

# Southcentral Regional Office CLEAN WATER PROGRAM

NPDES: PA0082147 WQM:3686420

Application Type Renewal

Facility Type

Non-Municipal NPDES PERMIT FACT SHEET **INDIVIDUAL SEWAGE** 

Application No.

**T3** 

APS ID

1030471

Major / Minor	<u>Minor</u>			Authorization ID 1339699			
Applicant and Facility Information							
Applicant Name	Graystone Comm	unity LLC	Facility Name	Holtwood MHP			
Applicant Address	PO Box 358 1069 I	ron Bridge Road	Facility Address	1971 Holtwood Road			
	Mount Joy, PA 175	52-0358	<u>_</u>	Holtwood, PA 17532-9733			
Applicant Contact	Timothy Kreider		Facility Contact	Timothy Kreider			
Applicant Phone	(717) 406-3925		Facility Phone	(717) 406-3925			
Client ID	360479		Site ID	238555			
Ch 94 Load Status	Not Overloaded		Municipality	Martic Township			
Connection Status	No Limitations		County	Lancaster			
Date Application Rece	eived January 1	9, 2021	EPA Waived?	Yes			
Date Application Acce	pted January 2	2, 2021	If No, Reason				
Purpose of Application	n This is an	application for a transf	er and NPDES renewal.				

Summary of Review	

Approve	Deny	Signatures	Date
Х		Nicholas Hong, P.E. / Environmental Engineer  Nick Hong (via electronic signature)	January 22, 2021
Х		Daniel W. Martin, P.E. / Environmental Engineer Manager  Daniel W. Martin	January 23, 2021

# **Summary of Review**

The application submitted by the applicant requests a NPDES renewal permit for the Holtwood MHP located at 1971 Holtwood Road, Holtwood, PA in Lancaster County, municipality of Martic Township. The existing permit became effective on March 1, 2014 and expired on February 28, 2019. The application for renewal was received by DEP Southcentral Regional Office (SCRO) on August 31, 2018. The corresponding WQM to this NPDES is 368420-T3.

The purpose of this Fact Sheet is to present the basis of information used for establishing the proposed NPDES permit effluent limitations. The Fact Sheet includes a description of the facility, a description of the facility's receiving waters, a description of the facility's receiving waters attainment/non-attainment assessment status, and a description of any changes to the proposed monitoring/sampling frequency. Section 6 provides the justification for the proposed NPDES effluent limits derived from technology based effluent limits (TBEL), water quality based effluent limits (WQBEL), total maximum daily loading (TMDL), antidegradation, anti-backsliding, and/or whole effluent toxicity (WET). A brief summary of the outlined descriptions has been included in the Summary of Review section.

The subject facility is a 0.015 MGD hydraulic design flow treatment facility. The applicant does not anticipate any proposed upgrades to the treatment facility in the next five years. The NPDES application has been processed as a Minor Sewage Facility (Level 1) due to the type of sewage and the design flow rate for the facility. The applicant disclosed the Act 14 requirement to Lancaster County Commissioners and Martic Township Supervisors and the notice was received by the parties on August 24, 2018 and August 28, 2018. A planning approval letter was not necessary as the facility is neither new or expanding.

Utilizing the DEP's web-based Emap-PA/StreamStats information system, the receiving waters has been determined to be an UNT to Susquehanna River. Since the receiving waters is a small stream, it does not appear on Emap. However, it does appear on StreamStats The Susquehanna River is approximately 0.5 miles from the facility. The receiving water information was based upon the Susquehanna River.

The sequence of receiving streams that the UNT to Susquehanna River discharges into are the Susquehanna River which eventually drains into the Chesapeake Bay. The subject site is subject to the Chesapeake Bay implementation requirements. The receiving water has protected water usage for warm water fishes (WWF) and migratory fishes (MF). No Class A Wild Trout fisheries are impacted by this discharge. The absence of high quality and/or exceptional value surface waters removes the need for an additional evaluation of anti-degradation requirements.

The Susquehanna River is a Category 2 and 5 stream listed in the 2020 Integrated List of All Waters (formerly 303d Listed Streams). The receiving stream is attaining and supports recreational purposes. This stream is also an impaired stream for fish consumption due to polychlorinated biphenyls from an unknown source. The receiving waters is not subject to a total maximum daily load (TMDL) plan to improve water quality in the subject facility's watershed.

The existing permit and proposed permit differ as follows:

There are no changes to the monitoring frequency or effluent limits.

The proposed permit will expire five (5) years from the effective date.

Based on the review in this report, it is recommended that the permit be drafted. 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.

Any additional information or public review of documents associated with the discharge or facility may be available at PA DEP Southcentral Regional Office (SCRO), 909 Elmerton Avenue, Harrisburg, PA 17110. To make an appointment for file review, contact the SCRO File Review Coordinator at 717.705.4700.

# 1.0 Applicant

# 1.1 General Information

This fact sheet summarizes PA Department of Environmental Protection's review for the NPDES renewal for the following subject facility.

Facility Name: Holtwood MHP

NPDES Permit # PA0082147

Physical Address: 1971 Holtwood Road

Holtwood, PA

Mailing Address: PO Box 506; 1069 Iron Bridge Road

Mount Joy, PA 17522-0358

Contact: Tim Kreider

Owner / Operator

Tim.kreider@waterqualitypa.com

717.406.3925 717.808.7021 Cell

Consultant: Terrence Kline (tkline@klineengineeringpc.com)

Kline Engineering 449 Cameron Street Marysville, PA 17020

# 1.2 Permit History

Description of Facility

The receiving stream originates from a farm pond and an adjacent spring house. Evidence of a high groundwater table and testimony from local residents indicated that the stream was perennial. The stream was observed to be a few inches deep and one to two feet wide. In 1985, before the discharge existed there were numerous planarians and about 50 feet downstream the aquatic community changed to numerous caddis larvae. No other specimens were noticed when turning rocks. The stream bed changed from a yellowish brown sediment deposit (resembling iron deposits) to (within 100 to 200 feet) a sandy, rocky typical mountain stream appearance. The stream's steep slope indicates fast recovery capabilities with a high reaeration rate. The geology in the area was of the schist formation type.

