Official Draft Public Notice Version **March 29, 2023**
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
LEWISTON CITY LAGOONS
RENEWAL PERMIT: DISCHARGE
UPDES PERMIT NUMBER: UT0020214
MINOR MUNICIPAL

FACILITY CONTACTS

Contact:	Paul Swainston
Position:	Public Works Director
Phone Number:	

Facility Name:	Lewiston City Lagoons
Mailing and Facility Address:	29 South Main Lewiston City, Utah 84320
Telephone:	(435) 258-2141 (435) 258-5191 (Shop) (435) 770-1696 (Cell)
Actual Address:	East of the Presto Products Company, Down in the river bottom.

DESCRIPTION OF FACILITY

The Lewiston City treatment facility (Lewiston Lagoons) consists of a three (3) cell lagoon system located east of Lewiston on the west bank of the Cub River which is the receiving stream during discharge periods. The lagoon system is located at 41°58'00" north latitude and 111°49'20" west longitude. The system was built in 1974 with a total surface area of 16.1 acres. The city had a population of 1,877 in 2000, with 558 housing units. Approximately 850 persons (estimated) are served by the lagoon system. The rest are on septic tanks. The facility is designed for a flow of 0.11 million gallons per day if operated as a total containment system. The lagoons can treat up to 0.21 MGD if they discharge. The system has the ability to use chlorine for disinfection. The lagoon receives a large amount of wastewater from Presto Products Incorporated, a producer of plastic bags. The water from Presto Products is non-contact cooling water and is not considered a significant industrial user at this time. The facility currently discharges one month each year.

The wasteload allocation (WLA) developed in 2017 for the 2017-2022 permit contained lower ammonia and total residual chlorine (TRC) water quality based effluent limits (WQBEL) than previous WLA's, as a result the included ammonia and TRC limits were reduced. Water Quality adopted UAC R317-1-3.3, Technology-Based Phosphorus Effluent Limit (TBPEL) Rule in 2014. The TBPEL rule as it relates to "lagoon" wastewater treatment plants establishes new regulations for the discharge of phosphorus to surface waters and is self-implementing. The TBPEL rule includes the requirements for influent and effluent sampling, and a phosphorus limit for discharges to receiving streams without an approved TMDL in place.

A TMDL, related to phosphorus loading, was completed for the Cub River on December 23, 1997. As a result, the TBPEL rule language was included, but no limit was included in the permit.

By 2017, Lewiston had started land applying effluent to reduce the potential to discharge to the cub river.

SUMMARY OF CHANGES FROM PREVIOUS PERMIT

The WLA developed for this renewal permit is using the design flow for the treatment plant of 1.0 MGD. The average monthly effluent flow has been 0.11 MGD with a max daily flow of 0.21 MGD. Previous WLA were generated using the max daily flow of 0.21 MGD. The use of the design flow has resulted in a reduction in the concentration based WQBEL for ammonia and TRC. The new Daily Maximum Effluent Limit for Total Ammonia (as N) will be 10.0 mg/L. The new Daily Maximum Effluent Limit for Total Residual Chlorine will be 0.05 mg/L.

Lewiston is not yet required to disinfect the effluent, and has been able to meet the *E. coli* limit with out the use of chlorine. If they need to start using it during this permit cycle, the TRC effluent limit is below the minimum quantification level (ML) of the most common and practical EPA approved TRC methods. The Division has determined the current acceptable ML to be .06 mg/L and the method detection limit (MDL) to be 0.02 mg/L when using the DPD colorimetric Method #4500 – CL G. Measured values greater than or equal to the ML of .06 mg/l will be considered violations of the permit, and values less than the ML of .06 mg/l will be considered to be in compliance with the permit. For purposes of calculating averages and reporting on the Discharge Monitoring Report form, the following will apply:

