Official Draft Public Notice Version **November 14, 2025**
The findings, determinations, and assertions contained in this document are not final and subject to change following the public comment period.

FACT SHEET
SCOUT ENERGY MANAGEMENT, LLC
RENEWAL PERMIT: DISCHARGE
UPDES PERMIT NUMBER: UT0000035
MINOR INDUSTRIAL

FACILITY CONTACTS

Operator:	Scout Energy Management, LLC
Person Name:	Nick Tunnell
Position:	Vice President
Phone Number:	(972) 951-8797
Person Name:	John Saint
Position:	Region Manager
Phone Number:	(214) 412-4543
Person Name:	Spencer Jackson
Position:	Senior HSE Specialist
Phone Number:	(972) 505-3842
Permittee Name:	Scout Energy Management, LLC
Facility Name:	Ashley Valley Unit North Production Facility
Mailing Address:	13800 Montfort Drive Dallas, TX 75240
Facility Address:	South 5500 East Jensen, UT 84035

DESCRIPTION OF FACILITY

Scout Energy Management, LLC (Scout) is the current permit holder of Ashley Valley Oil Fields, and, thus, the Ashley Valley Unit North Production Facility (Facility), located in Uintah County near Jensen, Utah. Scout became the Permit holder effective November 1, 2024. The Facility has a Standard Industrial Classification (SIC) Code 1311 for crude petroleum and natural gas extraction. Under normal operations, the Facility continuously discharges effluent, which consists of groundwater produced concurrently with oil production from the Ashley Valley Oil Field. The produced water is separated from the oil using both mechanical and gravitational means in treatment vessels, along with three retention ponds in series. The final effluent discharges from a culvert leaving the third retention pond and flows through one of two paths into an unnamed ditch. Discharge through either path eventually flows into the Union Irrigation Canal where it mixes with canal water before flowing through a diversion structure. The canal features a diverter that controls whether water flows into Ashley Creek or is diverted for local irrigation. During irrigation season, most, if not all, of the water is diverted into the Union Irrigation Canal. During the non-irrigation season, most is diverted to Ashley Creek.

SUMMARY OF CHANGES FROM PREVIOUS PERMIT

Compliance Schedule:
The Permittee requested (DWQ-2025-005649) a Compliance Schedule for undissociated hydrogen sulfide (H2S) and total dissolved solids (TDS), which were implemented in the Permit as follows. These Compliance Schedules were granted to allow Scout time to address the high H2S and TDS values.

H2S:

Date	Milestone
Permit Issue Date	H2S interim limit of 0.08 mg/L in effect
January 31, 2027	Provide DWQ with an update on compliance status
January 31, 2028	Provide DWQ with an update on compliance status
January 1, 2029	H2S final limit of 0.002 mg/L in effect

Date	H2S Parameter Limit, mg/L
Permit Issue – December 31, 2028	0.08
January 1, 2029	0.002

TDS:

Date	Milestone
Permit Issue Date	TDS interim limit of 1300 mg/L in effect
January 31, 2027	Provide DWQ with an update on compliance status
January 31, 2028	Provide DWQ with an update on compliance status
January 1, 2029	TDS final limit of 1200 mg/L in effect

Date	H2S Parameter Limit, mg/L
Permit Issue – December 31, 2028	1300
January 1, 2029	1200

Limits and Monitoring:
Whole Effluent Toxicity (WET) effluent limitations were updated in accordance with the Wasteload Analysis (WLA). Scout requested a reduction in WET monitoring (DWQ-2025-005649); however, based on the compliance history of the Facility, it was determined that the frequency of WET monitoring would continue as stipulated in the pervious Permit. Scout may petition for a reduction in WET testing once a wholistic pattern of compliance is established. Additionally, Metals testing was added to this Permit cycle to allow for the collection of enough data to run a Reasonable Potential Analysis. Per Utah Administrative Code (UAC) R317-8-4.3(3), all Permit effluent limitations, standards, or prohibitions for a metal will be expressed in terms of total recoverable metal, that is, the sum of the dissolved and suspended fractions of the metals.

Colorado Basin Salinity Forum Offset Program:
The Permittee also requested (DWQ-2025-005649) a reduction in payment to the Colorado River Basin Salinity Control Forum Offset Program. This request was partially accepted and incorporated into the Permit as follows. This Cost Reduction was granted to allow time for Scout to address elevated TDS in the effluent. If Scout wishes for a continuance in cost reductions, Scout may submit to DWQ a demonstration for an exemption following the outlined provisions on pages B-4 to B-8 in the "2023 Review, Water Quality Standards for Salinity, Colorado River System." DWQ will then evaluate the demonstration and either approve, partially approve, or deny the exemption as submitted.

