

# Northeast Regional Office CLEAN WATER PROGRAM

Application Type
Facility Type
Major / Minor

Minor

# NPDES PERMIT FACT SHEET INDIVIDUAL SEWAGE

 Application No.
 PA0063321

 APS ID
 860917

 Authorization ID
 1056197

Applicant and Facility Information				
Applicant Name	Ararat	Township	Facility Name	Fiddle Lake WWTP
Applicant Address	1765 A	rarat Road	Facility Address	Airport Road
	Thomp	son, PA 18465		Thompson, PA 18465
Applicant Contact	Mavis (	Cottrell	Facility Contact	Joseph Holmes
Applicant Phone	(570) 7	27-3115	Facility Phone	(570) 727-3115
Client ID	44739		Site ID	520284
Ch 94 Load Status	Not Ov	erloaded	Municipality	Herrick Township
Connection Status	No Lim	itations	County	Susquehanna
Date Application Rece	eived	December 24, 2014	EPA Waived?	Yes
Date Application Accepted		January 5, 2015	If No, Reason	-
Purpose of Application		Renewal of existing NPDES pe	ermit.	

# **Summary of Review**

A draft NPDES permit was issued for this facility on October 10, 2019. The final permit was not issued after the public comment period due to open violations for the permittee. When compared to the first draft permit, this second draft permit includes the most current permit template (revised 8/2021), slightly less stringent Ammonia-Nitrogen water quality-based limitations, and monthly E. Coli monitoring/reporting.

The applicant is requesting renewal of their NPDES permit to discharge up to 0.035 MGD of treated sewage to Fiddle Lake Creek (stream code is 28612), a CWF/MF designated receiving water in state water plan basin 05-A (Lackawanna River). As per the Department's current existing use list, the receiving water does not have an existing use classification that is more protective than its designated use.

The default low flow yield (LFY) of 0.1 cfs/mi² was chosen to model the discharge since there are no nearby representative stream gages to obtain flow data from. The drainage area at Outfall 001 is outside of the USGS StreamStats suggested range for estimating low flow values (see StreamStats Low Flow attachment). For modeling inputs, RMI values were obtained using the "PA Historic Streams" feature of eMapPA as well as the "measure" tool. Drainage areas were delineated using USGS's StreamStats Interactive Map and elevations were obtained using the elevation profile feature of StreamStats (see Watershed Information attachment).

Limitations for CBOD<sub>5</sub>, TSS, pH and Fecal Coliform are technology-based and carried over from the previous permit. Note that technology-based IMAX limitations for Fecal Coliform are added to the permit during this renewal.

TRC limitations in the previously issued permit were old technology-based limitations (1.2 mg/L monthly average, 2.8 mg/L IMAX). As per PA Code 92a.47(a)(8) (which refers to PA Code 92a.48(b)(2)), a monthly average TRC facility-specific BAT effluent limit of 0.5 mg/L and an IMAX limit of 1.6 mg/L is applied to this permit renewal. These limitations will come into effect 1 year after the Permit Effective Date.

Approve	Deny	Signatures	Date
Y		Brian Burden	
^	Brian Burden, E.I.T. / Project Manager	October 8, 2021	
Х		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Environmental Engineer Manager	10-12-21

# **Summary of Review**

When modeling the discharge using the latest TRC calculation spreadsheet, a monthly average limitation of 0.13 mg/L and an IMAX of 0.42 mg/L was recommended. These water quality-based limitations will come into effect 4 years after the Permit Effective Date. The permittee may conduct site-specific studies to alter the new TRC limitations (see Part C.IV). Several factors can change the recommended TRC limitations as calculated by the spreadsheet, such as: chlorine demand of stream, chlorine demand of discharge, and stream flow. Default values for chlorine demand were used to develop the limitations (0.3 mg/L for stream demand, 0 mg/L for discharge demand). The stream flow value was determined by multiplying the drainage area at Outfall 001 (delineated using USGS's StreamStats) by the default LFY of 0.1 cfs/mi². Partial mixing factors were obtained from PENTOX (attached).

WQM modeling recommends a summertime 3.45 mg/L monthly average limitation for Ammonia-Nitrogen to meet water quality standards. The new Ammonia-Nitrogen limitations will come into effect 4 years after the Permit Effective Date. The standard 2x multiplier was used to develop the IMAX limits and the standard 3x multiplier was used to develop the wintertime limitations for Ammonia-Nitrogen.