1) analytical values less than 0.02 mg/L shall be considered zero; and
2) analytical values less than 0.06 mg/L and equal to or greater than 0.02 mg/L will be recorded as measured.
3) when chlorine disinfection is not being used at the facility the No Data Indicator Code (NODI Code) of 9 should be used. (Conditional Monitoring - Not Required This Period)

DISCHARGE

The Lewiston Lagoons discharge to a segment of the Cub River that is 303(d) listed for total phosphorous (TP). A TMDL was completed for the Cub River on December 23, 1997. The TMDL cited that the lagoons were "contained with occasional overflow". As a result, the TMDL treated the lagoons as a *de minimus* source and neither a load allocation nor load reduction for phosphorous were indicated.

The lagoons are currently operated primarily as total containment lagoons with an occasional discharge once or twice a year. The Lewiston Lagoons discharge an average of 0.135 kg/d (Calculation based on limited flow and concentration data) TP. The TMDL calculated the total TP load attributed to the Cub River basin in Utah at 82 kg/d. The estimated TMDL target load for the Cub is 9 kg/d. Lewiston's lagoons contribute 0.16 percent of the TMDL's current calculated load of 82 kg/d and 1.5 percent of the TMDL target load of 9 kg/d.

In the absence of a TP allocation for the lagoons, the occasional intermittent discharge should be managed such that discharge does not occur during the biologically productive season between June-September. Permit monitoring requirements for flow and TP concentration should be adequate to characterize the intermittent nature of the lagoon's discharge.

DESCRIPTION OF DISCHARGE

Lewiston City has been reporting self-monitoring results on Discharge Monitoring Reports on a monthly basis. Lewiston City discharged during 8 different months from 2018 through 2022. There have been no violations in that time.

Outfall	Description of Discharge Point
001	Located at latitude 41°58'00" and longitude 111°49'20" to the Cub River.

RECEIVING WATERS AND STREAM CLASSIFICATION

The final discharge is to the Cub River. The Cub River is classified 2B, 3B and 4 at this location according to Utah Administrative Code (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 MAXIUM DAILY LOAD (TMDL) REQUIREMENTS

The Lewiston Lagoons discharge to a segment of the Cub River that is 303(d) listed for total phosphorous (TP). A TMDL was completed for the Cub River on December 23, 1997. The TMDL cited that the lagoons were "contained with occasional overflow". As a result, the TMDL treated the lagoons as a *de minimus* source and neither a load allocation nor load reduction for phosphorous were indicated.

The lagoons are currently operated primarily as total containment lagoons with an occasional discharge once or twice a year. The Lewiston Lagoons discharge an average of 0.135 kg/d (Calculation based on limited flow and concentration data) TP. The TMDL calculated the total TP load attributed to the Cub River basin in Utah at 82 kg/d. The estimated TMDL target load for the Cub is 9 kg/d. Lewiston's lagoons contribute 0.16 percent of the TMDL's current calculated load of 82 kg/d and 1.5 percent of the TMDL target load of 9 kg/d.

In the absence of a TP allocation for the lagoons, the occasional intermittent discharge should be managed such that discharge does not occur during the biologically productive season between June-September. Permit monitoring requirements for flow and TP concentration should be adequate to characterize the intermittent nature of the lagoon's discharge.

BASIS FOR EFFLUENT LIMITATIONS

Limitations on total suspended solids (TSS), biochemical oxygen demand (BOD5), *E. coli*, pH, and percent removal for BOD5 and TSS are based on current Utah Secondary Treatment Standards, UAC R317-1-3.2. The oil and grease is based on best professional judgment (BPJ). Limitations for Ammonia (as N), total residual chlorine (TRC), and dissolved oxygen (DO) are based on the Wasteload Analysis (WLA). Attached is a WLA for this discharge into the Cub River. It has been determined that this discharge will not cause a violation of water quality standards. An Antidegradation Level II review is not required since the Level I review shows that water quality impacts are minimal. 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 frame work for what routine monitoring or effluent limitations are required

Due to the nature of the community and discharge there has not been any monitoring of any metals to conduct an RP analysis on, and there will be no changes to the monitoring requirements for the permit. A copy of the RP analysis is included at the end of this Fact Sheet.

