

**STATEMENT OF BASIS FOR MODIFICATION  
OF AZPDES PERMIT NO. AZ0024341**

Pursuant to A.C.C. R18-9-B906, on May 16, 2023, ADEQ received an application from the Salt River Valley Users Association (Salt River Project (SRP), owner of SRP Groundwater Wells to modify AZPDES Permit No. AZ0024341 which became effective on November 10, 2022. The request would correct typographical issues on Table 1.C and Table 1.D. of the Permit.

SRP is a water and power utility operating in the State of Arizona. The facility is a water distribution system that provides surface and groundwater to a 248,200-acre area within metropolitan Phoenix for agricultural, urban, and municipal uses. SRP delivers water through its historic canals to city facilities where it is treated and delivered to homes and businesses for drinking water uses. SRP also delivers water directly to farms and urban irrigation users through an extensive distribution system of smaller open ditches and underground pipes called laterals. SRP also supplies water to supplement urban lakes.

Surface and groundwater supplies are delivered to users through a canal and lateral system over 135 miles in length within metropolitan Phoenix in Maricopa County. There are 155 groundwater wells that discharge above water treatment plants (WTP) and 37 wells that discharge to the canal system below WTP for a total of 192 wells contributing groundwater to protected surface waters (PSW) that are covered by this permit.

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

<b>Current Permit</b>	<b>Modification</b>	<b>Reason for Change</b>
Footnote 4 of Table 1.C. indicates that the associated limit is protective of partial body contact.	Change footnote to indicate that the 80 µg/L is protective of the fish consumption designated use for applicable urban lakes.	Correct error in the footnote.
Selenium limit is 2 µg/L.	Selenium limit is 10 ug/L.	The waste load allocation outlined in the Gila River Total Maximum Daily Limit Study for selenium is 10 µg/L.

**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 NPDES permit that contains effluent limits, permit conditions, or standards that are less stringent than those established in the previous permit. The rules and statutes do identify exceptions to these circumstances where backsliding is acceptable. 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 correcting typographically errors in the original permit.

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

These changes are considered a major modification because it impacts the permit limits tables. 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.