On April 7, 1993, the site was reinspected after the plant had been in operation for several years. The conditions were generally the same as those which existed pre-discharge except that 50 feet below the outfall only a few caddis larvae were found in addition to some midges and one stone fly. Upstream the stream still contained only planarians with midges and snails.

In August 1996, an aquatic survey was conducted on this stream to document months of inadequate treatment due to poor operation. The survey observed that about 200 feet of stream was covered with sewage sludge. Aquatic life was smothered. Enforcement actions and new operators brought the treatment plant back to acceptable operations by the summer of 1997.

In March 2003, an aquatic survey was conducted to follow-up on the findings of the 1996 survey. The survey showed that the stream was free of sludge and appeared to be normal but the aquatic life was lacking or non-existent. Possible causes were thought to be the extremely dry summer of 2002 or possible chlorine impacts.

(History abstracted from Fact Sheet dated for November 27, 2013)

# 2.0 Treatment Facility Summary

# 2.1.1 Site location

The physical address for the facility is 1971 Holtwood Road, Holtwood, PA.

A topographical and an aerial photograph of the facility are depicted as Figure 1 and Figure 2.

Figure 1: Topographical map of the subject facility

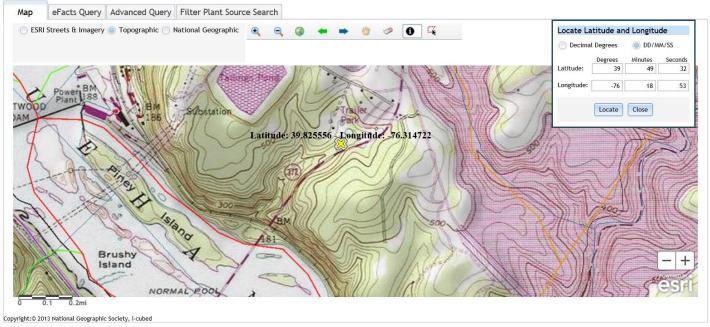
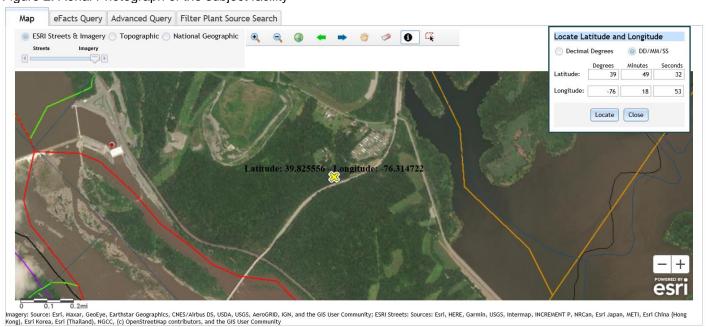


Figure 2: Aerial Photograph of the subject facility



# 2.1.2 Sources of Wastewater/Stormwater

Wastewater is generated from the mobile home park. No industrial/commercial contributions are suspected.

# 2.2 Description of Wastewater Treatment Process

The subject facility is a 0.015 MGD hydraulic design flow facility. The subject facility treats wastewater using a grease trap, a comminutor, an equalization tank, an aeration tank, a clarifier, a chlorine contact tank for disinfection prior to discharge through the outfall. The facility is being evaluated for flow, pH, dissolved oxygen, TRC, CBOD5, TSS, fecal coliform, nitrogen species, and phosphorus. The existing permits limits for the facility is summarized in Section 2.4.

The treatment process is summarized in the table.

	Tre	eatment Facility Summa	ry	
Treatment Facility Nar	me: Holtwood MHP			
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary	Activated Sludge	Hypochlorite	0.015
Hydraulic Capacity	Organic Capacity			Biosolids
(MGD)	(lbs/day)	Load Status	<b>Biosolids Treatment</b>	Use/Disposal
0.015		Not Overloaded		

# 2.3 Facility Outfall Information

The facility has the following outfall information for wastewater.

Outfall No.	_ 001	Design Flow (MGD)	.015
Latitude	39° 49' 32.00"	Longitude	-76º 18' 53.00"
Wastewater [	Description: Sewage Effluent		

# 2.3.1 Operational Considerations- Chemical Additives

Chemical additives are chemical products introduced into a waste stream that is used for cleaning, disinfecting, or maintenance and which may be detected in effluent discharged to waters of the Commonwealth. Chemicals excluded are those used for neutralization of waste streams, the production of goods, and treatment of wastewater.

The subject facility utilizes the following chemicals as part of their treatment process.

- Soda ash for pH control
- Aluminum sulfate for phosphorus reduction
- · Chlorine for disinfection

Type of Effluent:

# **2.4 Existing NPDES Permits Limits**

The existing NPDES permit limits are summarized in the table.

Sewage

# PART A - EFFLUENT LIMITATIONS, MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS I. A. For Outfall 001 , Latitude 39° 49′ 32″ , Longitude 76° 18′ 53″ , River Mile Index 0.79 , Stream Code 06685) Receiving Waters: UNT Susquehanna River

1. The permittee is authorized to discharge during the period from March 1, 2014 through February 28, 2019.

Based on the anticipated wastewater characteristics and flows described in the permit application and its supporting documents and/or amendments, the following effluent limitations and monitoring requirements apply (see also Additional Requirements and Footnotes).