Date	Action	Cost Reduction Applied
January 31, 2027	Salinity Offset Payment Due (Permit	

	issue through December 31, 2026)	75%
January 31, 2028	Salinity Offset Payment Due (January 1, 2026 through December 31, 2027)	65%
January 31, 2029	Salinity Offset Payment Due (January 1, 2027 through December 31, 2028)	55%
January 31, 2030	Salinity Offset Payment Due (January 1, 2028 through December 31, 2029)	55%
January 31, 2031	Salinity Offset Payment Due (January 1, 2029 through December 31, 2030)	55%

DISCHARGE

DESCRIPTION OF DISCHARGE

The Facility has been reporting self-monitoring results on Discharge Monitoring Reports on a monthly basis. Scout started reporting in December 2024.

Outfall	Description of Discharge Point
001	Located at latitude 40.366969° and longitude -109.414831°. The discharge is through a 30-inch diameter gravity flow pipe leading from the third retention pond to one of two unnamed ditches, both of which eventually lead to the Union Irrigation Canal.

RECEIVING WATERS AND STREAM CLASSIFICATION

Discharge occurs into an unnamed ditch, which flows into Ashley Creek, thence to the Green River, which is Class 2B, 3B, and 4, according to UAC R317-2-13:

Class 2B -- Protected for infrequent primary contact recreation. Also protected for secondary contact recreation where there is a low likelihood of ingestion of water or a low degree of bodily contact with the water. Examples include, but are not limited to, wading, hunting, and fishing.

Class 3B -- Protected for warm water species of game fish and other warm water aquatic life, including the necessary aquatic organisms in their food chain.

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

TOTAL MAXIMUM DAILY LOAD (TMDL) REQUIREMENTS

According to the Utah's Final 2024 Integrated Report on Water Quality dated April 30, 2024 (UDWQ, 2024), the receiving water for Outfall 001 discharge "*Ashley Creek and tributaries, from confluence with Green River to Steinaker diversion* (AU name: *Ashley Creek Lower*, AU ID: *UT14060010-001_00*)" was listed as "Not Supporting" for Selenium and Total Dissolved Solids. The report further states "TMDL Needed".

BASIS FOR EFFLUENT LIMITATIONS

In accordance with regulations promulgated in 40 Code of Federal Regulations Part 122.44 and UAC R317-8-4.2, effluent limitations are derived from technology-based effluent limitations guidelines, Utah Secondary Treatment Standards (UAC R317-1-3.2) or Utah Water Quality Standards (UAC R317-2) as applicable. In cases where multiple limits have been developed, those that are more stringent apply. In cases where no limits or multiple limits have been developed, Best Professional Judgment (BPJ) of the permitting authority may be used where applicable. Best Professional Judgment, or BPJ, refers to a

discretionary, best professional decision made by the permit writer based upon precedent, prevailing regulatory standards, or other relevant information.

Permit limits can also be derived from the WLA, which incorporates Secondary Treatment Standards, Water Quality Standards, including any applicable TMDL impairments as appropriate, Antidegradation Reviews (ADR), 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 completed as appropriate and determined that this discharge will not cause a violation of water quality standards. An ADR Level I review was performed and concluded that an ADR Level II review was not required at this time since water quality will not be further lowered by the proposed activity, as per UAC R317-2-3.5.b.1.(b). The WLA indicates that the effluent limitations will be sufficiently protective of water quality, in order to meet State water quality standards in the receiving waters. The WLA with ADR information is attached to this Fact Sheet.

Limitations for pH is based on current Utah Secondary Treatment Standards, UAC R317-1-3.2. Oil and grease limitations is based on BPJ. Limitations for whole effluent toxicity (WET) are derived from the WLA. Limitations for total suspended solids (TSS), biochemical oxygen demand (BOD_5), and H2S have been carried over from the previous Permit pursuant to UAC R317-8-4.2(11).