Quarterly monitoring and reporting requirements for Total Nitrogen, Nitrate+Nitrite-Nitrogen, Total Kjeldahl Nitrogen and Total Phosphorus are included in this renewal to monitor nutrient concentrations.

Monthly monitoring and reporting requirements for influent BOD<sub>5</sub> and influent TSS are added to the permit to determine if the facility meets secondary treatment standards of 85% removal.

A Total Maximum Daily Load (TMDL) for the Lackawanna River Watershed was prepared for PA DEP on March 9, 2005. The TMDL addresses metals (Iron, Manganese, and Aluminum) and depressed pH associated with acid mine drainage (AMD). The TMDL load allocations apply to nonpoint sources of pollution; there are no Waste Load Allocations (WLAs). Quarterly monitoring requirements for Total Iron, Total Manganese, and Total Aluminum are added to the permit to monitor these pollutants of concern.

Monitoring frequencies for all parameters with limitations are consistent with the recommended frequencies found in Table 6-3 of DEP's Technical Guidance for the Development and Specification of Effluent Limitations (doc. no. 362-0400-001).

A stream survey was conducted on July 28, 2016 on Fiddle Lake Creek by Timothy Daley, PA DEP Aquatic Biologist, to collect biological and chemical data for the Ararat Township WWTP and to determine if the discharge has caused any biological impacts to the receiving stream. Sampling was performed at two stations, one just upstream of the discharge, and the other approximately 300 feet downstream from the discharge. The results of the survey are below:

Station 01: "Sampling at this location occurred just upstream of the discharge location. The stream here was small and shallow and only several feet wide, but was flowing clear and full. A total of 18 taxa were found in the subsample, with 10 sensitive EPT taxa. Collectively, sensitive mayflies, stoneflies, and caddisflies were common, and the sensitive caddisfly *Diplectrona* was abundant. The IBI score here of 59.7, although modest, is well above the impairment threshold of 43.0.

In addition, the presence of numerous long-lived taxa clearly establishes this stream as perennial at the discharge location. A previous April 14, 1994 Point of First Use survey conducted by DER Water Pollution Biologist Edward Kupsky determined the stream to be ephemeral based on a sample collected 25 yards downstream of the Fiddle Lake outlet. The point of first use at that time was located approximately 1.5 miles downstream of the existing discharge location, and should be reevaluated based on these current findings."

Station 02: "The discharge during the course of sampling was a milky gray color and odorous. Several extreme changes occurred here when compared to the upstream station. The entire stream section, from the discharge downstream approximately 300 feet (and likely further) was coated by gray solids. This sludge was several inches thick throughout much of the reach, and covered all substrates on the stream bottom (cobble, boulder, gravel, woody debris). In several areas, colonies of what appeared to be *Sphaerotilus natans* (aka "sewage fungus") were observed growing on top of heavy sludge deposits. This filamentous bacterium can thrive in highly organic and low dissolved oxygen conditions such as sewage sludge.

The macroinvertebrate community here was poor, with just 4 total taxa and 0 sensitive EPT taxa, and contrasts sharply with the upstream community. Nearly the entire subsample (97%) was dominated by pollution tolerant Chironomids (midges) and worms (Oligochaeta), predominantly the red hemoglobin/erythrocruorin-containing varieties known as "bloodworms" and "sludge worms", respectively. These blood pigments allow species of both groups to flourish in organic sediments and

# **Summary of Review**

sludge nearly devoid of oxygen. There was a total loss of all mayflies, stoneflies, and caddisflies which were numerous upstream, and both the Beck's Index and Percent Sensitive were zero, as no sensitive individuals were found. The results of these changes was a 46.8 point decrease in the IBI score, from 59.7 upstream of the discharge to 12.9 here, indicative of severely degraded conditions.

The water quality parameters of note downstream of the discharge include elevated ammonia and phosphorus, and decreased dissolved oxygen. The ammonia value of 4.17 mg/L would violate the Chapter 93 Water Quality Standards Chronic Criteria (1.917 mg/L) at a temperature of 20.0°C and pH of 7.00. The low dissolved oxygen (2.72 mg/L) would also violate the 5.0 mg/L minimum criteria for Cold Water Fishes."

