

## Southcentral Regional Office CLEAN WATER PROGRAM

Application Type
Facility Type
Major / Minor

Minor

# NPDES PERMIT FACT SHEET INDIVIDUAL SEWAGE

 Application No.
 PA0022233

 APS ID
 276387

 Authorization ID
 1459166

Applicant Name	Arendtsville Borough Municipal Authority Adams County	Facility Name	Arendtsville STP
Applicant Address	1 Chestnut Street PO Box 508	Facility Address	241 E Main Street
	Arendtsville, PA 17303		Arendtsville, PA 17303
Applicant Contact	Ron Cooper	Facility Contact	Ron Cooper
Applicant Phone	(717) 677-9300	Facility Phone	(717) 677-9300
Client ID	77908	Site ID	250930
Ch 94 Load Status	Not Overloaded	Municipality	Arendtsville Borough
Connection Status	No Limitations	County	Adams
Date Application Rece	october 23, 2023	EPA Waived?	Yes
Date Application Acce	pted October 23, 2023	If No, Reason	

## **Summary of Review**

KPI Technology, on behalf of the Arendtsville Municipal Authority (Authority/Permittee), applied to the Pennsylvania Department of Environmental Protection (DEP) for issuance of the NPDES permit. The permit was reissued on May 21, 2019 and became effective on June 1, 2019. The permit expires on May 31, 2024.

The average annual design flow and hydraulic design capacity is 0.14 MGD, and the organic loading capacity is 280 lbs BOD₅/day. The treated effluent is discharged to Conewago Creek. This facility receives 100.0% of its flow from Arendtsville Borough. The 2023 application states that there are no industrial users.

WQM Part II Permit No. 0191402 A-1 amendment was issued on 11/8/2011.

Sludge use and disposal description and location(s): N/A because sludge is hauling by Pecks Septic contractor.

<u>Changes from the previous permit</u>: The E. Coli. monitoring and report requirements will add to the proposed permit. The 2/month monitoring and reporting requirements of Bromide will be removed from the proposed permit.

Based on the review outlined in this fact sheet, it is recommended that the permit be drafted. A public notice of the draft permit will be published in the *Pennsylvania Bulletin* for public comments for 30 days.

Approve	Deny	Signatures	Date
Х		Hilaryle Hilary H. Le / Environmental Engineering Specialist	March 15, 2024
х		Maria D. Bebenek for Daniel W. Martin, P.E. / Environmental Engineer Manager	March 22, 2024

ischarge, Receivir	ng Waters and Water Supply Info	ormation	
Outfall No. 001		Design Flow (MGD)	0.14
Latitude 39°	55' 24.17"	_ Longitude	-77° 17' 23.92"
Quad Name A	rendtsville	Quad Code	
Wastewater Desc	ription: Sewage Effluent		
D W.	0 1 (0)4(5)	0, 0, 1	0000
Receiving Waters		Stream Code	8303
NHD Com ID	57472489	RMI	69.89
Drainage Area	26.5 mi. <sup>2</sup>	Yield (cfs/mi²)	0.25
Q <sub>7-10</sub> Flow (cfs)	6.59	Q <sub>7-10</sub> Basis	USGS StreamStats
Elevation (ft)	635	Slope (ft/ft)	
Watershed No.	7-F	Chapter 93 Class.	CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Statu	s Attaining Use(s)		
Cause(s) of Impai	rment		
Source(s) of Impa	irment		
TMDL Status	-	Name	
Nearest Downstre	am Public Water Supply Intake	Wrightsville Water Supply Co.	, York County
PWS Waters	Susquehanna	Flow at Intake (cfs)	
PWS RMI	28.51 miles	Distance from Outfall (mi)	Approximate 83.0 miles

Changes Since Last Permit Issuance:

#### Drainage Area

The discharge is to Conewago Creek at RMI 69.89 miles. A drainage area upstream of the discharge is estimated to be 26.5 mi.<sup>2</sup>, according to USGS PA StreamStats available at <a href="https://streamstats.usgs.gov/ss/">https://streamstats.usgs.gov/ss/</a>.

#### Streamflow

According to StreamStats, the discharge point on Conewago Creek has a  $Q_{7-10}$  of 6.59 cfs and a drainage area of 26.5 mi.<sup>2</sup>, which results in a  $Q_{7-10}$  low flow yield of 0.25 cfs/mi.<sup>2</sup>. This information is used to obtain a chronic or 30-day ( $Q_{30-10}$ ), and an acute or 1-day ( $Q_{1-10}$ ) exposure stream flow for the discharge point as follows (Guidance No. 391-2000-023):

 $Q_{7\text{-}10} = 6.59 \text{ cfs}$  Low Flow Yield = 6.59 cfs / 26.5 mi.  $^2$  = 0.25 cfs/mi.  $^2$  Q<sub>30-10</sub> = 1.36 \* 6.59 cfs = 8.96 cfs Q<sub>1-10</sub> = 0.64 \* 6.59 cfs = 4.22 cfs

#### **Conewago Creek**

25 Pa. Code § 93.90 classifies Conewago Creek as Cold-Water Fishes & Migratory Fishes (CWF & MF) surface water. Based on the 2022 Integrated Report, Conewago Creek, assessment unit IDs 18517 & 13003, is not impaired. A TMDL currently does not exist for this stream segment, therefore, no TMDL has been taken into consideration during this review.

#### **Public Water Supply**

The nearest downstream public water supply intake is for Wrightsville Water Supply Co. in York County on Susquehanna River, approximately 83.0 miles downstream of this discharge. Considering distance and dilution, the discharge is not expected to impact the water supply.

	Treatment Facility Summary									
Treatment Facility Na	me: Arendtsville STP									
WQM Permit No.	Issuance Date									
0191402 A-1	11/8/2011									
	Degree of			Avg Annual						
Waste Type	Treatment	Process Type	Disinfection	Flow (MGD)						
Sewage	Secondary	Activated Sludge	Hypochlorite	0.14						
Hydraulic Capacity	Organic Capacity			Biosolids						
(MGD)	(lbs/day)	Load Status	Biosolids Treatment	Use/Disposal						
0.14	280	Not Overloaded	Aerobic Digestion	Other WWTP						

Changes Since Last Permit Issuance: none

## Other Comments:

The WWTP train is as follows:

Grit Removal / Surge Tank (1)  $\Rightarrow$  Aeration Tank (2)  $\Rightarrow$  Clarifier / Settling Tank (2)  $\Rightarrow$  Chlorine Contact Tank (1)  $\Rightarrow$  Post Aeration Tank (2)  $\Rightarrow$  Discharge to Conewago Creek

## Chemical used:

Liquid Aluminum Sulfate is used for phosphorus removal at a rate of 2 gpd. Chlorine is used for disinfection at a rate of 5 gpd.

## Industrial/Commercial Users:

The permit application indicated there are no commercial or industrial contributors to the treatment plant.

#### Biosolids:

The total sewage sludge/biosolids production within the facility for the previous year was 53.24 dry tons.

