

SOUTHWEST REGIONAL OFFICE CLEAN WATER PROGRAM

Application Type	Renewal
Facility Type	Sewage
Major / Minor	Major

NPDES PERMIT FACT SHEET ADDENDUM

Application No.	PA0027430
APS ID	930459
Authorization ID	1164427

Applicant and Facility Information

Applicant Name	Munici County	pal Authority of Westmoreland	Facility Name	Jeannette STP
Applicant Address	124 Pa	rk & Pool Road, PO Box 730	Facility Address	1000 S Railroad Street
	Greens	burg, PA 15601-0730		Penn, PA 15675
Applicant Contact	John A	shton	Facility Contact	Katelyn Warheit
Applicant Phone	(724) 7	55-5800	Facility Phone	724-454-0233
Client ID	64197		Site ID	738018
SIC Code	4952		Municipality	Penn Borough
SIC Description	Trans.	& Utilities - Sewerage Systems	County	Westmoreland
Date Published in PA B	Bulletin	December 17, 2022	EPA Waived?	No
Comment Period End D	Date	January 16, 2023	If No, Reason	
Purpose of Application		Application for a renewal of an NPL	DES permit for discharg	e of treated Sewage

Internal Review and Recommendations

The draft permit notification was published in the PA Bulletin on December 17, 2022.

The comment period ended on January 16, 2023. Comments were received from US EPA Region III and the Municipal Authority of Westmoreland County. This NPDES Permit will be drafted a second time in order to address the changes made as a result of comments received.

In an email dated December 12, 2022, the DEP received the following comments from US EPA Region III. The comments are reproduced below with DEP responses. The full correspondence can be found in Attachment A.

Regarding the TMDLs:

1. There appears to be a typo on page 14 of the draft Fact Sheet under the Brush Creek Watershed heading. The Clearfield Creek Watershed is mentioned which we believe should be switched to Brush Creek.

DEP Response: This was a typo and should have been Brush Creek Watershed.

Regarding Pretreatment

2. PADEP included the pretreatment special condition for developing a pretreatment program. MAWC already has an EPA approved pretreatment program and can expand its current program to include Jeannette MA's Service area using intermunicipal agreements and its Sewer Use Ordinance. Please edit the pretreatment language to include the standard pretreament implementation language instead of the pretreatment program development language...The fact sheet should be revised to remove the requirement to develop an approved program as MAWC's Pretreatment Program is already approved.

Approve	Deny	Signatures	Date
x		grue Polislasti Grace Polakoski, E.I.T. / Environmental Engineering Specialist	April 4, 2023
х		MAHBUGA JASMIN Mahbuba lasmin, Ph.D., P.E. / Environmental Engineer Manager	April 5, 2023

DEP Response: The "POTW Pretreatment Program Development and Implementation" language in Part C of the permit has been replaced with the "POTW Pretreatment Program Implementation" language.

Regarding the toxic pollutants compliance schedule

3. DEP should include a justification for the necessity for a compliance schedule: for copper, acrolein, trichloroethane an bis (2-ethylhexyl) phthalate, it has granted the permittee in the permit record, see 40 CFR 122.47(a). Each pollutant should be evaluated separately as it appears the copper data provided by the permittee may be below the newly calculated limits and suggests that the permittee may be able to comply with the copper WQBEL now (if the permittee can comply immediately, a compliance schedule would not be appropriate for copper in the permit). Please revise the fact sheet to include the justification for the compliance schedule.

DEP Response: All compliance schedules have been removed from the permit. Since the permittee can already comply with the new WQBEL for Total Copper, a compliance schedule is not necessary. Additionally, WQBELs are no longer recommended for acrolein, trichloroethylene, and bis(2-ethylhexyl)phthalate. See DEP's responses to MAWC below.

Regarding the CSO Provisions in the LTCP, Fact Sheet and Permit

4. The Fact Sheet states "Under the previously approved Long-Term Control Plan (LTCP), CSO Outfalls 003 and 008 will eventually be consolidated into Outfall 008A, CSO Outfall 009 and 010 will eventually be consolidated into Outfall 009A, and CSO Outfall 006 will be reconstructed. Constructions related to the consolidations are expected to be completed by XXX." EPA believes that XXX is a place holder for the actual date listed in the LTCP, but this information should be completed before the permit record is finalized.

DEP Response: The date represented by the placeholder was July 1, 2024.

5. Jeannette's LTCP update evaluated CSO control alternatives consistent with the 1994 CSO Policy. The LTCP states that Jeannette intends to capture 94% by volume as its performance standard however, the permit contains the 85% capture WQBEL requirement. PADEP should revise the performance standard to 94% as defined in the LTCP and LTCP Update.

DEP Response: The EPA's CSO Control Policy only requires 85% capture from dischargers. Since Jeannette's LTCP is not yet fully implemented, the Performance Standard will remain at 85%. Upon completion of the LTCP and review of the PCCMP data, DEP will review the Performance Standard at a later date and possibly update it to 94% as stated in the LTCP.

6. The 2018 LTCP describes the design conditions as being based on the 2003 wet-weather events and defines I as the typical year. Section IV.B.2.c of the "Policy" refers to includes the average design conditions for which the performance standard was based. EPA recommends including this in the permit to increase consistency with the "Policy" and clarify the conditions under which the CSO controls are expected to operate/perform. The design conditions should also be continued in subsequent permits.

DEP Response: The design conditions for the 2003 typical year have been defined in Part C.II.C.2 of the NPDES Permit.

Regarding the Permittee's PCCMP

7. The permit's CSO compliance schedule contains 4 milestones for PCCMP implementation that come into effect once DEP approves the PCMP, see Part C.II.C.3. Part C.II.C.1 of the permit states that the PCCMP has already been approved. Was the PCCMP approved when the LTCP Update in March 2022? If not can PADEP please provide an explanation of the status of the PCCMP and clarify when it was approved? Depending on the approval date, changes may need to occur to the CSO compliance schedule.

DEP Response: The statement indicating that the PCCMP has already been approved was incorrect. This misleading statement has been removed. MAWC has not yet submitted the PCCMP because construction to fulfill the conditions of the LTCP is still ongoing. A milestone for submitting the PCCMP to the DEP was added to the LTCP Implementation Schedule in Part C.II.C.3 of the NPDES Permit.

8. E. Coli monitoring must be included in post-construction compliance monitoring (PCCM) plans to verify compliance with water quality standard and designated uses.

DEP Response: Language was added in Part C.II.C.3 of the NPDES Permit to inform the permittee of the *E. Coli* monitoring requirement.

9. The compliance schedule and CSO Water Quality-Based Effluent Limit condition, Part C.C.2, does not clearly state when the performance standard applies. PADEP should include the LTCP Compliance Date as part of the schedule and define when the performance standard becomes effective.

DEP Response: A milestone was added to the LTCP Implementation Schedule in Part C.II.C.3 defining the LTCP Compliance Date and designating when the performance standard becomes effective.

10. As part of the LTCP implementation plan, CSO Outfalls 003 and 008 will eventually be consolidated into Outfall 008A, CSO Outfalls 009 and 010 will eventually be consolidated into Outfall 009A. Part A of the draft Permit does not mention these new outfalls which are scheduled to commence discharge during this permit cycle. PADEP should include the changes to the CSO outfalls in Part A of the permit and refer to CSO compliance schedule section of the permit, Part C.C.3.

DEP Response: The consolidation of CSO Outfalls 003 and 008 is covered under WQM Permit # 9084-S A-5 (issued December 12, 2019). The consolidation of CSO Outfalls 009 and 010 is covered under WQM Permit # 6519403 (issued March 24, 2020). Upon the receipt of the Post-Construction Certification of each of these projects, the permittee will be instructed to submit an amendment application to amend their NPDES permit to reflect the consolidation of the CSOs. The estimated completion date of these construction projects has been revised multiple times in the past so it would not be possible to predict when Outfall 008A and 009A would actually be constructed. As such, Part A will not be amended at this time to include Outfall 008A and Outfall 009A.

In a letter dated December 16, 2022, the DEP received the following comments from MAWC. The comments are reproduced below with DEP responses. The full correspondence can be found in Attachment B.

Page 2

Acrolein was added to the effluent limitations even though all of the permit renewal sample results for this parameter were non-detect. Although there was one instance when the result was non-detect by the lab did not meet DEP's Target QL because they mistakenly did a dilution, I [Katelyn Warheit] have correspondence with you [Grace Polakoski] indicating that a resample was not required because DEP can disregard that result due to lab error.

DEP Response: Jeannette STP conducted two rounds of sampling: one was done at the time the NPDES permit renewal application was originally submitted in 2015-2016 and the second was done in 2022, at the request of the DEP. When evaluating all the sample data available, the maximum effluent concentration was used since the total number of effluent samples was less than 10. Per current DEP policy, data with less than 10 samples cannot be subjected to statistical analysis and outliers cannot be eliminated. Upon receipt of MAWC's comment letter and considering that the original round of sampling is over 5 years old, the DEP has made the decision to disregard sample values from the 2015/2016 round of testing and to disregard the sample that was associated with lab error. As a result, the TMS no longer recommends a WQBEL for Acrolein.

Bis (2-Ethylhexyl) Phthalate was added to the effluent limitations even though three of the four permit renewal sample results had a qualifier indicating that this parameter was also detected in the lab's blank. MAWC contends that this parameter is a lab contaminant. There is scientific literature that discusses how this ubiquitous plasticizer is found in laboratory equipment and can leach into samples during analytical procedures.

DEP Response: MAWC was given the opportunity to resample for bis(2-ethylhexyl)phthalate if the lab sampled with an approved method in 40 CFR 136 and demonstrated their efforts to avoid cross-contamination. MAWC elected to perform these additional samples and submitted the results to the DEP on February 16, 2023 (Attachment C). The maximum value from these new samples was entered into the Toxics Management Spreadsheet (TMS). The TMS no longer recommends a WQBEL for bis(2-ethylhexyl)phthalate (Attachment D).

Trichloroethylene was added to the effluent limitations even though all of the permit renewal sample results for this parameter were non-detect and DEP's Target QL was met.

DEP Response: Jeannette STP conducted two rounds of sampling: one was done at the time the NPDES permit renewal application was originally submitted in 2015-2016 and the second was done in 2022, at the request of the DEP. When evaluating all the sample data available, the maximum effluent concentration was used since the total number of effluent samples was less than 10. Per current DEP policy, data with less than 10 samples cannot be subjected to statistical analysis and outliers cannot be eliminated. Upon receipt of MAWC's comment letter and considering that the original round of sampling is over 5 years old, the DEP has made the decision to disregard sample values from the 2015/2016 round of testing. As a result, the TMS no longer recommends a WQBEL for trichloroethylene.

Page 3

The numerical effluent limitations proposed for Bis(2-Ethylhexyl) Phthalate in the second phase of the compliance schedule are lower than DEP's Target QL for this parameter.

DEP Response: This comment no longer applies since the TMS did not recommend a WQBEL for bis(2ethylhexyl)phthalate after the resampling.

Pages 4-5

The effluent limitations for CBOD and Ammonia-Nitrogen were made significantly more stringent but the justification for this change is unclear. What input data for the model has changed since the previous permit?

DEP Response: There are many factors that affect CBOD₅ and ammonia-nitrogen limitations. First, at the time the last permit was issued for Jeannette STP, the DEP was using an older version of the WQM modeling software to evaluate CBOD₅, ammonia-nitrogen, and dissolved oxygen. The DEP now uses the most updated version of the software (WQM7.0). Additionally, the 2017 Triennial Review adjusted state water quality criteria for ammonia-nitrogen for the waters of the Commonwealth. MAWC is advised to refer to Page 12 of the first Draft NPDES Fact Sheet for a comprehensive listing of model inputs. It should also be noted that Jeannette STP can immediately comply with the updated effluent limitations, as determined by a review of past eDMR data.

Page 5

Total nitrogen and total phosphorus are listed as grab samples but these parameters are listed as 24-hr composite samples at all other MAWC WWTPs.

DEP Response: Total Nitrogen and Total Phosphorus have been changed to 24-hour composite samples.

Total Antimony was added to the effluent limitations even though all of the permit renewal sample results were below DEP's Target QL for this parameter.

DEP Response: Total Antimony was added to the effluent limitations because the resampling data show that Total Antimony is present in the treated effluent at a concentration between 25-50% of the WQBEL for Total Antimony. Since the discharge concentration of Total Antimony is less than 50% of the WQBEL, only monitoring is required. The monitoring requirement for Total Antimony will remain in the permit.

Total Arsenic was added to the effluent limitations even though all of the permit renewal sample results were below DEP's Target QL for this parameter.

DEP Response: Total Arsenic was added to the effluent limitations because the resampling data show that Total Arsenic is present in the treated effluent at a concentration between 25-50% of the WQBEL for Total Arsenic. Since the discharge concentration of Total Arsenic is less than 50% of the WQBEL, only monitoring is required. The monitoring requirement for Total Arsenic will remain in the permit.