			Effluent L	imitations			Monitoring Re	quirements
Parameter	Mass Units	(lbs/day) (1)		Concentrat	Minimum (2)	Required		
raianietei	Average Monthly	Total Annual	Minimum	Average Monthly		Instant. Maximum	Measurement Frequency	Sample Type
Flow (MGD)	Report	Report Daily Max	XXX	xxx	XXX	xxx	Continuous	Measured
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/day	Grab
Dissolved Oxygen	XXX	XXX	5.0	XXX	XXX	XXX	1/day	Grab
Total Residual Chlorine	XXX	XXX	XXX	0.21	XXX	0.69	1/day	Grab
CBOD5	XXX	XXX	XXX	25	XXX	50	2/month	8-Hr Composite
Total Suspended Solids	XXX	XXX	XXX	30	XXX	60	2/month	8-Hr Composite
Fecal Coliform (CFU/100 ml) May 1 - Sep 30	xxx	xxx	XXX	200 Geo Mean	XXX	1,000	2/month	Grab
Fecal Coliform (CFU/100 ml) Oct 1 - Apr 30	xxx	xxx	XXX	2,000 Geo Mean	XXX	10,000	2/month	Grab
Ammonia-Nitrogen May 1 - Oct 31	XXX	XXX	XXX	3.5	XXX	7.0	2/month	8-Hr Composite
Ammonia-Nitrogen Nov 1 - Apr 30	XXX	XXX	XXX	10.5	XXX	21	2/month	8-Hr Composite

### Outfall 001, Continued (from March 1, 2014 through February 28, 2019)

			Monitoring Requirements					
Parameter	Mass Units	s (lbs/day) (1)		Concentrat	ions (mg/L)		Minimum (2)	Required
Farameter	Average Monthly	Total Annual	Minimum	Average Monthly		Instant. Maximum	Measurement Frequency	Sample Type
Total Kieldahl Nitrogen (lbs/year)	XXX	Report	XXX	Report Appl Avg	XXX	XXX	1/year	8-Hr Composite
Nitrate-Nitrite as N (lbs/year)	XXX	Report	XXX	Report Appl Avg	XXX	XXX	1/year	8-Hr Composite
Total Nitrogen (lbs/year)	XXX	Report	XXX	Report Appl Avg	XXX	XXX	1/year	Calculation
Total Phosphorus	XXX	XXX	XXX	2.0	XXX	4.0	2/month	8-Hr Composite
Total Phosphorus	Report Total Mo	Report	XXX	XXX	XXX	XXX	2/month	Calculation

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

at discharge from facility

# 3.0 Facility NPDES Compliance History

# 3.1 Summary of Inspections

A summary of the most recent inspections during the existing permit review cycle is as follows.

The DEP inspector noted the following during the inspection.

# 02/16/2017:

• There was nothing significant to report.

# 03/06/2018:

• There was nothing significant to report.

# 3.2 Summary of DMR Data

A review of approximately 1-year of DMR data shows that the monthly average flow data for the facility at the design capacity of the treatment system. The maximum average flow data for the DMR reviewed was 0.005 MGD. The design capacity of the treatment system is 0.015 MGD.

The off-site laboratory used for the analysis of the parameters was ALS Environmental located at 34 Dogwood Lane, Middlletown, PA 17057.

# DMR Data for Outfall 001 (from December 1, 2019 to November 30, 2020)

Parameter	NOV-20	OCT-20	SEP-20	AUG-20	JUL-20	JUN-20	MAY-20	APR-20	MAR-20	FEB-20	JAN-20	DEC-19
Flow (MGD)												
Average Monthly	0.004	0.004	0.005	0.004	0.005	0.005	0.005	0.005	0.004	0.005	0.005	0.004
Flow (MGD)												
Daily Maximum	0.006	0.005	0.006	0.009	0.008	0.006	0.007	0.009	0.009	0.007	0.01	0.008
pH (S.U.)												
Minimum	7.0	7.2	7.7	7.6	7.5	7.4	7.3	7.0	7.1	7.2	6.9	6.9
pH (S.U.)												
Maximum	7.9	8.2	7.9	8.1	8.1	8.1	7.8	7.6	7.8	7.8	7.7	7.8
DO (mg/L)	0.4	0.4	0.0	7.0	7.4	0.4	0.7	0.4	40.4	40.0	0.7	0.4
Minimum	9.4	8.1	8.0	7.6	7.4	8.1	8.7	9.1	10.4	10.2	9.7	9.4
TRC (mg/L) Average Monthly	0.15	0.14	0.16	0.15	0.17	0.17	0.13	0.16	0.16	0.16	0.15	0.17
TRC (mg/L)	0.15	0.14	0.16	0.15	0.17	0.17	0.13	0.16	0.16	0.16	0.15	0.17
Instantaneous												
Maximum	0.29	0.26	0.25	0.21	0.40	0.25	0.20	0.26	0.21	0.24	0.20	0.24
CBOD5 (mg/L)	0.23	0.20	0.20	0.21	0.40	0.20	0.20	0.20	0.21	0.24	0.20	0.24
Average Monthly	< 2.0	< 2.5	< 2.5	3.4	2.5	< 2.0	3.3	3.3	3.4	< 2.5	4.5	3.1
TSS (mg/L)	12.0	12.0	12.0	<u> </u>		12.0	0.0	0.0	<u> </u>	12.0		<u> </u>
Average Monthly	< 5.0	< 5.0	< 5.0	< 5.5	< 5	< 5.0	< 5.5	< 5.0	< 5.0	< 5.0	< 5.0	< 5.5
Fecal Coliform												
(CFU/100 ml)												
Geometric Mean	< 1	5	< 1	< 1	4	< 1	< 1	< 1	< 1	< 1	1	< 2
Fecal Coliform												
(CFU/100 ml)												
Instantaneous			_	_	_	_	_	_		_	_	_
Maximum	1	13	< 1	2	4	< 1	1	1	< 1	< 1	2	3
Nitrate-Nitrite												
(lbs/year)												700
Total Annual Nitrate-Nitrite (mg/L)												< 730
Annual Average												< 53.1
Total Nitrogen												< 55.1
(lbs/year)												
Total Annual												< 730
Total Nitrogen (mg/L)												7.00
Annual Average												< 54.1
Ammonia (mg/L)												
Average Monthly	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1	< 0.1
TKN (lbs/year)												
Total Annual												< 15

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TKN (mg/L) Annual Average												< 1
Total Phosphorus												
(lbs/mo)												
Total Monthly	0.4	0.5	0.9	0.7	0.9	1	0.7	0.7	0.6	0.6	0.5	0.7
Total Phosphorus												
(mg/L)												
Average Monthly	0.4	0.6	0.8	0.8	0.9	1.0	0.7	0.7	0.5	0.5	0.5	0.7
Total Phosphorus (lbs)												
Total Annual												10

# 3.3 Non-Compliance

# 3.3.1 Non-Compliance- NPDES Effluent

A summary of the non-compliance to the permit limits for the existing permit cycle is as follows.