	Compliance History
Summary of DMRs:	A summary of past 12-month DMRs is presented on the pages 5-7.
Summary of Inspections:	<b>8/07/23:</b> Mr. Hoy, DEP WQS, conducted a compliance evaluation inspection. There were no violations noted during inspection. The field test results were within permit limits. Recommendations were regular maintenance of the outfall path and placing a NIST thermometer in the sample storage refrigerator and recording temperature. DEP requested that individual aliquots be at least 100 mL for composite samples and completing the beneficial use information for future sewage sludge supplemental reports.
	<b>6/29/21:</b> Mr. Bettinger, DEP WQS, conducted a compliance evaluation inspection. There were no violations noted during inspection. The field test results were within permit limits. Recommendations were regular maintenance of the outfall path.
Other Comments:	There are no violations against the permittee or applicant.

Other Comments:

The table below summarizes the influent/effluent testing results submitted along with the application.

Int	fluent Testing Resul	ts	Eff	luent Testing Resu	lts
Parameter	Min/Max Value	Average Value	Parameter	Min/Max Value	Average Value
BOD <sub>5</sub> (mg/L)	29.6/345 mg/L	90 mg/L	pH (minimum)	6.5 S.U.	_
BOD <sub>5</sub> (lbs/day)	12/241 lbs/day	51 lbs/day	pH (maximum)	8.3 S.U.	
TSS (mg/L)	4/160 mg/L	61 mg/L	D.O (minimum)	5.0 mg/L	7.67 mg/L
TSS (lbs/day)	2/89 lbs/day	34 lbs/day	TRC	0.014 mg/L	0.24 mg/L
TN (mg/L)	66 mg/L	66 mg/L	Fecal Coliform	1/2420 No./100mL	31.19 No./100 mL
TN (lbs/day)	19 lbs/day	19 lbs/day	CBOD₅	2.4/3mg/L	2.6 mg/L
TP (mg/L)	7.0 mg/L	7.0 mg/L	TSS	1/5.8 mg/L	3.2 mg/L
TP (lbs/day)	2.0 lbs/day	2.0 lbs/day	NH <sub>3</sub> -N	0.1/7.5 mg/L	0.37 mg/L
NH <sub>3</sub> -N (mg/L)	39.0 mg/L	39.0 mg/L	TN	33.5 mg/L	33.5 mg/L
NH <sub>3</sub> -N (lbs/day)	11.0 lbs/day	11.0 lbs/day	TP	1.8 mg/L	1.8 mg/L
TDS (mg/L)	354 mg/L	354 mg/L	Temp	66 F	66 F
TDS (lbs/day)	103.0 lbs/day	103.0 lbs/day	TKN	0.5 mg/L	0.5 mg/L
TKN	mg/L	mg/L	NO <sub>2</sub> -N + NO <sub>3</sub> -N	34.4 mg/L	34.4 mg/L
$NO_2$ -N + $NO_3$ -N	mg/L	mg/L	TDS	478 mg/L	478 mg/L
			Chloride	43 mg/L	43 mg/L
			Bromide	0.5 mg/L	0.5 mg/L
			Sulfate	23 mg/L	23 mg/L
			Oil and Grease	5.0 mg/L	5.0 mg/L
			Total Copper	0.028 mg/L	0.02 mg/L
			Total Lead	0.001 mg/L	0.001 mg/L
			Total Zinc	0.022 mg/L	0.022 mg/L
			I		

## **Compliance History**

## DMR Data for Outfall 001 (from February 1, 2023 to January 31, 2024)

Parameter	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23
Flow (MGD)												
Average Monthly	0.122	0.077	0.042	0.045	0.049	0.04	0.043	0.043	0.06	0.063	0.085	0.058
Flow (MGD)												
Daily Maximum	0.281	0.194	0.115	0.095	0.14	0.054	0.102	0.069	0.149	0.214	0.173	0.077
pH (S.U.)												
Instantaneous												
Minimum	6.9	7.0	6.9	7.0	7.3	7.0	7.0	6.9	6.9	6.9	6.9	6.9
pH (S.U.)												
Instantaneous												
Maximum	7.8	7.6	7.7	7.6	7.6	7.6	7.4	7.4	7.5	7.5	7.6	7.5
DO (mg/L)												
Instantaneous												
Minimum	8.2	6.8	6.3	6.1	5.9	5.7	5.7	5.7	6.0	6.1	7.2	6.8
TRC (mg/L)												
Average Monthly	0.33	0.27	0.25	0.22	0.20	0.22	0.20	0.23	0.238	0.27	0.28	0.23
TRC (mg/L)												
Instantaneous												
Maximum	0.57	0.76	0.57	0.32	0.41	0.46	0.31	0.34	0.39	0.49	0.48	0.34
CBOD5 (lbs/day)												
Average Monthly	< 3.0	< 2.0	< 0.80	< 0.80	< 1.0	< 0.80	< 0.80	< 0.8	< 1.0	< 1.0	< 2.0	< 1.0
CBOD5 (lbs/day)												
Weekly Average	< 3.0	2.0	1.0	< 1.0	< 2.0	< 0.90	< 0.90	< 0.8	< 2.0	< 1.0	< 2.0	< 1.0
CBOD5 (mg/L)												
Average Monthly	< 3.0	< 2.0	< 3.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
CBOD5 (mg/L)	0.0			0.4	0.0	0.0	0.0	0.0	0.0	0.0	0.0	0.0
Weekly Average	3.0	3.0	3.0	< 2.4	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.0
BOD5 (lbs/day)												
Raw Sewage Influent	04.0	20.0	20.0	24.0	45.0	45.0	25	20	45	40	50.0	50.0
Average Monthly	91.0	36.0	20.0	31.0	45.0	15.0	25	30	45	43	53.0	53.0
BOD5 (lbs/day)												
Raw Sewage Influent	404.0	54.0	04.0	40.0	00.0	04.0	20	20	0.5	40	05.0	400.0
   	131.0	51.0	21.0	48.0	69.0	24.0	36	39	65	48	65.0	132.0
BOD5 (mg/L)												
Raw Sewage Influent	104.0	50.0	69.0	90.0	125.0	40.0	76	90	03.0	101	02.0	125.0
Average Monthly	104.0	58.0	68.0	89.0	125.0	48.0	76	89	93.0	101	93.0	125.0
TSS (lbs/day)	2.0	2.0	0.50	0.80	1.0	0.00	0.3	0.4	0.60	1.0	1.0	< 1.0
Average Monthly	2.0	2.0	0.50	0.80	1.0	0.90	0.3	0.4	0.00	1.0	1.0	< 1.0

