

Official Draft Public Notice Version **July 19th, 2024**

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

**FACT SHEET AND STATEMENT OF BASIS
PITMAN FAMILY FARMS, INC
RENEWAL PERMIT: PRETREATMENT SIGNIFICANT INDUSTRIAL USER
UTAH POLLUTANT DISCHARGE ELIMINATION SYSTEM (UPDES)
PRETREATMENT PERMIT NUMBER: UTP000059**

FACILITY INFORMATION

Permittee: Pitman Family Farms, Inc.
Facility: Pitman Family Farms, Inc. Poultry Processing Plant

Facility Contact: Isai Carias
Title: Maintenance Manager
Office: 435-436-8211
Cell: 435-851-3406

Facility Address: 350 South 300 West
Moroni, Utah 84646

Signatory Authority: Mike Vance
Title: VP of Turkey Operations
and Sales Utah Division
Office: 435-436-8211
Cell: 714-353-5474
Email: Mike.Vance@Pitmanfarms.com

Mailing Address:
PO Box 308
Moroni, UT 84646

DESCRIPTION OF FACILITY

Pitman Family Farms, Inc. (Pitman) owns and operates Pitman Family Farms, Inc. Poultry Processing Plant (Facility), a poultry processing plant. The Facility processes live animals into ready-to-cook whole birds, parts, roasts, and ground meat. The average production rate has been about 90 million pounds annually for the last five years.

The Facility has two shifts working daily. On average, it processes about 16,000 turkeys, with a maximum daily capacity of 32,300. The operation is continuous throughout the year without seasonal or scheduled closures other than holidays.

Pitman has been classified as a Significant Industrial User due to the flow and load discharged to the Publicly Owned Treatment Works (POTW). Limitations will be based on ensuring compliance with the general and specific prohibitions.

Outfall 001 is located south of the northeast corner of the lagoon system, at latitude: 39° 31' 7.74" N, longitude: 111° 35' 39.7" W. The average flow from the discharge point is 0.55 million gallons per day (MGD). The maximum daily flow rate is 1.1 MGD, with a peak hourly flow rate of 0.7 MGD. The discharge from the outfall is generally continuous.

DESCRIPTION OF DISCHARGE

The influent wastewater is from cutting, bagging, cleaning and rendering, which occur at the facility. The

wastewater is treated utilizing a dissolved air flotation system (DAF) and a single-cell lagoon. Before entering the DAF, there is an equalization basin.

EFFLUENT LIMITATIONS

Utah Administrative Code (UAC) R317-8-8.5 contains general and specific prohibitions that all non-domestic dischargers into a POTW must achieve. Pollutants introduced into a POTW by a non-domestic source shall not Pass Through the POTW or Interfere with the operation or performance of the POTW.

A reasonable potential analysis was not completed for this facility because it does not discharge directly into a water of the State. Instead, the facility discharges to a POTW and is regulated by Pretreatment Standards and Requirements.

The daily minimum pH limit is based on the prohibited standard per *UAC R317-8-8.5(3)(b)*. The daily maximum pH limit is based on not allowing waste that would otherwise be classified as hazardous waste to be discharged to the POTW, *Title 40, Code of Federal Regulations (40 CFR) 261.22*. The limit is slightly more stringent than stated in *40 CFR 261.22(a)(1)*, which is a pH of 12.5 SU. This is to protect the POTW and POTW personnel from corrosive wastewater.

Oil and grease limits are based on protecting the POTW from Interference or Pass Through. The limit protects the wastewater treatment plant from being impacted by oil and grease build-up, which is not allowed per *UAC R317-8-8.5 (3)(c)*. This is due to the potential for the grease from the facility to affect the equipment at the wastewater treatment system and potentially cause Interference with the wastewater treatment process by causing blockages of the membranes and other equipment. If the wastewater treatment system is impacted by grease, it could also Pass Through the process. The permittee has installed a DAF, which is known to treat grease adequately. Also, grease issues were not seen in the lagoon during inspections. This indicates the facility has installed adequate treatment to ensure grease does not impact the POTW. This equipment must continue to be operated and maintained to ensure grease issues do not cause problems at the POTW. Controlling oil and grease discharging to a membrane facility is supported by a study published in the International Journal of Applied Business and Economic Research titled Impact of High Oil & Grease in the Sewage Affecting the Performance of Advanced Treatment System of Membrane Bioreactor (MBR), ISSN: 0972-7302 Volume 15 Number 17 in 2017. The article was authored by S. Karthikeyan, Manju Rawat Ranjan, Amit Kumar Pandey, Nupur, Raj Gupta and Tanu Jindal. It is available at <http://www.serialsjournal.com>.

The effluent limitations listed in the Effluent Limitations Table will apply to the discharge from the facility as end-of-pipe standards.

Parameter	Effluent Limitations Table		
	Maximum Monthly Avg	Daily Minimum	Daily Maximum
pH, SU	NA	5.0	12.0
Polar Oil and Grease, mg/L	NA	NA	100

NA – Not Applicable

SELF-MONITORING AND REPORTING REQUIREMENTS

The permittee must notify the Utah Division of Water Quality (DWQ) Director and the POTW of any permit violations, including spills or changes at the facility. If a sample result violates a permit requirement, it must be reported within 24 hours of becoming aware of the violation. Also, a resample of the violated permit requirement must occur, with the results being submitted to DWQ within 30 days of becoming aware of the violation. Also, notification of bypasses of any treatment units utilized to treat the process wastewater from the processing plant must be reported to DWQ and the POTW.

