

## Northeast Regional Office CLEAN WATER PROGRAM

Application Type Renewal NPDES PERMIT FACT SHEET Application No. PA0065013

Facility Type Industrial INDIVIDUAL INDUSTRIAL WASTE (IW) APS ID 547333

Major / Minor Minor AND IW STORMWATER Authorization ID 1167178

Applicant and Facility Information								
Applicant Name	Blythe Township Municipal Authority (MATB)	Facility Name	Silver Creek Water Filtration Plant (a.k.a. WTP)					
Applicant Address	375 Valley Street	Facility Address	Silver Creek Road (no address #)					
	New Philadelphia, PA 17959-1218	_	New Philadelphia, PA 17959					
Applicant Contact	Joseph Turnitza	Facility Contact	Michael Burda					
Applicant Phone	(570) 277-6921	Facility Phone	(570) 277-6921					
Client ID	83009	Site ID	652049					
SIC Code	4952	Municipality	Blythe Township					
SIC Description	Trans. & Utilities - Sewerage Systems	County	Schuylkill					
Date Application Rece	eived January 20, 2017	EPA Waived?	Yes					
Date Application Acce	epted March 3, 2017	If No, Reason	-					

#### **Summary of Review**

This is an 0.038 MGD NPDES Permit Renewal application for a Water Treatment (Filtration) Plant discharge to Silver Creek (CWF; Stream Code# 2367; impaired for siltation). NPDES Permit basis flow is being adjusted to 0.050 MGD due to increased monthly average flows per EDMR (confirmed as accurate by applicant).

#### Background:

- The WFP backwash cycle goes to a clarifier and then into Silver Creek. The wastewater is described as supernatant from the Clarifier/Thickener as a result of the filter and clarifier backwash and "filter to waste" cycles.
- Facility raw water comes from upstream Silver Creek Reservoir.
- The WTP process includes use of Soda Ash and Alum prior to filtration, with additional post-filtration potassium permanganate, chlorine (disinfection), and "Aqua Mag" (corrosion inhibitor) after filtration (i.e. should not be present in wastewater discharge per Line Drawing). TRC levels were non-detect in the wastewater discharge.
- Facility sludge (~30,000 gallons annually) is being sent to Moss Glen WFP drying beds.
- Previous NPDES Permit included DEP TBELs for aluminum, iron, and manganese.
- The application indicated average flow during production at 0.02 MGD with maximum flow of 0.03 MGD, but EDMR data shows extended period of greater wastewater discharges (monthly average flows ~0.050 MGD range; Daily Max flows of 0.072 MGD. This permit will use 0.050 MGD monthly average flows to determine permit limits unless they provide other information.

#### Part C Special Conditions:

 Part C.I.A through D: Updated Standard IW conditions (Necessary property rights; Residuals Management: Relationship to WQMs; ELG/BAT).

Approve	Deny	Signatures	Date
х		James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	June 30, 2020
х		Amy M Bellanca (signed) Amy M. Bellanca, P.E. / Environmental Engineer Manager	7-16-20

#### **Summary of Review**

- Part C.I.E: New Chlorine minimization condition (other usages, not used for wastewater disinfection)
- Part C.I.F: Existing Stream/Discharge change condition
- Part C.II: Toxics WQBEL Conditions (Aluminum, Copper, Lead, and Zinc)
- <u>Part C.III</u>: New Chemical Additive conditions to address potential use of chemical additives in the wastewater portion of the treatment plant only. Process water chemicals are excluded from definition.