The facility's latest Chapter 94 report shows no projected hydraulic/organic overloads at the WWTF. As per the September 2020 Sewage Sludge / Biosolids Production and Disposal form, 10,000 gallons of liquid sludge was hauled off site by Hallstead Sanitary on September 17, 2020 and 10,000 more gallons were hauled off site by Hallstead on September 18, 2020.

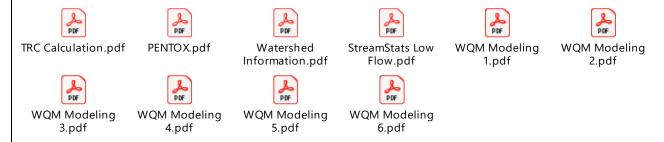
DMR review of the past 2 years reveals the following concentration limitation exceedances:

July 2021: CBOD<sub>5</sub> – 28.2 mg/L monthly average (limitation is 25 mg/L) August 2021: CBOD<sub>5</sub> – 29.0 mg/L monthly average (limitation is 25 mg/L)

The previously issued permit expired on June 30, 2015 and the application for permit renewal was submitted on time. There are three open violations for the client that could warrant withholding the issuance of the final permit:

- Inspection ID 3094672, Violation ID 897295 (dated 10/20/2020) "NPDES Failure to utilize an accredited environmental laboratory for testing or analysis of environmental samples".
- Inspection ID 3094672, Violation ID 897296 (dated 10/20/2020) "Operator Certification Operator failed to comply with the Act or Chapter 302 regulations".
- Inspection ID 3094672, Violation ID 897297 (dated 10/20/2020) "Operator Certification Operator failed to comply with the Act or Chapter 302 regulations".

Antibacksliding requirements have been met since no effluent limitations were made less stringent or removed from the permit. EPA waiver is in effect.