The permit limitations are:

Parameter	Effluent Limitations *a				
	Maximum Monthly Avg	Maximum Weekly Avg	Yearly Average	Daily Minimum	Daily Maximum
Total Flow	-	-	-	-	1.0
BOD_5, mg/L BOD_5 Min. % Removal	25 85	35 -	- -	- -	- -
TSS, mg/L TSS Min. % Removal	25 85	35 -	- -	- -	- -
Dissolved Oxygen, mg/L	-	-	-	5.0	-
Total Ammonia (as N), mg/L	-	-	-	-	10.0
TRC, mg/L	-	-	-	-	0.05
E. coli, No./100mL	126	157	-	-	-
Oil & Grease, mg/L	-	-	-	-	10.0
pH, Standard Units	-	-	-	6.5	9
*a. see Definitions, *Part VIII*, for definition of terms.					

SELF-MONITORING AND REPORTING REQUIREMENTS
The following self-monitoring requirements are the same as in the previous permit. The permit will require reports to be submitted monthly and annually, as applicable, on Discharge Monitoring Report (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. Lab sheets for biomonitoring must be attached to the biomonitoring DMR. Lab sheets for metals and toxic organics must be attached to the DMRs.

Self-Monitoring and Reporting Requirements *a			
Parameter	Frequency	Sample Type	Units
Total Flow *b, *c	Instantaneous	Recorder	MGD
BOD_5, Influent *d Effluent	Monthly Monthly	Grab Grab	mg/L mg/L
TSS, Influent *d Effluent	Monthly Monthly	Grab Grab	mg/L mg/L
E. coli	Monthly	Grab	No./100mL
pH	Monthly	Grab	SU

Self-Monitoring and Reporting Requirements *a			
Parameter	Frequency	Sample Type	Units
DO	Monthly	Grab	mg/L
TRC, mg/L, *e	Monthly	Grab	mg/L
Oil & Grease *f	When Sheen Observed	Grab	mg/L
Total Ammonia (as N), *g	Monthly	Composite	mg/L
Orthophosphate (as P), *g Effluent	Monthly	Composite	mg/L
Total Phosphorus (as P), *g Influent Effluent	Monthly Monthly	Composite Composite	mg/L mg/L
Total Kjeldahl Nitrogen TKN (as N), *g Influent Effluent	Monthly Monthly	Composite Composite	mg/L mg/L
Nitrate, NO3 *g	Monthly	Composite	mg/L
Nitrite, NO2 *g	Monthly	Composite	mg/L
*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. In addition to monitoring the final discharge, influent samples shall be taken and analyzed for this constituent at the same frequency as required for this constituent in the discharge.			
*e. Analytical results less than 0.06 mg/l will not be considered out of compliance with the permit. For purposes of calculating averages and reporting on the Discharge Monitoring Report form, the following will apply: 1) analytical values less than 0.02 mg/L shall be considered zero; and 2) analytical values less than 0.06 mg/L and equal to or greater than 0.02 mg/L will be recorded as measured. 3) when chlorine disinfection is not being used at the facility the No Data Indicator Code (NODI Code) of 9 should be used			
*f. Oil & Grease sampled when sheen is present or visible. If no sheen is present or visible, a NODI Code of 9 should be used.			
*g. These reflect changes required with the adoption of UCA R317-1-3.3, Technology-based Phosphorus Effluent Limits rule.			

BIOSOLIDS

The State of Utah has adopted the 40 CFR 503 federal regulations for the disposal of sewage sludge (biosolids) by reference. However, since this facility is a lagoon, there is not any regular sludge production. Therefore 40 CFR 503 does not apply at this time. In the future, if the sludge needs to be removed from the lagoons and is disposed in some way, the Division of Water Quality must be contacted prior to the removal of the sludge to ensure that all applicable state and federal regulations are met.