#### 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)	.038				
Latitude 40° 44' 45.	84"	Longitude	-76º 8' 2.86"				
Quad Name Pottsville	9	Quad Code	1336				
Wastewater Description:	Water Treatment Effluent						
Receiving Waters Silv	er Creek	Stream Code	2367				
	91122	RMI	1.5400				
-	7 square miles	Yield (cfs/mi²)	0.1329				
	oquaro milioo		LFY Method using Schuylkill River at point of				
Q <sub>7-10</sub> Flow (cfs) 0.23	302	Q <sub>7-10</sub> Basis	confluence.				
` '	290	Slope (ft/ft)	-				
Watershed No. 3-A		Chanter 93 Class	CWF, MF				
Eviating Llas		Evicting Lies Ouglifier	-				
Exceptions to Use -		Exceptions to Criteria	-				
Assessment Status	Impaired						
Cause(s) of Impairment	Siltation						
Source(s) of Impairment	Abandoned Mine Drainag	e					
TMDL Status	Final	Name Upper Schu	ylkill River				
Background/Ambient Da	t <u>a</u>	Data Source					
	00/1	NPDES Renewal Application (2/28/2017 sample) at location					
Hardness (mg/L)	_20 mg/l	upstream of Outfall No. 001. 12/6/2006 Silver Creek Reser	voir sampling (Sample ID:				
		1194666, Sequence Number:					
	4.0 (0000)	92724.	00 0 N I 40				
pH (SU) with 3.9 alkalinit	4.6 (2006) y 5.6 (2015)	9/26/2015: Sample ID: 19922 Monitoring Point ID: 92724	82; Sequence Number: 13;				
pri (CC) mai olo allalina		5/16/2020 Application Update (raw and discharge sampling					
		results), 4/8/2020 "Silver Cree					
		reservoir sampling). NOTE: E Drainage "seep" (Sampling po					
		Creek Reservoir & Outfall, Re					
A1 / "	4=0	representative of ambient con	ditions at Outfall in terms of				
Aluminum (ug/l)	150	cumulative AMD metals impa	cts.				
Manganese (ug/l)	-	-					
Total Iron (ug/l)	<20	See above					
Total Copper (ug/l)	7	See above					
Total Lead (ug/l)	<1	See above					
Total Zinc (ug/l)		See above					
Nearest Downstream Pu	blic Water Supply Intake	PA AMER GLEN ALSACE EX County)	(ETER WATER SYS (Berks				

Changes Since Last Permit Issuance:

- WTP and Outfall coordinates updated in 2017 NPDES Permit Application. Outfall is downstream of the Blythe Municipal Authority Surface Water Intake (ID# 102016-001) on the Silver Creek Reservoir.
- Facility discharge volumes have increased to require a 0.050 MGD NPDES Permit Basis flow.

#### Other Comments:

#### Upstream:

- Big Creek (CWF; Stream Code# 2374; with orphan mine discharges Brockton Mine "strip pool overflow") can flow into the Silver Creek reservoir (C1 Dam No. 54-023 with PWS Surface Water Withdrawal No. 102016-004).
- The <u>upstream</u> Silver Creek reaches (headwaters to Silver Creek Reservoir upstream of Intake) are Natural Trout Reproduction per E-maps.

#### Schuylkill River and TMDL Considerations:

- Silver Creek flows into the Schuylkill River at New Philadelphia. The (~2.4 miles) downstream Schuylkill River (CWF; Stream Code# 833) is a Natural Trout Reproduction stream, <u>impaired</u> life due to Urban Runoff/Storm Sewers (flow variability), Road runoff, channelization (other habitat changes) AMD siltation, <u>AMD metals</u>, pathogens (source unknown), and is subject to the Schuylkill River PCB TMDL and the 3/28/2007 Upper Schuylkill River (AMD metals).
- The March 28, 2007 Upper Schuylkill River TMDL (AMD) did not assign WLAs to this facility (or other Water Treatment Plants). The Schuylkill River is affected by pollution from AMD. This pollution has caused high levels of metals in the Schuylkill River. The TMDL sampling data for Schuylkill River in New Philadelphia (Sample Point SRNP) indicates that existing loads exceed the allowable loading for Total Iron and Manganese. Total Aluminum loading were not determined (either above or below the confluence) but available sampling data indicates <500 ug/l (i.e. there remains some assimilative capacity for Aluminum). Additional AMD metal loadings are directly adding to the stream impairment. The applicable TMDL WQS are:</p>

TMDL Parameter	Water Quality Criterion (mg/l)	Recoverable/Dissolved
Aluminum (AI)	0.75	Total Recoverable
Iron (Fe)	1.50	30-day average; Total
Manganese (Mn)	1.00	Total Recoverable
pH*	6.0-9.0	NA

<sup>\*</sup>The pH values shown will be used when applicable. In the case of freestone streams with little or no buffering capacity, the TMDL endpoint for pH will be the natural background water quality. These values are typically as low as 5.4 (Pennsylvania Fish and Boat Commission).

g Annual ow (MGD)
0.050
iosolids /Disposal
NA
3i

<u>Changes Since Last Permit Issuance</u>: Increase from 0.038 MGD to 0.050 MGD effluent discharge rates over extended period per EDMR.

