

| Application Type | Renewal |
|------------------|-----------|
| | Non- |
| Facility Type | Municipal |
| Major / Minor | Minor |

NPDES PERMIT FACT SHEET INDIVIDUAL SEWAGE

| Application No. | PA0081337 |
|------------------|-----------|
| APS ID | 328109 |
| Authorization ID | 1244563 |

Applicant and Facility Information

| Applicant Name | ATG Properties LLC | | Facility Name | Northwood Manor MHP |
|-------------------------|--------------------|----------|------------------|---------------------------|
| Applicant Address | PO Box 677 | | Facility Address | 1300 York Haven Road |
| | Morgantown, PA 195 | 43-0677 | | York Haven, PA 17370-9624 |
| Applicant Contact | Frank Perano | | Facility Contact | Steve Cawley |
| Applicant Phone | (610) 286-0490 | | Facility Phone | (610) 594-0101 |
| Client ID | 143577 | | Site ID | 271671 |
| Ch 94 Load Status | Not Overloaded | | Municipality | Newberry Township |
| Connection Status | | | County | York |
| Date Application Receiv | ved August 23, 2 | 2018 | EPA Waived? | Yes |
| Date Application Accep | ted September | 19, 2018 | If No, Reason | |
| | | | | |
| Purpose of Application | NPDES Rer | newal. | | |

Summary of Review

ATG Properties has applied to the Pennsylvania Department of Environmental Protection (DEP) for reissuance of its NPDES permit for the Northwood Manor MHP STP. The permit was last reissued on February 27, 2014 and became effective on April 1, 2014. The permit expired on March 31, 2019 but the terms and conditions of the permit have been administratively extended since that time.

Based on the review outlined in this fact sheet, it is recommended that the permit be drafted, and a notice of the draft permit be published in the *Pennsylvania Bulletin* for public comments for 30 days. A file review of documents associated with the discharge or permittee may be available at the PA DEP southcentral regional office (SCRO), 909 Elmerton Avenue, Harrisburg, PA 17110. To make an appointment for file reviews, contact the SCRO file review coordinator at 717.705.4700.

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.

| Approve | Deny | Signatures | Date |
|---------|------|---|-------------------|
| x | | Aaron Baar / Permits Section | November 15, 2019 |
| | | Daniel W. Martin, P.E. / Environmental Engineer Manager | |
| | | Maria D. Bebenek, P.E. / Program Manager | |

| Discharge, Receivi | ng Waters and Water Supply Inform | ation | |
|---|--|---|---|
| | 7' 17.21" | Design Flow (MGD) Longitude Quad Code | .019125 -76º 45' 30.85" 1831 |
| Receiving Waters NHD Com ID Drainage Area Q ₇₋₁₀ Flow (cfs) Elevation (ft) Watershed No. Existing Use Exceptions to Use Assessment Statu | 57463769 0.0358 0.00572 479.38 7-F | Stream Code RMI Yield (cfs/mi ²) Q ₇₋₁₀ Basis Slope (ft/ft) Chapter 93 Class. Existing Use Qualifier Exceptions to Criteria | 08450 0.25 0.15978 USGS StreamStats WWF |
| Cause(s) of Impai Source(s) of Impa TMDL Status | | Wrightsville Water Supply Cor | npany |
| PWS Waters PWS RMI | Susquehanna River 43.54 | Flow at Intake (cfs) Distance from Outfall (mi) | 21 |

Drainage Area

The discharge is to UNT to Conewago Creek at RMI 0.25. A drainage area upstream of the discharge point is determined to be 0.0358 sq.mi. according to USGS PA StreamStats available at https://streamstats.usgs.gov/ss/.

Stream Flow

According to StreamStats, this watershed has a Q_{7-10} of 0.00572 cfs and a drainage area of 0.0358 mi², which results in a LFY of 0.15978 cfs/mi².

UNT to Conewago Creek

25 Pa Code §93.9 classifies UNT to Conewago Creek as a WWF waterway. Effluent limits for this discharge have been developed to ensure that existing in-stream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. The discharge is in a stream segment listed as attaining uses. No local TMDL has been taken into consideration during this review.