From the DMR data beginning in March 1, 2014 to January 11, 2021, there were no observed effluent non-compliances.

# 3.3.2 Non-Compliance- Enforcement Actions

A summary of the non-compliance enforcement actions for the current permit cycle is as follows:

Beginning on March 1, 2014 to January 11, 2021, there were no observed enforcement actions.

# 3.4 Summary of Biosolids Disposal

A summary of the biosolids disposed of from the facility is as follows.

	2020						
Sewage SI	Sewage Sludge / Biosolids Production Information						
	Hauled	Off-Site					
Date (YEAR)	Gallons	% Solids	Dry Tons				
January	0	0	0				
February	0	0	0				
March	6000	1.4	0.35				
April	0	0	0				
May	0	0	0				
June	3500	1.4	0.204				
July	0	0	0				
August	3500	1.4	0.204				
September	0	0	0				
October	0	0	0				
November	6000	1.4	0.35				
Notes:							
Sewage sludge/	biosolids dispos	sed at Manheim	Township				

Sewage sludge/biosolids disposed at Manheim Township WWTP, Lancaster, PA (PA20893) and at LASA, Lancaster, PA (PA42269)

# 3.5 Open Violations

No open violations existed as of January 2021.

# 4.0 Receiving Waters and Water Supply Information Detail Summary

# **4.1 Receiving Waters**

The sequence of receiving streams that the UNT to Susquehanna River discharges into are the Susquehanna River which eventually drains into the Chesapeake Bay.

# 4.2 Public Water Supply (PWS) Intake

The closest PWS to the subject facility is Peach Bottom Power Station (PWS ID #7670905) located approximately 7 miles downstream of the subject facility on the Susquehanna River. Based upon the distance and the flow rate of the facility, the PWS should not be impacted.

# 4.3 Class A Wild Trout Streams

Class A Wild Trout Streams are waters that support a population of naturally produced trout of sufficient size and abundance to support long-term and rewarding sport fishery. DEP classifies these waters as high-quality coldwater fisheries.

The information obtained from EMAP suggests that no Class A Wild Trout Fishery will be impacted by this discharge.

# 4.4 2020 Integrated List of All Waters (303d Listed Streams):

Section 303(d) of the Clean Water Act requires States to list all impaired surface waters not supporting uses even after appropriate and required water pollution control technologies have been applied. The 303(d) list includes the reason for impairment which may be one or more point sources (i.e. industrial or sewage discharges) or non-point sources (i.e. abandoned mine lands or agricultural runoff and the pollutant causing the impairment such as metals, pH, mercury or siltation).

States or the U.S. Environmental Protection Agency (EPA) must determine the conditions that would return the water to a condition that meets water quality standards. As a follow-up to listing, the state or EPA must develop a Total Maximum Daily Load (TMDL) for each waterbody on the list. A TMDL identifies allowable pollutant loads to a waterbody from both point and non-point sources that will prevent a violation of water quality standards. A TMDL also includes a margin of safety to ensure protection of the water.

The water quality status of Pennsylvania's waters uses a five-part categorization (lists) of waters per their attainment use status. The categories represent varying levels of attainment, ranging from Category 1, where all designated water uses are met to Category 5 where impairment by pollutants requires a TMDL for water quality protection.

The receiving waters is listed in the 2020 Pennsylvania Integrated Water Quality Monitoring and Assessment Report as a Category 2 and 5 and waterbody. The receiving stream is attaining and supports recreational purposes. This stream is also an impaired stream for fish consumption due to polychlorinated biphenyls from an unknown source. The designated use has been classified as protected waters for warm water fishes (WWF) and migratory fishes (MF).

# 4.5 Low Flow Stream Conditions

Water quality modeling estimates are based upon conservative data inputs. The data are typically estimated using either a stream gauge or through USGS web based StreamStats program. The NPDES effluent limits are based upon the combined flows from both the stream and the facility discharge.

A conservative approach to estimate the impact of the facility discharge using values which minimize the total combined volume of the stream and the facility discharge. The volumetric flow rate for the stream is based upon the seven-day, 10-year low flow (Q710) which is the lowest estimated flow rate of the stream during a 7 consecutive day period that occurs once in 10 -year time period. The facility discharge is based upon a known design capacity of the subject facility.

The closest WQN station to the subject facility is the Susquehanna River station at Marietta, PA (WQN201). This WQN station is located approximately 19 miles upstream of the subject facility.

The closest gauge station to the subject facility is the Susquehanna River station at Marietta, PA (USGS station number 1576000). This gauge station is located approximately 21 miles upstream of the subject facility.

For WQM modeling, default values for pH and stream water temperature data were used.

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The low flow yield and the Q710 for the subject facility was researched extensively in the November 27, 2013 Fact Sheet. StreamStats was run on the entire watershed of UNT Susquehanna Rive with a resulting low flow yield of 0.20 ft<sup>3</sup>/s/mi<sup>2</sup>.

The drainage area for the facility obtained from StreamStats in January 2021 was 0.14 mi<sup>2</sup>. This drainage area was very similar to the drainage area of 0.16 mi<sup>2</sup> used for the November 27, 2013 Fact Sheet. The previous drainage area of 0.16 mi<sup>2</sup> was used for modeling for consistency purposes. This give a Q710 of 0.032 ft<sup>3</sup>/s.