## mit Fact Sheet

## NPDES Permit No. PA0022233

N	IPDES Permit F
Α	rendtsville STP
	TSS (lbs/day)
	Raw Sewage In

Arendtsville STP												
TSS (lbs/day)												
Raw Sewage Influent												
Average Monthly	66.0	21.0	20.0	28.0	33.0	24.0	24	22	36	27	33	44.0
TSS (lbs/day)												
Raw Sewage Influent												
 br/> Daily Maximum	44.0	29.0	33.0	40.0	43.0	35.0	30	29	45	30	49	77.0
TSS (lbs/day)												
Weekly Average	2.3	5.9	1.0	1.1	1.9	1.50	0.4	0.7	1.0	1.5	2.2	< 1.0
TSS (mg/L)												
Average Monthly	2.0	3.0	2.0	2.0	2.0	3.0	1.0	1.0	1.0	2.0	2.0	2.0
TSS (mg/L)												
Raw Sewage Influent												
Average Monthly	49.0	37.0	71.0	79.0	93.0	76.0	75	64	73	65	56	94.0
TSS (mg/L)												
Weekly Average	2.0	6.0	3.0	3.0	4.0	4.0	1.0	2.0	2.0	3.0	3.0	2.0
Fecal Coliform												
(No./100 ml)												
Geometric Mean	< 1.0	< 3.0	< 1.0	< 3.0	2.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0	< 1.0
Fecal Coliform												
(No./100 ml)												
Instantaneous												
Maximum	2.0	34	< 1.0	51.0	5.0	2.0	< 1.0	< 1.0	1.0	< 1.0	1.0	< 1.0
Nitrate-Nitrite (mg/L)												
Annual Average		13.0										
Nitrate-Nitrite (lbs)												
Annual Average		12.5										
Total Nitrogen (mg/L)												
Annual Average		13.59										
Total Nitrogen (lbs)												
Annual Average		13.0										
Ammonia (lbs/day)												
Average Monthly	< 0.10	< 0.10	< 0.07	< 0.04	< 0.04	< 0.03	< 0.03	< 0.4	< 0.07	< 0.05	< 0.06	< 0.05
Ammonia (mg/L)												
Average Monthly	< 0.10	0.17	< 0.23	< 0.10	< 0.10	< 0.10	< 0.11	< 0.11	< 0.13	< 0.13	< 0.10	< 0.10
TKN (mg/L)												
Annual Average		2.0										
TKN (lbs)												
Annual Average		< 2.0										
Total Phosphorus												
(lbs/day)												
Average Monthly	0.4	0.70	0.2	0.20	0.2	0.50	0.60	0.4	0.3	0.2	0.2	0.2
Total Phosphorus												
(mg/L)												
Average Monthly	0.35	0.92	0.64	0.55	0.61	1.38	2.0	1.27	0.54	0.38	0.35	0.21
Total Copper (lbs/day)												
Average Monthly	0.009	0.01	0.006	0.009	0.007	0.009	0.006	0.006	0.009	0.008	0.008	0.009

## NPDES Permit No. PA0022233

Total Copper (lbs/day)												
Daily Maximum	0.01	0.02	0.007	0.01	0.008	0.009	0.006	0.006	0.01	0.009	0.009	0.01
Total Copper (mg/L)												
Average Monthly	0.013	0.92	0.023	0.022	0.025	0.028	0.019	0.017	0.013	0.017	0.014	0.021
Total Copper (mg/L)												
Daily Maximum	0.014	1.30	0.023	0.02	0.025	0.028	0.019	0.018	0.015	0.017	0.016	0.025
Bromide (lbs/day)												
Average Monthly	< 0.4	< 0.30	< 0.1	< 0.20	< 0.2	< 0.20	< 0.2	< 0.2	< 0.4	< 0.2	< 0.3	< 0.2
Bromide (lbs/day)												
Daily Maximum	< 0.50	< 0.50	< 0.1	< 0.30	< 0.20	< 0.20	< 0.2	< 0.2	< 0.5	< 0.30	< 0.4	< 0.30
Bromide (mg/L)												
Average Monthly	< 0.5	< 0.5	0.023	< 0.5	< 0.5	< 0.50	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
Bromide (mg/L)												
Daily Maximum	< 0.50	< 0.5	0.023	< 0.50	< 0.5	< 0.50	< 0.50	< 0.5	< 0.50	< 0.50	< 0.50	< 0.5

	Development of Effluent Limitations							
Outfall No.	001	Design Flow (MGD)	0.14					
Latitude	39° 55' 24.17"	Longitude	-77º 17' 23.92"					
Wastewater D	Description: Sewage Effluent							

## **Technology-Based Limitations**

The following technology-based limitations apply, subject to water quality analysis and BPJ where applicable:

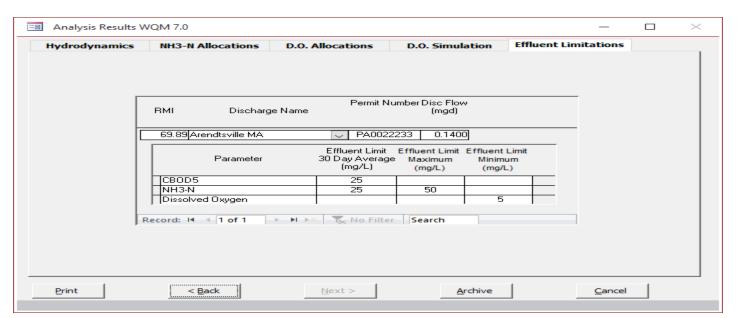
Pollutant	Limit (mg/l)	SBC	Federal Regulation	State Regulation
CBOD <sub>5</sub>	25	Average Monthly	133.102(a)(4)(i)	92a.47(a)(1)
CBOD5	40	Average Weekly	133.102(a)(4)(ii)	92a.47(a)(2)
Total Suspended	30	Average Monthly	133.102(b)(1)	92a.47(a)(1)
Solids	45	Average Weekly	133.102(b)(2)	92a.47(a)(2)
pН	6.0 – 9.0 S.U.	Min – Max	133.102(c)	95.2(1)
Fecal Coliform				
(5/1 – 9/30)	200 / 100 ml	Geo Mean	-	92a.47(a)(4)
Fecal Coliform				
(5/1 – 9/30)	1,000 / 100 ml	IMAX	-	92a.47(a)(4)
Fecal Coliform				
(10/1 – 4/30)	2,000 / 100 ml	Geo Mean	-	92a.47(a)(5)
Fecal Coliform				
(10/1 – 4/30)	10,000 / 100 ml	IMAX	-	92a.47(a)(5)
Total Residual Chlorine	0.5	Average Monthly	-	92a.48(b)(2)

## **Water Quality-Based Limitations**

## Ammonia (NH<sub>3</sub>-N):

 $NH_3N$  calculations are based on the Department's Implementation Guidance of Section 93.7 Ammonia Criteria, dated 11/4/97 (ID No. 391-2000-013). The following data is necessary to determine the in-stream  $NH_3-N$  criteria used in the attached WQM 7.0 computer model of the stream:

*	Discharge pH	=	7.0	(Default)
*	Discharge Temperature	=	20°C	(Default)
*	Stream pH	=	7.0	(Default)
*	Stream Temperature	=	20°C	(Default)
*	Background NH <sub>3</sub> -N	=	0 mg/L	(Default)



