



**STATEMENT OF BASIS FOR MODIFICATION
OF AZPDES PERMIT NO. AZ0023558**

Pursuant to A.C.C. R18-9-B906, on Nov 11, 2024, ADEQ received an application from Salt River Project (SRP) to modify AZPDES Permit No. AZ0023558 which became effective on August 13, 2024. The request would remove the Chromium VI limit from outfall 021.

The Santan Generating Station (Santan) is considered a major facility under the Clean Water Act. The receiving water for Santan Outfall 021 is the SRP Western Canal which is a Phoenix area canal. The Santan Generating Station has a design capacity of 5.2 MGD discharges through Outfall 021. The applicable designated uses for the Western Canal are Agricultural Irrigation (AgI) and Agricultural Livestock Watering (AgL).

ADEQ has reviewed the request and proposes to modify the permit as follows:

The parameter of Chromium VI should not have been set as a limit in the final permit for outfall 021. This parameter was erroneously included in the issued permit after the draft permit public notice period.

Current Permit	Modification	Reason for Change
Chromium VI for outfall 021	Remove Chromium VI limit from this outfall.	Chromium VI has no standard for the associated designated uses.
Chromium VI monitoring in effluent characterization	Footnote added to denote that effluent monitoring not required.	Clarifies appropriate monitoring of parameters for the designated uses of each outfall.

1. For Part 1.e, Table 1, limits for Outfall 021 are as follows:

Table 1.e Effluent Limitations and Monitoring Requirements for Outfall 021

Parameter	Monitoring Requirement (1) (2)			
	Concentration Limits			Sample Type
	Monthly Average	Daily Maximum	Monitoring Frequency	
Discharge Flow (MGD) (3)	REPORT	REPORT	Continuous	Metered
Chlorine, Free Available (FAC) (3)(4)(5)	Report	Report	1x/month	Discrete
Chromium, Total	200 µg/L	200 µg/L	1x/month	Discrete
Selenium	20 µg/L	40 µg/L	1x/month	Discrete
Zinc	1,000 µg/L	1,000 µg/L	1x/month	Discrete
Hardness (CaCO ₃) (6)	Report	Report	1 x/month	Discrete
Total Suspended Solids (TSS)	30 mg/L	100 mg/L	1x/month	Discrete
pH (5)	Not less than 6.5 standard units (S.U.) not greater than 9.0 S.U.		1/week	Discrete

Footnotes

- 1 All metals effluent limits are for total recoverable metals.
- 2 The Limit of Quantitation (LOQ) must be low enough to allow comparison of the results to the lowest applicable surface water quality standard (SWQS). If a reported LOQ below the SWQS cannot be achieved the permittee shall use the method with the lowest LOQ, per Part II.A.4 See Part II.A.4 for how to determine the method LOQ in the absence of a published value. Samples are to be representative of seasonal variation in the discharge.
- 3 Monitoring and reporting required. No limit set at this time.
- 4 Sample when chlorine or bromine compounds are used for disinfection. See Part II.A.5 for specific monitoring requirements for chlorine.
- 5 pH, FAC, and TRC must be measured at the time of sampling and do not require use of a certified laboratory. Measurements must be obtained in accordance with the applicable method and must meet all method quality assurance/quality control requirements to be considered valid data.
- 6 Monitoring and reporting required. No limit set at this time.

2. For Table 4.b, Outfall 021 should be removed for certain parameters:

Table 4.b. Outfall 021 — Effluent Characterization Testing—Selected Metals, Trace Substances

Footnote added to note which parameters not applicable to outfall 021. Includes Thallium, Chromium VI, Nickel, and Lead.

Anti-Backsliding Considerations:

“Anti-backsliding” refers to statutory (Section 402(o) of the Clean Water Act) and regulatory (40 CFR 122.44(l)) requirements that prohibit the renewal, reissuance, or modification of an existing AZPDES permit that contains effluent limits, permit conditions, or standards that are less stringent than those established in the previous permit. This permit has been reviewed and drafted with consideration of anti-backsliding concerns. 40 CFR 122.44(l)(2)(i)(B)(1) allows a permit to be modified to contain a less stringent effluent limitation if information becomes available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance. This permit modification is not removing limitations from the permit that are required for the appropriate designated uses. The changes are reflective of the permit that was presented in the public notice period.

Public Notice (A.A.C. R18-9-A907) / Public Comment Period:

These changes are considered a major modification. This proposed modification will be public noticed for a 30-day comment period prior to issuance of the final permit decision.

EPA Review (A.A.C. R18-9-A908(C))

A copy of this draft permit modification any revisions made to this draft as a result of public comments received will be sent to EPA Region 9 for review. If EPA objects to a provision of the draft, ADEQ will not issue the permit until the objection is resolved.