The Q110 of 0.64 ft<sup>3</sup>/s and Q3010 of 1.36 ft<sup>3</sup>/s were abstracted from the November 2013 Fact Sheet.

Summary of Disc	charge,	Receiving Waters and W	later Supply Information		
Outfall No. 001			Design Flow (MGD)	.015	
Latitude 39° 49' 49.56"  Quad Name		56"	Longitude	-76º 18' 25.32"	
		Quad Code			
Wastewater Descri	ption:	Sewage Effluent	-		
Description Waters	Model	du Dura (TCT)	Ctroom Code	Not evellable (to OCCOF)	
Receiving Waters NHD Com ID		dy Run (TSF) 0643	Stream Code RMI	Not available (to 06685) 0.52	
				•	
Drainage Area		(prior Fact Sheet)	Yield (cfs/mi²)	0.20	
Q <sub>7-10</sub> Flow (cfs)	0.032	<u>/</u>	Q <sub>7-10</sub> Basis	StreamStats	
Elevation (ft)	417		Slope (ft/ft)	\ADA/E / A 4E	
Watershed No.	7-K		Chapter 93 Class.	WWF/ MF	
Existing Use	Same	e as Chapter 93 class.	Existing Use Qualifier		
Exceptions to Use			Exceptions to Criteria		
Assessment Status		Not Assessed			
Cause(s) of Impair		Not applicable			
Source(s) of Impair	rment	Not applicable			
TMDL Status		Not applicable	Name		
Background/Ambie	ent Data		Data Source		
pH (SU)		7.0	Default value		
Temperature (°C)		25	Default value		
Hardness (mg/L)					
Other:					
Nearest Downstrea	am Publ	ic Water Supply Intake	Peach Bottom Power Station		
		hanna River	Flow at Intake (cfs)		
<del>-</del>	18.4		Distance from Outfall (mi)	7	

# 5.0: Overview of Presiding Water Quality Standards

# 5.1 General

There are at least six (6) different policies which determines the effluent performance limits for the NPDES permit. The policies are technology based effluent limits (TBEL), water quality based effluent limits (WQBEL), antidegradation, total maximum daily loading (TMDL), anti-backsliding, and whole effluent toxicity (WET) The effluent performance limitations enforced are the selected permit limits that is most protective to the designated use of the receiving waters. An overview of each of the policies that are applicable to the subject facility has been presented in Section 6.

# 5.2.1 Technology-Based Limitations

TBEL treatment requirements under section 301(b) of the Act represent the minimum level of control that must be imposed in a permit issued under section 402 of the Act (40 CFR 125.3). Available TBEL requirements for the state of Pennsylvania are itemized in PA Code 25, Chapter 92a.47.

The presiding sources for the basis for the effluent limitations are governed by either federal or state regulation. The reference sources for each of the parameters is itemized in the tables. The following technology-based limitations apply, subject to water quality analysis and best professional judgement (BPJ) where applicable:

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

# 5.3 Water Quality-Based Limitations

WQBEL are based on the need to attain or maintain the water quality criteria and to assure protection of designated and existing uses (PA Code 25, Chapter 92a.2). The subject facility that is typically enforced is the more stringent limit of either the TBEL or the WQBEL.

Determination of WQBEL is calculated by spreadsheet analysis or by a computer modeling program developed by DEP. DEP permit engineers utilize the following computing programs for WQBEL permit limitations: (1) MS Excel worksheet for Total Residual Chorine (TRC); (2) WQM 7.0 for Windows Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen Version 1.0 (WQM Model) and (3) PENTOXSD using DEP Toxics Management Spreadsheet for Toxics pollutants.

# 5.3.1 Water Quality Modeling 7.0

The WQM Model is a computer model that is used to determine NPDES discharge effluent limitations for Carbonaceous BOD (CBOD5), Ammonia Nitrogen (NH3-N), and Dissolved Oxygen (DO) for single and multiple point source discharges scenarios. WQM Model is a complete-mix model which means that the discharge flow and the stream flow are assumed to instantly and completely mixed at the discharge node.

WQM recommends effluent limits for DO, CBOD5, and NH<sub>3</sub>-N in mg/l for the discharge(s) in the simulation.

Four types of limits may be recommended. The limits are

- (a) a minimum concentration for DO in the discharge as 30-day average;
- (b) a 30-day average concentration for CBOD5 in the discharge;
- (c) a 30-day average concentration for the NH<sub>3</sub>-N in the discharge;
- (d) 24-hour average concentration for NH<sub>3</sub>-N in the discharge.

The WQM Model requires several input values for calculating output values. The source of data originates from either EMAP, the National Map, or Stream Stats. Data for stream gauge information, if any, was abstracted from USGS Low-Flow, Base-Flow, and Mean-Flow Regression Equations for Pennsylvania Streams authored by Marla H. Stuckey (Scientific Investigations Report 2006-5130).

The input values utilized for the modeling are summarized in the table which can be found in Attachment B.

The applicable WQM Effluent Limit Type are discussed in Section 6 under the corresponding parameter which is either DO, CBOD, or ammonia-nitrogen.

# 5.3.2 PENTOXSD Modeling

The facility is not subject to PENTOXSD.

# 5.3.3 Whole Effluent Toxicity (WET)

The facility is not subject to WET.

# 5.4 Total Maximum Daily Loading (TMDL)

# 5.4.1 TMDL

The goal of the Clean Water Act (CWA), which governs water pollution, is to ensure that all of the Nation's waters are clean and healthy enough to support aquatic life and recreation. To achieve this goal, the CWA created programs designed to regulate and reduce the amount of pollution entering United States waters. Section 303(d) of the CWA requires states to assess their waterbodies to identify those not meeting water quality standards. If a waterbody is not meeting standards, it is listed as impaired and reported to the U.S. Environmental Protection Agency. The state then develops a plan to clean up

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the impaired waterbody. This plan includes the development of a Total Maximum Daily Load (TMDL) for the pollutant(s) that were found to be the cause of the water quality violations. A Total Maximum Daily Load (TMDL) calculates the maximum amount of a specific pollutant that a waterbody can receive and still meet water quality standards.