### Other Comments:

- This WTP takes in 538,000 gallons of water and produces 500,000 gallons of potable water for public use.
- No chemical additives are presently in use.
- Chemical feed area drain, floor drains, sinks and toilet water go to 2,500 gallon Holding Tank onsite.

### **Compliance History**

### DMR Data for Outfall 001 (from May 1, 2019 to April 30, 2020)

Parameter	APR-20	MAR-20	FEB-20	JAN-20	DEC-19	NOV-19	OCT-19	SEP-19	AUG-19	JUL-19	JUN-19	MAY-19
Flow (MGD)												
Average Monthly	0.024	0.024	0.027	0.029	0.03	0.037	0.004	0.024	0.023	0.028	0.025	0.031
Flow (MGD)												
Daily Maximum	0.035	0.036	0.061	0.038	0.039	0.34	0.037	0.057	0.036	0.038	0.037	0.078
pH (S.U.)	5.0	<b>5</b> 0	0.4	0.4	0.4	0.0	0.0	0.4	0.4	0.4	0.4	0.0
Minimum	5.9	5.8	6.1	6.1	6.1	6.0	6.0	6.1	6.1	6.1	6.1	6.2
pH (S.U.) Maximum	6.1	6.3	6.2	6.2	6.3	6.2	6.2	6.3	6.3	6.3	6.2	6.4
TRC (mg/L)	0.1	0.3	0.2	0.2	0.3	0.2	0.2	0.3	0.3	0.3	0.2	0.4
Average Monthly	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
TRC (mg/L)	7 0.01	V 0.01	V 0.01	7 0.01	V 0.01	7 0.01	7 0.01	V 0.01	7 0.01	V 0.01	V 0.01	V 0.01
Daily Maximum	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	0.01	< 0.01	< 0.01
TSS (mg/L)												
Average Monthly	< 0.01	8.5	5.3	2.0	4.3	5.0	4.0	4.5	6.3	2.0	28	< 0.01
TSS (mg/L)												
Daily Maximum	< 0.01	8.5	5.3	2.0	4.3	5.0	4.0	4.5	6.3	2.0	28	< 0.01
Total Aluminum												
(mg/L)												
Average Monthly	0.43	1.07	1.01	0.9	1.5	1.09	1.21	3.79	0.78	0.64	3.27	0.94
Total Aluminum												
(mg/L) Daily Maximum	0.43	1.07	1.01	0.9	1.5	1.09	1.21	3.79	0.78	0.64	5.66	0.94
Total Iron (mg/L)	0.43	1.07	1.01	0.9	1.5	1.09	1.21	3.79	0.76	0.04	3.00	0.94
Average Monthly	0.06	0.09	0.08	0.07	0.12	0.58	0.71	2.7	0.81	0.16	0.61	0.14
Total Iron (mg/L)	0.00	0.00	0.00	0.0.	0112	0.00	011 1		0.0.	51.15	0.0.	0111
Daily Maximum	0.06	0.09	0.08	0.07	0.12	0.58	0.71	2.7	0.81	0.16	0.61	0.14
Total Manganese												
(mg/L)												
Average Monthly	0.029	0.035	0.037	0.036	0.032	0.038	0.043	0.085	0.051	0.035	0.042	0.064
Total Manganese												
(mg/L)	0.005						0.040		0.054		0.040	
Daily Maximum	0.029	0.035	0.037	0.036	0.032	0.038	0.043	0.085	0.051	0.035	0.042	0.064