Dichlorobromomethane and Chloroform were added to the effluent limitations even though these trihalomethanes are known to be disinfection byproducts of drinking water treatment. Furthermore, all of the permit renewal sample results for Dichlorobromomethane were at or below DEP's Target QL for this parameter.

DEP Response: Both dichlorobromomethane and chloroform were added to the effluent limitations because the resampling data show that each pollutant is present in the treated effluent at a concentration between 25-50% of the WQBEL. Since both the discharge concentrations of dichlorobromomethane and chloroform are each less than 50% of the WQBEL for that pollutant, only monitoring is required. The monitoring requirement for dichlorobromomethane and chloroform will remain in the permit.

Pages 2-5

MAWC believes that a sample frequency of 1/week is excessive for non-conventional parameters (Acrolein, Bis(2-Ethylhexyl) Phthalate, Trichloroethylene, Total Antimony, Total Arsenic, Total Zinc, Dichlorobromomethane, Chloroform) that have been added to this permit and are listed only as "Report." The sampling cost for Jeannette WWTP is going to increase substantially when going from 0 samples per year to 52 samples per year for these parameters, especially since some of them are VOCs and one is an SVOC.

DEP Response: Per the above responses, bis(2-ethylhexyl)phthalate and trichloroethylene have been removed from the permit. The monitoring frequency of 1/week is recommended by the Toxics Management Spreadsheet. If MAWC still believes that this frequency is excessive, they may submit a request containing a proposed sampling frequency to the DEP with supporting evidence. Upon receipt of this request, the DEP shall reevaluate the sampling frequency. Changing the sampling frequency of the above pollutants would not require a re-draft of the NPDES permit.

Page 6

For clarity and accuracy, MAWC requests updating the CSO Location Descriptions and Latitude and Longitude [as listed in the original correspondence].

DEP Response: The CSO Outfall Location Descriptions and latitude and longitude have been updated in the second draft of the NPDES Permit

Page 24

The permit states that no stormwater shall be directly admitted to the sanitary sewers, but this is a combined sewer system.

DEP Response: This language is a standard condition but has been removed in the second draft of the NPDES Permit for clarity.

Please provide clarification on the statement that the "UV system shall be considered functional when all components that are necessary for disinfection to achieve effluent limitations in Part A of this permit are operating properly." At any given time, a few of the individual bulbs on the UV disinfection system may be out. Is the UV system still considered functional in this case as long as there is not a fecal coliform exceedance on that date?

DEP Response: This is correct. As long as there is not a fecal coliform exceedance on a particular date, the UV system is considered functional.

Page 25

Please provide clarification on the specific requirements for implementation of a pollution prevention program. Does the routine street sweeping, prescription drug and electronic waste collection, and other activities conducted by the City of Jeannette satisfy this requirement?

DEP Response: EPA Guidance Document "Combined Sewer Overflows: Guidance for Nine Minimum Controls" (1995) lists the following activities as potential components of a Pollution Prevention Plan:

- Street cleaning: either mechanically or by flushing during dry periods
- Public education programs to bring awareness to the issue and provide guidance on proper disposal of different types of wastes
- Solid waste collection and recycling
- Product ban/substitution
- Control of product use (i.e. fertilizer, road salt)
- Control of illegal dumping
- Bulk refuse disposal
- Hazardous waste collection

• Water conservation

Commercial/industrial pollution prevention

MAWC is advised to refer to the two following EPA Guidance documents in addition to the list above: "Stormwater Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices" (1992) and "Municipal Wastewater Management Fact Sheets – Storm Water Best Management Practices" (1993). If MAWC has specific questions about the Pollution Prevention Plan of the City of Jeannette, they may submit the plan to the DEP for review.

Please provide clarification on the specific requirements for public notification. Does posting signs at each CSO outfall satisfy this requirement?

DEP Response: EPA Guidance Document "Combined Sewer Overflows: Guidance for Nine Minimum Controls" (1995) states the following about the public notification minimum control: "the intent of the eighth minimum control, public notification, is to inform the public of the location of CSO outfalls, actual occurrences of CSOs, the possible health and environmental effects of CSOs, and the recreational or commercial activities (e.g. swimming and shellfish harvesting) curtailed as a result of CSOs. Public notification is of particular concern at beach and recreation areas directly or indirectly affected by CSOs. Potential risk is generally indicated by the exceedance of relevant water quality criteria."

While the selection of appropriate control measures is best left up to MAWC/City of Jeannette, the DEP recommends implementing a system to notify resident when a CSO event occurs, in addition to posting signs at each CSO outfall. The above-referenced EPA Guidance also provides a list of potential control measures to implement for the Public Notification minimum control.

Please provide clarification on the specific requirements for monitoring CSO outfalls to characterize impacts and efficacy of controls. Do twice weekly and post-rain event inspections of the outfall pipe to visually check for debris and other visible stream impacts satisfy this requirement?

DEP Response: In general, as long as MAWC is fulfilling the obligations as set forth in the previously-approved Nine Minimum Controls Report and Long Term Control Plan (LTCP), they will be considered in compliance. However, the goal of monitoring the CSO outfalls is to collect enough data to determine whether the selected alternative and predicted percent capture (as documented in the approved LTCP) can be achieved. MAWC must therefore evaluate the data they are collecting through this monitoring and determine if they will be able to demonstrate compliance. MAWC is advised to refer to EPA Guidance Document "Combined Sewer Overflows: Guidance for Monitoring and Modeling" (1999) for additional resources.

The draft permit states that the PCCMP is approved, but the PCCMP has not been submitted to the DEP yet. In the LTCP Implementation Schedule, the due date for submission of the PCCMP is 12-31-24.

DEP Response: The language indicating that the PCCMP had been approved has been removed from the Draft NPDES Permit. A milestone for PCCMP submission was added to the LTCP Implementation Schedule. The permittee is also advised that *E. Coli* monitoring is now a required component for a PCCMP.

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MAWC proposed incorporating the LTCP Implementation Schedule by reference so that any future revisions will only require an amendment to the CO&A rather than amendments to both the CO&A and the NPDES permit. MAWC is scheduled to meet with DEP on January 20, 2023 to discuss these deadlines.

DEP Response: This is not possible. Future revisions to the LTCP Implementation Schedule must be addressed by an amendment to both the CO&A and the NPDES permit. As a follow-up to the January 20, 2023 meeting, DEP requested a revised LTCP Implementation Schedule from MAWC, which was received on March 8, 2023. The updated LTCP Implementation Schedule will be included in this draft of the NPDES permit and can be found in Attachment E.

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MAWC does not believe that a Toxics Reduction Evaluation (TRE) is warranted because it is our position that Acrolein, Trichloroethylene, and Bis(2-Ethylhexyl) Phthalate should not be added to the permit. Acrolein and Trichloroethylene had all non-detect results in the permit renewal sampling and Bis(2-Ethylhexyl) Phthalate is a lab contaminant. Total Copper is already in the NPDES Permit and the results since 2019 have all been below the proposed concentration limits, so a TRE is not necessary.

DEP Response: The TRE component of the permit has been removed. MAWC is correct that the numeric limit for Total Copper is already being achieved so a TRE is not warranted. Additionally, upon further evaluation and a new set of TMS results, WQBELs for acrolein, trichloroethylene, and bis(2-ethylhexyl)phthalate are no longer recommended.

Additionally, UV monitoring was added into the permit since it was erroneously left out of the previous draft NPDES permit.

ATTACHMENT A: EPA Correspondence (December 12, 2022)

Polakoski, Grace

From	Fulton Jappifer - Fulton Jappifer@ana.gov>
From:	Futton, Jennier < Futton.Jennier@epa.gov>
Sent:	Monday, December 12, 2022 11:41 AM
To:	Polakoski, Grace
Cc:	lasmin, Mahbuba; Furjanic, Sean; Schumack, Maria; Martinsen, Jessica; Hales, Dana;
	Shuart, Ryan
Subject:	[External] Jeannette Municipal Authority-PA0027430
Attachments:	CSO_LETTER_TO_EPA_09June2020pdf; 4 15 POLICY WP Memo to Begin Rulemaking
	Chapter 92a.pdf; Pretreatment Implementation.docx

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the <u>Report Phishing button in Outlook</u>.

Grace,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the revised draft National Pollutant Discharge Elimination System (NPDES) permit for:

Jeannette Municipal Authority Muncipal Authority of Westmoreland County (MAWC) NPDES Number: PA0027430 EPA Received: 12/1/2022 30-day response due date: 12/31/2022

This is a major permit that discharges to Brush Creek and is affected by the Brush Creek (Westmoreland) and Turtle Creek Watershed TMDLs for Acid Mine Drainage Affected Segments. EPA has chosen to perform a limited review of the following: the CSO provisions; WET; Pretreatment Requirements; both TMDLs listed above; the compliance schedule for copper, acrolein, trichloroethane and bis(2-ethylhexl) phthalate. EPA has completed its review and offers the following comments:

Regarding the TMDLs

 There appears to be a typo on page 14 of the draft Fact Sheet under the Brush Creek Watershed heading. The Clearfield Creek Watershed is mentioned which we believe should be switched to Brush Creek.

Regarding Pretreatment

2. PADEP included the pretreatment special condition for developing a pretreatment program. MAWC already has an EPA approved pretreatment program and can expand its current program to include Jeannette MA's Service area using intermunicipal agreements and its Sewer Use Ordinance. Please edit the pretreatment language to include the standard pretreatment implementation language instead of the pretreatment program development language, see attached. The fact sheet should be revised to remove the requirement to develop an approved program as MAWC's Pretreatment Program is already approved.

Regarding the toxic pollutants compliance schedule

3. DEP should include a justification for the necessity for a compliance schedule: for copper, acrolein, trichloroethane and bis(2-ethylhexl) phthalate, it has granted the permittee in the permit record, see 40 CFR 122.47(a). Each pollutant should be evaluated separately as it appears the copper data provided by the permittee may be below the newly calculated limits and suggests that the permittee may be able to comply with the copper WQBEL now (if the permittee can comply immediately, a compliance schedule would not be appropriate for copper in the permit). Please revise the fact sheet to include the justification for the compliance schedule.

Regarding the CSO Provisions in the LTCP, Fact Sheet and Permit

4. We would like to note that EPA's review of the CSO portion of this permit reflects the recent understanding between the EPA Region III Water Director and PADEP Deputy Secretary for Water Programs regarding how to proceed with reissuance of permits with CSOs and LTCPs consistent with Section 402(q) of the CWA and EPA's 1994 CSO Policy. As you know, consistent with that understanding, PADEP has committed to making changes to its CSO program as noted in its June 9, 2020 letter to EPA and its April 15, 2020 memo (see attached). PADEP's memo documents its commitment to initiate the regulatory revisions process for modifying its compliance schedule regulations at 25 Pa. Code § 92a.51(a), so that schedules for LTCP implementation can be placed in an NPDES permit. PADEP will draft CSO permits using the template language agreed upon by PADEP and EPA. EPA notes that once PADEP's compliance schedule regulations are revised and final, the template language will need to be modified to incorporate a CSO compliance schedule that meets the requirements of 40 CFR 122.47 and includes the final compliance date for LTCP implementation. EPA's Phase 2 e-Reporting rule requires electronic reporting of Sewer Overflow/Bypass Events, and PADEP will need to make modifications to this template that will be necessary to address the requirements of the e-Reporting rule that is effective at the time that the permit is issued.

In addition, consistent with the understanding between EPA and PADEP, since PADEP's proposed seasonal E. coli became effective in March 2021, PADEP will begin to incorporate E. coli monitoring in subsequently reissued NPDES permits and ensure it is included in CSO post-construction compliance monitoring (PCCM) plans to verify compliance with water quality standards and designated uses. Consistent with the CSO Policy, EPA notes that there will also need to be a requirement added to implement a PCCM plan with an established schedule in NPDES permits once a facility begins to implement its approved plan.

EPA offers the following CSO comments based on the draft permit, LTCP and supporting documents

- a. The Fact Sheet states "Under the previously approved Long-Term Control Plan (LTCP), CSO Outfalls 003 and 008 will eventually be consolidated into Outfall 008A, CSO Outfall 009 and 010 will eventually be consolidated into Outfall 009A, and CSO Outfall 006 will be reconstructed. Constructions related to the consolidations are expected to be completed by XXX." EPA believes that XXX is a place holder for the actual date listed in the LTCP but, this information should be completed before the permit record is finalized.
- b. Jeannette's LTCP Update evaluated CSO control alternatives consistent with the 1994 CSO Policy. The LTCP states that Jeannette intends to capture 94% by volume as its performance standard however, the permit contains the 85% capture WQBEL requirement. PADEP should revise the performance standard to 94% as defined in the LTCP and LTCP Update.
- c. The 2018 LTCP describes the design conditions as being based on the 2003 wet-weather events and defines it as the typical year. Section IV.B.2.c of the "Policy" refers to including the average design conditions for which the performance standard was based. EPA recommends including this in the permit to increase consistency with the "Policy" and clarify the conditions under which the CSO controls are expected to operate/perform. The design conditions should also be continued in subsequent permits.
- d. Regarding the Permittee's PCCMP
 - i. The permit's CSO compliance schedule contains 4 milestones for PCCMP implementation that come into effect once DEP approves the PCCMP, see PartC.II.C.3 and copied image below.