Regarding NH<sub>3</sub>-N limits, the attached computer printout of the WQM 7.0 stream model (version 1.1) indicates that a limit of 25.0 mg/L as a monthly average and 50.0 mg/L instantaneous maximum (IMAX) are necessary to protect the aquatic life from toxicity effects at the point of discharge. However, the existing limits of 6.0 mg/L monthly average & 12.0 mg/L IMAX are more stringent and will remain in the proposed permit. Per anti-backsliding policy, the existing winter average monthly limit of 18.0 mg/L & IMAX limit of 36.0 mg/L will remain in place. Recent DMRs and inspection reports show that the facility has been consistently achieving these limits. Mass limits are calculated as follows:

Summer average monthly mass limit:  $6.0 \text{ mg/L} \times 0.14 \text{ MGD} \times 8.34 = 7.0 \text{ lbs/day}$  Winter average monthly mass limit:  $18.0 \text{ mg/L} \times 0.14 \text{ MGD} \times 8.34 = 21.0 \text{ lbs/day}$ 

## **Dissolved Oxygen (D.O.):**

The D.O. goal is 6.0 mg/L. However, a minimum D.O. of 5.0 mg/L is required per 25 Pa. Code § 93.7. It is recommended that this limit be maintained in the proposed permit to ensure the protection of water quality standards. This approach is consistent with DEP's current Standard Operating Procedure (SOP) No. BCW-PMT-033, version 2.0 revised February 5, 2024, and has been applied to other point source dischargers throughout the state.

#### pH:

The effluent discharge pH should remain above 6.0 and below 9.0 standard units according to 25 Pa. Code § 95.2(1).

## Carbonaceous Biochemical Oxygen Demand (CBOD<sub>5</sub>):

The attached computer printout of the WQM 7.0 stream model (ver. 1.1) indicates that a monthly average limit of 25.0 mg/L, or secondary treatment, is adequate to protect the water quality of the stream. However, the existing permit 20.0 mg/L as AML, 30.0 mg/L as weekly average limit (AWL), & 40.0 mg/L as IMAX are more stringent and will remain in the proposed permit. Recent DMRs and inspection reports show that the facility has typically been achieving concentrations below this limit. Mass limits are calculated as follows:

Summer Average monthly mass limit:  $20.0 \text{ mg/L} \times 0.14 \text{ MGD} \times 8.34 = 23.35 (23.0) \text{ lbs/day}$ Summer Average weekly mass limit:  $30.0 \text{ mg/L} \times 0.14 \text{ MGD} \times 8.34 = 35.03 (35.0) \text{ lbs/day}$ 

These values are rounded down to 23.0 lbs/day and 35.0 lbs/day, respectively. Per anti-backsliding policy, the existing winter average monthly limit of 25.0 mg/L, weekly average limit (AWL) of 40.0 mg/L & IMAX limit of 50.0 mg/L will remain in place. Mass limits are calculated as follows:

Winter Average monthly mass limit:  $25.0 \text{ mg/L} \times 0.14 \text{ MGD} \times 8.34 = 29.19 (29.0) \text{ lbs/day}$  Winter Average weekly mass limit:  $40.0 \text{ mg/L} \times 0.14 \text{ MGD} \times 8.34 = 46.70 (46.5) \text{ lbs/day}$ 

These values are rounded down to 29.0 lbs/day and 46.5 lbs/day, respectively. The minimum monitoring frequency will remain the same as 1/week.

## **Total Suspended Solids (TSS):**

The existing technology-based limits of 30.0 mg/L average monthly, 45.0 mg/L weekly average, and 60.0 mg/L IMAX will remain in the proposed permit based on the minimum level of effluent quality attainable by secondary treatment based on 25 Pa. Code § 92a.47. Recent DMRs and inspection reports show that the facility has been consistently achieving these limits. Mass limits are calculated as follows:

Average monthly mass limit:  $30.0 \text{ mg/L} \times 0.14 \text{ MGD} \times 8.34 = 35.03 (35.0) \text{ lbs/day}$ Average weekly mass limit:  $45.0 \text{ mg/L} \times 0.14 \text{ MGD} \times 8.34 = 52.54 (52.5) \text{ lbs/day}$ 

The average monthly and weekly average mass loadings will be rounded down to 35.0 lbs/day and 52.5 lbs/day, respectively.

### **Fecal Coliform:**

The recent coliform guidance in 25 Pa. Code § 92a.47.(a)(4) requires a summer technology limit of 200/100 ml as a geometric mean and an instantaneous maximum not greater than 1,000/100ml and § 92a.47.(a)(5) requires a winter limit of 2,000/100ml as a geometric mean and an instantaneous maximum not greater than 10,000/100ml.

#### E. Coli:

As recommended by DEP's SOP No. BCW-PMT-033, version 2.0 revised February 5, 2024, a routine monitoring for E. Coli will be included in the proposed permit under 25 Pa. Code § 92a.61. This requirement applies to all sewage dischargers greater than 0.002 MGD in their new and reissued permits. A monitoring frequency of 1/quarter will be included in the permit to be consistent with the recommendation from this SOP.

### **Total Residual Chlorine (TRC):**

Based on the attached TRC Excel spreadsheet calculator, which uses the equations and calculations from the Department's May 1, 2003 Implementation Guidance for Total Residual Chlorine (ID No. 391-2000-015), the facility's discharge must meet a monthly average limit of 0.5 mg/L and an instantaneous maximum limit of 1.635 mg/L. However, due to anti-backsliding policy, the previous limits of 0.4 mg/L average monthly and 1.0 mg/L instantaneous maximum will remain in place.

TRC EVALUATION													
Input appropriate values in A3:A9 and D3:D9													
6.59	= Q stream	n (cfs)	0.5	= CV Daily									
0.14	= Q discha	arge (MGD)	0.5	= CV Hourly									
30	= no. samp	oles	1	= AFC_Partia	I Mix Factor								
0.3	= Chlorine	Demand of Stream	1	= CFC_Partia	I Mix Factor								
0	= Chlorine	Demand of Discharge	15	= AFC_Criter	ia Compliance Time (min)								
0.5	= BAT/BPJ	J Value	720	= CFC Criteria Compliance Time (min)									
0	= % Facto	r of Safety (FOS)		=Decay Coef	ficient (K)								
Source	Reference	AFC Calculations		Reference	CFC Calculations								
TRC	1.3.2.iii	WLA afc =	9.725	1.3.2.iii	WLA cfc = 9.474								
PENTOXSD TRO	5.1a	LTAMULT afc =	0.373	5.1c	LTAMULT cfc = 0.581								
PENTOXSD TRG	5.1b	LTA_afc=	3.624	5.1d	LTA_cfc = 5.508								
1 ENTOXOD THO 3.10 ETA_GIC = 3.024 3.10 ETA_GIC = 3.0													
Source Effluent Limit Calculations													
PENTOXSD TRG 5.1f AML MULT = 1.231													
PENTOXSD TRO	5.1g	AVG MON L	.IMIT (mg/l) =	0.500	BAT/BPJ								
		INST MAX L	.IMIT (mg/l) =	1.635									
WLA afc		AFC_tc)) + [(AFC_Yc*Q		e(-K-AFC_tc))									
LTAMULT afc		AFC_Yc*Qs*Xs/Qd)]*(1- (cvh^2+1))-2.326*LN(cvh^2											
	wla afc*LTA		2+1)~0.5)										
LTA_afc	wia_atc"L14	AMULI_atc											
WLA_cfc	( 011/e(-k*	*CFC_tc) + [(CFC_Yc*Qs	* 011/Od*e	(-k*CEC to))									
oca_cic		CFC_Yc*Qs*Xs/Qd)]*(1-		( K OI O_10, )									
LTAMULT cfc		(cvd^2/no samples+1))-2.3		2/no samples+1	1)^0.5)								
_	LTA_cfc wla_cfc*LTAMULT_cfc												
	5.0 2.17												
AML MULT	EXP(2.326*L	N((cvd^2/no_samples+1)^	0.5)-0.5*LN(c	vd^2/no_sampl	es+1))								
AVG MON LIMIT		PJ,MIN(LTA_afc,LTA_cfc)*											
INST MAX LIMIT		on_limit/AML_MULT)/L1		c)									