STORM WATER

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

Previously storm water discharge requirements and coverage were combined in this individual permit. These have been separated to provide consistency among permittees, electronic reporting for storm water discharge monitoring reports, and increase flexibility to changing site conditions.

Information on storm water permit requirements can be found at http://stormwater.utah.gov

PRETREATMENT REQUIREMENTS

The permittee does not have an Approved POTW Pretreatment Program (Program). This is due to the flow through the plant being less than five (5) MGD. Although the permittee does not have to develop a Program, information regarding Industrial Users discharging to the Publicly Owned Treatment Works (POTW) must be submitted within 60 days of the effective date of the permit as stated in Part II of the permit. This information will assist in determining the needs of the permittee regarding pretreatment assistance. If an Industrial User begins to discharge or an existing Industrial User changes their discharge, the permittee must resubmit the information stated in Part II no later than sixty days following the introduction or change.

Any wastewater discharged to the POTW from an Industrial User is subject to Federal, State and local 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 403, and the State Pretreatment Requirements found in UAC R317-8-8.

It is required that any local limits be submitted to the Division of Water Quality for review. If local limits are developed, it is required that the permittee perform an annual evaluation of the need to revise or develop technically based local limits for pollutants of concern, to implement the general and specific prohibitions *40 CFR, Part 403.5(a)* and *Part 403.5(b)*. This evaluation may indicate that present local limits are sufficiently protective, need to be revised or should be developed.

BIOMONITORING REQUIREMENTS

A nationwide effort to control toxic discharges where effluent toxicity is an existing or potential concern is regulated in accordance with the State of Utah Permitting and Enforcement Guidance Document for Whole Effluent Toxicity Control (biomonitoring). 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.

The potential for toxicity is not deemed sufficient to require biomonitoring or whole effluent toxicity (WET) limits because there are no present or anticipated industrial dischargers on the system nor are there any anticipated for the duration of this permit. The waste discharge is anticipated to be household waste only. Therefore, biomonitoring is not required in this permit; however, the permit will contain a WET reopener provision.

PERMIT DURATION

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

Drafted and Reviewed by
Daniel Griffin, Discharge Permit Writer, Biosolids
Jennifer Robinson, Pretreatment
Lonnie Shull, Biomonitoring
Carl Adams, Storm Water
Mike Allred, TMDL/Watershed
Chris Shope, Wasteload Analysis
Utah Division of Water Quality, (801) 536-4300

PUBLIC NOTICE

Began: Month Day, 2023
Ended: Month Day, 2023

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

The Public Noticed of the draft permit was published on the Division of Water Quality Public Notice Webpage.

During the public comment period provided under 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.

ADDENDUM TO FSSOB

During finalization of the Permit certain dates, spelling edits and minor language corrections were completed. Due to the nature of these changes they were not considered Major and the permit is not required to be Public Noticed again.

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

Industrial Waste Survey

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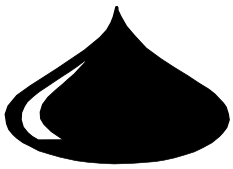
Industrial Pretreatment Wastewater Survey



Do you periodically experience any of the following treatment works problems:

foam, floaties or unusual colors
plugged collection lines caused by grease, sand, flour, etc.
discharging excessive suspended solids, even in the winter
smells unusually bad
waste treatment facility doesn't seem to be treating the waste right

Perhaps the solution to a problem like one of these may lie in investigating the types and amounts of wastewater entering the sewer system from industrial users.

An industrial user (IU) is defined as a non-domestic user discharging to the waste treatment facility which meets any of the following criteria:

1. **has a lot of process wastewater (5% of the flow at the waste treatment facility or more than 25,000 gallons per work day.)**

   Examples: Food processor, dairy, slaughterhouse, industrial laundry.