Submit a complete and accurate Post-Construction Compliance Monitoring Plan (PCCMP)	December 31, 2024
Begin PCCMP Implementation	Within 90 days of the Department's approval of the PCCMP
Complete PCCMP Implementation	Within 365 days of commencement of the Department-approved PCCMP
Submission of PCCMP report for Department Review	Within 90 days of completion of PCCMP implementation

- ii. Part C.II.C.1. of the permit states that the PCCMP has already been approved.
- iii. Was the PCCMP approved when the LTCP Update in March 2022? If not, can PADEP please provide an explanation of the status of the PCCMP and clarify when it was approved? Depending on the approval date, changes may need to occur to the CSO compliance schedule.

- e. E. coli monitoring must be included in post-construction compliance monitoring (PCCM) plans to verify compliance with water quality standard and designated uses.
- f. The compliance schedule and CSO Water Quality-Based Effluent Limit condition, Part C.C.2, does not clearly state when the performance standard applies. PADEP should include the LTCP Compliance Date as part of the schedule and define when the performance standard becomes effective.
- g. As part of the LTCP implementation plan, CSO Outfalls 003 and 008 will eventually be consolidated into Outfall 008A, CSO Outfalls 009 and 010 will eventually be consolidated into Outfall 009A. Part A of the draft Permit does not mention these new outfalls which are scheduled to commence discharge during this permit cycle. PADEP should include the changes to the CSO outfalls in Part A of the permit and refer to CSO compliance schedule section of the permit, Part C.C.3.

Should you have any questions, please feel free to reach out to Ryan Shuart, copied on this email. If there are any additional changes to the permit documents, please be sure to reach out to EPA as additional review may be necessary.

Thank you, Jen Fulton



Jennifer Fulton Acting Chief, Clean Water Branch US EPA Mid-Atlantic Region Phone 304-234-0248 Email fulton.jennifer@epa.gov

ATTACHMENT B: MAWC Correspondence (December 16, 2022)

An Equal Opportunity Employer 124 Park and Pool Road New Stanton, PA 15672 Phone: 724,755,5800 1,800,442,6829



Mailing Address P.O. Box 730 Greensburg, PA 15601 www.mawc.org mawc@mawc.org

December 16, 2022

Ms. Grace Polakoski PA DEP Clean Water Program 400 Waterfront Drive Pittsburgh, PA 15222

Re: Jeannette WWTP (PA0027430) Draft NPDES Permit Comments

Dear Ms. Polakoski:

MAWC has reviewed the draft NDPES permit for Jeannette WWTP and would like to provide the following comments:

Page 2

- Acrolein was added to the effluent limitations even though all of the permit renewal sample results for this parameter were non-detect. Although there was one instance when the result was non-detect but the lab did not meet DEP's Target QL because they mistakenly did a dilution, I have correspondence with you indicating that a resample was not required because DEP can disregard that result due to the lab error.
- Bis(2-Ethylhexyl)Phthalate was added to the effluent limitations even though three of the four permit renewal sample results had a qualifier indicating that this parameter was also detected in the lab's blank. MAWC contends that this parameter is a lab contaminant. There is scientific literature that discusses how this ubiquitous plasticizer is found in laboratory equipment and can leach into samples during analytical procedures.
- Trichloroethylene was added to the effluent limitations even though all of the permit renewal sample results for this parameter were non-detect and DEP's Target QL was met.

Page 3

 The numerical effluent limitations proposed for Bis(2-Ethylhexyl)Phthalate in the second phase of the compliance schedule are lower than DEP's Target QL for this parameter.

Pages 4-5

 The effluent limitations for CBOD and Ammonia Nitrogen were made significantly more stringent, but the justification for this change is unclear. What input data for the model has changed since the previous permit?

Page 5

 Total Nitrogen and Total Phosphorus are listed as grab samples, but these parameters are listed as 24-hour composite samples at all other MAWC wastewater treatment plants.

- Total Antimony was added to the effluent limitations even though all of the permit renewal sample results were below DEP's Target QL for this parameter.
- Total Arsenic was added to the effluent limitations even though all of the permit renewal sample results were below DEP's Target QL for this parameter.
- Dichlorobromomethane and Chloroform were added to the effluent limitations even though these trihalomethanes are known to be disinfection byproducts of drinking water treatment. Furthermore, all of the permit renewal sample results for Dichlorobromomethane were at or below DEP's Target QL for this parameter.

Pages 2-5

MAWC believes that a sample frequency of 1/week is excessive for non-conventional
parameters (Acrolein, Bis(2-Ethylhexyl)Phthalate, Trichloroethylene, Total Antimony,
Total Arsenic, Total Zinc, Dichlorobromomethane, Chloroform) that have been added to
this permit for the first time and are listed only as "Report." The sampling cost for
Jeannette WWTP is going to increase substantially when going from 0 samples per year
to 52 samples per year for these parameters, especially since some of them are VOCs and
one is an SVOC.

Page 6

 For clarity and accuracy, MAWC requests updating the CSO Location Descriptions and Latitude and Longitude as follows:

003	12th Street and Mapleton Avenue	40° 19' 39.00"	-79° 37' 40.00"
004	Orange Avenue	40° 19' 31.90"	-79° 37' 35.50"
006	Division Street and Lowry Avenue	40° 19' 25.50"	-79° 36' 58.50"
008	13th Street and Mapleton Avenue	40° 19' 41.50"	-79° 37' 42.00"
009	S 6th Street (Lower Alley)	40° 19' 29.50"	-79° 37' 25.00"
010	S 6th Street (Upper Alley)	40° 19' 30.00"	-79° 37' 24.50"

Page 24

- The permit states that no stormwater shall be directly admitted to the sanitary sewers, but this is a combined sewer system.
- Please provide clarification on the statement that the "UV system shall be considered functional when all components that are necessary for disinfection to achieve effluent limitations in Part A of this permit are operating properly." At any given time, a few of the individual bulbs on the UV disinfection system may be out. Is the UV system still considered functional in this case as long as there is not a fecal coliform exceedance on that date?

Page 25

- Please provide clarification on the specific requirements for implementation of a
 pollution prevention program. Does the routine street sweeping, prescription drug and
 electronic waste collection, and other activities conducted by the City of Jeannette satisfy
 this requirement?
- Please provide clarification on the specific requirements for public notification. Does
 posting signs at each CSO outfall satisfy this requirement?

- Please provide clarification on the specific requirements for monitoring CSO outfalls to characterize impacts and efficacy of controls. Do twice weekly and post-rain event inspections of the outfall pipe to visually check for debris and other visible stream impacts satisfy this requirement?
- The draft permit states that the PCCMP is approved, but the PCCMP has not been submitted to DEP yet. In the LTCP Implementation Schedule, the due date for submission of the PCCMP is 12-31-24.

Page 26

 MAWC proposes incorporating the LTCP Implementation Schedule by reference so that any future revisions will only require an amendment to the CO&A, rather than amendments to both the CO&A and NPDES permit. MAWC is scheduled to meet with DEP on January 20, 2023 to discuss these deadlines.

Page 31

 MAWC does not believe that a Toxics Reduction Evaluation (TRE) is warranted because it is our position that Acrolein, Trichloroethylene, and Bis(2-Ethylhexyl)Phthalate should not be added to the permit. Acrolein and Trichloroethylene had all non-detect results in the permit renewal sampling and Bis(2-Ethylhexyl)Phthalate is a lab contaminant. Total Copper is already in the NPDES permit and the results since 2019 have all been below the proposed concentration limits, so a TRE is not necessary.

Sincerely,

Katelyn Washeit

Katelyn Warheit Environmental Compliance Superintendent Municipal Authority of Westmoreland County

cc: Dom Garofola, Gibson-Thomas Engineering

ATTACHMENT C: Resampling Results for Bis (2-Ethylhexyl) Phthalate



MAWC Sewage Division Jeannette WWTP PO Box 730 Greensburg, PA 15601

> 23B0080-01 Waste Water

Composite

Effluent Comp - SVOC

Client

Lab Sample ID#:

Client Sample ID:

Sample Type: Sample Source:

Sampler:

1803 Philadelphia Street Indiana, PA 15701 P: (724) 463-8378 F: (724) 465-4209 PADEP: 32-00382 1276 Bentleyville Road Van Voorhis, PA 15366 P: (724) 258-8378 F: (724) 258-8376 PADEP: 63-04247 435 Broad Street Montoursville, PA 17754 P: (570) 321-9002 F: (570) 321-1957 PADEP: 41-04880 950 West Main Street Sharpsville, PA 16150 P: (724) 463-8378 x 500 F: (724) 465-4209 PADEP: 43-04934

Reported: 02/15/2023 16:44

Sample Begin Date:	: 02/01/2023	05:00
Sample End Date:	02/01/2023	13:00
Receipt Date:	02/01/2023	15:00

Analyte	Sample Result	Units	Data Qualifier	RL	Analyst/ Certification	Prep Date/Time	Analysis Date/Time
Organics	Analytical Method: EPA625				Prep Metho	i: EPA 625	
bis(2-ethylhexyl)phthalate	<4.76	ug/L		4.76	MJK	02/06/23 17:29	02/10/23 19:05
Surrogate: 2-Fluorophenol	18 %		9-41		MJK	02/06/23 17:29	02/10/23 19:05
Surrogate: Phenol-d5	12 %		5-26		MJK	02/06/23 17:29	02/10/23 19:05
Surrogate: Nitrobenzene-d5	31 %		19-77		MJK	02/06/23 17:29	02/10/23 19:05
Surrogate: 2-Fluorobiphenyl	29 %		16-74		MJK	02/06/23 17:29	02/10/23 19:05
Surrogate: 2,4,6-Tribromophenol	54 %		23-95		MJK	02/06/23 17:29	02/10/23 19:05
Surrogate: p-Terphenyl-d14	73 %		63-145		MJK	02/06/23 17:29	02/10/23 19:05



MAWC Sewage Division Jeannette WWTP

PO Box 730

Sample Source:

Client Sample ID:

Sampler:

1803 Philadelphia Street Indiana, PA 15701 P: (724) 463-8378 F: (724) 465-4209 PADEP: 32-00382 1276 Bentleyville Road Van Voorhis, PA 15366 P: (724) 258-8378 F: (724) 258-8376 PADEP: 63-04247 435 Broad Street Montoursville, PA 17754 P: (570) 321-9002 F: (570) 321-1957 PADEP: 41-04880 950 West Main Street Sharpsville, PA 16150 P: (724) 463-8378 x 500 F: (724) 465-4209 PADEP: 43-04934

Reported: 01/27/2023 09:37

Greensburg, PA 15601
Lab Sample ID#: 23A1775-01
Sample Type: Waste Water

Effluent Comp - SVOC

Composite

Client

Sample Begin Date:	01/18/2023	05:00
Sample End Date:	01/18/2023	13:00
Receipt Date:	01/18/2023	15:05

Analyte	Sample Result	Units	Data Qualifier	RL	Analyst/ Certification	Prep Date/Time	Analysis Date/Time
Organics	Analytical Method: EPA625				Prep Methoo	i: EPA 625	
bis(2-ethylhexyl)phthalate	<4.76	ug/L		4.76	MJK	01/24/23 17:16	01/25/23 17:14
Surrogate: 2-Fluorophenol	19 %		9-41		MJK	01/24/23 17:16	01/25/23 17:14
Surrogate: Phenol-d5	12 %		5-26		MJK	01/24/23 17:16	01/25/23 17:14
Surrogate: Nitrobenzene-d5	34 %		19-77		MJK	01/24/23 17:16	01/25/23 17:14
Surrogate: 2-Fluorobiphenyl	37 %		16-74		MJK	01/24/23 17:16	01/25/23 17:14
Surrogate: 2,4,6-Tribromophenol	51 %		23-95		MJK	01/24/23 17:16	01/25/23 17:14
Surrogate: p-Terphenyl-d14	84 %		63-145		MJK	01/24/23 17:16	01/25/23 17:14



MAWC Sewage Division Jeannette WWTP PO Box 730

Greensburg, PA 15601

1803 Philadelphia Street Indiana, PA 15701 P: (724) 463-8378 E. (724) 465-4209 PADEP: 32-00382

1276 Bentleyville Road Van Voorhis, PA 15366 P: (724) 258-8378 F: (724) 258-8376 PADEP: 63-04247

435 Broad Street Montoursville, PA 17754 P: (570) 321-9002 F: (570) 321-1957 PADEP: 41-04880

950 West Main Street Sharpsville, PA 16150 P: (724) 463-8378 x 500 F: (724) 465-4209 PADEP: 43-04934

Reported: 02/07/2023 16:52

Lab Sample ID#: Sample Type: Sample Source: Sampler: Client Sample ID:	23A2366-01 Waste Water Composite Client Effluent Comp - SVOC				Sample Begin Dat Sample End Date Receipt Date:	te: 01/25/2023 : 01/25/2023 01/25/2023	05:00 13:00 15:00
Analyte	Sample Result	Units	Data Qualifier	RL	Analyst/ Certification	Prep Date/Time	Analysis Date/Time