TDS limitations are based upon Utah Water Quality Standards for concentration values, which have been carried over from the previous Permit and the Colorado River Basin Salinity Control Forum (CRBSCF) for mass loading values when applicable, as authorized in UAC R317-2-4. The CRBSCF Policy entitled "NPDES Permit Program Policy for Implementation of Colorado River Salinity Standards" (Policy), with the most current version dated October 2023, requires the TDS loading limitation of one-ton per day (or 366 tons per year alternatively) as a sum from all discharge points, unless the average concentration of TDS is 500 mg/L or less. If the concentration of TDS at any Outfall is less than or equal to 500 mg/L as a thirty-day average, then no loading limit applies for that Outfall. The one-ton per day (or 366 tons per year) loading limit applies only to those Outfalls exceeding 500 mg/L as a thirty-day average. Outfalls exceeding 500 mg/L as a thirty-day average, collectively, need to meet the one-ton per day (or 366 tons per year) limit. If one-ton per day (or 366 tons per year) TDS cannot be achieved, then the Permittee will be required to remove salinity/TDS in excess of one-ton per day (or 366 tons per year) by developing a treatment process, participating in a salinity off-set program, or developing some type of mechanism to remove the salinity/TDS unless a demonstration is made by the Permittee resulting an exemption to these requirements. Scout will participate in the Offset Program, but has requested (DWQ-2025-005649) reduction in payment to the CRBSF Salinity Offset Program. DWQ has granted a reduction in cost as described in the Summary of Changes Section of this Fact Sheet.

The Permittee is expected to be able to comply with these limitations.

Reasonable Potential Analysis
Since January 1, 2016, DWQ has conducted Reasonable Potential Analysis (RP) on all new and renewal applications received after that date. RP for this Permit renewal was conducted following DWQ's September 10, 2015 Reasonable Potential Analysis Guidance (RP Guidance). There are four outcomes defined in the RP Guidance: Outcome A, B, C, or D. These Outcomes provide a framework for what routine monitoring or effluent limitations are required. RP was not performed because insufficient data were collected during the previous Permit cycle.

The Permit limitations are:

Parameter	Table 1: Effluent Limitations[a]				
	Maximum Monthly Avg	Maximum Weekly Avg	Yearly Average	Daily Minimum	Daily Maximum
Total Flow, MGD	1.5	--	--	--	--
Biochemical Oxygen Demand (BOD_5), mg/L	30	45	--	--	--
Total Suspended Solids (TSS), mg/L	25	35	--	--	--
Whole Effluent Toxicity (WET), Chronic Biomonitoring					IC_{25}>
Irrigation (Apr-Oct)	--	--	--	--	14.8%
Non-irrigation (Nov-Mar)	--	--	--	--	11.5%
Oil & Grease, mg/L	--	--	--	--	10.0
pH, Standard Units	--	--	--	6.5	9
Undissociated H2S, mg/L	--	--	--	--	0.08/0.002
TDS, mg/L	--	--	--	--	1,300/1,200
TDS	--	--	366 tons/year	--	1 ton/day

SELF-MONITORING AND REPORTING REQUIREMENTS

The following self-monitoring requirements are the same as in the previous. Metals were added as monitoring only semiannually. The Permit requires reports to be submitted monthly, quarterly and semiannually, as applicable, on Discharge Monitoring Report (DMR) forms due 28 days after the end of the monitoring period. Effective January 1, 2017, monitoring results shall be submitted using NetDMR unless the Permittee has successfully petitioned for an exception. Lab sheets for biomonitoring, metals and toxic organics shall be attached to the DMRs.

Table 2: Self-Monitoring and Reporting Requirements[a]			
Parameter	Frequency	Sample Type	Units
Total Flow[b][c]	Continuous	Recorder	MGD
BOD_5	Monthly	Grab	mg/L
TSS	Monthly	Grab	mg/L
pH	Monthly	Grab	SU
WET – Biomonitoring[d]	Semiannually	Grab	Pass/Fail
Oil & Grease	Monthly	Grab	mg/L
TDS[e][f]	Monthly	Grab	mg/L
TDS[e]	Monthly	Grab	Tons/day
Undissociated H2S[g][h]	Monthly	Grab	mg/L

Metals[(i)]			
Arsenic	Semi-annual	Grab	mg/L
Cadmium	Semi-annual	Grab	mg/L
Chromium	Semi-annual	Grab	mg/L
Copper	Semi-annual	Grab	mg/L
Cyanide	Semi-annual	Grab	mg/L
Lead	Semi-annual	Grab	mg/L
Mercury	Semi-annual	Grab	mg/L
Nickel	Semi-annual	Grab	mg/L
Selenium	Semi-annual	Grab	mg/L
Silver	Semi-annual	Grab	mg/L
Zinc	Semi-annual	Grab	mg/L