2. **is subject to Federal Categorical Pretreatment Standards**;

   Examples: metal plating, cleaning or coating of metals, blueing of metals, aluminum extruding, circuit board manufacturing, tanning animal skins, pesticide formulating or packaging, and pharmaceutical manufacturing or packaging,

3. **is a concern to the POTW.**

   Examples: septage hauler, restaurant and food service, car wash, hospital, photo lab, carpet cleaner, commercial laundry.

All users of the water treatment facility are **prohibited** from making the following types of discharges:

1. A discharge which creates a fire or explosion hazard in the collection system.

2. A discharge which creates toxic gases, vapor or fumes in the collection system.

3. A discharge of solids or thick liquids which creates flow obstructions in the collection system.

4. An acidic discharge (low pH) which causes corrosive damage to the collection system.

5. Petroleum oil, nonbiodegradable cutting oil, or products of mineral oil origin in amounts that will cause problems in the collection system or at the waste treatment facility.

6. Waste haulers are prohibited from discharging without permission. (No midnight dumping!)

When the solution to a sewer system problem may be found by investigating the types and amounts of wastewater entering the sewer system discharged from IUs, it's appropriate to conduct an Industrial Waste Survey.

An Industrial Waste Survey consists of:

Step 1: Identify Industrial Users

Make a list of all the commercial and industrial sewer connections.

Sources for the list:

business license, building permits, water and wastewater billing, Chamber of Commerce, newspaper, telephone book, yellow pages.

Split the list into two groups:

domestic wastewater only--no further information needed
everyone else (IUs)

Step 2: Preliminary Inspection

Go visit each IU identified on the "everybody else" list.

Fill out the **Preliminary Inspection Form** during the site visit.

Step 3: Informing the State

Please fax or send a copy of the Preliminary inspection form (both sides) to:

Jennifer Robinson

Division of Water Quality
288 North 1460 West
P.O. Box 144870
Salt Lake City, UT 84114-4870

Phone: (801) 536-4383
Fax: (801) 536-4301
E-mail: jenrobinson@utah.gov

PRELIMINARY INSPECTION FORM

INSPECTION DATE ___ / ____ /

Name of Business **Person Contacted** _____
Address _____ **Phone Number** _____

_____

Description of Business _____

Principal product or service: _____

Raw Materials used: _____

_____

Production process is: [ ] Batch [ ] Continuous [ ] Both

Is production subject to seasonal variation? [ ] yes [ ] no
If yes, briefly describe seasonal production cycle.

_____

This facility generates the following types of wastes (check all that apply):

1. [ ] Domestic wastes (Restrooms, employee showers, etc.)
2. [ ] Cooling water, non-contact **3. [ ] Boiler/Tower blowdown**
4. [ ] Cooling water, contact **5. [ ] Process**
6. [ ] Equipment/Facility washdown **7. [ ] Air Pollution Control Unit**
8. [ ] Storm water runoff to sewer **9. [ ] Other describe**

Wastes are discharged to (check all that apply):

[ ] Sanitary sewer **[ ] Storm sewer**
[ ] Surface water **[ ] Ground water**
[ ] Waste haulers **[ ] Evaporation**
[ ] Other (describe)
Name of waste hauler(s), if used

_____

Is a grease trap installed? Yes No
Is it operational? Yes No

Does the business discharge a lot of process wastewater?

- **More than 5% of the flow to the waste treatment facility? Yes No**
- **More than 25,000 gallons per work day? Yes No**

Does the business do any of the following:

[ ] Adhesives
[ ] Aluminum Forming
[ ] Battery Manufacturing
[ ] Copper Forming
[ ] Electric & Electronic Components
[ ] Explosives Manufacturing
[ ] Foundries
[ ] Inorganic Chemicals Mfg. or Packaging
[ ] Industrial Porcelain Ceramic Manufacturing
[ ] Iron & Steel
[ ] Metal Finishing, Coating or Cleaning
[ ] Mining
[ ] Nonferrous Metals Manufacturing
[ ] Organic Chemicals Manufacturing or Packaging
[ ] Paint & Ink Manufacturing
[ ] Pesticides Formulating or Packaging
[ ] Petroleum Refining
[ ] Pharmaceuticals Manufacturing or Packaging
[ ] Plastics Manufacturing
[ ] Rubber Manufacturing
[ ] Soaps & Detergents Manufacturing
[ ] Steam Electric Generation
[ ] Tanning Animal Skins
[ ] Textile Mills

[ ] Car Wash
[ ] Carpet Cleaner
[ ] Dairy
[ ] Food Processor
[ ] Hospital
[ ] Laundries
[ ] Photo Lab
[ ] Restaurant & Food Service
[ ] Septage Hauler
[ ] Slaughter House

Are any process changes or expansions planned during the next three years? Yes No
If yes, attach a separate sheet to this form describing the nature of planned changes or expansions.

_____
Inspector

_____
Waste Treatment Facility

Please send a copy of the preliminary inspection form (both sides) to:

Jennifer Robinson
Division of Water Quality
P. O. Box 144870
Salt Lake City, Utah 84114-4870

Phone: (801) 536-4383
Fax: (801) 536-4301
E-Mail: jenrobinson@utah.gov

	Industrial User	Jurisdiction	SIC Codes	Categorical Standard Number	Total Average Process Flow (gpd)	Total Average Facility Flow (gpd)	Facility Description
1							
2							
3							
4							
5							
6							
7							
8							
9							
10							
11							

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ATTACHMENT 2

Effluent Monitoring Data

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Effluent Monitoring Data.

Month	Flow	BOD5	TSS	Ammonia	E. coli	TRC	O & G		DO	pH
Unit	MGD	mg/L	mg/L	mg/L	#/100mL	mg/L	mg/L		mg/L	SU
Chronic		25	25		158		10	Min		6.5
Acute		35	35	14.4	126	0.31		Max	5	9
Jan-18										
Feb-18	0.197	13.9	21.5	2.88	816	0.07			7.3	7.8
Mar-18	0									
Apr-18	0.2	15.5	50.4	2.97	4.1	0.27	0		5.2	8.1
May-18	0									
Jun-18	0									
Jul-18	0									
Aug-18	0									
Sep-18	0									
Oct-18	0									
Nov-18	0									
Dec-18	0									
Jan-19	0									
Feb-19	0									
Mar-19	0.218	17	24.2	6	126	0.52			5.1	7.5
Apr-19	0.22	23.1	30.7	5	0	0.13			5	8.2
May-19	0									
Jun-19	0									
Jul-19	0									
Aug-19	0									
Sep-19	0									
Oct-19	0									
Nov-19	0.125	14.6	15.4	1.04	0	0.14	0		5.9	7.7
Dec-19	0									
Jan-20	0									
Feb-20	0.205	12.6	16.3	4	200	0.14	5		3.8	6.9
Mar-20	0									
Apr-20	0.019	14.7	40.2	4	4.2	0.19	5		5.7	8.1
May-20	0									
Jun-20	0									
Jul-20	0									
Aug-20	0									
Sep-20	0									
Oct-20	0									
Nov-20	0									

Month	Flow	BOD5	TSS	Ammonia	E. coli	TRC	O & G		DO	pH
Unit	MGD	mg/L	mg/L	mg/L	#/100mL	mg/L	mg/L		mg/L	SU
Chronic		25	25		158		10	Min		6.5
Acute		35	35	14.4	126	0.31		Max	5	9
Dec-20	0									
Jan-21	0									
Feb-21	0									
Mar-21	0									
Apr-21	0									
May-21	0									
Jun-21	0									
Jul-21	0									
Aug-21	0									
Sep-21	0									
Oct-21	0									
Nov-21	0									
Dec-21	0									
Jan-22	0									
Feb-22	0									
Mar-22	0									
Apr-22	0.11	14	34	2.8	0	0.17	0		7.3	8.4
May-22	0									
Jun-22	0									
Jul-22	0									
Aug-22	0									
Sep-22	0									
Oct-22	0									
Nov-22	0									
Dec-22	0									