Public Water Supply Intake

The nearest downstream public water supply intake is the Wrightsville Borough Municipal Authority intake located on the Susquehanna River approximately 21 miles from the discharge. Considering the distance and nature, the discharge is not expected to significantly affect the water supply.

Class A Wild Trout Streams

The receiving stream is not a Class A Wild Trout stream.

Treatment Facility Summary Treatment Facility Name: Northwood Manor MHP WQM Permit No. Issuance Date Degree of Avg Annual Flow (MGD) Waste Type Treatment Process Type Disinfection Secondary With Ammonia Reduction **Extended** Aeration **Hypochlorite** 0.0191 Sewage Hydraulic Capacity **Organic Capacity Biosolids Biosolids Treatment** Use/Disposal (MGD) (lbs/day) Load Status 0.0191 Not Overloaded Other WWTP

ATG Properties, LLC owns and operates the Northwood Manor MHP sanitary wastewater treatment facility located in Newberry Township, York County. The facility serves only the Northwood Manor MHP, all wastes are residential in nature, and all sewer systems are 100% separated. Having an annual average design flow of 0.019125 MGD and a hydraulic design capacity of 0.019125 MGD, this facility consists of a comminutor, an EQ tank, two aeration tanks, one secondary clarifier, two sand filters, a chlorinator, a chlorine contact tank/aeration tank, a dichlorination tank and the outfall (i.e., Outfall 001). Sodium hypochlorite (disinfection), sodium bisulfite (dichlorination) and sodium carbonate (alkalinity amendment) are all utilized at the facility. Solids are stored onsite in a sludge holding tank before being hauled offsite for disposal.

| | Compliance History | | | | | |
|-------------------------|--|--|--|--|--|--|
| Summary of DMRs: | A summary of past DMR data is presented on the next page. | | | | | |
| Summary of Inspections: | Since the last NPDES permit renewal on February 27, 2014, there are records in the Department's File Room that the facility has been inspected two times. The notes from the inspections are as follows: 3/31/2014: Austin Pardoe, DEP Water Quality Specialist, conducted a routine inspection. Numerous operational issues were identified at the time of inspection. 5/3/2016: Austin Pardoe, DEP Water Quality Specialist, conducted a routine inspection; there was no discharge from the plant at the time of the inspection. | | | | | |

Other Comments: A file review revealed that there is no Clean Water open violation associated with this facility.

Compliance History

DMR Data for Outfall 001 (from October 1, 2018 to September 30, 2019)