#### **Public Participation**

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Outfall No.         001         Design Flow (MGD)         0.035           Latitude         41° 46′ 48″         Longitude         -75° 31′ 48″           Quad Name         Thompson         Quad Code         0441           Receiving Waters Proposed           Fiddle Lake Creek (CWF)         Stream Code         28612           NHD Com ID         65628989         RMI         5.92           Drainage Area         0.45 mi²         Yield (cfs/mi²)         0.1           Qr-10 Flow (cfs)         0.045         Qr-10 Basis         Default LFY           Elevation (ft)         1976         Slope (fuft)         0.016           Watershed No.         5-A         Chapter 93 Class.         CWF/MF           Existing Use         -         Exceptions to Criteria         -           Assessment Status         Impaired         Cause Unknown & Thermal Modification           Source(s) of Impairment         Cause Unknown & Thermal Modification         Natural Sources (both)           TMDL Status         Final         Name         Lackawanna River Watershed           Background/Ambient Data pH (SU)         -         -         -           Temperature (°F)         -         -         -           Hardness (mg/L)         -<	Discharge, Receiving Waters and Water Supply Information				
Latitude         41° 46′ 48″         Longitude         -75° 31′ 48″           Quad Name         Thompson         Quad Code         0441           Wastewater Description:         Sewage Effluent           Receiving Waters         Fiddle Lake Creek (CWF)         Stream Code         28612           NHD Com ID         65628989         RMI         5.92           Drainage Area         0.45 mi²         Yield (cfs/mi²)         0.1           Qr-10 Flow (cfs)         0.045         Qr-10 Basis         Default LFY           Elevation (ft)         1976         Slope (ft/ft)         0.016           Watershed No.         5-A         Chapter 93 Class.         CWF/MF           Existing Use         -         Exceptions to Criteria         -           Assessment Status         Impaired         Cause (s) of Impairment         Cause Unknown & Thermal Modification           Source(s) of Impairment         Natural Sources (both)         Natural Sources (both)           TMDL Status         Final         Name         Lackawanna River Watershed           Background/Ambient Data pH (SU)         -         -         -           Temperature (°F)         -         -         -           Hardness (mg/L)         -         -         -					
Quad Name         Thompson         Quad Code         0441           Wastewater Description:         Sewage Effluent           Receiving Waters         Fiddle Lake Creek (CWF)         Stream Code         28612           NHD Com ID         65628989         RMI         5.92           Drainage Area         0.45 mi²         Yield (cfs/mi²)         0.1           Qr-10 Flow (cfs)         0.045         Qr-10 Basis         Default LFY           Elevation (ft)         1976         Slope (ft/ft)         0.016           Watershed No.         5-A         Chapter 93 Class.         CWF/MF           Existing Use         -         Existing Use Qualifier         -           Exceptions to Use         -         Exceptions to Criteria         -           Assessment Status         Impaired         Cause Unknown & Thermal Modification           Source(s) of Impairment         Natural Sources (both)         Name         Lackawanna River Watershed           Background/Ambient Data         Data Source         PAME Superson         Data Source           pH (SU)         -         -         -           Temperature (°F)         -         -         -           Hardness (mg/L)         -         -         - <t< td=""><td>Outfall No. 001</td><td></td><td>Design Flow (MGD)</td><td>0.035</td></t<>	Outfall No. 001		Design Flow (MGD)	0.035	
Receiving Waters         Fiddle Lake Creek (CWF)         Stream Code         28612           NHD Com ID         65628989         RMI         5.92           Drainage Area         0.45 mi²         Yield (cfs/mi²)         0.1           Qr-10 Flow (cfs)         0.045         Qr-10 Basis         Default LFY           Elevation (ft)         1976         Slope (ft/ft)         0.016           Watershed No.         5-A         Chapter 93 Class.         CWF/MF           Existing Use         -         Existing Use Qualifier         -           Exceptions to Use         -         Exceptions to Criteria         -           Assessment Status         Impaired         Cause Unknown & Thermal Modification           Source(s) of Impairment         Natural Sources (both)         Name         Lackawanna River Watershed           Background/Ambient Data pH (SU)         -         -         -         -           Temperature (°F)         -         -         -         -           Hardness (mg/L)         -         -         -         -           Other:         -         -         -         -           Nearest Downstream Public Water Supply Intake Stillwater Reservoir         Flow at Intake (cfs)         3.8 (using default LFY)	Latitude 41° 4	16' 48"	Longitude	-75º 31' 48"	
Receiving Waters	Quad Name The	ompson	Quad Code	0441	
NHD Com ID         65628989         RMI         5.92           Drainage Area         0.45 mi²         Yield (cfs/mi²)         0.1           Q7-10 Flow (cfs)         0.045         Q7-10 Basis         Default LFY           Elevation (ft)         1976         Slope (ft/ft)         0.016           Watershed No.         5-A         Chapter 93 Class.         CWF/MF           Existing Use         -         Existing Use Qualifier         -           Exceptions to Use         -         Exceptions to Criteria         -           Assessment Status         Impaired         Cause Unknown & Thermal Modification           Source(s) of Impairment         Natural Sources (both)         Name Lackawanna River Watershed           Background/Ambient Data pH (SU)         -         -         -           Temperature (°F)         -         -         -           Hardness (mg/L)         -         -         -           Other:         -         -         -           Nearest Downstream Public Water Supply Intake Stillwater Reservoir (Lackawanna River)         PAWC Forest City         3.8 (using default LFY)	Wastewater Descrip	ption: Sewage Effluent			