#### Raw Sewage Influent Monitoring:

As a result of negotiation with EPA, influent monitoring of TSS and  $BOD_5$  are required for any POTWs; therefore, influent sampling of  $BOD_5$  and TSS will remain in the proposed permit. A 24-hr composite sample type will be required to be consistent with the proposed sampling frequency for TSS and  $BOD_5$  in the effluent.

#### **Total Phosphorus:**

The existing permit average monthly TP concentration of 2.0 mg/L, and 4.0 mg/L IMAX will remain in the proposed permit. Mass average monthly of 2.3 lbs/day is also in the proposed permit.

Average monthly mass limit:  $2.0 \text{ mg/L} \times 0.14 \text{ MGD} \times 8.34 = 2.34 (2.3) \text{ lbs/day}$ 

#### Stormwater

There is no known stormwater outfall associated with this facility.

#### Toxics:

The data was analyzed based on the guidelines found in DEP's Water Quality Toxics Management Strategy (Document No. 361-0100-003, version 1.4, revised 5/2023) and DEP's SOP No. BPNPSM-PMT-033. Spreadsheet results are attached to this fact sheet. The Toxics Management Spreadsheet uses the following logic:

- a. Establish average monthly and IMAX limits in the draft permit where the maximum reported concentration exceeds 50% of the WQBEL.
- b. For non-conservative pollutants, establish monitoring requirements where the maximum reported concentration is between 25% 50% of the WQBEL.
- c. For conservative pollutants, establish monitoring requirements where the maximum reported concentration is between 10%-50% of the WQBEL.

Therefore, the results are as follows.

✓ Recommended WQBELs & Monitoring Requirements

No. Samples/Month: 4

	Mass	Limits		Concentra	ation Limits				
Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL	WQBEL Basis	Comments
Total Copper	Report	Report	Report	Report	Report	mg/L	0.18	AFC	Discharge Conc > 10% WQBEL (no RP)

Other Pollutants without Limits or Monitoring

The following pollutants do not require effluent limits or monitoring based on water quality because reasonable potential to exceed water quality criteria was not determined and the discharge concentration was less than thresholds for monitoring, or the pollutant was not detected and a sufficiently sensitive analytical method was used (e.g., <= Target QL).

Pollutants	Governing WQBEL	Units	Comments
Total Dissolved Solids (PWS)	N/A	N/A	PWS Not Applicable
Chloride (PWS)	N/A	N/A	PWS Not Applicable
Bromide	N/A	N/A	No WQS
Sulfate (PWS)	N/A	N/A	PWS Not Applicable
Total Lead	101	µg/L	Discharge Conc ≤ 10% WQBEL
Total Zinc	1.56	mg/L	Discharge Conc ≤ 10% WQBEL

- Total Copper pollutant has no reasonable potential (no-RP) discharge concentration greater than 10% WQBEL, therefore the 2/month monitoring and reporting requirements of this pollutant will remain in the proposed permit. During the next permit renewal cycle, the need for Copper monitoring in the permit will be re-evaluated.
- Bromide is no WQS, therefore, the 2/month monitoring and reporting requirements of this pollutant will remove from the proposed permit.

## **Chesapeake Bay Strategy:**

Phase 2 WIP identifies Cassville WWTP as a non-significant Phase 5 facility. DEP's SOP mentioned that for facilities with design flows >0.002 MGD and <0.2 MGD will include monitoring, at a minimum, for Total Nitrogen and Total Phosphorus, with a monitoring frequency specified in DEP's technical guidance. Therefore, 2/year TN species (such as Nitrate-Nitrite as N, Total Kjeldahl Nitrogen, and Total Nitrogen). The yearly calculation "report" for Nitrate-Nitrite, TKN, & TN will remain in the proposed permit.

#### WETT:

Minor facilities and facilities without a formal EPA approved pretreatment program are exempted from WETT.

#### Anti-Backsliding:

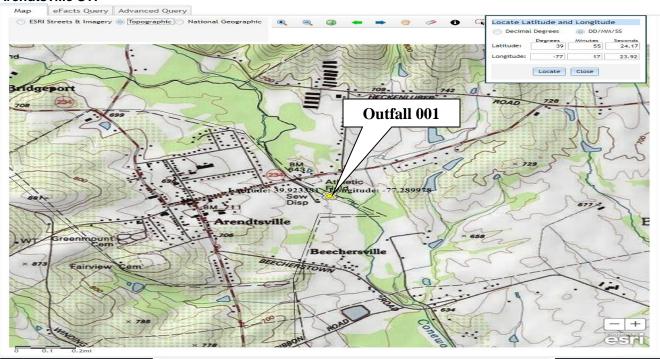
The proposed limits are at least as stringent as are in existing permit; therefore, anti-backsliding is not applicable

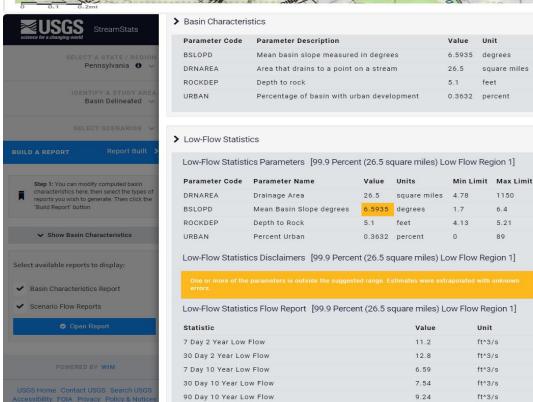
#### Antidegradation (93.4):

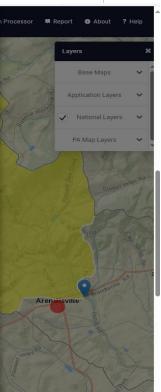
The effluent limits for this discharge have been developed to ensure that existing in-stream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. No High-Quality Waters are impacted by this discharge. No Exceptional Value Waters are impacted by this discharge.