| Flow (MGD) Average Monthly 0.0037 0.0041 0.0044 0.005 0.0173 0.0058 0.0141 0.0088 0.0102 0.0102 0.0147 Flow (MGD) Daily Maximum 0.0093 0.0055 0.0097 0.0091 0.0915 0.0234 0.0724 0.0259 0.0382 0.042 0.0414 pH (S.U.) Minimum 7.3 7.53 7.0 7.5 7.2 6.9 7.3 7.6 7.4 7.3 7.5 pH (S.U.) Maximum 8.6 8.4 8.5 8.3 8.5 8.3 8.5 8.3 8.5 8.3 8.5 8.3 8.5 8.3 8.5 8.3 8.5 8.3 8.6 8.6 8.5 9.7 7.5 8.93 8.09 8.89 6.71 6.97 TRC (mg/L) Average Monthly < 0.017 < 0.020 < 0.015<<<0.010 <0.016 <0.010 <0.010 <0.010 <0.010 <0.010 <0.010 <0.010 <0.010 <0.010 <0.010 <0.010 <0.010 < | 0.0061 0.0102 7.9 8.4 7.91 < 0.010 |
|---|---|
| Flow (MGD) Daily Maximum 0.0093 0.0055 0.0097 0.0091 0.0915 0.0234 0.0724 0.0259 0.0382 0.042 0.0414 pH (S.U.) Minimum 7.3 7.53 7.0 7.5 7.2 6.9 7.3 7.6 7.4 7.3 7.5 pH (S.U.) Maximum 8.6 8.4 8.5 8.3 8.5 8.6 8.5 9.7 7.5 8.93 8.09 8.89 6.71 6.97 TRC (mg/L) Instantaneous Maximum 0.040 0.050 0.040 0.050 | 0.0102 7.9 8.4 7.91 |
| Daily Maximum 0.0093 0.0055 0.0097 0.0091 0.0915 0.0234 0.0724 0.0259 0.0382 0.042 0.0414 pH (S.U.) Minimum 7.3 7.53 7.0 7.5 7.2 6.9 7.3 7.6 7.4 7.3 7.5 pH (S.U.) Maximum 8.6 8.4 8.5 8.3 8.5 8.6 8.5 9.7 7.5 8.93 8.09 8.89 6.71 6.97 TRC (mg/L) Average Monthly < 0.017 <td>7.9 8.4 7.91</td> | 7.9 8.4 7.91 |
| pH (S.U.) Minimum 7.3 7.53 7.0 7.5 7.2 6.9 7.3 7.6 7.4 7.3 7.5 pH (S.U.) Maximum 8.6 8.4 8.5 8.3 8.5 8.5 8.7 6.97 7.5 8.93 8.09 8.89 6.71 6.97 TRC (mg/L) Average Monthly < 0.017 < 0.020 < 0.015 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 <th< td=""><td>7.9 8.4 7.91</td></th<> | 7.9 8.4 7.91 |
| Minimum 7.3 7.53 7.0 7.5 7.2 6.9 7.3 7.6 7.4 7.3 7.5 pH (S.U.) Maximum 8.6 8.4 8.5 8.3 8.5 8.5 7.5 7.5 8.93 8.09 8.89 6.71 6.97 TRC (mg/L) Instantaneous Maximum 0.040 0.050 0.010 < 0.010 | 8.4 7.91 |
| pH (S.U.) Maximum 8.6 8.4 8.5 8.3 8.5 8.3 8.5 8.3 8.2 8.6 8.5 DO (mg/L) Minimum 5.92 6.68 2.76 5.67 7.97 7.5 8.93 8.09 8.89 6.71 6.97 TRC (mg/L) Average Monthly < 0.017 | 8.4 7.91 |
| Maximum 8.6 8.4 8.5 8.3 8.5 8.3 8.5 8.3 8.2 8.6 8.5 DO (mg/L) Minimum 5.92 6.68 2.76 5.67 7.97 7.5 8.93 8.09 8.89 6.71 6.97 TRC (mg/L) Average Monthly < 0.017 | 7.91 |
| DO (mg/L) Minimum 5.92 6.68 2.76 5.67 7.97 7.5 8.93 8.09 8.89 6.71 6.97 TRC (mg/L) Average Monthly < 0.017 | 7.91 |
| Minimum 5.92 6.68 2.76 5.67 7.97 7.5 8.93 8.09 8.89 6.71 6.97 TRC (mg/L) < 0.017 | |
| TRC (mg/L) Average Monthly < 0.017 < 0.020 < 0.015 < 0.010 < 0.016 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0. | |
| Average Monthly < 0.017 < 0.020 < 0.015 < 0.010 < 0.016 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.010 < 0.020 < 0.030 < 0.020 < 0.030 < 0.020 < 0.030 < 0.020 < 0.030 < 0.020 < 0.030 < 0.020 < 0.030 < 0.020 < 0.030 < 0.020 < 0.030 < 0.020 < 0.030 < 0.020 < 0.030 < 0.020 | < 0.010 |
| TRC (mg/L) Instantaneous Maximum 0.040 0.050 0.040 0.030 0.040 0.050 0.040 0.020 0.010 0.020 0.030 CBOD5 (mg/L) Average Monthly < 2 | < 0.010 |
| Instantaneous 0.040 0.050 0.040 0.030 0.040 0.050 0.040 0.020 0.010 0.020 0.030 Maximum 0.040 0.050 0.040 0.050 0.040 0.050 0.030 0.020 0.010 0.020 0.030 CBOD5 (mg/L) Average Monthly < 2 | |
| Maximum 0.040 0.050 0.040 0.030 0.040 0.050 0.030 0.020 0.010 0.020 0.030 CBOD5 (mg/L) Average Monthly < 2 | |
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| Average Monthly < 2 < 2.0 < 2.3 < 3.8 < 2 < 2.1 < 9 < 2.2 < 2.6 < 3.1 < 2.4 | 0.020 |
| | |
| CBOD5 (mg/L) | < 2.1 |
| | |
| Instantaneous | |
| Maximum < 2 < 2.0 2.5 5.5 2 2.2 20.8 2.3 3.4 5.8 2.9 | 2.2 |
| TSS (mg/L) | _ |
| Average Monthly < 4 < 4 < 4.1 < 4 < 6.1 < 4 < 4.1 < 4 | < 5 |
| TSS (mg/L) | |
| Instantaneous | 6 |
| Maximum < 4 < 4 4.5 < 4 4.4 < 4 10.8 < 4 < 4 4.4 < 4 Fecal Coliform | 0 |
| (CFU/100 ml) | |
| Geometric Mean <1 50 137 <10 <2 <1 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 <1 <2 | 37 |
| Geometric mean < 1 50 157 < 10 < 2 < 1 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 < 2 < 1 | |
| (CFU/100 ml) | |
| | |
| Maximum 2 108 20000 100 11 1 2 <1 4 7 10 | 196 |
| Maximum 2 100 20000 100 11 2 <1 4 7 10 Ammonia (mg/L) | 100 |
| Average Monthly < 0.1 < 1.24 < 0.1 < 0.17 < 0.1 < 1.64 < 0.1 < 0.43 < 1.65 < 1.1 | < 0.1 |
| Ammonia (mg/L) Control Contro Control Contron Control Control Control Contron Control Control | |
| | |
| Maximum < 0.1 < 0.1 3.11 < 0.1 0.32 0.2 5.11 < 0.1 1.09 8.96 3.98 | |