NHD Com ID         65628989         RMI         5.92           Drainage Area         0.45 mi²         Yield (cfs/mi²)         0.1           Q7-10 Flow (cfs)         0.045         Q7-10 Basis         Default LFY           Elevation (ft)         1976         Slope (ft/ft)         0.016           Watershed No.         5-A         Chapter 93 Class.         CWF/MF           Existing Use         -         Existing Use Qualifier         -           Exceptions to Use         -         Exceptions to Criteria         -           Assessment Status         Impaired         Cause Unknown & Thermal Modification           Source(s) of Impairment         Natural Sources (both)         Name Lackawanna River Watershed           Background/Ambient Data pH (SU)         -         -         -           Temperature (°F)         -         -         -           Hardness (mg/L)         -         -         -           Other:         -         -         -           Nearest Downstream Public Water Supply Intake Stillwater Reservoir (Lackawanna River)         PAWC Forest City         3.8 (using default LFY)					
Drainage Area         0.45 mi²         Yield (cfs/mi²)         0.1           Q7-10 Flow (cfs)         0.045         Q7-10 Basis         Default LFY           Elevation (ft)         1976         Slope (ft/ft)         0.016           Watershed No.         5-A         Chapter 93 Class.         CWF/MF           Existing Use         -         Existing Use Qualifier         -           Exceptions to Use         -         Exceptions to Criteria         -           Assessment Status         Impaired         Cause Unknown & Thermal Modification           Source(s) of Impairment         Natural Sources (both)         Name Lackawanna River Watershed           Background/Ambient Data pH (SU)         -         -           Temperature (°F)         -         -           Hardness (mg/L)         -         -           Other:         -         -           Nearest Downstream Public Water Supply Intake Stillwater Reservoir (Lackawanna River)         Flow at Intake (cfs)         3.8 (using default LFY)	Receiving Waters	Fiddle Lake Creek (CWF)	Stream Code	28612	
Q7-10 Flow (cfs)         0.045         Q7-10 Basis         Default LFY           Elevation (ft)         1976         Slope (ft/ft)         0.016           Watershed No.         5-A         Chapter 93 Class.         CWF/MF           Existing Use         -         Existing Use Qualifier         -           Exceptions to Use         -         Exceptions to Criteria         -           Assessment Status         Impaired         Cause Unknown & Thermal Modification           Source(s) of Impairment         Natural Sources (both)         Name Lackawanna River Watershed           TMDL Status         Final         Name Lackawanna River Watershed           Background/Ambient Data pH (SU)         -         -           Temperature (°F)         -         -           Hardness (mg/L)         -         -           Other:         -         -           Nearest Downstream Public Water Supply Intake Stillwater Reservoir (Lackawanna River)         PAWC Forest City           Flow at Intake (cfs)         3.8 (using default LFY)	NHD Com ID	65628989	RMI	5.92	
Slope (ft/ft)   1976	Drainage Area	0.45 mi <sup>2</sup>	Yield (cfs/mi²)	0.1	
Watershed No. 5-A Chapter 93 Class. CWF/MF  Existing Use	Q <sub>7-10</sub> Flow (cfs)	0.045	Q <sub>7-10</sub> Basis	Default LFY	
Existing Use	Elevation (ft)	1976	Slope (ft/ft)	0.016	
Exceptions to Use Exceptions to Criteria	Watershed No.	5-A	Chapter 93 Class.	CWF/MF	
Assessment Status         Impaired           Cause(s) of Impairment         Cause Unknown & Thermal Modification           Source(s) of Impairment         Natural Sources (both)           TMDL Status         Final         Name Lackawanna River Watershed           Background/Ambient Data pH (SU)         -         -           Temperature (°F)         -         -           Hardness (mg/L)         -         -           Other:         -         -           Nearest Downstream Public Water Supply Intake Stillwater Reservoir (Lackawanna River)         PAWC Forest City           Flow at Intake (cfs)         3.8 (using default LFY)	Existing Use		Existing Use Qualifier		
Cause(s) of Impairment Source(s) of Impairment TMDL Status Final Name Lackawanna River Watershed  Background/Ambient Data pH (SU) Temperature (°F) Hardness (mg/L) Other:  Data Source  -  -  Hardness (mg/L) Other:  Name Lackawanna River Watershed  PAWC Forest City Stillwater Reservoir PWS Waters (Lackawanna River) Flow at Intake (cfs) 3.8 (using default LFY)	Exceptions to Use		Exceptions to Criteria		
Source(s) of Impairment TMDL Status Final Name Lackawanna River Watershed  Background/Ambient Data pH (SU) Temperature (°F) Hardness (mg/L) Other:  Data Source	Assessment Status	Impaired			
TMDL Status Final Name Lackawanna River Watershed  Background/Ambient Data  pH (SU)	Cause(s) of Impairr	ment Cause Unknown & Therm	nal Modification		
Background/Ambient Data  pH (SU)  - Temperature (°F)  Hardness (mg/L)  Other:  - Nearest Downstream Public Water Supply Intake Stillwater Reservoir PWS Waters  (Lackawanna River)  Data Source  -  PAWC Forest City  Flow at Intake (cfs)  3.8 (using default LFY)	Source(s) of Impair	ment Natural Sources (both)			
PH (SU)  Temperature (°F)  Hardness (mg/L)  Other:  -  Nearest Downstream Public Water Supply Intake Stillwater Reservoir  PWS Waters  (Lackawanna River)  Flow at Intake (cfs)  3.8 (using default LFY)	TMDL Status	Final	Name Lackawanna	a River Watershed	
PH (SU)  Temperature (°F)  Hardness (mg/L)  Other:  -  Nearest Downstream Public Water Supply Intake Stillwater Reservoir  PWS Waters  (Lackawanna River)  Flow at Intake (cfs)  3.8 (using default LFY)					
Temperature (°F)	Background/Ambie	nt Data	Data Source		
Hardness (mg/L)	pH (SU)	<u>-</u>	-		
Other:	Temperature (°F)	<u>-</u>			
Nearest Downstream Public Water Supply Intake Stillwater Reservoir PWS Waters (Lackawanna River)  PAWC Forest City Flow at Intake (cfs) 3.8 (using default LFY)	Hardness (mg/L)		-		
Stillwater Reservoir PWS Waters (Lackawanna River) Flow at Intake (cfs) 3.8 (using default LFY)	Other:	<u>-</u>	- -		
Stillwater Reservoir PWS Waters (Lackawanna River) Flow at Intake (cfs) 3.8 (using default LFY)					
PWS Waters (Lackawanna River) Flow at Intake (cfs) 3.8 (using default LFY)			PAWC Forest City		
			Flow at Intake (cfs)	3.8 (using default LEV)	
PWS RMI 38 63 Distance from Outfall (mi) ~8 75		38.63	Distance from Outfall (mi) ~8.75		

