<i>TRC (mg/l)</i>	37	NA	0.22/0/0.48	0.5	
<i>BOD5 (mg/l)</i>	37	27/10/45	27/10/45	30/45	3
<i>BOD5 (% removal)</i>	37	86/77/94	NA	85	8
<i>TSS (mg/l)</i>	37	49/18/129	47/8/129	105/160	1
<i>Oil and Grease (mg/l)</i>	61	NA	0	10	
<i>*The pH data shows the minimum reported values in the "average" column, and the maximum reported values in the "maximum column"</i>					

NA means Not Applicable  
 NV means No Visible Sheen

### B. Compliance with Terms and Conditions of Previous Permit

- Effluent Limitations –The data shown in the preceding table indicate apparent violations of the permit. The facility reported three violations for BOD<sub>5</sub> during the previous permit term. The

maximum reported value was 45 mg/l on one occasion, and 38 mg/l on two occasions, which are minor exceedances. The issue appears to have been resolved. Review of most recent DMRs indicates the permittee has been in compliance with permit limits for the last year. No enforcement action is being pursued for these apparent violations.

The facility reported eight violations for BOD<sub>5</sub> percent removal during the previous permit term. The lowest reported value was 77 %, but other excursions ranged from 82 to 84.4%. This is a small facility with variable inflow which can decrease the accuracy of the percent removal calculation. According to Section 62.5(2) of the Regulations for Effluent Limitations “Where the permittee has demonstrated that the treatment facility is unable to meet the 85% removal requirement for a parameter and the inability to meet the requirement is not caused by excessive infiltration, as defined in 40 CFR 35.2005(b)(16), a lower percent removal requirement or a mass loading limit may be substituted provided that the permittee can demonstrate that the provisions of 40 CFR 133.103(d) can be met. Additionally, the facility is required to initiate engineering and financial planning for expansion whenever throughput and treatment reaches 80% of the design capacity that has been identified in the site approval for the facility. The permittee should notify the Division should either of these circumstances lead to BOD<sub>5</sub> exceedances from the permitted limitation. No enforcement action is being pursued for these apparent violations.

The 30-day average limitation for TSS was exceeded on one occasion. The maximum reported value was 129 mg/l. The exceedance appears to be an isolated event as the permittee has been in compliance the remainder of the permit term. No enforcement action is being pursued for this apparent violation.

In accordance with 40 CFR Part 122.41(a), any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

2. Other Permit Requirements – The permittee has been in compliance with all other aspects of the previous permit.

## **VI. DISCUSSION OF EFFLUENT LIMITATIONS**

### **A. Regulatory Basis for Limitations**

1. Technology Based Limitations
  - a. Federal Effluent Limitation Guidelines – The Federal Effluent Limitation Guidelines for domestic wastewater treatment facilities are the secondary treatment standards. These standards have been adopted into, and are applied out of, Regulation 62, the Regulations for Effluent Limitations.
  - b. Regulation 62: Regulations for Effluent Limitations – These Regulations include effluent limitations that apply to all discharges of wastewater to State waters and are shown in Section VIII of the WQA. These regulations are applicable to the discharge from the Avondale Water and Sanitation District WWTF.
2. Numeric Water Quality Standards - The WQA contains the evaluation of pollutants limited by water

quality standards. The mass balance equation shown in Section VI of the WQA was used for most pollutants to calculate the potential water quality based effluent limitations (WQBELs),  $M_2$ , that could be discharged without causing the water quality standard to be violated. A detailed discussion of the calculations for the maximum allowable concentrations for the relevant parameters of concern is provided in Section VI of the Water Quality Assessment developed for this permitting action.

The maximum allowable pollutant concentrations determined as part of these calculations represent the calculated effluent limits that would be protective of water quality. These are also known as the water quality-based effluent limits (WQBELs). Both acute and chronic WQBELs may be calculated based on acute and chronic standards, and these may be applied as daily maximum (acute) or 30-day average (chronic) limits.