Organics	Analytical Method: EPA625		Prep Method: EPA 625						
bis(2-ethylhexyl)phthalate	<4.76	ug/L	4.76	MJK	01/31/23 13:05	02/04/23 00:18			
Surrogate: 2-Fluorophenol	22 %	9-41		MJK	01/31/23 13:05	02/04/23 00:18			
Surrogate: Phenol-d5	13 %	5-26		MJK	01/31/23 13:05	02/04/23 00:18			
Surrogate: Nitrobenzene-d5	39 %	19-77		MJK	01/31/23 13:05	02/04/23 00:18			
Surrogate: 2-Fluorobiphenyl	36 %	16-74		MJK	01/31/23 13:05	02/04/23 00:18			
Surrogate: 2,4,6-Tribromophenol	54 %	23-95		MJK	01/31/23 13:05	02/04/23 00:18			
Surrogate: p-Terphenyl-d14	84 %	63-145		MJK	01/31/23 13:05	02/04/23 00:18			



MAWC Sewage Division Jeannette WWTP

PO Box 730 Greensburg, PA 15601

Analyte

1803 Philadelphia Street Indiana, PA 15701 P: (724) 463-8378 F: (724) 465-4209 PADEP: 32-00382

Sample

Result

1276 Bentleyville Road Van Voorhis, PA 15366 (724) 258-8378 F: (724) 258-8376 PADEP: 63-04247

435 Broad Street Montoursville, PA 17754 P: (570) 321-9002 F: (570) 321-1957 PADEP: 41-04880

Analyst/

Certification

RI

950 West Main Street Sharpsville, PA 16150 P: (724) 463-8378 x 500 F: (724) 465-4209 PADEP: 43-04934

Analysis

Date/Time

Reported: 01/20/2023 16:34

Prep

Date/Time

Lab Sample ID#: 23A1125-01 Sample Begin Date: 01/11/2023 05:00 Sample Type: Waste Water Sample End Date: 01/11/2023 13:00 Sample Source: Composite **Receipt Date:** 01/11/2023 15:40 Sampler: Client Client Sample ID: Effluent Comp - SVOC

Units

Data

Onalifier

P:

	Real	Cana	Quinner	RL	certainenton	Date Thire	Dute Thire
Organics	Analytical Method: EPA625				Prep Metho	d: EPA 625	
bis(2-ethylhexyl)phthalate	<4.76	ug/L		4.76	MJK	01/16/23 10:01	01/17/23 19:43
Surrogate: 2-Fluorophenol	19 %		9-41		MJK	01/16/23 10:01	01/17/23 19:43
Surrogate: Phenol-d5	12 %		5-26		MJK	01/16/23 10:01	01/17/23 19:43
Surrogate: Nitrobenzene-d5	37 %		19-77		MJK	01/16/23 10:01	01/17/23 19:43
Surrogate: 2-Fluorobiphenyl	37 %		16-74		MJK	01/16/23 10:01	01/17/23 19:43
Surrogate: 2,4,6-Tribromophenol	48 %		23-95		MJK	01/16/23 10:01	01/17/23 19:43
Surrogate: p-Terphenyl-d14	74 %		63-145		MJK	01/16/23 10:01	01/17/23 19:43

ATTACHMENT D: Updated Toxics Management Spreadsheet Results



Discharge Information

Ir	structio	ons Disc	harge Stream														
Fa	acility:	Jeanet	tte STP					NP	DES Per	mit No.:	PA0	027	430		Outfall	No.: 001	
E	valuation	n Type:	Major Sewage /	Industr	ial V	Vast	e	Wa	stewater	Descript	tion:	sev	vage				
_																	
							Discha	rge Cha	racteris	tics							
	Design	Flow H	ardness (mg/l)*	pH (SU)	•		Parti	al Mix Fa	actors (F	PMFs	5)		Com	plete Mi	x Times	(min)
	(MGD))*					AFC	;	CFC	THH	·		CRL	Q	7-10		2 _h
	3.3		144	7	.2												
								0 if let	ft blank	0.5 if le	ft blan	k	6) if left blan	k	1 if let	t blank
	Discharge Pollutant		e Pollutant	Units	Ма	x Dis Co	scharge onc	Trib Conc	Stream Conc	Daily CV	Hou	ırly V	Strea m CV	Fate Coeff	FOS	Criteri a Mod	Chem Transl
Г	Total [Dissolved S	Solids (PWS)	mg/L			587										
17	Chlori	de (PWS)		mg/L			217										
1	Bromi	de		mg/L			0.41										
ð	5 Sulfate	e (PWS)		mg/L			45										
L	Fluorio	de (PWS)		mg/L													
	Total /	Total Aluminum		µg/L			3										
	Total /	Antimony		µg/L			0.8										
	Total /	Arsenic		µg/L			1.9										
	Total E	Barium		µg/L			35										
	Total E	Beryllium		µg/L	<		0.3										
	Total E	Boron		µg/L			133				<u> </u>					<u> </u>	
	Total	Cadmium	////	µg/L	<	<u> </u>	0.1				<u> </u>					<u> </u>	
	l otal (Chromium	(III) mium	µg/L	<	<u> </u>	1				<u> </u>						
	Total	Cobalt	mum	µg/L	-	<u> </u>	0.7				<u> </u>						
	Total (Copper		µg/L	-	<u> </u>	8				<u> </u>						
•	Free C	Cvanide		ug/L		-	2										
1	Total	Cvanide		ug/L	<	-	6										
	Dissol	lved Iron		ug/L		-	20										
1	Total I	Iron		µg/L			52										
	Total I	Lead		µg/L	<		1										
	Total I	Manganese	•	µg/L			14										
	Total I	Mercury		µg/L	<		0.1										
	Total I	Nickel		µg/L			6										
	Total F	Phenols (Pl	henolics) (PWS)	µg/L			125										
	Total \$	Selenium		µg/L	<		3.3										
	Total \$	Silver		µg/L	<		0.66										
	Total 1	Thallium		µg/L	<		0.33										
	Total 2	Zinc		µg/L			20										
	Total I	Molybdenu	m	µg/L			16										
	Acrole	ein		µg/L	<		0.9					_					
	Acryla	amide		µg/L	<		27					_					
	Acrylo	niune		µg/L	<		2.1										
	Denze	91 6		µg/L	5		0.04		8								

Toxics Management Spreadsheet Version 1.3, March 2021

<

µg/L

Bromoform

2

	Carbon Tetrachloride	µg/L	<	0.1					
	Chlorobenzene	ug/l	<	0.95		 			
	Chlorodibromomethane	µg/L	-	0.35		 		 	
	Chlorodibiomometrarie	µg/L		0.3		 	 		
	Chloroethane	µg/L	<	1.7		 			
	2-Chloroethyl Vinyl Ether	µg/L	<	1.9	 	 	 	 	
	Chloroform	µg/L		2.8		 	 		
	Dichlorobromomethane	µg/L		0.5					
	1,1-Dichloroethane	µg/L	<	1.4					
~	1,2-Dichloroethane	µg/L	<	1.6					
<u>₽</u>	1,1-Dichloroethylene	µg/L	۸	1.5					
ē	1.2-Dichloropropane	µg/L	<	0.1					
Ö	1.3-Dichloropropylene	ua/L	<	0.06					
	1.4-Dioxane	ug/l	<	0.77		 			
	Ethylbenzene	ug/L	~	17		 			
	Methyl Bromide	µg/L		2.4		 	 	 	
	Methyl Bromide	µg/L	<	2.4					
	Methyl Chloride	µg/L	<	8.4		 		 	
	Methylene Chloride	µg/L	<	0.1	 	 	 		
	1,1,2,2-Tetrachloroethane	µg/L	<	0.1					
	Tetrachloroethylene	µg/L	<	1.8					
	Toluene	µg/L	<	1.2					
	1,2-trans-Dichloroethylene	µg/L	<	1.3					
	1,1,1-Trichloroethane	µg/L	<	1.1					
	1,1,2-Trichloroethane	µg/L	٨	0.08					
	Trichloroethylene	µg/L	<	0.1					
	Vinvl Chloride	ug/L	<	0.1					
_	2-Chlorophenol	ug/L	<	0.37					
	2 4-Dichlorophenol	ug/l	<	0.36					
	2 4-Dimethylphenol	ug/l	<	0.23		 			
	4.6-Dinitro-o-Cresol	ug/L	-	0.37					
4	2.4-Dinitrophenol	µg/L	-	0.57		 			
đ	2. Nitrenhanal	µg/L	-	0.5		 			
ē	2-Nitrophenol	µg/L	<	0.5	 	 	 		
G	4-Nitrophenol	µg/L	<	1.2		 			
	p-Chloro-m-Cresol	µg/L	<	0.21		 			
	Pentachlorophenol	µg/L	<	1.2		 			
	Phenol	µg/L		0.4		 			
	2,4,6-Trichlorophenol	µg/L	<	0.63					
	Acenaphthene	µg/L	<	0.17					
	Acenaphthylene	µg/L	<	0.21					
	Anthracene	µg/L	<	0.17					
	Benzidine	µg/L	<	3.4					
	Benzo(a)Anthracene	µg/L	<	0.14					
	Benzo(a)Pyrene	µg/L	<	0.24					
	3,4-Benzofluoranthene	µg/L	<	0.12					
	Benzo(ahi)Pervlene	ug/L	<	0.24					
	Benzo(k)Fluoranthene	µg/L	<	0.21					
	Bis(2-Chloroethoxy)Methane	µg/L	<	0.23					
	Bis(2-Chloroethyl)Ether	ug/L	<	0.19					
	Bis(2-Chloroisopropyl)Ether	ug/l		0.31					
	Bis/2-Ethylheyd\Phthalate	ug/L	~	4.76					
	A Bromonhamid Dhamid Ethor	µg/L	-	9.10		 	 	 	
	4-Bromophenyl Phenyl Euler	µg/L	-	0.19		 			
	Butyi Benzyi Phthalate	µg/L	< .	0.0635	 	 			
	2-Chioronaphthalene	µg/L	<	0.2					
	4-Chlorophenyl Phenyl Ether	µg/L	<	0.16		 			
	Chrysene	µg/L	<	0.13					
	Dibenzo(a,h)Anthrancene	µg/L	<	0.23					
	1,2-Dichlorobenzene	µg/L	<	1.9					
	1,3-Dichlorobenzene	µg/L	<	1.3					
ŝ	1,4-Dichlorobenzene	µg/L	<	1.4					
đ	3,3-Dichlorobenzidine	µg/L	<	0.53					
2	Diethyl Phthalate	µg/L	<	0.2					
0	Dimethyl Phthalate	µg/L	<	0.16					
	Di-n-Butyl Phthalate	µg/L		0.16					
	2.4-Dinitrotoluene	ua/L	<	0.13					

	2,6-Dinitrotoluene	µg/L	<	0.23					
	Di-n-Octyl Phthalate	ug/L	<	0.11					
	1.2-Diphenylhydrazine	ug/L	<	0.29					
	Eluoranthene	ug/l	<	0.19					
	Fluorene	ua/L	<	0.22				 	
	Hexachlorobenzene	ug/L	<	0.26					
	Hexachlorobutadiene	ug/L	<	0.21				 	
	Hexachlorocyclopentadiene	ug/l	<	0.19				 	
	Hexachloroethane	ug/L	-	0.33					
	Indeno(1.2.3-cd)Pyrene	ug/L	<	0.11				 	
	Isophorope	ug/L	~	0.17					
	Naphthalene	ug/L	2	0.13				 	
	Nitrobenzene	µg/L	-	0.31				 	
	n-Nitrosodimethylamine	µg/L	~	0.71				 	
	n Nitrosodi n Pronulamine	µg/L	-	0.27				 	
	n-Nitrosodi-h-Propylamine	µg/L	-	0.27					
	Departhrape	µg/L	-	0.14				 	
	Durana	µg/L	-	0.14				 	
	1 2 4 Trichlershenzene	µg/L	-	0.16				 	
_		µg/L	-	0.0052					
	alpha BHC	µg/L	-	0.0032					
	aipid-Dric	µg/L	~	0.004		 			
	aamma BHC	µg/L	-	0.0082					
	delte BHC	µg/L	~	0.0031					
	Chlordono	µg/L	~	0.0031					
		µg/L	~	0.036		 		 	
	4,4-001	µg/L	~	0.0062	 	 		 	
	4,4-DDE	µg/L	<	0.0072		 	 	 	
	4,4-DDD	µg/L	<	0.0072	 	 	 	 	
	Dielarin	µg/L	<	0.0031				 	
	alpha-Endosultan	µg/L	<	0.0031				 	
	beta-Endosulfan	µg/L	<	0.0062					
đ	Endosulfan Sulfate	µg/L	<	0.0041	 	 	 	 	
ē	Endrin	µg/L	<	0.0082					
פ	Endrin Aldenyde	µg/L	<	0.01		 	 	 	
	Heptachior	µg/L	<	0.0031				 	
	Heptachlor Epoxide	µg/L	<	0.0041	 				
	PCB-1016	µg/L	<						
	PCB-1221	µg/L	<			 		 	
	PCB-1232	µg/L	<		 	 		 	
	PCB-1242	µg/L	<		 			 	
	PCB-1248	µg/L	<						
	PCB-1254	µg/L	<						
	PCB-1260	µg/L	<						
	PCBs, Total	µg/L	<						
	Ioxaphene	µg/L	<	0.2					
	2,3,7,8-TCDD	ng/L	<						
	Gross Alpha	pCI/L					 		
	Total Beta	pCi/L	<						
'n	Radium 226/228	pCi/L	<					 	
STO IS	Total Strontium	µg/L	<						
-	Total Uranium	µg/L	<		 			 	
_	Osmotic Pressure	mOs/kg							