**DMR Data for Outfall 001 (from May 1, 2018 to April 30, 2019)** 

Parameter	APR-19	MAR-19	FEB-19	JAN-19	DEC-18	NOV-18	OCT-18	SEP-18	AUG-18	JUL-18	JUN-18	MAY-18
Flow (MGD)												
Average Monthly	0.024	0.042	0.038	0.038	0.038	0.042	0.043	0.044	0.050	0.036	0.028	0.030
Flow (MGD)												
Daily Maximum	0.065	0.065	0.050	0.047	0.045	0.047	0.047	0.072	0.075	0.070	0.047	0.047
pH (S.U.)												
Minimum	6.2	7.0	6.0	6.0	6.0	6.0	6.6	6.6	6.6	6.6	6.5	6.6
pH (S.U.)												
Maximum	6.6	7.2	6.0	6.1	6.3	6.3	6.7	6.7	6.7	6.6	6.6	6.7
TRC (mg/L)												
Average Monthly	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	> 0.01	< 0.01	< 0.01
TRC (mg/L)												
Daily Maximum	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	> 0.01	< 0.01	< 0.01
TSS (mg/L)												
Average Monthly	< 0.01	2.7	< 0.01	< 0.01	10.3	10.0	17	4.7	3.7	6.5	17.2	12.8
TSS (mg/L)												
Daily Maximum	< 0.01	2.7	< 0.01	< 0.01	10.3	10.0	17	4.7	3.7	6.5	17.2	12.8
Total Aluminum												
(mg/L)							_					
Average Monthly	0.55	0.93	0.50	0.08	1.31	1.32	2.05	0.45	0.42	1.73	4.97	2.05
Total Aluminum												
(mg/L)												
Daily Maximum	0.55	0.93	0.50	0.08	1.31	1.32	2.05	0.45	0.42	1.73	4.97	2.05
Total Iron (mg/L)												
Average Monthly	0.02	0.05	0.06	0.05	0.32	0.42	1.26	1.0	0.50	0.308	0.646	0.206
Total Iron (mg/L)												
Daily Maximum	0.02	0.05	0.06	0.05	0.32	0.42	1.26	1.0	0.50	0.308	0.646	0.206
Total Manganese												
(mg/L)	0.000	0.000	0.004	0.000	0.000	0.007	0.004	0.075	0.044	0.0004	0.005-	0.0000
Average Monthly	0.028	0.032	0.034	0.030	0.030	0.027	0.031	0.075	0.041	0.0331	0.0357	0.0326
Total Manganese												
(mg/L)	0.000	0.000	0.004	0.000	0.000	0.007	0.004	0.075	0.044	0.0004	0.0057	0.0000
Daily Maximum	0.028	0.032	0.034	0.030	0.030	0.027	0.031	0.075	0.041	0.0331	0.0357	0.0326

### DMR Data for Outfall 001 (from March 1, 2016 to February 28, 2017)

Parameter	FEB-17	JAN-17	DEC-16	NOV-16	OCT-16	SEP-16	AUG-16	JUL-16	JUN-16	MAY-16	APR-16	MAR-16
Flow (MGD)												
Daily Maximum	0.045	0.044	0.047	0.042	0.044	0.044	0.044	0.050	0.049	0.045	0.047	0.048
Flow (MGD)												
Daily Maximum	0.045	0.044	0.047	0.042	0.044	0.044	0.044	0.050	0.049	0.045	0.047	0.048

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pH (S.U.)												
Minimum	6.5	6.4	6.4	6.4	6.4	6.3	6.3	6.3	6.3	6.3	6.3	6.2
pH (S.U.)												
Maximum	6.6	6.6	6.5	6.5	6.7	6.4	6.5	6.4	6.4	6.5	6.4	6.3
TRC (mg/L)												
Average Monthly	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
TRC (mg/L)												
Daily Maximum	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01	< 0.01
TSS (mg/L)												
Average Monthly	5.0	< 0.01	4.0	3.5	3.5	6.5	3.0	< 0.01	< 0.01	5.5	10.0	6.5
TSS (mg/L)												
Daily Maximum	5.0	< 0.01	4.0	3.5	3.5	6.5	3.0	< 0.01	< 0.01	5.5	10.0	6.5
Total Aluminum												
(mg/L)												
Average Monthly	0.508	0.222	0.554	0.373	0.438	0.217	< 0.01	< 0.01	< 0.01	0.639	1.11	1.3
Total Aluminum												
(mg/L)	. =		1		0.400		0.04	0.04	0.04			
Daily Maximum	0.508	0.222	0.554	0.373	0.438	0.217	< 0.01	< 0.01	< 0.01	0.639	1.11	1.3
Total Iron (mg/L) Average Monthly	< 0.01	< 0.01	< 0.01	< 0.01	0.203	0.339	0.558	< 0.01	< 0.01	< 0.01	< 0.01	< 1.00
Total Iron (mg/L)	V 0.01	V 0.01	V 0.01	V 0.01	0.200	0.000	0.000	V 0.01	V 0.01	V 0.01	V 0.01	V 1.00
Daily Maximum	< 0.01	< 0.01	< 0.01	< 0.01	0.203	0.339	0.558	< 0.01	< 0.01	< 0.01	< 0.01	< 1.00
Total Manganese												
(mg/L)												
Average Monthly	0.0316	0.0289	0.0214	0.0221	0.0280	0.0382	0.0614	0.0316	0.0289	0.0458	0.0306	0.0319
Total Manganese												
(mg/L)												
Daily Maximum	0.0316	0.0289	0.0214	0.0221	0.0280	0.0382	0.0614	0.0316	0.0289	0.0458	0.0306	0.0319