3. Narrative Water Quality Standards - Section 31.11(1)(a)(iv) of The Basic Standards and Methodologies for Surface Waters (Regulation No. 31) includes the narrative standard that State surface waters shall be free of substances that are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life.
  - a. Whole Effluent Toxicity - The Water Quality Control Division has established the use of WET testing as a method for identifying and controlling toxic discharges from wastewater treatment facilities. WET testing is being utilized as a means to ensure that there are no discharges of pollutants "in amounts, concentrations or combinations which are harmful to the beneficial uses or toxic to humans, animals, plants, or aquatic life" as required by Section 31.11 (1) of the Basic Standards and Methodologies for Surface Waters. The requirements for WET testing are being implemented in accordance with Division policy, Implementation of the Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (Sept 30, 2010). Note that this policy has recently been updated and the permittee should refer to this document for additional information regarding WET.
4. Water Quality Regulations, Policies, and Guidance Documents
  - a. Antidegradation - Since the receiving water is Use Protected an antidegradation review is not required pursuant to Section 31.8(2)(b) of The Basic Standards and Methodologies for Surface Water. **DELETE THE REMAINDER OF THIS SECTION**
  - b. Antibacksliding – As the receiving water is designated Use-Protected, the antibacksliding requirements in Regulation 61.10 have been met.
  - c. Determination of Total Maximum Daily Loads (TMDLs) – This stream segment is not on the State's 303(d) list, but the downstream segment on the Arkansas River (COARLA01b) is listed on the 303(d) list for dissolved selenium. Therefore, selenium monitoring requirements have been included in the permit in support of TMDL development.
  - d. Colorado Mixing Zone Regulations – Pursuant to section 31.10 of The Basic Standards and Methodologies for Surface Water, a mixing zone determination is required for this permitting action. The Colorado Mixing Zone Implementation Guidance, dated April 2002, identifies the process for determining the meaningful limit on the area impacted by a discharge to surface water where standards may be exceeded (i.e., regulatory mixing zone). This guidance document provides for certain exclusions from further analysis under the regulation, based on site-specific conditions.

The guidance document provides a mandatory, stepwise decision-making process for determining if the permit limits will not be affected by this regulation. Exclusion, based on Extreme Mixing Ratios, may be granted if the ratio of the facility design flow to the chronic low flow (30E3) is greater than 2:1 or if the ratio of the chronic low flow to the design flow is greater than 20:1. Since the ratio of the chronic low flow to the design flow is 0:1 the permittee is eligible for an exclusion from further analysis under the regulation

- e. Reasonable Potential Analysis – Using the assimilative capacities contained in the WQA, an analysis must be performed to determine whether to include the calculated assimilative capacities as WQBELs in the permit. This reasonable potential (RP) analysis is based on the Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, dated December, 2002. This guidance document utilizes both quantitative and qualitative approaches to establish RP depending on the amount of available data.

A qualitative determination of RP may be made where ancillary and/or additional treatment technologies are employed to reduce the concentrations of certain pollutants. Because it may be anticipated that the limits for a parameter could not be met without treatment, and the treatment is not coincidental to the movement of water through the facility, limits may be included to assure that treatment is maintained.

A qualitative RP determination may also be made where a federal ELG exists for a parameter, and where the results of a quantitative analysis results in no RP. As the federal ELG is typically less stringent than a limitation based on the WQBELs, if the discharge was to contain concentrations at the ELG (above the WQBEL), the discharge may cause or contribute to an exceedance of a water quality standard.

To conduct a quantitative RP analysis, a minimum of 10 effluent data points from the previous 5 years, should be used. The equations set out in the guidance for normal and lognormal distribution, where applicable, are used to calculate the maximum estimated pollutant concentration (MEPC). For data sets with non-detect values, and where at least 30% of the data set was greater than the detection level, MDLWIN software is used consistent with Division guidance to generate the mean and standard deviation, which are then used to establish the multipliers used to calculate the MEPC. If the MDLWIN program cannot be used the Division's guidance prescribes the use of best professional judgment.