Stream / Surface Water Information

Toxics Management Spreadsheet Version 1.3, March 2021

Jeanette STP, NPDES Permit No. PA0027430, Outfall 001

Instructions	Discharge	Stream	
--------------	-----------	--------	--

Receiving Surface Water Name: Brush Creek

No. Reaches to Model: 1

Location	Stream Code*	RMI*	Elevation (ft)*	DA (mi ²)*	Slope (ft/ft)	PWS Withdrawal (MGD)	Apply Fish Criteria*
Point of Discharge	037246	14.33	955	18.7			Yes
End of Reach 1	037246	12.06	926	20.9			Yes

_	
۲	Statewide Criteria
0	Great Lakes Criteria

_		
Ο	ORSANCO	Criteria

Q	7-10

Location	RMI	LFY	Flow (cfs)		W/D Width		Width Depth V	Velocit	Time	Tributary		Stream		Analysis	
		(cfs/mi ²)*	Stream	Tributary	Ratio	(ft)	(ft)	y (fps)	(dave)	Hardness	pН	Hardness*	pH*	Hardness	pН
Point of Discharge	14.33	0.016										100	7		
End of Reach 1	12.06	0.017													

Q,

Location	PM	LFY Flow (cfs)		W/D	//D Width Depth Velo		Velocit	elocit Time	Tributary		Stream		Analysis		
Location	1 XIVII	(cfs/mi ²)	Stream	Tributary	Ratio	(ft)	(ft)	y (fps)	(daye)	Hardness	pН	Hardness	pН	Hardness	pН
Point of Discharge	14.33														
End of Reach 1	12.06														

pennsylvania DEPARTMENT OF ENVIRONMENTAL PROTECTION

NPDES Permit No. PA0027430

Toxics Management Spreadsheet

Version 1.3, March 2021

Model Results

Jeanette STP, NPDES Permit No. PA0027430, Outfall 001

|--|

☑ Hydrodynamics

Q 7-10 **Discharge Analysis** Stream PWS Withdrawal Net Stream Velocity Complete Mix Time RMI Slope (ft/ft) Depth (ft) Width (ft) W/D Ratio Time Flow (cfs) 5.105 (fps) 0.267 Flow (cfs) (cfs) Flow (cfs) (min) 0.519 0.147 45.949 0.002 0.664 30.487 14.33 0.30 0.30 12.06 0.34 0.337

 Q_h

RMI	Stream Flow (cfs)	PWS Withdrawal (cfs)	Net Stream Flow (cfs)	Discharge Analysis Flow (cfs)	Slope (ft/ft)	Depth (ft)	Width (ft)	W/D Ratio	Velocity (fps)	Time	Complete Mix Time (min)
14.33	2.59		2.59	5.105	0.002	0.775	30.487	39.336	0.326	0.426	4.296
12.06	2.869		2.87								

✓ Wasteload Allocations

✓ AFC CC	CT (min): 0.	147	PMF:	1	Ana	lysis Hardne	ss (mg/l):	141.56 Analysis pH: 7.19
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 Aluminum	0	0		0	750	750	794	
Total Antimony	0	0		0	1,100	1,100	1,164	
Total Arsenic	0	0		0	340	340	360	Chem Translator of 1 applied
Total Barium	0	0		0	21,000	21,000	22,231	
Total Boron	0	0		0	8,100	8,100	8,575	
Total Cadmium	0	0		0	2.823	3.04	3.22	Chem Translator of 0.929 applied
Total Chromium (III)	0	0		0	757.399	2,397	2,537	Chem Translator of 0.316 applied
Hexavalent Chromium	0	0		0	16	16.3	17.2	Chem Translator of 0.982 applied
Total Cobalt	0	0		0	95	95.0	101	
Total Copper	0	0		0	18.647	19.4	20.6	Chem Translator of 0.96 applied
Free Cyanide	0	0		0	22	22.0	23.3	

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Dissolved Iron	0	0	0	N/A	N/A	N/A	
Total Iron	0	0	0	N/A	N/A	N/A	
Total Lead	0	0	0	94.088	127	135	Chem Translator of 0.74 applied
Total Manganese	0	0	0	N/A	N/A	N/A	
Total Mercury	0	0	0	1.400	1.65	1.74	Chem Translator of 0.85 applied
Total Nickel	0	0	0	628.305	630	666	Chem Translator of 0.998 applied
Total Phenols (Phenolics) (PWS)	0	0	0	N/A	N/A	N/A	
Total Selenium	0	0	0	N/A	N/A	N/A	Chem Translator of 0.922 applied
Total Silver	0	0	0	5.849	6.88	7.28	Chem Translator of 0.85 applied
Total Thallium	0	0	0	65	65.0	68.8	
Total Zinc	0	0	0	157.310	161	170	Chem Translator of 0.978 applied
Acrolein	0	0	0	3	3.0	3.18	
Acrylonitrile	0	0	0	650	650	688	
Benzene	0	0	0	640	640	678	
Bromoform	0	0	0	1,800	1,800	1,905	
Carbon Tetrachloride	0	0	0	2,800	2,800	2,964	
Chlorobenzene	0	0	0	1,200	1,200	1,270	
Chlorodibromomethane	0	0	0	N/A	N/A	N/A	
2-Chloroethyl Vinyl Ether	0	0	0	18,000	18,000	19,055	
Chloroform	0	0	0	1,900	1,900	2,011	
Dichlorobromomethane	0	0	0	N/A	N/A	N/A	
1,2-Dichloroethane	0	0	0	15,000	15,000	15,879	
1,1-Dichloroethylene	0	0	0	7,500	7,500	7,940	
1,2-Dichloropropane	0	0	0	11,000	11,000	11,645	
1,3-Dichloropropylene	0	0	0	310	310	328	
Ethylbenzene	0	0	0	2,900	2,900	3,070	
Methyl Bromide	0	0	0	550	550	582	
Methyl Chloride	0	0	0	28,000	28,000	29,641	
Methylene Chloride	0	0	0	12,000	12,000	12,703	
1,1,2,2-Tetrachloroethane	0	0	0	1,000	1,000	1,059	
Tetrachloroethylene	0	0	0	700	700	741	
Toluene	0	0	0	1,700	1,700	1,800	
1,2-trans-Dichloroethylene	0	0	0	6,800	6,800	7,199	
1,1,1-Trichloroethane	0	0	0	3,000	3,000	3,176	
1,1,2-Trichloroethane	0	0	0	3,400	3,400	3,599	
Trichloroethylene	0	0	0	2,300	2,300	2,435	
Vinyl Chloride	0	0	0	N/A	N/A	N/A	
2-Chlorophenol	0	0	0	560	560	593	
2,4-Dichlorophenol	0	0	0	1,700	1,700	1,800	
2,4-Dimethylphenol	0	0	0	660	660	699	
4,6-Dinitro-o-Cresol	0	0	0	80	80.0	84.7	
2,4-Dinitrophenol	0	0	0	660	660	699	
2-Nitrophenol	0	0	0	8,000	8,000	8,469	
4-Nitrophenol	0	0	0	2,300	2,300	2,435	
p-Chloro-m-Cresol	0	0	0	160	160	169	
Pentachlorophenol	0	0	0	10.518	10.5	11.1	
Phenol	0	0	0	N/A	N/A	N/A	
2,4,6-Trichlorophenol	0	0	0	460	460	487	

Acenaphthene	0	0	0	83	83.0	87.9	
Anthracene	0	0	0	N/A	N/A	N/A	
Benzidine	0	0	0	300	300	318	
Benzo(a)Anthracene	0	0	0	0.5	0.5	0.53	
Benzo(a)Pyrene	0	0	0	N/A	N/A	N/A	
3,4-Benzofluoranthene	0	0	0	N/A	N/A	N/A	
Benzo(k)Fluoranthene	0	0	0	N/A	N/A	N/A	
Bis(2-Chloroethyl)Ether	0	0	0	30,000	30,000	31,758	
Bis(2-Chloroisopropyl)Ether	0	0	0	N/A	N/A	N/A	
Bis(2-Ethylhexyl)Phthalate	0	0	0	4,500	4,500	4,764	
4-Bromophenyl Phenyl Ether	0	0	0	270	270	286	
Butyl Benzyl Phthalate	0	0	0	140	140	148	
2-Chloronaphthalene	0	0	 0	N/A	N/A	N/A	
Chrysene	0	0	0	N/A	N/A	N/A	
Dibenzo(a,h)Anthrancene	0	0	0	N/A	N/A	N/A	
1,2-Dichlorobenzene	0	0	0	820	820	868	
1,3-Dichlorobenzene	0	0	0	350	350	371	
1,4-Dichlorobenzene	0	0	0	730	730	773	
3,3-Dichlorobenzidine	0	0	0	N/A	N/A	N/A	
Diethyl Phthalate	0	0	0	4,000	4,000	4,234	
Dimethyl Phthalate	0	0	0	2,500	2,500	2,647	
Di-n-Butyl Phthalate	0	0	0	110	110	116	
2,4-Dinitrotoluene	0	0	0	1,600	1,600	1,694	
2,6-Dinitrotoluene	0	0	0	990	990	1,048	
1,2-Diphenylhydrazine	0	0	0	15	15.0	15.9	
Fluoranthene	0	0	0	200	200	212	
Fluorene	0	0	0	N/A	N/A	N/A	
Hexachlorobenzene	0	0	0	N/A	N/A	N/A	
Hexachlorobutadiene	0	0	0	10	10.0	10.6	
Hexachlorocyclopentadiene	0	0	0	5	5.0	5.29	
Hexachloroethane	0	0	0	60	60.0	63.5	
Indeno(1,2,3-cd)Pyrene	0	0	0	N/A	N/A	N/A	
Isophorone	0	0	0	10,000	10,000	10,586	
Naphthalene	0	0	0	140	140	148	
Nitrobenzene	0	0	0	4,000	4,000	4,234	
n-Nitrosodimethylamine	0	0	0	17,000	17,000	17,996	
n-Nitrosodi-n-Propylamine	0	0	0	N/A	N/A	N/A	
n-Nitrosodiphenylamine	0	0	0	300	300	318	
Phenanthrene	0	0	0	5	5.0	5.29	
Pyrene	0	0	0	N/A	N/A	N/A	
1,2,4-Trichlorobenzene	0	0	0	130	130	138	
Aldrin	0	0	0	3	3.0	3.18	
alpha-BHC	0	0	0	N/A	N/A	N/A	
beta-BHC	0	0	0	N/A	N/A	N/A	
gamma-BHC	0	0	0	0.95	0.95	1.01	
Chlordane	0	0	0	2.4	2.4	2.54	
4,4-DDT	0	0	0	1.1	1.1	1.16	
4,4-DDE	0	0	0	1.1	1.1	1.16	