TBPEL Rule Monitoring Data

	Effluent						Influent	
Param.	Flow	NH3 + NH4	Ortho P.	TKN	Total P.	Total Rec. P.	TKN	Total P.
Unit	MGD	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Month								
Jan-18	0						39.1	4.54
Feb-18	0.197	0.0324	1.33	6.45	2.03	2.29	30.9	4.18
Mar-18	0						38.6	5.29
Apr-18	0.2	0.146	1.23	7.92	1.47	2.21	2.21	2.44
May-18	0						44	8.18
Jun-18	0							2.98
Jul-18	0						31.9	2.82
Aug-18	0						39.8	2.96
Sep-18	0						42	3.98
Oct-18	0						40.5	4.95
Nov-18	0						38.7	4.17
Dec-18	0						53.7	4.49
Jan-19	0						50.1	5.25
Feb-19	0						43.4	3.61
Mar-19	0.218	0.0289	2.04	11.1	2.41	2.14	55.5	10.8
Apr-19	0.22	0.148	1.33	11	1.79	1.89	19.1	1.97
May-19	0						21.2	2.35
Jun-19	0						30.4	3.48
Jul-19	0						40.5	3.43
Aug-19	0						42.2	3.2
Sep-19	0						36.6	3.48
Oct-19	0						22.5	3.56
Nov-19	0.125	0.0227	1.11	4.06	1.64	1.6	40.2	4.1
Dec-19	0						35.9	3.96
Jan-20	0						38.8	3.27
Feb-20	0.205	0.0335	1.95	8.46	2.35	2.35	24.6	1.99
Mar-20	0						23.5	2.16
Apr-20	0.019	0.0988	1.67	12.9	2.18	1.67	15.4	1.95
May-20	0						24	2.32
Jun-20	0						18.8	2.51
Jul-20	0						29.2	3.69
Aug-20	0						41.5	4.01
Sep-20	0						44.1	4.61
Oct-20	0						41.8	4.26

	Effluent						Influent	
Param.	Flow	NH3 + NH4	Ortho P.	TKN	Total P.	Total Rec. P.	TKN	Total P.
Unit	MGD	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L	mg/L
Month								
Nov-20	0						39.9	4.35
Dec-20	0						46.8	4.92
Jan-21	0						54.5	5.42
Feb-21	0						56.4	5.43
Mar-21	0						51	4.29
Apr-21	0						70	3.77
May-21	0						59.4	3.54
Jun-21	0						49.9	3.88
Jul-21	0						35.8	4.51
Aug-21	0						46.2	4.61
Sep-21	0						65.9	3.57
Oct-21	0						74.5	3.81
Nov-21	0						34.3	3.89
Dec-21	0						42.3	5.55
Jan-22	0						63.4	5.39
Feb-22	0						48.1	4.84
Mar-22	0						48.1	4.84
Apr-22	0.11	0.1	1.9	8	2.8	2.8	30.4	3.9
May-22	0						31.3	
Jun-22	0						27.6	3.6
Jul-22	0						43.1	5.2
Aug-22	0						38.5	
Sep-22	0						38.3	5.5
Oct-22	0						50.1	5.6
Nov-22	0						43.3	4.6
Dec-22	0						49.7	5.9

ATTACHMENT 3

Wasteload Analysis

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ATTACHMENT 4

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.

As a result of the infrequent discharge and low flow conditions Lewiston has not been required to sample for metals in previous permit cycles. This results in no data for an RP. This result is similar to one that would result in Outcome B and the addition or increase of monitoring for the permit. Due to the nature of the community and discharge, there is currently no reasonable expectation of there to be any issues with the metals in the effluent. Metals monitoring will not be added to the permit.

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