For some parameters, recent effluent data or an appropriate number of data points may not be available, or collected data may be in the wrong form (dissolved vs total) and therefore may not be available for use in conducting an RP analysis. Thus, consistent with Division procedures, monitoring will be required to collect samples to support a RP analysis and subsequent decisions for a numeric limit. A compliance schedule may be added to the permit to require the request of an RP analysis once the appropriate data have been collected.

For other parameters, effluent data may be available to conduct a quantitative analysis, and therefore an RP analysis will be conducted to determine if there is RP for the effluent discharge to cause or contribute to exceedances of ambient water quality standards. The guidance specifies that if the MEPC exceeds the maximum allowable pollutant concentration (MAPC), limits must be established and where the MEPC is greater than half the MAPC (but less than the MAPC), monitoring must be established. Table VI-1 contains the calculated MEPC compared to the

corresponding MAPC, and the results of the reasonable potential evaluation, for those parameters that met the data requirements. The RP determination is discussed for each parameter in the text below.

## **B. Parameter Evaluation**

BOD<sub>5</sub> - The BOD<sub>5</sub> concentrations in Regulations for Effluent Limitations are the most stringent effluent limits and are therefore applied. These limitations are the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Total Suspended Solids - The TSS concentrations in Regulations for Effluent Limitations are the most stringent effluent limits and are therefore applied. These limitations are the same as those contained in the previous permit and are imposed upon the effective date of this permit.

Oil and Grease - The oil and grease limitation from the Regulations for Effluent Limitations is applied as it is the most stringent limitation. This limitation is the same as that contained in the previous permit and is imposed upon the effective date of this permit.

pH - This parameter is limited by the water quality standards of 6.5-9.0 s.u., as this range is more stringent than other applicable standards. This limitation is the same as that contained in the previous permit and is imposed upon the effective date of this permit.

E. Coli - The limitation for E. Coli is based upon the WQBEL as described in the WQA. A qualitative determination of RP has been made as the treatment facility has been designed to treat specifically for this parameter. This is a new limitation, but fecal coliform monitoring data in Table V-1 indicate the new permit limit can be met.

Total Residual Chlorine (TRC) - This TRC limitation from the Regulations for Effluent Limitations is applied as it is the most stringent limitation. This limitation is the same as those contained in the previous permit and is imposed upon the effective date of this permit.

Ammonia - The limitation for ammonia is based upon the WQBEL as described in the WQA. A qualitative determination of RP has been made as the treatment facility has been designed to treat specifically for domestic wastewater. Monitoring requirements for ammonia are included in the permit.

Whole Effluent Toxicity (WET) Testing - For this facility, acute WET testing has been determined to be applicable based on the instream waste concentrations calculated in the WQA. This is a domestic minor facility that does not receive waste from industrial users, the stream segment does not include the full suite of aquatic life standards, and the discharge waters typically do not reach downstream segments.

Due to the above statements, and in accordance with Section 61.8(2)(b)(i)(B) of the Colorado Discharge Permit System Regulations, the discharge does not have the reasonable potential to cause, or measurably contribute to, an excursion above any narrative standards for water quality. Therefore, WET testing is not a requirement of this permit. However, the Division reserves the right to reopen the permit to include WET testing, should facility conditions change or if new information becomes available.

**VII. ADDITIONAL TERMS AND CONDITIONS**

**A. Monitoring**

Effluent Monitoring – Effluent monitoring will be required as shown in the permit document. Refer to the permit for locations of monitoring points. Monitoring requirements have been established in accordance with the frequencies and sample types set forth in the Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Industrial and Domestic Wastewater Treatment Facilities. Table VI-1 shows the results of the reduced monitoring frequency analysis based upon compliance with the previous permit.