Compliance History

Effluent Violations for Outfall 001, from: November 1, 2018 To: September 30, 2019

| Parameter | Date | SBC DMR Value Units | | Limit Value | Units | |
|----------------|----------|---------------------|---------|-------------|-------|------------|
| DO | 07/31/19 | Min | 2.76 | mg/L | 5.0 | mg/L |
| TRC | 08/31/19 | Avg Mo | < 0.020 | mg/L | 0.017 | mg/L |
| Fecal Coliform | 07/31/19 | IMAX | 20000 | CFU/100 ml | 1000 | CFU/100 ml |
| Ammonia | 07/31/19 | IMAX | 3.11 | mg/L | 3.0 | mg/L |

Other Comments: It is this reviewer's understanding that the violations listed above are operational in nature and not a reflection of the treatment capabilities of the existing treatment plant. A file review revealed that there is no Clean Water open violation associated with this facility.

Existing Effluent Limitations and Monitoring Requirements

| | | | Effluent L | imitations. | | | Monitoring Re | quirements |
|---|--------------------|--------------------------|-----------------|--------------------|-------------|---------------------|--------------------------|-------------------|
| Parameter | Mass Units | (lbs/day) ⁽¹⁾ | | Concentrat | ions (mg/L) | | Minimum ⁽²⁾ | Required |
| Falameter | Average Monthly | Average Weekly | Minimum | Average Monthly | Maximum | Instant. Maximum | Measurement Frequency | Sample Type |
| | | Report | | | | | | |
| Flow (MGD) | Report | Daily Max | XXX | XXX | XXX | XXX | Continuous | Measured |
| pH (S.U.) | xxx | xxx | 6.0 Inst Min | xxx | xxx | 9.0 | 1/day | Grab |
| DO | ххх | xxx | 5.0 Inst Min | xxx | xxx | XXX | 1/day | Grab |
| TRC | ХХХ | XXX | XXX | 0.017 | XXX | 0.054 | 1/day | Grab |
| CBOD5 | | | | | | | | 8-Hr |
| Nov 1 - Apr 30 | XXX | XXX | XXX | 20.0 | XXX | 40 | 2/month | Composite |
| CBOD5 | | | | | | | | 8-Hr |
| May 1 - Oct 31 | XXX | XXX | XXX | 10.0 | XXX | 20 | 2/month | Composite |
| TSS | xxx | xxx | xxx | 20.0 | xxx | 40 | 2/month | 8-Hr Composite |
| Fecal Coliform (No./100 ml) Oct 1 - Apr 30 | XXX | XXX | XXX | 2000 Geo Mean | XXX | 10000 | 2/month | Grab |
| Fecal Coliform (No./100 ml) | | | | 200 | | | | |
| May 1 - Sep 30 | XXX | XXX | XXX | Geo Mean | XXX | 1000 | 2/month | Grab |
| Ammonia | | | | | | | | 8-Hr |
| Nov 1 - Apr 30 | XXX | XXX | XXX | 4.5 | XXX | 9 | 2/month | Composite |
| Ammonia | | | | | | | | 8-Hr |
| May 1 - Oct 31 | XXX | XXX | XXX | 1.5 | XXX | 3 | 2/month | Composite |

