

FACT SHEET FOR MODIFICATION 1

DISCHARGES ASSOCIATED WITH PRODUCED-WATER TREATMENT FACILITIES

GENERAL PERMIT IN COLORADO
FIRST ISSUE
CDPS PERMIT NUMBER COG-840000

I. PURPOSE OF AMENDMENT

This permit is being amended to include the following updates:

- 1) To remove the requirement that treatment need to be provide for a discharge under this permit. If a facility can meet the permit limits without treatment they will also be allowed to discharge under a certification to this permit.
- 2) To update/change the permit limits table (Table I.B.1)
 - a. To be able to include limitations based on site-specific water quality standards (specific segment being discharged to) and not just default values from Regulation 31 (ex: temperature, TVS equations for metals).
 - b. To take into account the Division's Baseline Monitoring Policy and its associated monitoring frequencies and sample types (grab sampling for lagoon treatment and composite sampling for mechanical facilities).
 - c. To add the ability to substitute acute WET testing where applicable
 - d. To implement SAR and EC in accordance with current practices in individual permits (SAR as a pass/fail type limit, and calculation and reporting of the SAR limit based on the EC of the discharge and the adjusted SAR of the effluent). Also, the addition of bicarbonate reporting to assist in calculating the adjusted SAR values.
 - e. To require sampling and analysis of oil and grease instead of an observation of a visual sheen.
 - f. Deletion of all references to Appendix A, and insertion of "various" or "TVS" as applicable. Limitations are to be applied based on the site specific standards, or the basic standards, and this has been shown in the permit limit table. Additionally, because the TVS equations for the various metals may be different in the various basins, and should be determined at the time of certification, specific to the receiving stream, the ones shown in Appendix A may not be the most updated or correct equations for the specific basins.
- 3) To update the permit requirements in regards to the new policy on WET testing, specifically the implementation of sublethal limitations and the new statistical endpoints (NOEC and IC25 vs. Stat Diff and IC25).
- 4) To update the Definitions section of the permit (Part I.D) with the current individual permit definitions which includes but isn't limited to assistance in the explanation of the calculation of adjusted SAR, the temperature statistics (MWAT and Daily maximum), and the WET testing definitions.
- 5) Updating to other language in the remainder of the permit, which includes but is not limited to specification of "calendar" days, where applicable, in the notification requirements in Part II.A.4 and 5.
- 6) Addition of language under Part I.A.1, stating that the Division may require an individual permit where significant public interest in a particular project exists.

II. PUBLIC NOTICE COMMENTS

The public notice comment period was from December 16, 2011 to January 16, 2012. One comment was received during this period.

The comment referred to adding language to the permit in Part I.A.1 regarding additional jurisdictional authorities. Specifically, this included recycling and other beneficial uses of water that may fall under the jurisdiction of the Solid Waste Unit of the Hazardous Materials and Waste Management Division. This additional language was added to the permit.

Additionally, the Division noticed remaining references to Appendix A in the paragraphs following the limitation table (Part I.B.1) of the permit. This language was edited to remove those references.

**Andrew Neuhart
January 18, 2012**