Treatment Facility Summary					
Treatment Facility Na	me: Fiddle Lake WWTP				
WQM Permit No.	Issuance Date				
5899402	12/13/1999				
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)	
Sewage	Secondary	Trickling Filter With Settling	Chlorination	0.012* (2020)	
Hydraulic Capacity	Organic Capacity			Biosolids	
(MGD)	(lbs/day)	Load Status	Biosolids Treatment	Use/Disposal	
0.035	73	Not Overloaded	Settled	Hauled	

Other Comments: \*Calculated from eDMRs.

Development of Effluent Limitations				
Outfall No.	001		Design Flow (MGD)	0.035
Latitude	41º 46' 48"		Longitude	-75° 31' 48"
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
	25.0	Average Monthly	133.102(a)(4)(i)	92a.47(a)(1)
CBOD₅	40.0	Average Weekly	133.102(a)(4)(ii)	92a.47(a)(2)
	50.0	IMAX	-	-
	30.0	Average Monthly	133.102(b)(1)	92a.47(a)(1)
Total Suspended	45.0	Average Weekly	133.102(b)(2)	92a.47(a)(2)
Solids	60.0	IMAX	-	-
pН	6.0 – 9.0 S.U.	Min – Max	133.102(c)	95.2(1)
Fecal Coliform	200 / 100 ml	Geo Mean	-	92a.47(a)(4)
(5/1 – 9/30)	1,000 / 100 ml	IMAX	-	92a.47(a)(4)
Fecal Coliform	2,000 / 100 ml	Geo Mean	-	92a.47(a)(5)
(10/1 – 4/30)	10,000 / 100 ml	IMAX	-	92a.47(a)(5)

#### **Water Quality-Based Limitations**

The following limitations were determined through water quality modeling (output files attached):

Parameter	Limit (mg/l)	SBC	Model
Ammonia-Nitrogen	3.45	Average Monthly	
(5/1 – 10/31)	6.9	IMAX	
Ammonia-Nitrogen	10.35	Average Monthly	2021 WQM 7.0 Modeling
(11/1 – 4/30)	20.7	IMAX	_
Total Residual Chlorine	0.13	Average Monthly	
Total Residual Chionne	0.42	IMAX	2021 TRC Calculation Spreadsheet

Comments: The Total Residual Chlorine limitations above will come into effect 4 years after the permit effective date. For the first year of permit coverage, the old technology-based 1.2 mg/L monthly average and 2.8 mg/L IMAX limitations are in effect. For the second, third and fourth years of permit coverage, the updated technology-based TRC limitations will be in effect (0.5 mg/L monthly average, 1.6 mg/L IMAX). The Ammonia-Nitrogen limitations will come into effect 4 years after the permit effective date.