If notification must occur to the city, it must be provided to the public works director and the city manager or mayor. If the POTW does not have a public works director at the time of notification, the notification must be made to the city manager or mayor and the direct responsible charge (DRC) for the wastewater treatment plant or collection system.

Monitoring requirements, measurement frequencies, and sample types were adapted from guidance documents for pretreatment permitting. The wastewater discharge shall be sampled as specified in the Self-Monitoring and Reporting Requirements Table.

Due to violations or increased concentrations at the POTW, increases to the following parameters were determined necessary: ammonia, biochemical oxygen demand (BOD₅) and total suspended solids (TSS). If issues continue at the POTW, local limits may be developed to ensure loading from the permittee does not impact the POTW.

Samples should be collected utilizing time-proportioned composite samples for the parameters listed in the permit. Timed proportioned samples will be allowed so long as aliquots are taken every 15 minutes.

Samples for pH and oil and grease must be collected using a grab sample.

Self-Monitoring and Reporting Requirements Table			
Parameter	Frequency	Sample Type	Units
Total Flow	Continuous	Recorder	gpd
pH	Weekly	Grab	SU
Polar Oil and Grease	Monthly	Grab	mg/L
Total Ammonia (as N)	Weekly	Composite	mg/L
BOD ₅	Weekly	Composite	mg/L
TSS	Weekly	Composite	mg/L
Total Copper	Monthly	Composite	mg/L
Total Phosphorous	Monthly	Composite	mg/L

All monitoring results and observations shall be summarized on a monthly discharge monitoring report (DMR) form. The permit requires reports to be submitted monthly and annually, as applicable, on DMR forms due 28 days after the end of the monitoring period. Effective January 1, 2017, monitoring results must be submitted using NetDMR unless the permittee has successfully petitioned for an exception. DMRs must either be submitted with monitoring data included or indicate that "no discharge" occurred for the monitoring month.

PRETREATMENT REQUIREMENTS

Any wastewater that Pitman discharges to the sanitary sewer, either as an Indirect Discharge or as a hauled waste, is subject to Federal, state of Utah, 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 §403*, the state of Utah Pretreatment Requirements found in *UAC R317-8-8*, and any specific local discharge limitations developed by the POTW accepting the waste.

SLUG CONTROL PLAN

Pitman has been evaluated for a slug control plan. Raw materials are stored in an area without floor drains. Waste and sludge are stored in drums before being disposed of or further processed. Liquid wastes are stored with secondary containment. If a spill were to occur in the processing area, the discharge would first enter the DAF and then the lagoon. Based on this information, it has been determined that a slug control plan is unnecessary.

The facility will be reevaluated as part of the inspections every two years. If conditions change and a slug control plan is needed, the permit will be modified to require the development of a slug control plan. The facility must immediately notify the DWQ and the POTW of potential spills or slug changes that could impact the POTW.

STORM WATER

Permit coverage under the Multi-Sector General Permit (MSGP) for Storm Water Discharges from Industrial Activities is required based on the Standard Industrial Classification (SIC) code for the facility (SIC Code 2015). If the facility is not already covered, it has 30 days from when this permit is issued to either submit the appropriate Notice of Intent (NOI) for the MSGP or to submit the applicable exemption documentation. The following link provides additional information regarding the UPDES Industrial Stormwater Permit.

<https://deq.utah.gov/water-quality/general-multi-sector-industrial-storm-water-permit-updes-permits>.

Permit coverage under the Construction General Storm Water Permit (CGP) is required for any construction at the facility which disturb an acre or more, or is part of a common plan of development or sale that is an acre or greater. A Notice of Intent (NOI) is required to obtain a construction storm water permit prior to the period of construction. Information on storm water permit requirements can be found at <http://stormwater.utah.gov>.

PERMIT DURATION

It is recommended that this permit be effective for four (4) years. This will allow for an extension of a year if needed when the permit is renewed. This is beneficial as the requirements of *40 CFR 403.8(f)(1)(iii)(B)(1)* do not allow a pretreatment permit to be issued for more than five (5) years.

¹ North American Industry Classification System

PUBLIC NOTICE INFORMATION

[The information below will be updated once the public comment period is completed. Information will be consistent with the information stated or include updated information based on the public comment period. This information will be deleted following the public comment period.]

Began: Month Day, Year

Ended: Month Day, Year

Comments will be received at: 195 North 1950 West
PO Box 144870
Salt Lake City, UT 84114-4870

The Public Notice of the draft permit was published on the DWQ Webpage.

During the public comment period provided under *UAC R317-8-6.5*, any interested person may submit written comments on the draft permit and may request a public hearing, if no hearing has already been scheduled. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing. All comments will be considered in making the final decision and shall be answered as provided in R317-8-6.12.

Responsiveness Summary

(Explain any comments received and response sent. Actual letters can be referenced, but not required to be included).

PERMIT DEVELOPMENT INFORMATION

Permit drafted by
Jennifer Robinson

*Permit DWQ-2024-
Fact Sheet/Statement of Basis DWQ-2024-*

Draft Permit DWQ-2024-004361
Draft Fact Sheet/Statement of Basis DWQ-2024-004360

Permit Application Information DWQ-2024-0003471

Public Notice Document DWQ-2024-005107