The permittee is not eligible for reduced monitoring for pH, TRC, BOD<sub>5</sub>, and TSS. Two years of monitoring data is necessary to evaluate reduced monitoring frequency for *E.coli*.

**Table VII-1 – Monitoring Reduction Evaluation**

<i>Parameter</i>	<i>Proposed Permit Limit</i>	<i>Average of 30-Day (or Daily Max) Average Conc.</i>	<i>Standard Deviation</i>	<i>Long Term Characterization (LTC)</i>	<i>Reduction Potential</i>
<i>pH (su) Minimum</i>	<i>min 6.5</i>	7.6	0.39	6.82	<i>None</i>
<i>pH (su) Maximum</i>	<i>max 9.0</i>	8.1	0.39	8.88	
<i>TRC (mg/l)</i>	<i>0.019</i>	<i>0.16</i>	<i>0.19</i>	<i>0.54</i>	<i>None</i>
<i>BOD<sub>5</sub>, effluent (mg/l)</i>	<i>30</i>	<i>30</i>	<i>6.4</i>	<i>42.8</i>	<i>None</i>
<i>TSS, effluent (mg/l)</i>	<i>75</i>	<i>47</i>	<i>29</i>	<i>105</i>	<i>None</i>

**B. Reporting**

1. Discharge Monitoring Report – The Avondale Water and Sanitation District facility must submit Discharge Monitoring Reports (DMRs) on a monthly basis to the Division. These reports should contain the required summarization of the test results for all parameters and monitoring frequencies shown in Part I.A.2 of the permit. See the permit, Part I.D for details on such submission.
2. Special Reports – Special reports are required in the event of an upset, bypass, or other noncompliance. Please refer to Part II.A. of the permit for reporting requirements. As above, submittal of these reports to the US Environmental Protection Agency Region VIII is no longer required.

**C. Signatory and Certification Requirements**

Signatory and certification requirements for reports and submittals are discussed in Part I.D.8. of the permit.

**D. Economic Reasonableness Evaluation**

Section 25-8-503(8) of the revised (June 1985) Colorado Water Quality Control Act required the Division to "determine whether or not any or all of the water quality standard based effluent limitations are reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons, and are in furtherance of the policies set forth in sections 25-8-192 and 25-8-104."

The Colorado Discharge Permit System Regulations, Regulation No. 61, further define this requirement under 61.11 and state: "Where economic, environmental, public health and energy impacts to the public and affected persons have been considered in the classifications and standards setting process, permits written to meet the standards may be presumed to have taken into consideration economic factors unless:

- a. A new permit is issued where the discharge was not in existence at the time of the classification and standards rulemaking, or
- b. In the case of a continuing discharge, additional information or factors have emerged that were not anticipated or considered at the time of the classification and standards rulemaking."

The evaluation for this permit shows that the Water Quality Control Commission, during their proceedings to adopt the Classifications and Numeric Standards for Arkansas River Basin, considered economic reasonableness.

Furthermore, this is not a new discharger and no new information has been presented regarding the classifications and standards. Therefore, the water quality standard-based effluent limitations of this permit are determined to be reasonably related to the economic, environmental, public health and energy impacts to the public and affected persons and are in furtherance of the policies set forth in Sections 25-8-102 and 104. If the permittee disagrees with this finding, pursuant to 61.11(b)(ii) of the Colorado Discharge Permit System Regulations, the permittee should submit all pertinent information to the Division during the public notice period.

**Geneva Brion**  
**September 15, 2014**

## VIII. REFERENCES

- A. Colorado Department of Public Health and Environment, Water Quality Control Division Files, for Permit Number CO0021075.
- B. Basic Standards and Methodologies for Surface Water, Regulation No. 31, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective January 31, 2013.
- C. Classifications and Numeric Standards for Arkansas River Basin, Regulation No. 32, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective April 30, 2014.
- D. Colorado Discharge Permit System Regulations, Regulation No. 61, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective January 30, 2012.
- E. Regulations for Effluent Limitations, Regulation No. 62, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective July 30, 2012.