Pennsylvania has committed to restoring all impaired waters by developing TMDLs and TMDL alternatives for all impaired waterbodies. The TMDL serves as the starting point or planning tool for restoring water quality.

# **5.4.1.1 Local TMDL**

The subject facility does not discharge into a local TMDL.

# 5.4.1.2 Chesapeake Bay TMDL Requirement

The Chesapeake Bay Watershed is a large ecosystem that encompasses approximately 64,000 square miles in Maryland, Delaware, Virginia, West Virginia, Pennsylvania, New York and the District of Columbia. An ecosystem is composed of interrelated parts that interact with each other to form a whole. All of the plants and animals in an ecosystem depend on each other in some way. Every living thing needs a healthy ecosystem to survive. Human activities affect the Chesapeake Bay ecosystem by adding pollution, using resources and changing the character of the land.

Most of the Chesapeake Bay and many of its tidal tributaries have been listed as impaired under Section 303(d) of the federal Water Pollution Control Act ("Clean Water Act"), 33 U.S.C. § 1313(d). While the Chesapeake Bay is outside the boundaries of Pennsylvania, more than half of the State lies within the watershed. Two major rivers in Pennsylvania are part of the Chesapeake Bay Watershed. They are (a) the Susquehanna River and (b) the Potomac River. These two rivers total 40 percent of the entire Chesapeake Bay watershed.

The overall management approach needed for reducing nitrogen, phosphorus and sediment are provided in the Bay TMDL document and the Phase I, II, and III WIPs which is described in the Bay TMDL document and Executive Order 13508.

The Bay TMDL is a comprehensive pollution reduction effort in the Chesapeake Bay watershed identifying the necessary pollution reductions of nitrogen, phosphorus and sediment across the seven Bay watershed jurisdictions of Delaware, Maryland, New York, Pennsylvania, Virginia, West Virginia and the District of Columbia to meet applicable water quality standards in the Bay and its tidal waters.

The Watershed Implementation Plans (WIPs) provides objectives for how the jurisdictions in partnership with federal and local governments will achieve the Bay TMDL's nutrient and sediment allocations.

Phase 3 WIP provides an update on Chesapeake Bay TMDL implementation activities for point sources and DEP's current implementation strategy for wastewater. The latest revision of the supplement was December 17, 2019.

The Chesapeake Bay TMDL (Appendix Q) categorizes point sources into four sectors:

- Sector A- significant sewage dischargers;
- Sector B- significant industrial waste (IW) dischargers;
- Sector C- non-significant dischargers (both sewage and IW facilities); and
- Sector D- combined sewer overflows (CSOs).

All sectors contain a listing of individual facilities with NPDES permits that were believed to be discharging at the time the TMDL was published (2010). All sectors with the exception of the non-significant dischargers have individual wasteload allocations (WLAs) for TN and TP assigned to specific facilities. Non-significant dischargers have a bulk or aggregate allocation for TN and TP based on the facilities in that sector that were believed to be discharging at that time and their estimated nutrient loads.

Based upon the supplement the subject facility has been categorized as a Sector C discharger. The supplement defines Sector C non-significant discharger that includes sewage facilities (Phase 4 facilities: ≥ 0.2 MGD and < 0.4 MGD and Phase 5 facilities: > 0.002 MGD and < 0.2 MGD), small flow/single residence sewage treatment facilities (≤ 0.002 MGD), and non-significant IW facilities, all of which may be covered by statewide General Permits or may have individual NPDES permits.

At this time, there are approximately 850 Phase 4 and 5 sewage facilities, approximately 715 small flow sewage treatment facilities covered by a statewide General Permit, and approximately 300 non-significant IW facilities

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For Phase 5 sewage facilities with individual permits (average annual design flow on August 29, 2005 > 0.002 MGD and < 0.2 MGD), DEP will issue individual permits with monitoring and reporting for TN and TP throughout the permit term at a frequency no less than annually, unless 1) the facility has already conducted at least two years of nutrient monitoring and 2) a summary of the monitoring results are included in the next permit's fact sheet. If, however, Phase 5 facilities choose to expand, the renewed or amended permits will contain Cap Loads based on the lesser of a) existing TN/TP concentrations at current design average annual flow or b) 7,306 lbs/yr TN and 974 lbs/yr TP.

If no data are available to determine existing concentrations for expanding Phase 4 or 5 facilities, default concentrations of 25 mg/l TN and 4 mg/l TP may be used (these are the average estimated concentrations of all non-significant sewage facilities).

DEP will not issue permits to existing Phase 4 and 5 facilities containing Cap Loads unless it is done on a broad scale or unless the facilities are expanding.

For new Phase 4 and 5 sewage discharges, in general DEP will issue new permits containing Cap Loads of "0" and new facilities will be expected to purchase credits and/or apply offsets to achieve compliance, with the exception of small flow and single residence facilities.

For the Chesapeake Bay wasteload implementation plan, this facility is subject to Sector C monitoring requirements. Monitoring for nitrogen shall be at least 1x/yr. Phosphorus monitoring was required in prior permits and shall continue due to anti-backsliding. With the required 2x/mo sampling, phosphorus will satisfy monitoring requirements for Chesapeake Bay.

# 5.5 Anti-Degradation Requirement

Chapter 93.4a of the PA regulations requires that surface water of the Commonwealth of Pennsylvania may not be degraded below levels that protect the existing uses. The regulations specifically state that *Existing instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected.* Antidegradation requirements are implemented through DEP's guidance manual entitled Water Quality Antidegradation Implementation Guidance (Document #391-0300-02).