### **Compliance History**

Effluent Violations for Outfall 001, from: June 1, 2018 To: April 30, 2020

Parameter	Date	SBC	DMR Value	Units	Limit V
Total Aluminum	06/30/18	Avg Mo	4.97	mg/L	4.0
Total Iron	09/30/19	Avg Mo	2.7	mg/L	2.0

#### **Summary of Inspections:**

SITE NAME	INSP PROGRAM	INSP ID	INSPECTED DATE	INSP TYPE	INSPECTION RESULT DESC
BLYTHE TWP MUNI AUTH SILVER CREEK WTP	WPCNP	2817649	11/14/2018	Compliance Evaluation	No Violations Noted
BLYTHE TWP MUNI AUTH SILVER CREEK WTP	WPCNP	2473252	02/23/2016	Compliance Evaluation	Viol(s) Noted & Immediately Corrected

### Other Comments:

Application was early (due July 4, 2017). Therefore, the permit was administratively extended past current expiration date of December 31, 2017.

Development of Effluent Limitations							
Outfall No.	001	Design Flow (MGD)	.050				
Latitude	40° 44′ 46.78″	Longitude	-76º 8' 2.63"				
Wastewater I	Description: Water Treatment Effluent	<del>-</del>					

### Permit Limits and/or Monitoring (Changes bolded): UPDATE TO SITE-SPECIFIC Limits.

Parameter	Limit	SBC	Model/Basis
	(mg/l unless		
	otherwise		
	specified)		
TSS	Report (lb/d)	Daily Max	Existing Technology limit per 10/1/97 DEP
	30.0	Monthly Average	Policy ID# 362-2183-003 (Technology-based
	60.0	Daily Max	control requirements for water treatment plant
	75.0	IMAX	wastes) for filter backwash plants.
			Application data: 22 mg/l max value with 4.19
			mg/l LTA value (24 samples).
pН	5.5 – 9.0 SU	Inst. Min - Max	Existing limits. The previous NPDES Permit
			allowed for 5.5 SU pH (Chapter 95.2 option
			when source stream has a very low pH. See
			2015 sampling data. The Authority did not
			provide any stream pH data.
			Application data: 6.1 – 6.4 SU (24 samples)
Total Iron	Report (lb/d)	Monthly Average	Existing Technology limit (2.0 mg/l
(final limits effective in	Report	Monthly Average	monthly average; 4.0 mg/l daily max, with
fourth year)	1.500	Daily Max	new 4.0 mg/I IMAX) Interim Limits to be
	1.500	IMAX	superseded by Final permit limits based
			on TMDL water quality considerations
			(downstream Schuylkill River has zero
			assimilative capacity). IMAX limit is added
			and set to daily max level to ensure EDMR
			reporting of violations. Mass reporting
			added to allow for updating of TMDL in
			future.
			Application data: 1.805 mg/l max and 0.27
			mg/l average (24 samples). See table below
Tatal Manager	D (U. / -1)	Manual In Account	for 4 additional sample data, plus EDMR.
Total Manganese	Report (lb/d)	Monthly Average	Existing Technology limit (1.0 mg/l
(final limits effective in	Report	Monthly Average	monthly average; 2.0 mg/l daily max; new
fourth year)	1.0 <b>1.0</b>	Daily Max IMAX	2.0 mg/l IMAX limit) Interim Limits to be superseded by Final Permit limits based
	1.0	IIVIAA	on TMDL water quality considerations
			(downstream Schuylkill River has zero
			assimilative capacity). IMAX limit is added
			and set to daily max level to ensure EDMR
			reporting of violations. Mass reporting
			added to allow for updating of TMDL in
			future.
			Application data: 0.171 mg/l max and 0.0408
			mg/l average (24 samples). See EDMR for
			additional sampling data.
Total Aluminum	Report (lb/d)	Daily Max	Existing Technology limit (4.0 mg/l
(final limits effective in	0.750	Monthly Average	monthly average; 8.0 mg/l daily max; new
fourth year)	1.500	Daily Max	8.0 mg/l IMAX) Interim Limits to be
	1.500	IMAX	superseded by Final Permit limits based
_			on TMDL water quality considerations