Development of Effluent Limitations

| Outfall No. | 001 | | Design Flow (MGD) | .019125 |
|--------------|---------------|-----------------|-------------------|-----------------|
| Latitude | 40º 7' 18.91" | | Longitude | -76º 45' 31.01" |
| Wastewater D | escription: | Sewage Effluent | | |

Technology-Based Limitations

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

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

Comments: These standards apply, subject to water quality analysis and BPJ where applicable.

Water Quality-Based Limitations

CBOD5, NH3-N and Dissolved Oxygen (DO)

WQM 7.0 version 1.0b is a water quality model designed to assist DEP to determine appropriate permit requirements for CBOD5, NH3-N and DO. DEP's guidance 391-2000-007 provides the technical methods contained in WQM 7.0 for conducting wasteload allocation and for determining recommended NPDES effluent limits for point source discharges.

The model output indicated that existing summer WQBEL of 10 mg/L for CBOD5 is still appropriate. The output also indicated that the existing summer WQBEL of 1.5 mg/L for NH3-N is still protective of water quality.

The monitoring frequency and sample type for NH3-N, CBOD5 and DO are proposed to remain unchanged.

Total Residual Chlorine

Since chlorine is used for disinfection, Total Residual Chlorine (TRC) effluent levels must be regulated in accordance with 25 Pa Code §92a.48(b). DEP's TRC_CALC worksheet is utilized to determine if the existing BAT TBEL is still appropriate. The worksheet indicates that existing limits of 0.017 mg/L (average monthly) and 0.054 mg/L (IMAX) are no longer protective of water quality. New limits of 0.012 mg/L (average monthly) and 0.038 mg/L (IMAX) are proposed in this amendment. Given that the average monthly TRC limit is decreasing by only 0.0056 mg/L and the instantaneous maximum TRC limit is decreasing by only 0.016 mg/L, the existing dechlorination system should be able to achieve the proposed new TRC limits with a minor feed adjustment.

Toxics

DEP's NPDES permit application for minor sewages (less than 1.0 MGD) does not require sampling for heavy metals including Total Copper, Total Lead, and Total Zinc.

Best Professional Judgment (BPJ) Limitations

Dissolved Oxygen

A minimum of 5.0 mg/L for DO is an existing effluent limit and will remain unchanged in the draft permit as recommended by DEP's SOP. This requirement has also been assigned to other sewage facilities in the region. 5.0 mg/L is taken directly from 25 Pa. Code § 93.7(a) and it is also determined to be appropriate according to water quality modeling.

Total Phosphorus & Total Nitrogen

DEP's SOP no. BPNPSM-PMT-033 recommends monitoring requirements for Total Phosphorus and Total Nitrogen for all sewage facilities. Therefore, a routine monitoring for TKN, Nitrate-Nitrite, Total Nitrogen and Total Phosphorus is recommended to be introduced into this permit renewal.

Additional Considerations

Flow Monitoring

The requirement to monitor the volume of effluent will remain in the draft permit per 40 CFR § 122.44(i)(1)(ii).