Notes Tables 1 and 2

a. See Definitions, *Part VIII*, for definition of terms.
b. Flow measurements of influent/effluent volume shall be made in such a manner that the Permittee can affirmatively demonstrate that representative values are being obtained.
c. If the rate of discharge is controlled, the rate and duration of discharge shall be reported.
d. One semiannual sample shall be collected during irrigation season (April – October) and one semiannual sample shall be collected during non-irrigation season (November – March). Tests will be conducted using both Ceriodaphnia dubia and Pimephales promelas (fathead minnows).
e. If the Permittee cannot achieve one-ton per day, or 366 tons per year alternatively, as a sum from all applicable Outfalls, the Permittee will be required to participate in a Salinity Offset Program.
f. The effective date for the final TDS limit of 1200 mg/L is January 1, 2029. The interim limit is 1,300 mg/L.
g. Method for H2S calculation can be found in the most recent edition of *Standard Methods for the Examination of Water and Wastewater*. In the event any value associated with this parameter is non-detect, 0.5 of the detection limit will be used to calculate the reported value.
h. The effective date for the final undissociated H2S limit of 0.002 mg/L is January 1, 2029. The interim limit is 0.08 mg/L.
i. Metals will be monitored semi-annually as to collect enough data to run a reasonable potential analysis. Metals shall be collected as total recoverable metals.

BIOSOLIDS

The State of Utah has adopted the 40 C.F.R. § 503 federal regulations for the disposal of sewage sludge (biosolids) by reference. However, this Facility does not receive, generate, treat or dispose of biosolids. Therefore 40 C.F.R. § 503 shall not apply.

STORM WATER

Separate storm water Permits may be required based on the types of activities occurring on site.

Permit coverage under the Multi Sector General Permit (MSGP) for Storm Water Discharges from Industrial Activities may be required based on the Standard Industrial Classification (SIC) code for the facility and the types of industrial activities occurring. If the facility is not already covered, it has 30 days from when this Permit is issued to submit the appropriate Notice of Intent (NOI) for the MSGP or exclusion documentation.

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

PRETREATMENT REQUIREMENTS

Scout is an industrial Facility that discharges into an unnamed ditch, which flows into Ashley Creek and thence the Green River. However, if any process wastewater is discharged to a Publicly Owned Treatment Works (POTW) either as indirect discharge or as a hauled waste, the 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 Utah Pollutant Discharge Elimination System Permit and Enforcement Guidance Document for Whole Effluent Toxicity Control (biomonitoring), dated February 2018. 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.

This renewal Permit will again require WET testing and are the same as the previous Permit. The Permittee will sample WET semiannually and conduct testing on both species. The Permit will also contain the standard requirements for accelerated testing upon failure of a WET test and a Preliminary Toxicity Investigation and Toxicity Reduction Evaluation as necessary. Because the Facility (SIC Code 1311 – Crude Petroleum and Natural Gas Extraction) discharges produced water subject to the federal effluent limitation guidelines for the Oil and Gas Extraction Point Source Category (40 CFR Part 435), it is considered an industrial "categorical industry" with a reasonable potential to discharge toxic pollutants. The Utah WET Guidance (Section 5, p. 7) specifically notes that industrial dischargers subject to technology-based effluent limits for priority pollutants are presumed to have reasonable potential for toxicity. Produced water from petroleum operations may contain variable concentrations of hydrocarbons, treatment chemicals, and dissolved solids that can cause acute or chronic toxicity, even after treatment. WET testing is therefore necessary under UAC R317-2-5 and 40 CFR §122.44(d)(1) to verify that the discharge does not cause or contribute to whole effluent toxicity in the effluent.

PERMIT DURATION

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

Drafted and Reviewed by
Lindsay Cowles, Discharge Permit Writer
Daniel Griffin, Biosolids
Jennifer Robinson, Pretreatment
Lonnie Shull, Biomonitoring
Jordan Bryant, Storm Water
Christine Osborne, TMDL/Watershed Protection
Christopher Shope, PhD., Wasteload Analysis/ADR
Utah Division of Water Quality, (801) 536-4300

PUBLIC NOTICE INFORMATION (to be updated after)

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 State of Utah and/or DWQ's website for at least 30 days as required.

During the public notice and 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 UAC R317-8-6.12.