- F. Section 303(d) List of Water Quality Limited Segments Requiring TMDLs, Regulation No 93, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 30, 2012.
- G. Colorado's Section 303(d) List of Impaired Waters and Monitoring and Evaluation List, Regulation No 93, Colorado Department of Public Health and Environment, Water Quality Control Commission, effective March 30, 2012.
- H. Antidegradation Significance Determination for New or Increased Water Quality Impacts, Procedural Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective December 2001.
- I. Memorandum Re: First Update to (Antidegradation) Guidance Version 1.0, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 23, 2002.
- J. Determination of the Requirement to Include Water Quality Standards-Based Limits in CDPS Permits Based on Reasonable Potential, Policy Number CW-1, Colorado Department of Public Health and Environment, Water Quality Control Division, effective November 18, 2013.
- K. The Colorado Mixing Zone Implementation Guidance, Colorado Department of Public Health and Environment, Water Quality Control Division, effective April 2002.
- L. Baseline Monitoring Frequency, Sample Type, and Reduced Monitoring Frequency Policy for Domestic and Industrial Wastewater Treatment Facilities, Water Quality Control Division Policy WQP-20, May 1, 2007.
- M. Implementing Narrative Standard for Toxicity in Discharge Permits Using Whole Effluent Toxicity (WET) Testing. Colorado Department of Public Health and Environment, Water Quality Control Division Policy Permits-1, September 30, 2010.

## IX. PUBLIC NOTICE COMMENTS

The public notice period was from August 15, 2014 to September 15, 2014. Comments were received from Bert Potestio, Avondale Water and Sanitation District. Topical summaries of the comments and the response of the Division are given below.

Comment #1: Discharge Point 001A for Effluent Monitoring Requirements Sample Type listed as "Grab" for monthly Frequency Sample for Effluent Parameters for BOD<sub>5</sub> and TSS. The past permit had composite samples for this item. Is this correct?

Division Response: In both the previous permit and the renewal permit, the BOD<sub>5</sub> and TSS composite samples are specified for **influent** samples only. Effluent samples for BOD<sub>5</sub> and TSS at Outfall 001A are grab samples.

Comment #2: In the Water Quality Assessment, the Green Arroyo flow is listed as zero low flow; however, this flow has never been zero per the upstream dischargers.

Division Response: The determination that the Green Arroyo is zero low flow was based on information provided by the district Water Commissioner in January 2014. Although there may typically be flow

present upstream of the Avondale discharge, the Colorado Regulations specify the use of low flow conditions when establishing water quality based effluent limitations in order to provide protection during critical conditions. The acute low flow, represents the one-day low flow recurring in a three-year interval, and the chronic low flow, represents the 30-day average low flow recurring in a three-year interval. If the stream has no flow at any point then it is considered a zero low flow stream. The Water Commissioner did state that there is flow at times from upstream discharges, but that the stream does go dry.

Comment #3: The WQA states that acute WET testing will be applicable to the new permit. Is WET testing required in the new permit?

Division Response: The RP analysis for WET testing was inadvertently left out of the Fact Sheet. Section VI.B. has been changed to include an RP analysis for WET testing, and an explanation as to why WET testing is not a requirement of this permit.

Comment #4: Has the sprinkler system to land application which was part of the previous permit been eliminated in the new permit?

Division Response: Additional information was gathered regarding this comment on a teleconference call on September 19, 2014 with the facility operator. The operator indicated that land application has not been performed on this site for over five years and the equipment to facilitate this is not currently in working order. Although historically the permit included land application of effluent, land application was not indicated on the permit application and was not relayed as part of the treatment process during a site visit to the facility. Therefore, land application and monitoring wells are not included in this permit renewal. Should the permittee want to obtain coverage for land application in the future, the permittee will need to apply for a Notice of Authorization by providing a Letter of Intent and User Plan to Comply, in accordance with Regulation 84.