4,4-DDD	0	0		0	1.1	1.1	1.16	
Dieldrin	0	0		0	0.24	0.24	0.25	
alpha-Endosulfan	0	0		0	0.22	0.22	0.23	
beta-Endosulfan	0	0		0	0.22	0.22	0.23	
Endosulfan Sulfate	0	0		0	N/A	N/A	N/A	
Endrin	0	0		0	0.086	0.086	0.091	
Endrin Aldehyde	0	0		0	N/A	N/A	N/A	
Heptachlor	0	0		0	0.52	0.52	0.55	
Heptachlor Epoxide	0	0		0	0.5	0.5	0.53	
Toxaphene	0	0		0	0.73	0.73	0.77	
✓ CFC CC	T (min): 0.	147	PMF:	1	Ana	Ilysis Hardne	ess (mg/l):	141.56 Analysis pH: 7.19
Pollutants	Conc	Stream	Trib Conc	Fate	WQC	WQ Obj	WLA (ug/L)	Comments
Folidanta	(ug/L)	CV	(µg/L)	Coef	(µg/L)	(µg/L)	(µg/c)	Commenta
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 Aluminum	0	0		0	N/A	N/A	N/A	
Total Antimony	0	0		0	220	220	233	
Total Arsenic	0	0		0	150	150	159	Chem Translator of 1 applied
Total Barium	0	0		0	4,100	4,100	4,340	
Total Boron	0	0		0	1,600	1,600	1,694	
Total Cadmium	0	0		0	0.313	0.35	0.37	Chem Translator of 0.894 applied
Total Chromium (III)	0	0		0	98.522	115	121	Chem Translator of 0.86 applied
Hexavalent Chromium	0	0		0	10	10.4	11.0	Chem Translator of 0.962 applied
Total Cobalt	0	0		0	19	19.0	20.1	
Total Copper	0	0		0	12.053	12.6	13.3	Chem Translator of 0.96 applied
Free Cyanide	0	0		0	5.2	5.2	5.5	
Dissolved Iron	0	0		0	N/A	N/A	N/A	
Total Iron	0	0		0	1,500	1,500	1.588	WOC = 30 day average: PMF = 1
Total Lead	0	0		0	3,666	4.95	5.24	Chem Translator of 0.74 applied
Total Manganese	0	0		0	N/A	N/A	N/A	
Total Mercury	0	0		0	0.770	0.91	0.96	Chem Translator of 0.85 applied
Total Nickel	Ő	ő		0	69 785	70.0	74.1	Chem Translator of 0.997 applied
Total Phenols (Phenolics) (PWS)	0	Ő		0	N/A	N/A	N/A	
Total Selenium	ő	ő		0	4 600	4 99	5.28	Chem Translator of 0.022 applied
Total Silver	0	ő		0	-1.000	N/A	0.20	Chem Translator of 1 applied
Total Thallium	0	0		0	13	13.0	13.8	
Total Zinc	0	0		0	158 507	161	170	Chem Translator of 0.986 applied
Acrolein	0	0		0	100.097	3.0	3 19	Chem translator or 0.500 applied
Acodesitrile	0	0		0	120	120	120	
Benzene	0	0		0	130	130	130	
Bramelarm	0	0		0	130	130	100	
Bromotorm	0	0		0	3/0	3/0	392	
Carbon i etrachioride	0	0		0	000	560	593	

Chlorobenzene	0	0	0	240	240	254	
Chlorodibromomethane	0	0	0	N/A	N/A	N/A	
2-Chloroethyl Vinyl Ether	0	0	0	3,500	3,500	3,705	
Chloroform	0	0	0	390	390	413	
Dichlorobromomethane	0	0	0	N/A	N/A	N/A	
1,2-Dichloroethane	0	0	0	3,100	3,100	3,282	
1,1-Dichloroethylene	0	0	0	1,500	1,500	1,588	
1,2-Dichloropropane	0	0	0	2,200	2,200	2,329	
1,3-Dichloropropylene	0	0	0	61	61.0	64.6	
Ethylbenzene	0	0	0	580	580	614	
Methyl Bromide	0	0	0	110	110	116	
Methyl Chloride	0	0	0	5,500	5,500	5,822	
Methylene Chloride	0	0	0	2,400	2,400	2,541	
1,1,2,2-Tetrachloroethane	0	0	0	210	210	222	
Tetrachloroethylene	0	0	0	140	140	148	
Toluene	0	0	0	330	330	349	
1,2-trans-Dichloroethylene	0	0	0	1,400	1,400	1,482	
1,1,1-Trichloroethane	0	0	0	610	610	646	
1,1,2-Trichloroethane	0	0	0	680	680	720	
Trichloroethylene	0	0	0	450	450	476	
Vinyl Chloride	0	0	0	N/A	N/A	N/A	
2-Chlorophenol	0	0	0	110	110	116	
2.4-Dichlorophenol	0	0	0	340	340	360	
2,4-Dimethylphenol	0	0	0	130	130	138	
4,6-Dinitro-o-Cresol	0	0	0	16	16.0	16.9	
2,4-Dinitrophenol	0	0	0	130	130	138	
2-Nitrophenol	0	0	0	1,600	1,600	1,694	
4-Nitrophenol	0	0	0	470	470	498	
p-Chloro-m-Cresol	0	0	0	500	500	529	
Pentachlorophenol	0	0	0	8.069	8.07	8.54	
Phenol	0	0	0	N/A	N/A	N/A	
2,4,6-Trichlorophenol	0	0	0	91	91.0	96.3	
Acenaphthene	0	0	0	17	17.0	18.0	
Anthracene	0	0	0	N/A	N/A	N/A	
Benzidine	0	0	0	59	59.0	62.5	
Benzo(a)Anthracene	0	0	0	0.1	0.1	0.11	
Benzo(a)Pyrene	0	0	0	N/A	N/A	N/A	
3,4-Benzofluoranthene	0	0	0	N/A	N/A	N/A	
Benzo(k)Fluoranthene	0	0	0	N/A	N/A	N/A	
Bis(2-Chloroethyl)Ether	0	0	0	6,000	6,000	6,352	
Bis(2-Chloroisopropyl)Ether	0	0	0	N/A	N/A	N/A	
Bis(2-Ethylhexyl)Phthalate	0	0	0	910	910	963	
4-Bromophenyl Phenyl Ether	0	0	0	54	54.0	57.2	
Butyl Benzyl Phthalate	0	0	0	35	35.0	37.1	
2-Chloronaphthalene	0	0	0	N/A	N/A	N/A	

Chrysene	0	0	0	N/A	N/A	N/A	
Dibenzo(a,h)Anthrancene	0	0	0	N/A	N/A	N/A	
1,2-Dichlorobenzene	0	0	0	160	160	169	
1,3-Dichlorobenzene	0	0	0	69	69.0	73.0	
1,4-Dichlorobenzene	0	0	0	150	150	159	
3,3-Dichlorobenzidine	0	0	0	N/A	N/A	N/A	
Diethyl Phthalate	0	0	0	800	800	847	
Dimethyl Phthalate	0	0	0	500	500	529	
Di-n-Butyl Phthalate	0	0	0	21	21.0	22.2	
2,4-Dinitrotoluene	0	0	0	320	320	339	
2,6-Dinitrotoluene	0	0	0	200	200	212	
1,2-Diphenylhydrazine	0	0	0	3	3.0	3.18	
Fluoranthene	0	0	0	40	40.0	42.3	
Fluorene	0	0	0	N/A	N/A	N/A	
Hexachlorobenzene	0	0	0	N/A	N/A	N/A	
Hexachlorobutadiene	0	0	0	2	2.0	2.12	
Hexachlorocyclopentadiene	0	0	0	1	1.0	1.06	
Hexachloroethane	0	0	0	12	12.0	12.7	
Indeno(1,2,3-cd)Pyrene	0	0	0	N/A	N/A	N/A	
Isophorone	0	0	0	2,100	2,100	2,223	
Naphthalene	0	0	0	43	43.0	45.5	
Nitrobenzene	0	0	0	810	810	857	
n-Nitrosodimethylamine	0	0	0	3,400	3,400	3,599	
n-Nitrosodi-n-Propylamine	0	0	0	N/A	N/A	N/A	
n-Nitrosodiphenylamine	0	0	0	59	59.0	62.5	
Phenanthrene	0	0	0	1	1.0	1.06	
Pyrene	0	0	0	N/A	N/A	N/A	
1,2,4-Trichlorobenzene	0	0	0	26	26.0	27.5	
Aldrin	0	0	0	0.1	0.1	0.11	
alpha-BHC	0	0	0	N/A	N/A	N/A	
beta-BHC	0	0	0	N/A	N/A	N/A	
gamma-BHC	0	0	0	N/A	N/A	N/A	
Chlordane	0	0	0	0.0043	0.004	0.005	
4,4-DDT	0	0	0	0.001	0.001	0.001	
4,4-DDE	0	0	0	0.001	0.001	0.001	
4,4-DDD	0	0	0	0.001	0.001	0.001	
Dieldrin	0	0	0	0.056	0.056	0.059	
alpha-Endosulfan	0	0	0	0.056	0.056	0.059	
beta-Endosulfan	0	0	0	0.056	0.056	0.059	
Endosulfan Sulfate	0	0	0	N/A	N/A	N/A	
Endrin	0	0	0	0.036	0.036	0.038	
Endrin Aldehyde	0	0	0	N/A	N/A	N/A	
Heptachlor	0	0	0	0.0038	0.004	0.004	
Heptachlor Epoxide	0	0	0	0.0038	0.004	0.004	
Toxaphene	0	0	0	0.0002	0.0002	0.0002	

<i>⊡ тнн</i> сс	T (min): 0.	147	PMF:	1	Ana	alysis Hardne	ess (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	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	
Total Aluminum	0	0		0	N/A	N/A	N/A	
Total Antimony	0	0		0	5.6	5.6	5.93	
Total Arsenic	0	0		0	10	10.0	10.6	
Total Barium	0	0		0	2,400	2,400	2,541	
Total Boron	0	0		0	3,100	3,100	3,282	
Total Cadmium	0	0		0	N/A	N/A	N/A	
Total Chromium (III)	0	0		0	N/A	N/A	N/A	
Hexavalent Chromium	0	0		0	N/A	N/A	N/A	
Total Cobalt	0	0		0	N/A	N/A	N/A	
Total Copper	0	0		0	N/A	N/A	N/A	
Free Cyanide	0	0		0	4	4.0	4.23	
Dissolved Iron	0	0		0	300	300	318	
Total Iron	0	0		0	N/A	N/A	N/A	
Total Lead	0	0		0	N/A	N/A	N/A	
Total Manganese	0	0		0	1,000	1,000	1,059	
Total Mercury	0	0		0	0.050	0.05	0.053	
Total Nickel	0	0		0	610	610	646	
Total Phenols (Phenolics) (PWS)	0	0		0	5	5.0	N/A	
Total Selenium	0	0		0	N/A	N/A	N/A	
Total Silver	0	0		0	N/A	N/A	N/A	
Total Thallium	0	0		0	0.24	0.24	0.25	
Total Zinc	0	0		0	N/A	N/A	N/A	
Acrolein	0	0		0	3	3.0	3.18	
Acrylonitrile	0	0		0	N/A	N/A	N/A	
Benzene	0	0		0	N/A	N/A	N/A	
Bromoform	0	0		0	N/A	N/A	N/A	
Carbon Tetrachloride	0	0		0	N/A	N/A	N/A	
Chlorobenzene	0	0		0	100	100.0	106	
Chlorodibromomethane	0	0		0	N/A	N/A	N/A	
2-Chloroethyl Vinyl Ether	0	0		0	N/A	N/A	N/A	
Chloroform	0	0		0	5.7	5.7	6.03	
Dichlorobromomethane	0	0		0	N/A	N/A	N/A	
1,2-Dichloroethane	0	0		0	N/A	N/A	N/A	
1,1-Dichloroethylene	0	0		0	33	33.0	34.9	
1,2-Dichloropropane	0	0		0	N/A	N/A	N/A	
1,3-Dichloropropylene	0	0		0	N/A	N/A	N/A	

Ethylbenzene	0	0	0	68	68.0	72.0	
Methyl Bromide	0	0	0	100	100.0	106	
Methyl Chloride	0	0	0	N/A	N/A	N/A	
Methylene Chloride	0	0	0	N/A	N/A	N/A	
1,1,2,2-Tetrachloroethane	0	0	0	N/A	N/A	N/A	
Tetrachloroethylene	0	0	0	N/A	N/A	N/A	
Toluene	0	0	0	57	57.0	60.3	
1,2-trans-Dichloroethylene	0	0	0	100	100.0	106	
1,1,1-Trichloroethane	0	0	0	10,000	10,000	10,586	
1,1,2-Trichloroethane	0	0	0	N/A	N/A	N/A	
Trichloroethylene	0	0	0	N/A	N/A	N/A	
Vinyl Chloride	0	0	0	N/A	N/A	N/A	
2-Chlorophenol	0	0	0	30	30.0	31.8	
2,4-Dichlorophenol	0	0	0	10	10.0	10.6	
2,4-Dimethylphenol	0	0	0	100	100.0	106	
4,6-Dinitro-o-Cresol	0	0	0	2	2.0	2.12	
2,4-Dinitrophenol	0	0	0	10	10.0	10.6	
2-Nitrophenol	0	0	0	N/A	N/A	N/A	
4-Nitrophenol	0	0	0	N/A	N/A	N/A	
p-Chloro-m-Cresol	0	0	0	N/A	N/A	N/A	
Pentachlorophenol	0	0	0	N/A	N/A	N/A	
Phenol	0	0	0	4,000	4,000	4,234	
2,4,6-Trichlorophenol	0	0	0	N/A	N/A	N/A	
Acenaphthene	0	0	0	70	70.0	74.1	
Anthracene	0	0	0	300	300	318	
Benzidine	0	0	0	N/A	N/A	N/A	
Benzo(a)Anthracene	0	0	0	N/A	N/A	N/A	
Benzo(a)Pyrene	0	0	0	N/A	N/A	N/A	
3,4-Benzofluoranthene	0	0	0	N/A	N/A	N/A	
Benzo(k)Fluoranthene	0	0	0	N/A	N/A	N/A	
Bis(2-Chloroethyl)Ether	0	0	0	N/A	N/A	N/A	
Bis(2-Chloroisopropyl)Ether	0	0	0	200	200	212	
Bis(2-Ethylhexyl)Phthalate	0	0	0	N/A	N/A	N/A	
4-Bromophenyl Phenyl Ether	0	0	0	N/A	N/A	N/A	
Butyl Benzyl Phthalate	0	0	0	0.1	0.1	0.11	
2-Chloronaphthalene	0	0	0	800	800	847	
Chrysene	0	0	0	N/A	N/A	N/A	
Dibenzo(a,h)Anthrancene	0	0	0	N/A	N/A	N/A	
1,2-Dichlorobenzene	0	0	0	1,000	1,000	1,059	
1,3-Dichlorobenzene	0	0	0	7	7.0	7.41	
1,4-Dichlorobenzene	0	0	0	300	300	318	
3,3-Dichlorobenzidine	0	0	0	N/A	N/A	N/A	
Diethyl Phthalate	0	0	0	600	600	635	
Dimethyl Phthalate	0	0	0	2,000	2,000	2,117	
Di-n-Butyl Phthalate	0	0	0	20	20.0	21.2	