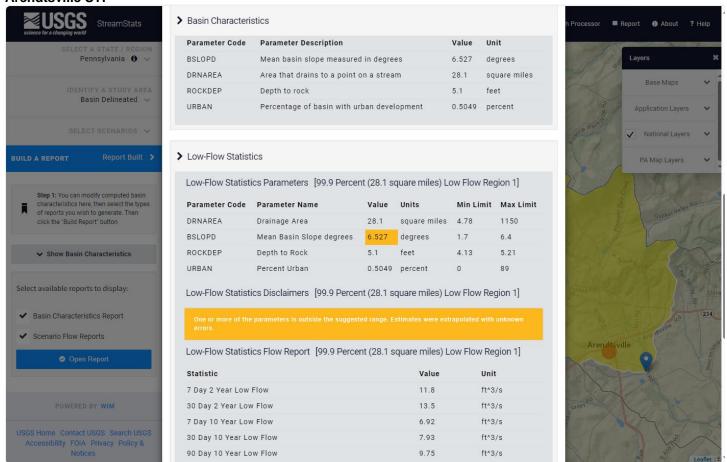
#### **Class A Wild Trout Fisheries:**

No Class A Wild Trout Fisheries are impacted by this discharge.









#### **WQM 7.0**:

The following data were used in the attached computer model (WQM 7.0) of the stream:

Discharge pH 7.0 (Default) Discharge Temperature = 20°C (Default) Stream pH 7.0 (Default) Stream Temperature 20°C (Default) = Background NH<sub>3</sub>-N 0 mg/L (Default)

Node 1: Outfall 001 Conewago Creek (08303)

Elevation: 635 ft (USGS National Map Viewer)
Drainage Area: 26.5 mi² (USGS PA StreamStats)

River Mile Index: 69.89 (PA DEP eMapPA)

Low Flow Yield: 0.25 cfs/mi<sup>2</sup>

Discharge Flow: 0.14 mgd (NPDES PA0022233 Application)

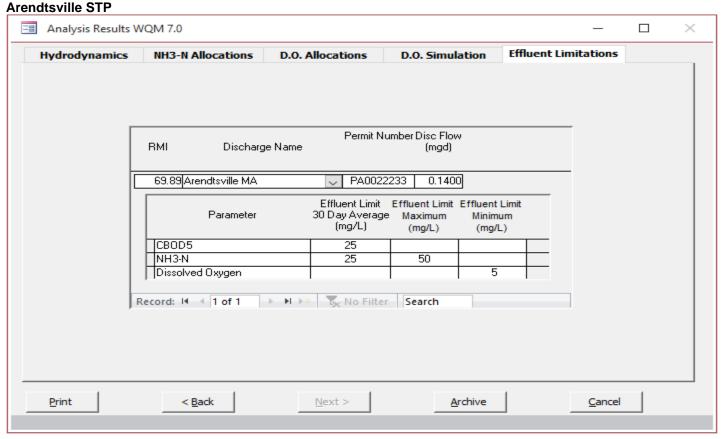
Node 2: Just after confluence of Conewago Creek with UNT 09151

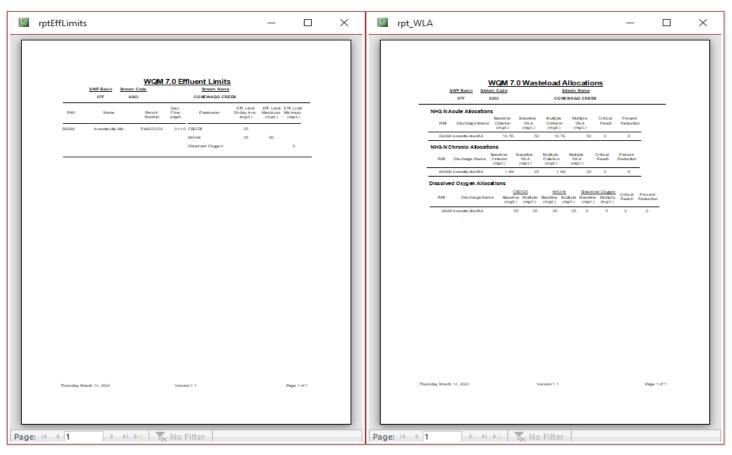
Elevation: 619 ft (USGS National Map Viewer)
Drainage Area: 28.1 mi<sup>2</sup> (USGS PA StreamStats)

River Mile Index: 69.23 (PA DEP eMapPA)

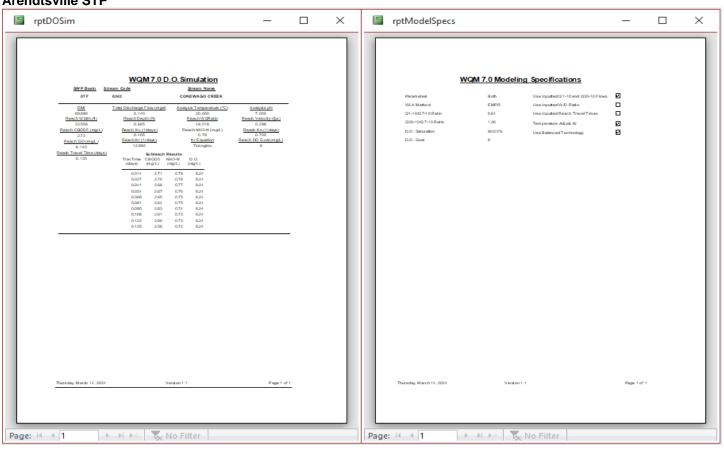
Low Flow Yield: 0.25 cfs/mi<sup>2</sup> Discharge Flow: 0.00 mgd

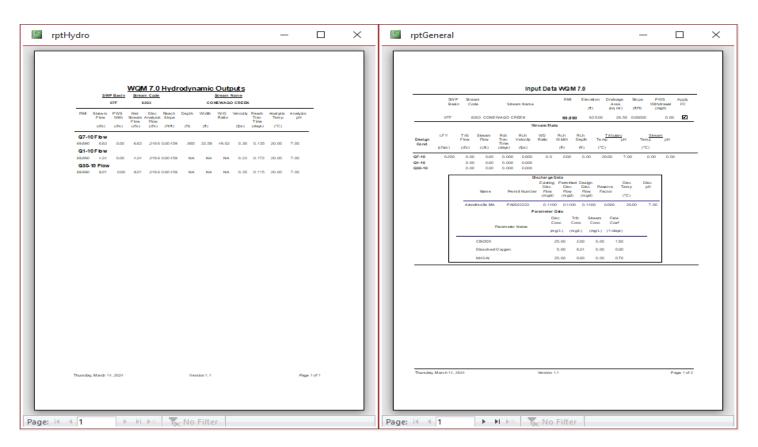
## NPDES Permit Fact Sheet

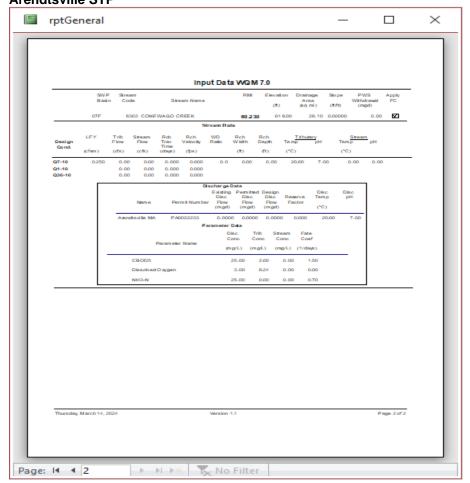




#### NPDES Permit No. PA0022233







## **Toxics Data:**

The following input data were used for Toxic Management Spreadsheet (TMS) Analysis:

Discharge pH = 7.4 (Application) (average (6.5 + 8.3)/2 = 7.4)

\* Stream pH = 7.0 (Default)

\* Discharge Hardness = 100 mg/L (Default)

\* Stream Hardness = 100 mg/L (Default)

Node 1: Outfall 001 Conewago Creek (08303)

Elevation: 635 ft (USGS National Map Viewer)
Drainage Area: 26.5 mi² (USGS PA StreamStats)

River Mile Index: 69.89 (PA DEP eMapPA)

Low Flow Yield: 0.25 cfs/mi<sup>2</sup>

Discharge Flow: 0.14 MGD (NPDES PA0022233 Application)

Node 2: Just after confluence of Conewago Creek with UNT 09151

Elevation: 619 ft (USGS National Map Viewer)
Drainage Area: 28.1 mi<sup>2</sup> (USGS PA StreamStats)

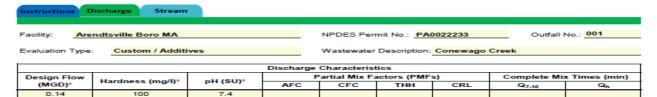
River Mile Index: 69.23 (PA DEP eMapPA)

Low Flow Yield: 0.25 cfs/mi<sup>2</sup> Discharge Flow: 0.00 MGD

Toxics Management Spreadsheet Version 1.4, May 2023



### **Discharge Information**



		-	OKI	en	blank	0.5 lf le	ft blank		) if left blan	k	1 If left blank			
Discharge Pollutant	Units	Ma	Max Discharge Conc		Trib Conc		Stream Conc	Daily CV	Hourly CV	Strea m CV	Fate Coeff	FOS		Chem Transl
Total Dissolved Solids (PWS)	mg/L		480	-		Н						i		
Chloride (PWS)	mg/L		43			Н								
Bromide	mg/L		0.5			Н								
Sulfate (PWS)	mg/L		23	-		Н								
Total Copper	mg/L		0.028			Ħ								
Total Lead	mg/L		0.001			Ħ								
Total Zinc	mg/L		0.022			П								
				П		П								

Discharge Information 3/14/2024 Page 1



nstructions Discharge

Q 7-10

## Stream / Surface Water Information

Arendtsville Boro MA, NPDES Permit No. PA0022233, Outfall 001

Receiving Surface V	Vater Name:	No. Reaches to Model: 1												
Location	Stream Code*	RMI*	Elevation (ft)*	DA (mi²)*	Slope (ft/ft)	PWS Withdrawal (MGD)	Apply Fish Criteria*							
Point of Discharge	008303	69.89	635	26.5			Yes							
End of Reach 1	008303	69.23	619	28.1			Yes							

- Statewide Criteria
- Great Lakes Criteria
   ORSANCO Criteria

Location	RMI	LFY	Flow	Flow (cfs) V			Depth	Velocit	Time			Stream		Analysis	
Location	IXIVII	(cfs/mi <sup>2</sup> )*	Stream	Tributary	Ratio	(ft)	(ft)	y (fps)	(days)	Hardness	pН	Hardness*	pH*	Hardness	pН
Point of Discharge	69.89	0.25										100	7		
End of Reach 1	69.23	0.25										100	7		

Q h																
	Location	Location RMI LFY		Flow (cfs)		W/D	Width	Depth	Velocit	Time	Tributary		Stream		Analysis	
	Location	IXMII	(cfs/mi <sup>2</sup> )	Stream	Tributary	Ratio	(ft)	(ft)	y (fps)	(days)	Hardness	pН	Hardness	pН	Hardness	pН
	Point of Discharge	69.89														
	End of Reach 1	69.23														

## NPDES Permit No. PA0022233

Toxics Management Spreadsheet Version 1.4, May 2023



## **Model Results**

#### Arendtsville Boro MA, NPDES Permit No. PA0022233, Outfall 001

Instructions Results	RETURN	TO INPU	тѕ)	SAVE AS	PDF	PRINT		II   Inputs   Results   Limits						
☐ Hydrodynamics														
✓ Wasteload Allocations														
✓ AFC cc		15	PMF:	0.631	Ana	lysis Hardne	ss (mg/l):	100 Analysis pH: 7.01						
Pollutants	Conc	Stream	Trib Cone	Fate	WQC	WQ Obj	WLA (µg/L)	Comments						
Foliatarits	(uall.)	CV	(µg/L)	Coef	(µg/L)	(µg/L)	WEX (pg/E)	Continents						
Total Dissolved Solids (PWS)	0	0		0	N/A	N/A	N/A							
Chloride (PWS)	0	0		0	N/A	N/A	N/A							
Sulfate (PWS)	0	0		0	N/A	N/A	N/A							
Total Copper	0	0		0	13.439	14.0	284	Chem Translator of 0.96 applied						
Total Lead	0	0		0	64.581	81.6	1,657	Chem Translator of 0.791 applied						
Total Zinc	0	0		0	117.180	120	2,431	Chem Translator of 0.978 applied						
☑ CFC cc	Γ (min): 37.	.709	PMF:	1	Ana	alysis Hardne	ess (mg/l):	100 Analysis pH: 7.01						
Pollutants	Conc	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments						
Total Dissolved Solids (PWS)	0	0		0	N/A	N/A	N/A							
Chloride (PWS)	0	0		0	N/A	N/A	N/A							
Sulfate (PWS)	0	0		0	N/A	N/A	N/A							
Total Copper	0	0		0	8.956	9.33	295	Chem Translator of 0.96 applied						
Total Lead	0	0		0	2.517	3.18	101	Chem Translator of 0.791 applied						
Total Zinc	0	0		0	118.139	120	3,785	Chem Translator of 0.986 applied						
<i>⊻ тнн</i> сст		709	PMF:	1	Ana	alysis Hardne	ess (mg/l):	N/A Analysis pH: N/A						
Pollutants	Pollutants   Stream   Conc   CV   (μg/L)   Coef   (μg/L)   (μg/													
Total Dissolved Solids (PWS)	0	0		0	500,000	500,000	N/A							
Chloride (PWS)	0	0		0	250,000	250,000	N/A							
Sulfate (PWS)	0	0		0	250,000	250,000	N/A							

Model Results 3/14/2024 Page 3

Total Copper	0	0		0	N/A	N/A	N/A	
Total Lead	0	0		0	N/A	N/A	N/A	
Total Zinc	0	0		0	N/A	N/A	N/A	
☑ CRL	CCT (min): 12.	607	PMF:	1	Ana	alysis Hardne	ss (mg/l):	N/A Analysis pH: N/A