Chesapeake Bay TMDL

The Department formulated a strategy in April 2007, to comply with the EPA's and Chesapeake Bay Foundation's requirements to reduce point source loadings of Total Nitrogen (TN) and Total Phosphorus (TP) to the Bay. In the Strategy, sewage dischargers have been prioritized by Central Office based on their delivered TN loadings to the Bay. The highest priority (Phases 1, 2, and 3) dischargers received annual loading caps based on their design flow on August 29, 2005 and concentrations of 6 mg/l TN and 0.8 mg/l TP. Phase 4 (0.2 -0.4mgd) and Phase 5 (below 0.2mdg) facilities were required to monitor and report TN and TP during permit renewal at a monitoring frequency following Table 6-3 of DEP's Technical Guidance for Development and Specification of effluent Limitations (No. 362-0400-001).

EPA published the Chesapeake Bay Total Maximum Daily Load (TMDL) in December of 2010. Despite extensive restoration efforts during the past 25 years, the TMDL was prompted by insufficient progress and continued poor water quality in the Chesapeake Bay and its tidal tributaries.

In order to address the TMDL, Pennsylvania developed, in addition to the Bay Strategy, a Chesapeake Watershed Implementation Plan (WIP) Phase 1 in January 2011 and Phase 2 in March 2012. In accordance with the Phase 2 WIP and its supplement, re-issuing permits for significant dischargers follow the same phased approach formulated in the original Bay strategy, whilst Phase 4 and Phase 5 will be required to monitor and report TN and TP during permit renewal.

The Phase 2 WIP categorizes this facility as a phase 5 non-significant sewage facility that has a design flow less than 0.2 MGD but greater than 0.002 MGD. The WIP recommends monitoring and reporting for Total Nitrogen and Total Phosphorus throughout the permit term at a frequency no less than annual. The monitoring of these pollutants once every six months will be written in the permit in conformity with other permits issued in the region.

Monitoring Frequency and Sample Type

The facility currently is required to collect 8-hr composite effluent samples of non-Bay parameters twice a month, which is consistent with DEP Guidance 362-0400-001 (Table 6-3).

Antidegradation Requirements

All effluent limitations and monitoring requirements have been developed to ensure that existing instream water uses and the level of water quality necessary to protect the existing uses are maintained and protected.

Anti-backsliding Requirement

All effluent limits proposed in this fact sheet are as stringent as effluent limits specified in the existing permit renewal. This approach is in accordance with 40 CFR §122.44(I(1).

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (362-0400-001), SOPs and/or BPJ.