Total Residual Chlorine	0.5 <b>0</b> 1.0 <b>0</b> 1.35	Average Monthly Daily Max IMAX	(downstream Schuylkill River has some assimilative capacity, resulting in use of daily max multiplier). Facility uses alum as a water treatment chemical IMAX limit is added and set to daily max level to ensure EDMR reporting of violations. Mass reporting added to allow for updating of TMDL in future.  Application data: 1.51 mg/l max and 0.48 mg/l average (24 samples). See table below for 4 additional sample data, plus EDMR.  Existing limits retained, except for IMAX value added (TRC Spreadsheet water quality IMAX limit) and significant zero.
			Application data: 0.01 mg/l max and 0.02 mg/l average (24 samples). See EDMR for additional sample data.
Total Dissolved Solids	Report (lb/d) Report Report	Monthly Average Monthly Average Daily Max	Monitoring per Chapter 92a.61 due to siltation impairments plus being a DRBC constituent of interest.  Application data: 21.1 max and 20.23 mg/l average (3 samples)
Total Cadmium (final limits effective in fourth year)	Report (lb/d) 0.0002 0.0004 0.0006	Monthly Average Monthly Average Daily Max IMAX	Interim monitoring, with final limits effective in fourth year. See Reasonable Potential Analysis.  Application data: 0.78 ug/l max, 0.387 ug/l average (3 samples). Four later samples were ND above DEP Target QL (0.0002 mg/l).
Total Copper (final limits effective in fourth year)	Report (lb/d) 0.005 0.009 0.014	Monthly Average Monthly Average Daily Max IMAX	Interim monitoring, with final limits effective in fourth year. See Reasonable Potential Analysis.  Application data: 35.3 ug/l max, 13.13 ug/l average (3 samples). Four later samples ranged from 8 to 17 ug/l.
Total Lead (final limits effective in fourth year)	Report (lb/d) 0.0011 0.0017 0.0028	Monthly Average Monthly Average Daily Max IMAX	Interim monitoring, with final limits effective in fourth year. See Reasonable Potential Analysis. Application data: 1.9 ug/l max, 1.18 ug/l average (3 samples). Four later samples ranged from 1 to 4 ug/l.
Total Zinc (final limits effective in fourth year)	Report (lb/d) 0.061 0.095 0.153	Monthly Average Monthly Average Daily Max IMAX	Interim monitoring, with final limits effective in fourth year. See Reasonable Potential Analysis.  Application data: 31.1 ug/l max, 17.4 ug/l average (3 samples). Four later samples ranged from 15 – 22 ug/l.
Nutrients: Total Nitrogen Nitrate-Nitrite as N Total Kjehldahl Nitrogen Total Phosphorus	-	-	Available nutrient data indicates no need for monitoring.  TKN: <0.500 mg/l (3 samples)  Nitrate-Nitrite-N: <0.04 mg/l (3 samples)  Total Phosphorus: <0.05 mg/l (3 samples)
Chlorides, Sulfates	-	-	Not needed per Reasonable Potential Analysis.

#### Comments:

**Monitoring Requirements**: Updated to meet current EDMR/ICIS reporting requirements.

• Due to variability of effluent quality and TMDL considerations, flow-proportional 24-hour composite sampling is being required to avoid potential biasing.

- Monitoring frequencies have been updated to reflect minimum WTP sampling frequencies for this size of facility, except for toxics (upon permit limit effective date).
- Mass loading reporting is being required. No additional sampling is required.
- Due to potential for exceedances, weekly monitoring is required for toxics (including Aluminum, and Total Iron).

Reasonable Potential Analysis: See Toxic Screening Spreadsheet and PENTOXSD water quality modeling output. The water quality modeling has been updated (0.277 mg/l LTA discharge Total hardness; site-specific upstream 20 mg/l hardness data; change in outfall location; increased NPDES permit basis flow due to increased site discharges; raw Silver Creek sampling data below). Additional sampling data was received (see below).