Pollutants	Conc	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Total Dissolved Solids (PWS)	0	0		0	N/A	N/A	N/A	
Chloride (PWS)	0	0		0	N/A	N/A	N/A	
Sulfate (PWS)	0	0		. 0	N/A	N/A	N/A	
Total Copper	0	0		0	N/A	N/A	N/A	
Total Lead	0	0		0	N/A	N/A	N/A	
Total Zinc	0	0		0	N/A	N/A	N/A	

#### Recommended WQBELs & Monitoring Requirements

No. Samples/Month: 4

	Mass	Limits		Concentra	ation Limits				
Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL	WQBEL Basis	Comments
Total Copper	Report	Report	Report	Report	Report	mg/L	0.18	AFC	Discharge Conc > 10% WQBEL (no RP)

## ⊘ Other Pollutants without Limits or Monitoring

The following pollutants do not require effluent limits or monitoring based on water quality because reasonable potential to exceed water quality criteria was not determined and the discharge concentration was less than thresholds for monitoring, or the pollutant was not detected and a sufficiently sensitive analytical method was used (e.g., <= Target QL).

Pollutants	Governing WQBEL	Units	Comments
Total Dissolved Solids (PWS)	N/A	N/A	PWS Not Applicable
Chloride (PWS)	N/A	N/A	PWS Not Applicable
Bromide	N/A	N/A	No WQS
Sulfate (PWS)	N/A	N/A	PWS Not Applicable
Total Lead	101	μg/L	Discharge Conc ≤ 10% WQBEL
Total Zinc	1.56	mg/L	Discharge Conc ≤ 10% WQBEL

## **Existing Effluent Limitations and Monitoring Requirements**

## Outfall 001,

**Arendtsville STP** 

	Effluent Limitations						Monitoring Requirements	
Parameter	Mass Units	(lbs/day) (1)		Concentrati	Minimum (2)	Required		
Faranietei	Average Monthly	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum	Measurement Frequency	Sample Type
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	5.0 Inst Min	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	0.4	XXX	1.0	1/day	Grab
CBOD5 Nov 1 - Apr 30	29	46.5	XXX	25	40	50	1/week	24-Hr Composite
CBOD5 May 1 - Oct 31	23	35	XXX	20	30	40	1/week	24-Hr Composite
BOD5 Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS	35	52.5	XXX	30	45	60	1/week	24-Hr Composite
TSS Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	1/week	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	1/week	Grab
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab
Nitrate-Nitrite	XXX	XXX	XXX	Report Annl Avg	XXX	XXX	2/year	24-Hr Composite
Nitrate-Nitrite (lbs)	Report Annl Avg	XXX	XXX	XXX	XXX	XXX	2/year	24-Hr Composite
Total Nitrogen	XXX	XXX	XXX	Report Annl Avg	XXX	XXX	2/year	Calculation
Total Nitrogen (lbs)	Report Annl Avg	XXX	XXX	XXX	XXX	XXX	2/year	Calculation
Ammonia Nov 1 - Apr 30	21	XXX	XXX	18	XXX	36	1/week	24-Hr Composite

## NPDES Permit No. PA0022233

			Effluent L	imitations			Monitoring Re	quirements
Parameter	Mass Units (lbs/day) (1)			Concentra	Minimum <sup>(2)</sup>	Required		
raiameter	Average Monthly	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum	Measurement Frequency	Sample Type
Ammonia								24-Hr
May 1 - Oct 31	7.0	XXX	XXX	6.0	XXX	12	1/week	Composite
				Report				24-Hr
TKN	XXX	XXX	XXX	Annl Avg	XXX	XXX	2/year	Composite
	Report							24-Hr
TKN (lbs)	Anni Avg	XXX	XXX	XXX	XXX	XXX	2/year	Composite
								24-Hr
Total Phosphorus	2.3	XXX	XXX	2.0	XXX	4	1/week	Composite
		Report			Report			24-Hr
Total Copper	Report	Daily Max	XXX	Report	Daily Max	XXX	2/month	Composite
		Report			Report			24-Hr
Bromide	Report	Daily Max	XXX	Report	Daily Max	XXX	2/month	Composite

## **Proposed Effluent Limitations and Monitoring Requirements**

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

## Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

			Monitoring Requirements					
Parameter	Mass Units	(lbs/day) <sup>(1)</sup>		Concentrat	Minimum (2)	Required		
Farameter	Average Monthly	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum	Measurement Frequency	Sample Type
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Measured
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	5.0	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	0.4	XXX	1.0	1/day	Grab
CBOD <sub>5</sub> Nov 1 - Apr 30	29.0	46.5	XXX	25.0	40.0	50.0	1/week	24-Hr Composite
CBOD₅ May 1 - Oct 31	23.0	35.0	XXX	20.0	30.0	40.0	1/week	24-Hr Composite
BOD₅ Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS	35.0	52.5	XXX	30.0	45.0	60.0	1/week	24-Hr Composite
TSS Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2,000 Geo Mean	XXX	10,000	1/week	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1,000	1/week	Grab
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab
Nitrate-Nitrite	XXX	XXX	XXX	Report Annl Avg	XXX	XXX	2/year	24-Hr Composite
Nitrate-Nitrite (lbs)	Report Annl Avg	XXX	XXX	XXX	XXX	XXX	2/year	24-Hr Composite
Total Nitrogen	XXX	XXX	XXX	Report Annl Avg	XXX	XXX	2/year	Calculation
Total Nitrogen (lbs)	Report Annl Avg	XXX	XXX	XXX	XXX	XXX	2/year	Calculation

## NPDES Permit No. PA0022233

			Effluent L	imitations			Monitoring Red	quirements
Parameter	Mass Units (lbs/day) (1)			Concentra	Minimum <sup>(2)</sup>	Required		
Parameter	Average Monthly	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum	Measurement Frequency	Sample Type
Ammonia								24-Hr
Nov 1 - Apr 30	21.0	XXX	XXX	18.0	XXX	36.0	1/week	Composite
Ammonia								24-Hr
May 1 - Oct 31	7.0	XXX	XXX	6.0	XXX	12.0	1/week	Composite
-				Report				24-Hr
TKN	XXX	XXX	XXX	Annİ Avg	XXX	XXX	2/year	Composite
	Report							24-Hr
TKN (lbs)	Anni Avg	XXX	XXX	XXX	XXX	XXX	2/year	Composite
								24-Hr
Total Phosphorus	2.3	XXX	XXX	2.0	XXX	4.0	1/week	Composite
		Report			Report			24-Hr
Total Copper	Report	Daily Max	XXX	Report	Daily Max	XXX	2/month	Composite

Compliance Sampling Location:

Other Comments:

	Tools and References Used to Develop Permit
	MOM ( W. L. M. LL ( Av. L. Av.
	WQM for Windows Model (see Attachment )
	Toxics Management Spreadsheet (see Attachment )
	TRC Model Spreadsheet (see Attachment )
$ \vdash$	Temperature Model Spreadsheet (see Attachment )
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