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

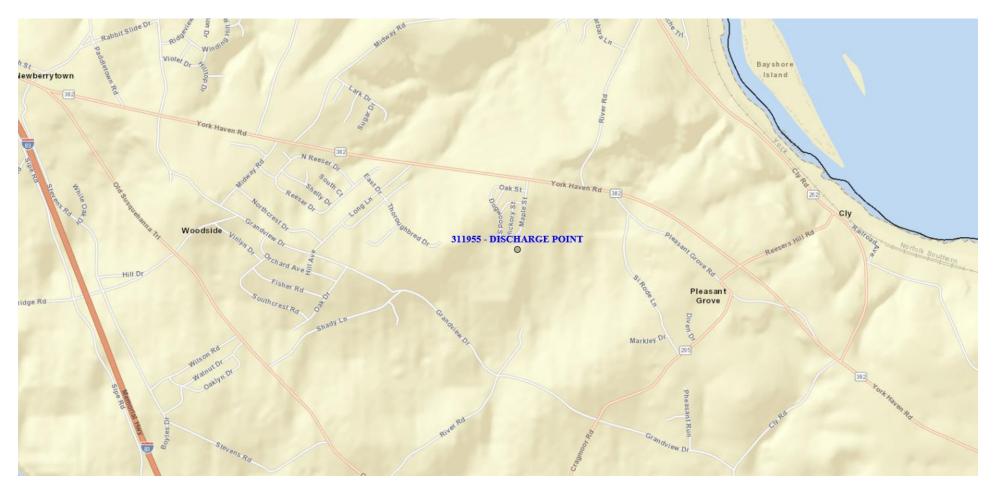
| | | | Effluent L | imitations. | | | Monitoring Re | quirements |
|---|--------------------|----------------------------|-----------------------|---------------------|---------|---------------------|--------------------------|-------------------|
| Parameter | Mass Units | s (lbs/day) ⁽¹⁾ | Concentrations (mg/L) | | | | Minimum ⁽²⁾ | Required |
| | Average Monthly | Average Weekly | Minimum | Average Monthly | Maximum | Instant. Maximum | Measurement Frequency | Sample Type |
| Flow (MGD) | Report | Report Daily Max | XXX | xxx | xxx | xxx | Continuous | Measured |
| pH (S.U.) | xxx | xxx | 6.0 Inst Min | XXX | XXX | 9.0 | 1/day | Grab |
| DO | ххх | XXX | 5.0 Inst Min | xxx | xxx | ххх | 1/day | Grab |
| TRC | ХХХ | xxx | XXX | 0.012 | XXX | 0.038 | 1/day | Grab |
| CBOD5 Nov 1 - Apr 30 | xxx | XXX | XXX | 20.0 | xxx | 40 | 2/month | 8-Hr Composite |
| CBOD5 May 1 - Oct 31 | ххх | xxx | XXX | 10.0 | XXX | 20 | 2/month | 8-Hr Composite |
| TSS | ххх | xxx | XXX | 20.0 | XXX | 40 | 2/month | 8-Hr Composite |
| Fecal Coliform (No./100 ml) Oct 1 - Apr 30 | ххх | xxx | XXX | 2000 Geo Mean | xxx | 10000 | 2/month | Grab |
| Fecal Coliform (No./100 ml) May 1 - Sep 30 | XXX | XXX | XXX | 200 Geo Mean | XXX | 1000 | 2/month | Grab |
| Nitrate-Nitrite | XXX | Report Daily Max | XXX | Report Daily Max | XXX | XXX | 1/6 months | 8-Hr Composite |
| Total Nitrogen | XXX | Report Daily Max | XXX | XXX | XXX | XXX | 1/6 months | Calculation |
| Ammonia Nov 1 - Apr 30 | ххх | xxx | XXX | 4.5 | xxx | 9 | 2/month | 8-Hr Composite |
| Ammonia May 1 - Oct 31 | ХХХ | xxx | XXX | 1.5 | XXX | 3 | 2/month | 8-Hr Composite |

Outfall 001, Continued (from Permit Effective Date through Permit Expiration Date)

| Parameter | Effluent Limitations | | | | | | Monitoring Requirements | |
|------------------|-------------------------------------|-------------------|-----------------------|--------------------|---------|---------------------|--------------------------|----------------|
| | Mass Units (Ibs/day) ⁽¹⁾ | | Concentrations (mg/L) | | | | Minimum ⁽²⁾ | Required |
| | Average Monthly | Average Weekly | Minimum | Average Monthly | Maximum | Instant. Maximum | Measurement Frequency | Sample Type |
| | | Report | | Report | | | | 8-Hr |
| TKN | XXX | Daily Max | XXX | Daily Max | XXX | XXX | 1/6 months | Composite |
| | | Report | | Report | | | | 8-Hr |
| Total Phosphorus | XXX | Daily Max | XXX | Daily Max | XXX | XXX | 1/6 months | Composite |

Compliance Sampling Location: Outfall 001

Permit No. PA0081337



| | WQM for Windows Model (see Attachment) |
|-----------|--|
| | PENTOXSD for Windows Model (see Attachment) |
| | TRC Model Spreadsheet (see Attachment) |
| | Temperature Model Spreadsheet (see Attachment) |
| | Toxics Screening Analysis Spreadsheet (see Attachment) |
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| | Pennsylvania CSO Policy, 385-2000-011, 9/08. |
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| | Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997. |
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| | Implementation Guidance for Temperature Criteria, 391-2000-017, 4/09. |
| | Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 391-2000-018, 10/97. |
| | Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 391-2000-019, 10/97. |
| | Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 391-2000-021, 3/99. |
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| | SOP: |
| | Other: |