ADDENDUM TO FACT SHEET

During finalization of the Permit certain dates, spelling edits and minor language corrections were completed. Due to the nature of these changes, they are considered minor changes and the Permit is not required to be re Public Noticed as provided in UAC R317-8-5.6(3)

Responsiveness Summary

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

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ATTACHMENT 1

Effluent Monitoring Data

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Effluent Monitoring Data.

Parameter		Flow (MGD)	BOD Maximum Monthly Average (mg/L)	BOD Maximum Weekly Average (mg/L)	TSS Maximum Monthly Average (mg/L)	TSS Maximum Weekly Average (mg/L)	O&G (mg/L)	pH Daily Minimum (SU)	pH Daily Maximum (SU)	H2S (mg/L)	TDS (mg/L)
Monitoring Period	7/31/2020	0.44	23.3	23.3	3	3	ND	7.86	7.86	0.0005	1160
	8/31/2020	0.44	25	25	3	3	5	7.95	7.95	0.0064	1120
	9/30/2020	0.44	24.2	24.2	3	3	5	7.99	7.99	0.0099	1080
	10/31/2020	0.44	25.3	25.3	3	3	5	7.96	7.96	0.02	1180
	11/30/2020	0.44	20.1	20.1	3	3	5	7.98	7.98	0.0772	1240
	12/31/2020	0.44	16.2	16.2	3	3	5	8.03	8.03	0.0175	1110
	1/31/2021	0.44	18.8	18.8	3	3	5	8.01	8.01	0.019	1130
	2/28/2021	0.39	20.2	20.2	8	8	5	8.13	8.13	0.364	1060
	3/31/2021	0.79	28.6	28.6	3	3	5	8.05	8.05	0.012	1280
	4/30/2021	0.74	26	26	6.8	6.8	5	8.14	8.14	0.02	1240
	5/31/2021	0.86	28.5	28.5	3	3	5	8	8	0.004	1130
	6/30/2021	0.87	25.6	25.6	3	3	5	8.02	8.02	0.08	932
	7/31/2021	0.85	29.2	29.2	3	3	5	7.99	7.99	0.13	1380
	8/31/2021	0.86	38	38	3.6	3.6	5	7.92	7.92	0.005	1170
	9/30/2021	0.83	24.6	24.6	3	3	5	8.1	8.1	0.3154	1180
	10/31/2021	0.92	27.1	27.1	3	3	5	8.21	8.21	0.2187	1210
	11/30/2021	0.84	24.1	24.1	3	3	5	8.21	8.21	0.13	1210
	12/31/2021	0.83	17.2	17.2	4	4	5	8.35	8.35	0.36	1440
	1/31/2022	0.82	28	28	4	4	5	7.34	7.34	0.02	1280
	2/28/2022	0.87	45	45	4	4	5	7.48	7.48	0.6	1250
	3/31/2022	0.84	28	28	4	4	5	7.32	7.32	0.4	1180
	4/30/2022	0.81	32	32	ND	ND	ND	7.21	7.21	1.035	1230
	5/31/2022	0.83	37	37	ND	ND	ND	7.2	7.2	0.7458	1200
	6/30/2022	0.81	43	43	4	4	ND	7.9	7.9	0.024	1210
	7/31/2022	0.83	75	75	4	4	5	7.79	7.79	0.7	1270
	8/31/2022	0.82	27	27	4	4	5	7.67	7.67	1.2	1250
	9/30/2022	0.78	57	57	ND	ND	ND	7.55	7.55	2.5	1250
	10/31/2022	0.85	32	32	26	26	ND	8.11	8.11	1.1	1300
	11/30/2022	0.83	22	22	6	6	5	7.75	7.75	ND	1310
	12/31/2022	0.81	22	22	ND	ND	ND	8.15	8.15	0.08	1270
	1/31/2023	0.81	20	20	4	4	ND	8.27	8.27	ND	1300
	2/28/2023	0.81	18	18	4	4	ND	8.39	8.39	ND	1260
	3/31/2023	0.81	17	17	5	5	ND	8.13	8.13	0.01	1260
	4/30/2023	0.82	22	22	6	6	ND	8.26	8.26	ND	1260
	5/31/2023	0.72	17	17	ND	ND	ND	8.06	8.06	ND	1260
	6/30/2023	0.75	21	21	ND	ND	ND	7.95	7.95	0.02	1220
	7/31/2023	0.76	28	28	ND	ND	6	7.7	7.7	0.04	1270
	8/31/2023	0.69	24	24	ND	ND	ND	7.75	7.75	0.05	1340
	9/30/2023	0.72	24	24	4	4	ND	8.12	8.12	0.02	1280
	10/31/2023	0.8	19	19	ND	ND	ND	8.25	8.25	0.05	1300
	11/30/2023	0.84	24	24	ND	ND	ND	8.1	8.1	0.03	1170
	12/31/2023	0.8	27	27	ND	ND	ND	8.22	8.22	0.02	1280
	1/31/2024	0.8	19	19	ND	ND	ND	8.26	8.26	0.03	1280
	2/29/2024	0.83	23	23	4	4	ND	8.37	8.37	ND	1300
	3/31/2024	0.8	24	24	4	4	2	8.28	8.28	0.02	1340
	4/30/2024	0.8	27	27	4	4	2	8.1	8.1	0.03	1280
	5/31/2024	0.79	26	26	ND	ND	1	7.76	7.76	0.01	1280
	6/30/2024	0.79	27	27	4	4	ND	7.5	7.5	ND	1290
	7/31/2024	0.81	23	23	ND	ND	4	8.1	8.1	0.01	1300
	8/31/2024	0.71	25	25	ND	ND	5	8.44	8.44	0.01	1210
	9/30/2024	0.7	24	24	ND	ND	2.1	8.34	8.34	ND	1320
	10/31/2024	0.79	25	25	ND	ND	3.3	8.26	8.26	0.01	1340
	11/30/2024	0.76	16	16	6	6	2.1	8.23	8.23	0.07	1310
	12/31/2024	0.696	17	17	ND	ND	ND	8.04	8.04	0.07	1240
	1/31/2025	0.693	13	13	4	4	ND	8.96	8.96	0.02	1130
	2/28/2025	0.67	21	21	ND	ND	ND	6.5	6.5	0.098	1275
	3/31/2025	0.671	26	26	ND	ND	ND	8.6	8.6	ND	1260
	4/30/2025	0.692	28	28	ND	ND	ND	7.98	7.98	ND	1255
	5/31/2025	0.663	30	30	ND	ND	ND	7.92	7.92	0.01	1280