The policy requires DEP to protect the existing uses of all surface waters and the existing quality of High Quality (HQ) and Exceptional Value (EV) Waters. Existing uses are protected when DEP makes a final decision on any permit or approval for an activity that may affect a protected use. Existing uses are protected based upon DEP's evaluation of the best available information (which satisfies DEP protocols and Quality Assurance/Quality Control (QA/QC) procedures) that indicates the protected use of the waterbody.

For a new, additional, or increased point source discharge to an HQ or EV water, the person proposing the discharge is required to utilize a nondischarge alternative that is cost-effective and environmentally sound when compared with the cost of the proposed discharge. If a nondischarge alternative is not cost-effective and environmentally sound, the person must use the best available combination of treatment, pollution prevention, and wastewater reuse technologies and assure that any discharge is nondegrading. In the case of HQ waters, DEP may find that after satisfaction of intergovernmental coordination and public participation requirements lower water quality is necessary to accommodate important economic or social development in the area in which the waters are located. In addition, DEP will assure that cost-effective and reasonable best management practices for nonpoint source control in HQ and EV waters are achieved.

The subject facility's discharge will be to a non-special protection waters and the permit conditions are imposed to protect existing instream water quality and uses. Neither HQ waters or EV waters is impacted by this discharge.

# 5.6 Anti-Backsliding

Anti-backsliding is a federal regulation which prohibits a permit from being renewed, reissued, or modified containing effluent limitations which are less stringent than the comparable effluent limitations in the previous permit (40 CFR 122.I.1 and 40 CFR 122.I.2). A review of the existing permit limitations with the proposed permit limitations confirm that the facility is consistent with anti-backsliding requirements. The facility has proposed effluent limitations that are as stringent as the existing permit.

# **6.0 NPDES Parameter Details**

The basis for the proposed sampling and their monitoring frequency that will appear in the permit for each individual parameter are itemized in this Section. The final limits are the more stringent of technology based effluent treatment (TBEL) requirements, water quality based (WQBEL) limits, TMDL, antidegradation, anti-degradation, or WET.

The reader will find in this section:

- a) a justification of recommended permit monitoring requirements and limitations for each parameter in the proposed NPDES permit;
- b) a summary of changes from the existing NPDES permit to the proposed permit; and
- c) a summary of the proposed NPDES effluent limits.

# 6.1 Recommended Monitoring Requirements and Effluent Limitations

A summary of the recommended monitoring requirements and effluent limitations are itemized in the tables. The tables are categorized by (a) Conventional Pollutants and Disinfection and (b) Nitrogen Species and Phosphorus.