0

0

Chloride (PWS) Sulfate (PWS)

0

0

0

0

N/A N/A

N/A

N/A

N/A

N/A

2,4-Dinitrotoluene	0	0		0	N/A	N/A	N/A	
2,6-Dinitrotoluene	0	0		0	N/A	N/A	N/A	
1,2-Diphenylhydrazine	0	0		0	N/A	N/A	N/A	
Fluoranthene	0	0		0	20	20.0	21.2	
Fluorene	0	0		0	50	50.0	52.9	
Hexachlorobenzene	0	0		0	N/A	N/A	N/A	
Hexachlorobutadiene	0	0		0	N/A	N/A	N/A	
Hexachlorocyclopentadiene	0	0		0	4	4.0	4.23	
Hexachloroethane	0	0		0	N/A	N/A	N/A	
Indeno(1,2,3-cd)Pyrene	0	0		0	N/A	N/A	N/A	
Isophorone	0	0		0	34	34.0	36.0	
Naphthalene	0	0		0	N/A	N/A	N/A	
Nitrobenzene	0	0		0	10	10.0	10.6	
n-Nitrosodimethylamine	0	0		0	N/A	N/A	N/A	
n-Nitrosodi-n-Propylamine	0	0		0	N/A	N/A	N/A	
n-Nitrosodiphenylamine	0	0		0	N/A	N/A	N/A	
Phenanthrene	0	0		0	N/A	N/A	N/A	
Pyrene	0	0		0	20	20.0	21.2	
1,2,4-Trichlorobenzene	0	0		0	0.07	0.07	0.074	
Aldrin	0	0		0	N/A	N/A	N/A	
alpha-BHC	0	0		0	N/A	N/A	N/A	
beta-BHC	0	0		0	N/A	N/A	N/A	
gamma-BHC	0	0		0	4.2	4.2	4.45	
Chlordane	0	0		0	N/A	N/A	N/A	
4,4-DDT	0	0		0	N/A	N/A	N/A	
4,4-DDE	0	0		0	N/A	N/A	N/A	
4,4-DDD	0	0		0	N/A	N/A	N/A	
Dieldrin	0	0		0	N/A	N/A	N/A	
alpha-Endosulfan	0	0		0	20	20.0	21.2	
beta-Endosulfan	0	0		0	20	20.0	21.2	
Endosulfan Sulfate	0	0		0	20	20.0	21.2	
Endrin	0	0		0	0.03	0.03	0.032	
Endrin Aldehyde	0	0		0	1	1.0	1.06	
Heptachlor	0	0		0	N/A	N/A	N/A	
Heptachlor Epoxide	0	0		0	N/A	N/A	N/A	
Toxaphene	0	0		0	N/A	N/A	N/A	
✓ CRL CC	T (min): 4.	296	PMF:	1	Ana	alysis Hardne	ess (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	

Total Aluminum	0	0	0	N/A	N/A	N/A	
Total Antimony	0	0	0	N/A	N/A	N/A	
Total Arsenic	0	0	0	N/A	N/A	N/A	
Total Barium	0	0	0	N/A	N/A	N/A	
Total Boron	0	0	0	N/A	N/A	N/A	
Total Cadmium	0	0	0	N/A	N/A	N/A	
Total Chromium (III)	0	0	0	N/A	N/A	N/A	
Hexavalent Chromium	0	0	0	N/A	N/A	N/A	
Total Cobalt	0	0	0	N/A	N/A	N/A	
Total Copper	0	0	0	N/A	N/A	N/A	
Free Cyanide	0	0	0	N/A	N/A	N/A	
Dissolved Iron	0	0	0	N/A	N/A	N/A	
Total Iron	0	0	0	N/A	N/A	N/A	
Total Lead	0	0	0	N/A	N/A	N/A	
Total Manganese	0	0	0	N/A	N/A	N/A	
Total Mercury	0	0	0	N/A	N/A	N/A	
Total Nickel	0	0	0	N/A	N/A	N/A	
Total Phenols (Phenolics) (PWS)	0	0	0	N/A	N/A	N/A	
Total Selenium	0	0	0	N/A	N/A	N/A	
Total Silver	0	0	0	N/A	N/A	N/A	
Total Thallium	0	0	0	N/A	N/A	N/A	
Total Zinc	0	0	0	N/A	N/A	N/A	
Acrolein	0	0	0	N/A	N/A	N/A	
Acrylonitrile	0	0	0	0.06	0.06	0.09	
Benzene	0	0	0	0.58	0.58	0.87	
Bromoform	0	0	0	7	7.0	10.5	
Carbon Tetrachloride	0	0	0	0.4	0.4	0.6	
Chlorobenzene	0	0	0	N/A	N/A	N/A	
Chlorodibromomethane	0	0	0	0.8	0.8	1.21	
2-Chloroethyl Vinyl Ether	0	0	0	N/A	N/A	N/A	
Chloroform	0	0	0	N/A	N/A	N/A	
Dichlorobromomethane	0	0	0	0.95	0.95	1.43	
1,2-Dichloroethane	0	0	0	9.9	9.9	14.9	
1,1-Dichloroethylene	0	0	0	N/A	N/A	N/A	
1,2-Dichloropropane	0	0	0	0.9	0.9	1.36	
1,3-Dichloropropylene	0	0	0	0.27	0.27	0.41	
Ethylbenzene	0	0	0	N/A	N/A	N/A	
Methyl Bromide	0	0	0	N/A	N/A	N/A	
Methyl Chloride	0	0	0	N/A	N/A	N/A	
Methylene Chloride	0	0	0	20	20.0	30.1	
1,1,2,2-Tetrachloroethane	0	0	0	0.2	0.2	0.3	
Tetrachloroethylene	0	0	0	10	10.0	15.1	
Toluene	0	0	0	N/A	N/A	N/A	
1,2-trans-Dichloroethylene	0	0	0	N/A	N/A	N/A	
1,1,1-Trichloroethane	0	0	0	N/A	N/A	N/A	

1,1,2-Trichloroethane	0	0	0	0.55	0.55	0.83	
Trichloroethylene	0	0	0	0.6	0.6	0.9	
Vinyl Chloride	0	0	0	0.02	0.02	0.03	
2-Chlorophenol	0	0	0	N/A	N/A	N/A	
2,4-Dichlorophenol	0	0	0	N/A	N/A	N/A	
2,4-Dimethylphenol	0	0	0	N/A	N/A	N/A	
4,6-Dinitro-o-Cresol	0	0	0	N/A	N/A	N/A	
2,4-Dinitrophenol	0	0	0	N/A	N/A	N/A	
2-Nitrophenol	0	0	0	N/A	N/A	N/A	
4-Nitrophenol	0	0	0	N/A	N/A	N/A	
p-Chloro-m-Cresol	0	0	0	N/A	N/A	N/A	
Pentachlorophenol	0	0	0	0.030	0.03	0.045	
Phenol	0	0	0	N/A	N/A	N/A	
2,4,6-Trichlorophenol	0	0	0	1.5	1.5	2.26	
Acenaphthene	0	0	0	N/A	N/A	N/A	
Anthracene	0	0	0	N/A	N/A	N/A	
Benzidine	0	0	0	0.0001	0.0001	0.0002	
Benzo(a)Anthracene	0	0	0	0.001	0.001	0.002	
Benzo(a)Pyrene	0	0	0	0.0001	0.0001	0.0002	
3,4-Benzofluoranthene	0	0	0	0.001	0.001	0.002	
Benzo(k)Fluoranthene	0	0	0	0.01	0.01	0.015	
Bis(2-Chloroethyl)Ether	0	0	0	0.03	0.03	0.045	
Bis(2-Chloroisopropyl)Ether	0	0	0	N/A	N/A	N/A	
Bis(2-Ethylhexyl)Phthalate	0	0	0	0.32	0.32	0.48	
4-Bromophenyl Phenyl Ether	0	0	0	N/A	N/A	N/A	
Butyl Benzyl Phthalate	0	0	0	N/A	N/A	N/A	
2-Chloronaphthalene	0	0	0	N/A	N/A	N/A	
Chrysene	0	0	0	0.12	0.12	0.18	
Dibenzo(a,h)Anthrancene	0	0	0	0.0001	0.0001	0.0002	
1,2-Dichlorobenzene	0	0	0	N/A	N/A	N/A	
1,3-Dichlorobenzene	0	0	0	N/A	N/A	N/A	
1,4-Dichlorobenzene	0	0	0	N/A	N/A	N/A	
3,3-Dichlorobenzidine	0	0	0	0.05	0.05	0.075	
Diethyl Phthalate	0	0	0	N/A	N/A	N/A	
Dimethyl Phthalate	0	0	0	N/A	N/A	N/A	
Di-n-Butyl Phthalate	0	0	0	N/A	N/A	N/A	
2,4-Dinitrotoluene	0	0	0	0.05	0.05	0.075	
2,6-Dinitrotoluene	0	0	0	0.05	0.05	0.075	
1,2-Diphenylhydrazine	0	0	0	0.03	0.03	0.045	
Fluoranthene	0	0	0	N/A	N/A	N/A	
Fluorene	0	0	0	N/A	N/A	N/A	
Hexachlorobenzene	0	0	0	0.00008	0.00008	0.0001	
Hexachlorobutadiene	0	0	0	0.01	0.01	0.015	
Hexachlorocyclopentadiene	0	0	0	N/A	N/A	N/A	
Hexachloroethane	0	0	0	0.1	0.1	0.15	

Indeno(1,2,3-cd)Pyrene	0	0	0	0.001	0.001	0.002	
Isophorone	0	0	0	N/A	N/A	N/A	
Naphthalene	0	0	0	N/A	N/A	N/A	
Nitrobenzene	0	0	0	N/A	N/A	N/A	
n-Nitrosodimethylamine	0	0	0	0.0007	0.0007	0.001	
n-Nitrosodi-n-Propylamine	0	0	0	0.005	0.005	0.008	
n-Nitrosodiphenylamine	0	0	0	3.3	3.3	4.97	
Phenanthrene	0	0	0	N/A	N/A	N/A	
Pyrene	0	0	0	N/A	N/A	N/A	
1,2,4-Trichlorobenzene	0	0	0	N/A	N/A	N/A	
Aldrin	0	0	0	0.000008	8.00E-07	0.000001	
alpha-BHC	0	0	0	0.0004	0.0004	0.0006	
beta-BHC	0	0	0	0.008	0.008	0.012	
gamma-BHC	0	0	0	N/A	N/A	N/A	
Chlordane	0	0	0	0.0003	0.0003	0.0005	
4,4-DDT	0	0	0	0.00003	0.00003	0.00005	
4,4-DDE	0	0	0	0.00002	0.00002	0.00003	
4,4-DDD	0	0	0	0.0001	0.0001	0.0002	
Dieldrin	0	0	0	0.000001	0.000001	0.000002	
alpha-Endosulfan	0	0	0	N/A	N/A	N/A	
beta-Endosulfan	0	0	0	N/A	N/A	N/A	
Endosulfan Sulfate	0	0	0	N/A	N/A	N/A	
Endrin	0	0	0	N/A	N/A	N/A	
Endrin Aldehyde	0	0	0	N/A	N/A	N/A	
Heptachlor	0	0	0	0.000006	0.000006	0.000009	
Heptachlor Epoxide	0	0	0	0.00003	0.00003	0.00005	
Toxaphene	0	0	0	0.0007	0.0007	0.001	