<u>TMDL Considerations</u>: Due to zero assimilative capacity (and no TMDL Waste Load Allocations), Total Iron and Manganese limits have been set to Water Quality Criterion for daily max and IMAX. Due to limited assimilative capacity (<500 ug/l insensitive NDs used in TMDL), the Total Aluminum monthly average limit has been set to the water quality criterion with a daily max multiplier used for the Daily Max and IMAX.

#### Additional Authority provided sampling data:

- Cadmium: The Authority did not supply additional sampling data meeting the DEP Target QL.
- <u>pH</u>: The Authority did not supply stream data to support a Chapter 95.2 request for lower pH Instantaneous Minimum limit.
- Raw Water Sampling: Silver Creek Raw sampling location not identified. (Because of Mine Drainage "seep"
  (Name: SC-BH) between Silver Creek Reservoir & Outfall, Reservoir data is not completely representative of
  ambient conditions at Outfall in that higher metal loadings might be present at the outfall location.)

Constituent	4/8/2020 Silver Creek Raw Sampling (ug/l)	RL (ug/l)	DEP Target QL (ug/I)
Aluminum	150	20	10
Cadmium	ND (<1.0)	1.0	0.2
Copper	7	1	4.0
Total Iron	ND (<20)	20	20
Lead	ND (<1)	1	1.0
Zinc	12	5	5.0

Constituent	3/12/2020 Effluent Sampling (ug/l)	3/19/2020 Effluent Sampling (ug/)	3/24/2020 Effluent Sampling (ug/l)	4/3/2020 Effluent Sampling (ug/l)	RL (ug/l)	DEP Target QL (ug/l)	Original Application Sampling Max Value (ug/l)	WQBEL (ug/l)
Aluminum	820	730	540	400	20	10	1510	750 (TMDL WQC)
Cadmium	ND (<1.0)	ND (<1.0)	ND (<1.0)	ND (<1.0)	1.0	0.2	0.78	
Copper	17	11	15	8	1	4.0	35.3	
Total Iron	80	90	110	69	20	20	1805	1500 (TMDL WQC)
Lead	4	2	3	1	1	1.0	1.9	,
Zinc	20	15	22	19	5	5.0	31.1	

Facility: Blythe MA Silver Creek WTP

Analysis Hardness (mg/L): 15.041
Stream Flow, Q<sub>7-10</sub> (cfs): 0.2302

NPDES Permit No.: PA0065013

Outfall: 001

Analysis pH (SU): 7

Parameter		Maximum Concentration in Application or DMRs (µg/L)		Candidate for PENTOXSD Modeling?	Most Stringent WQBEL (µg/L)	Screening Recommendation
Total Dissolved Solids		21100	500000	No		
Chloride		1500	250000	No		
Bromide	<	15	N/A	No		
Sulfate		5700	250000	No		
Fluoride		58	2000	No		
Total Aluminum		4970	750	Yes	750	Establish Limits
Total Antimony	<	0.48	5.6	No (Value < QL)		
Total Arsenic		1.7	10	No		
Total Barium		8.4	2400	No		
Total Beryllium		0.16	N/A	No		
Total Boron	<	8.3	1600	No (Value < QL)		
Total Cadmium		0.78	0.066	Yes	0.264	Establish Limits
Total Chromium	<	0.59	N/A	No		
Hexavalent Chromium	<	0.015	10.4	No (Value < QL)		
Total Cobalt		0.62	19	No		
Total Copper		35.3	1.9	Yes	55.989	Establish Limits
Total Cyanide	<	5	N/A	No		
Total Iron		1260	1500	Yes	1500	Establish Limits
Dissolved Iron	<	33.7	300	No		
Total Lead		4	0.3	Yes	1.135	Establish Limits
Total Manganese		75	1000	No	1000	
Total Mercury	<	0.05	0.05	No (Value < QL)		
Total Molybdenum	<	0.23	N/A	No		
Total Nickel		1.8	10.5	No		
Total Phenols (Phenolics)	<	15	5	Yes		
Total Selenium	<	0.44	5.0	No (Value < QL)		
Total Silver	<	0.12	0.2	No (Value < QL)		
Total Thallium	<	0.16	0.24	No (Value < QL)	24.254	
Total Zinc		31.1	24.1	Yes	61.354	Establish Limits