Template updated 6/23/2025

WET Results

Month	WET Test	Pass / Fail
Sept-20	96Hr Acute Ceriodaphnia	Pass
Sept-20	96Hr Acute Pimephales Promelas	Pass
Jun-21	96Hr Acute Ceriodaphnia	Pass
Jun-21	96Hr Acute Pimephales Promelas	Pass
Dec-21	96Hr Acute Ceriodaphnia	Pass
Dec-21	96Hr Acute Pimephales Promelas	Pass
Jun-22	96Hr Acute Ceriodaphnia	Pass
Jun-22	96Hr Acute Pimephales Promelas	Pass
Dec-22	96Hr Acute Ceriodaphnia	Pass
Dec-22	96Hr Acute Pimephales Promelas	Pass
Jun-23	96Hr Acute Ceriodaphnia	Pass
Jun-23	96Hr Acute Pimephales Promelas	Pass
Dec-23	96Hr Acute Ceriodaphnia	Pass
Dec-23	96Hr Acute Pimephales Promelas	Pass
Jun-24	96Hr Acute Ceriodaphnia	Pass
Jun-24	96Hr Acute Pimephales Promelas	Pass
Dec-24	96Hr Acute Ceriodaphnia	Pass
Dec-24	96Hr Acute Pimephales Promelas	Pass

ATTACHMENT 2

Wasteload Analysis

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ATTACHMENT 3

Reasonable Potential Analysis

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REASONABLE POTENTIAL ANALYSIS

Water Quality has worked to improve our reasonable potential analysis (RP) for the inclusion of limits for parameters in the Permit by using an EPA provided model. As a result of the model, more parameters may be included in the renewal Permit. A Copy of the Reasonable Potential Analysis Guidance (RP Guide) is available at water Quality. There are four outcomes for the RP Analysis[1]. They are;

Outcome A: A new effluent limitation will be placed in the Permit.
Outcome B: No new effluent limitation. Routine monitoring requirements will be placed or increased from what they are in the Permit,
Outcome C: No new effluent limitation. Routine monitoring requirements maintained as they are in the Permit,
Outcome D: No limitation or routine monitoring requirements are in the Permit.

RP was not performed because there was insufficient data collected during the previous Permit cycle.

[1] See Reasonable Potential Analysis Guidance for definitions of terms