☑ Recommended WQBELs & Monitoring Requirements

No. Samples/Month: 4

	Mass	Limits	Concentration Limits						
Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL	WQBEL Basis	Comments
Total Antimony	Report	Report	Report	Report	Report	µg/L	5.93	THH	Discharge Conc > 10% WQBEL (no RP)
Total Arsenic	Report	Report	Report	Report	Report	µg/L	10.6	THH	Discharge Conc > 10% WQBEL (no RP)
Total Copper	0.37	0.57	13.3	20.6	20.6	µg/L	13.3	CFC	Discharge Conc ≥ 50% WQBEL (RP)
Free Cyanide	Report	Report	Report	Report	Report	µg/L	4.23	THH	Discharge Conc > 25% WQBEL (no RP)
Total Zinc	Report	Report	Report	Report	Report	µg/L	161	AFC	Discharge Conc > 10% WQBEL (no RP)
Chloroform	Report	Report	Report	Report	Report	µg/L	6.03	THH	Discharge Conc > 25% WQBEL (no RP)
Dichlorobromomethane	Report	Report	Report	Report	Report	µg/L	1.43	CRL	Discharge Conc > 25% 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 Aluminum	750	µg/L	Discharge Conc ≤ 10% WQBEL
Total Barium	2,541	µg/L	Discharge Conc ≤ 10% WQBEL
Total Beryllium	N/A	N/A	No WQS
Total Boron	1,694	µg/L	Discharge Conc ≤ 10% WQBEL
Total Cadmium	0.37	µg/L	Discharge Conc < TQL
Total Chromium (III)	121	µg/L	Discharge Conc < TQL
Hexavalent Chromium	11.0	µg/L	Discharge Conc < TQL
Total Cobalt	20.1	µg/L	Discharge Conc ≤ 10% WQBEL
Total Cyanide	N/A	N/A	No WQS
Dissolved Iron	318	µg/L	Discharge Conc ≤ 10% WQBEL
Total Iron	1,588	µg/L	Discharge Conc ≤ 10% WQBEL
Total Lead	5.24	µg/L	Discharge Conc < TQL
Total Manganese	1,059	µg/L	Discharge Conc ≤ 10% WQBEL
Total Mercury	0.053	µg/L	Discharge Conc < TQL
Total Nickel	74.1	µg/L	Discharge Conc ≤ 10% WQBEL
Total Phenols (Phenolics) (PWS)		µg/L	PWS Not Applicable
Total Selenium	5.28	µg/L	Discharge Conc < TQL
Total Silver	6.88	µg/L	Discharge Conc ≤ 10% WQBEL
Total Thallium	0.25	µg/L	Discharge Conc < TQL
Total Molybdenum	N/A	N/A	No WQS
Acrolein	3.0	µg/L	Discharge Conc < TQL
Acrylonitrile	0.09	µg/L	Discharge Conc < TQL
Benzene	0.87	µg/L	Discharge Conc < TQL
Bromoform	10.5	µg/L	Discharge Conc ≤ 25% WQBEL
Carbon Tetrachloride	0.6	µg/L	Discharge Conc < TQL
Chlorobenzene	106	µg/L	Discharge Conc ≤ 25% WQBEL
Chlorodibromomethane	1.21	µg/L	Discharge Conc < TQL
Chloroethane	N/A	N/A	No WQS
2-Chloroethyl Vinyl Ether	3,705	µg/L	Discharge Conc < TQL
1,1-Dichloroethane	N/A	N/A	No WQS
1,2-Dichloroethane	14.9	µg/L	Discharge Conc ≤ 25% WQBEL
1.1-Dichloroethylene	34.9	µa/L	Discharge Conc ≤ 25% WQBEL

1,2-Dichloropropane	1.36	µg/L	Discharge Conc < TQL
1,3-Dichloropropylene	0.41	µg/L	Discharge Conc < TQL
1,4-Dioxane	N/A	N/A	No WQS
Ethylbenzene	72.0	µg/L	Discharge Conc ≤ 25% WQBEL
Methyl Bromide	106	µg/L	Discharge Conc ≤ 25% WQBEL
Methyl Chloride	5,822	µg/L	Discharge Conc ≤ 25% WQBEL
Methylene Chloride	30.1	µg/L	Discharge Conc < TQL
1,1,2,2-Tetrachloroethane	0.3	µg/L	Discharge Conc < TQL
Tetrachloroethylene	15.1	µg/L	Discharge Conc ≤ 25% WQBEL
Toluene	60.3	µg/L	Discharge Conc ≤ 25% WQBEL
1,2-trans-Dichloroethylene	106	µg/L	Discharge Conc ≤ 25% WQBEL
1,1,1-Trichloroethane	646	µg/L	Discharge Conc ≤ 25% WQBEL
1,1,2-Trichloroethane	0.83	µg/L	Discharge Conc < TQL
Trichloroethylene	0.9	µg/L	Discharge Conc < TQL
Vinyl Chloride	0.03	µg/L	Discharge Conc < TQL
2-Chlorophenol	31.8	µg/L	Discharge Conc < TQL
2,4-Dichlorophenol	10.6	µg/L	Discharge Conc < TQL
2,4-Dimethylphenol	106	µg/L	Discharge Conc < TQL
4,6-Dinitro-o-Cresol	2.12	µg/L	Discharge Conc < TQL
2,4-Dinitrophenol	10.6	µg/L	Discharge Conc < TQL
2-Nitrophenol	1,694	µg/L	Discharge Conc < TQL
4-Nitrophenol	498	µg/L	Discharge Conc < TQL
p-Chloro-m-Cresol	160	µg/L	Discharge Conc < TQL
Pentachlorophenol	0.045	µg/L	Discharge Conc < TQL
Phenol	4,234	µg/L	Discharge Conc ≤ 25% WQBEL
2,4,6-Trichlorophenol	2.26	µg/L	Discharge Conc < TQL
Acenaphthene	18.0	µg/L	Discharge Conc < TQL
Acenaphthylene	N/A	N/A	No WQS
Anthracene	318	µg/L	Discharge Conc < TQL
Benzidine	0.0002	µg/L	Discharge Conc < TQL
Benzo(a)Anthracene	0.002	µg/L	Discharge Conc < TQL
Benzo(a)Pyrene	0.0002	µg/L	Discharge Conc < TQL
3,4-Benzofluoranthene	0.002	µg/L	Discharge Conc < TQL
Benzo(ghi)Perylene	N/A	N/A	No WQS
Benzo(k)Fluoranthene	0.015	µg/L	Discharge Conc < TQL
Bis(2-Chloroethoxy)Methane	N/A	N/A	No WQS
Bis(2-Chloroethyl)Ether	0.045	µg/L	Discharge Conc < TQL
Bis(2-Chloroisopropyl)Ether	212	µg/L	Discharge Conc < TQL
Bis(2-Ethylhexyl)Phthalate	0.48	µg/L	Discharge Conc < TQL
4-Bromophenyl Phenyl Ether	57.2	µg/L	Discharge Conc < TQL
Butyl Benzyl Phthalate	0.11	µg/L	Discharge Conc < TQL
2-Chloronaphthalene	847	µg/L	Discharge Conc < TQL
4-Chlorophenyl Phenyl Ether	N/A	N/A	No WQS
Chrysene	0.18	µg/L	Discharge Conc < TQL
Dibenzo(a,h)Anthrancene	0.0002	µg/L	Discharge Conc < TQL

1.2-Dichlorobenzene	169	ua/l	Discharge Conc < 25% WOBEL
1.3-Dichlorobenzene	7.41	ug/L	Discharge Conc ≤ 25% WQBEI
1.4-Dichlorobenzene	159	ua/L	Discharge Conc ≤ 25% WQBEL
3.3-Dichlorobenzidine	0.075	ug/l	Discharge Conc < TO
Diethyl Phthalate	635	ug/L	Discharge Conc < TQL
Dimethyl Phthalate	529	ug/L	Discharge Conc < TQL
Di-n-Butyl Phthalate	21.2	ug/L	Discharge Conc < 25% WOBEI
2 4-Dinitrotoluene	0.075	ug/L	Discharge Conc < TOI
2.6-Dinitrotoluene	0.075	ug/L	Discharge Conc < TQL
Di-n-Octyl Phthalate	N/A	N/A	No WOS
1.2-Diphenylbydrazine	0.045	ual	Discharge Conc < TOI
Fluoranthene	21.2	µg/L	Discharge Conc < TOL
Fluorene	52.9	µg/L µg/l	Discharge Conc < TO
Hexachlorobenzene	0.0001	µg/L	Discharge Conc < TOL
Hexachlorobutadiene	0.015	µg/L µg/l	Discharge Conc < TO
Heyachlorocyclopentadiene	1.06	µg/L	Discharge Conc < TO
Hevachloroethane	0.15	µg/L µg/L	Discharge Conc < TQL
Indepo(1.2.3-cd)Pyrene	0.002	µg/L	Discharge Conc < TOL
Indeno(1,2,3-cd)Fyrene	36.0	µg/L	Discharge Conc < TQL
Naphthalene	45.5	µg/L	Discharge Conc < TOL
Nitrobenzene	10.6	µg/L µg/L	Discharge Conc < TOL
n Nitrosodimothylomino	0.001	µg/L	Discharge Conc < TQL
n Nitrocodi n Bronylamino	0.001	µg/L	Discharge Conc < TQL
n-Nitrosodinhenvlamine	0.000	µg/L	Discharge Conc < TQL
Departhrape	4.57	µg/L	Discharge Conc < TQL
Durana	21.2	µg/L	Discharge Conc < TQL
1 2 4-Trichlorobenzene	0.074	µg/L	Discharge Conc < TOL
Aldrin	0.00001	µg/L	Discharge Conc < TQL
alpha BHC	0.000001	µg/L	Discharge Conc < TQL
beta BHC	0.0000	µg/L	Discharge Conc < TQL
damma_BHC	0.012	µg/L	Discharge Conc < TQL
delta BHC	0.55 N/A	μg/L N/Δ	No WOS
Chlordane	0.0005	10/0	Discharge Conc < TOI
	0.0005	µg/L	Discharge Conc < TQL
4,4-DDT	0.00003	µg/L	Discharge Conc < TQL
4,4-DDD	0.00003	µg/L	Discharge Conc < TQL
Pieldrin	0.0002	µg/L	Discharge Conc < TOL
alpha-Endosulfan	0.000002	µg/L	Discharge Conc < TOL
beta-Endosulfan	0.059	µg/L	Discharge Conc < TOL
Endocultan Sulfate	21.2	Pg/L	Discharge Cons < TOL
Endosuian Sullate	0.022	µg/L	Discharge Conc < TQL
Endrin Aldebude	1.06	µg/L	Discharge Conc < TQL
Hentschlor	0.000000	µg/L	Discharge Conc < TQL
Hentachlor Enovide	0.00009	µg/L	Discharge Conc < TQL
	0.00003	µg/L	Discharge Conc < TQL
roxaprierie	0.0002	µg/L	Discharge Cond S TQL

ATTACHMENT E: Updated LTCP Implementation Schedule

SSO Elimination Implementation Schedule						
Task Due Date						
Act 537 Plan Approval by PADEP	Approved: 6-7-19					
Apply for WQM Part II Permit for Pump Station Improvements	Submitted to PADEP on 12-27-18 (Resubmitted 6-17-19)					
WQM Part II Permit Issuance by PADEP	Issued: 12-12-19					
Begin Construction on Pump Station Improvements	4-1-21 (Completed 3-29-21)					
Complete Construction on Pump Station Improvements	12-31-21 (Completed 12-7-21)					

LTCP and Act 537 Plan Implementation Schedule						
CSOs 3 & 8 Consolidation, CSOs 9 & 10 Consolidation, I&I Removal, CSO 6 Modifications,						
Chambers Avenue Realignn	nent, Partial Separation					
Task	Due Date					
LTCP Approval by PADEP	Approved: 2-7-19					
Act 537 Plan Approval by PADEP	Approved: 6-7-19					
Apply for WQM Part II Permit for CSOs 3 & 8 Consolidation	Submitted to PADEP on 12-27-18 (Resubmitted 6-17-19)					
WQM Part II Permit Issuance by PADEP	Issued: 12-12-19					
Begin Construction on CSOs 3 & 8 Consolidation	<mark>3-1-24</mark>					
Complete Construction on CSOs 3 & 8 Consolidation	<mark>7-1-25</mark>					
Apply for WQM Part II Permit for All Other Work	Submitted to PADEP on 12-4-19					
WQM Part II Permit Issuance by PADEP	Issued: 3-24-20					
Begin Construction on All Other Work	<mark>3-1-24</mark>					
Complete Construction on All Other Work	<mark>7-1-25</mark>					
Submit Post-Construction Compliance Monitoring Plan (PCCMP)	<mark>12-31-25</mark>					
PCCMP Approval by PADEP						
Begin PCCMP Implementation	Within 90 days of PCCMP approval					
Complete PCCMP Implementation	365 days from PCCMP implementation begin date					