# **6.1.1 Conventional Pollutants and Disinfection**

Parameter   Permit Limitation   Required by!   Sequency shall be daily as a grab sample (Table 6-3).		Summary	of Proposed N	IPDES Parameter Details for Conventional Pollutants and Disinfection Holtwood MHP, PA0082147					
The monitoring: The monitoring frequency shall be daily as a grab sample (Table 6-3).	Parameter								
Rationale:   The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limit assigned by Chapter 95.2(1).	~U (C II )	-							
Effluent Limit: Effluent limits shall be greater than 5.0 mg/l.   Rationale:   The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits shall be greater than 5.0 mg/l.	рн (5.0.)	IBEL	Rationale:	The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by Chapter 95.2(1).					
Rationale:   The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limit assigned by best professional judgement.			Monitoring:	The monitoring frequency shall be daily as a grab sample (Table 6-3).					
Rationale: Rationale: Rationale: Rationale: Rationale: Rationale: Rationale: Rationale: Refluent Limit: Reflue		BPJ	Effluent Limit:	Effluent limits shall be greater than 5.0 mg/l.					
Effluent Limit Effluent limits shall not exceed 25 mg/l as an average monthly.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent lim assigned by Chapter 92a.47(a)(1). WQM modeling indicates that the TBEL is more stringent the WQBEL. Thus, the permit limit is confined to TBEL.  Monitoring:  The monitoring frequency shall be 2x/mo as an 8-hr composite sample (Table 6-3).  Effluent Limit Effluent limits shall not exceed 30 mg/l as an average monthly.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limit assigned by Chapter 92a.47(a)(1). While there is no WQM modeling for this parameter, the permit limit for TSS is generally assigned similar effluent limits as CBOD or BOD. Since the TE is more stringent than TBEL, TBEL will apply.  Monitoring:  The monitoring frequency shall be on a daily basis as a grab sample (Table 6-3).  Effluent Limit:  The average monthly limit should not exceed 0.21 mg/l and/or 0.69 mg/l as an instantaneous maximum.  Rationale: Chlorine in both combined (chloramine) and free form is extremely toxic to freshwater fish and oth forms of aquatic life (Implementation Guidance Total Residual Chlorine 1). The TRC effluent limitations to be imposed on a discharger shall be the more stringent of either the WQBEL or TBEL requirements and shall be expressed in the NPDES permit as an average monthly and instantaneous maximum effluent concentration (Implementation Guidance Total Residual Chlorine 4).  Based on the stream flow rate (lowest 7-day flow rate in 10 years) and the design flow rate of the subject facicalculated by the TRC Evaluation worksheet, the WQBEL is more stringent than the TBEL. The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits shall not exceed 200 No./100 mL as a geometric mean. Winter effluent limits shall not exceed 200 No./100 mL as a geometric mean. Winter effluent limits shall not exceed 200 No./100 mL as a geometric mean.  The monitoring frequency has bee	Oxygen	DI 3	Rationale:	The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by best professional judgement.					
The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent lim assigned by Chapter 92a.47(a)(1). WQM modeling indicates that the TBEL is more stringent the WQBEL. Thus, the permit limit is confined to TBEL.  Monitoring:  The monitoring frequency shall be 2x/mo as an 8-hr composite sample (Table 6-3).  Effluent Limit: Effluent limits shall not exceed 30 mg/l as an average monthly.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limit assigned by Chapter 92a.47(a)(1). While there is no WQM modeling for this parameter, the permit limit for TSS is generally assigned similar effluent limits as CBOD or BOD. Since the TE is more stringent than TBEL, TBEL will apply.  Monitoring:  The monitoring frequency shall be on a daily basis as a grab sample (Table 6-3).  Effluent Limit:  The average monthly limit should not exceed 0.21 mg/l and/or 0.69 mg/l as an instantaneous maximum.  Rationale: Chlorine in both combined (chloramine) and free form is extremely toxic to freshwater fish and oth forms of aquatic life (Implementation Guidance Total Residual Chlorine 1). The TRC effluent limitations to be expressed in the NPDES permit as an average monthly and instantaneous maximum effluent concentration (Implementation Guidance Total Residual Chlorine 4).  Based on the stream flow rate (lowest 7-day flow rate in 10 years) and the design flow rate of the subject facicalculated by the TRC Evaluation worksheet, the WQBEL is more stringent than the TBEL. The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by TRC Evaluation worksheet.  Monitoring:  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits is shall not exceed 200 No./100 mL as a geometric mean. Winter effluent limits shall not exceed 200 No./100 mL as a geometric mean. Winter effluent limits shall not exceed 200 No./100 mL as a geometric mean.  The monitoring frequency has been assigned in accordance with Tabl			Monitoring:	The monitoring frequency shall be 2x/month as an 8-hr composite sample (Table 6-3).					
Rationale: assigned by Chapter 92a.47(a)(1). WQM modeling indicates that the TBEL is more stringent the WQBEL. Thus, the permit limit is confined to TBEL.  Monitoring: The monitoring frequency shall be 2x/mo as an 8-hr composite sample (Table 6-3).  Effluent Limit: Effluent limits shall not exceed 30 mg/l as an average monthly.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limit assigned by Chapter 92a.47(a)(1). While there is no WQM modeling for this parameter, the permit limit for TSS is generally assigned similar effluent limits as CBOD or BOD. Since the TE is more stringent than TBEL, TBEL will apply.  Monitoring: The monitoring frequency shall be on a daily basis as a grab sample (Table 6-3).  Effluent Limit: The average monthly limit should not exceed 0.21 mg/l and/or 0.69 mg/l as an instantaneous maximum.  Rationale: Chlorine in both combined (chloramine) and free form is extremely toxic to freshwater fish and oth forms of aquatic life (Implementation Guidance Total Residual Chlorine 1). The TRC effluent limitations to be imposed on a discharger shall be the more stringent of either the WQBEL or TBEL requirements and shall be expressed in the NPDES permit as an average monthly and instantaneous maximum effluent concentration (Implementation Guidance Total Residual Chlorine 4).  Based on the stream flow rate (lowest 7-day flow rate in 10 years) and the design flow rate of the subject facicalculated by the TRC Evaluation worksheet, the WQBEL is more stringent than the TBEL. The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits shall not exceed 200 No./100 mL as a geometric mean. Winter effluent limits shall not exceed 200 No./100 mL as a geometric mean. The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits shall not exceed 200 No./100 mL as a geometric mean.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits shall not exceed 200 No./10			Effluent Limit:	Effluent limits shall not exceed 25 mg/l as an average monthly.					
TRC    TBEL   Effluent Limit:   Effluent limits shall not exceed 30 mg/l as an average monthly.	CBOD	TBEL	Rationale:	The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by Chapter 92a.47(a)(1). WQM modeling indicates that the TBEL is more stringent than the WQBEL. Thus, the permit limit is confined to TBEL.					
TRC  TRC  TREL  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent lin assigned by Chapter 92a.47(a)(1). While there is no WQM modeling for this parameter, the permit limit for TSS is generally assigned similar effluent limits as CBOD or BOD. Since the TE is more stringent than TBEL, TBEL will apply.  Monitoring:  The monitoring frequency shall be on a daily basis as a grab sample (Table 6-3).  Effluent Limit:  The average monthly limit should not exceed 0.21 mg/l and/or 0.69 mg/l as an instantaneous maximum.  Rationale: Chlorine in both combined (chloramine) and free form is extremely toxic to freshwater fish and oth forms of aquatic life (Implementation Guidance Total Residual Chlorine 1). The TRC effluent limitations to be imposed on a discharger shall be the more stringent of either the WQBEL or TBEL requirements and shall be expressed in the NPDES permit as an average monthly and instantaneous maximum effluent concentration (Implementation Guidance Total Residual Chlorine 4).  Based on the stream flow rate (lowest 7-day flow rate in 10 years) and the design flow rate of the subject facicalculated by the TRC Evaluation worksheet, the WQBEL is more stringent than the TBEL. The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by TRC Evaluation worksheet imits shall not exceed 200 No./100 mL as a geometric mean. Winter effluent limits shall not exceed 200 No./100 mL as a geometric mean.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by Chapter 92a.47(a)(4) and 92a.47(a)(5).			Monitoring:	The monitoring frequency shall be 2x/mo as an 8-hr composite sample (Table 6-3).					
Rationale:  Ration			Effluent Limit:	Effluent limits shall not exceed 30 mg/l as an average monthly.					
TRC  WQBEL  WQBEL  WQBEL  Rationale: Chlorine in both combined (chloramine) and free form is extremely toxic to freshwater fish and oth forms of aquatic life (Implementation Guidance Total Residual Chlorine 1). The TRC effluent limitations to be imposed on a discharger shall be the more stringent of either the WQBEL or TBEL requirements and shall be expressed in the NPDES permit as an average monthly and instantaneous maximum effluent concentration (Implementation Guidance Total Residual Chlorine 4).  Based on the stream flow rate (lowest 7-day flow rate in 10 years) and the design flow rate of the subject faci calculated by the TRC Evaluation worksheet, the WQBEL is more stringent than the TBEL. The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by TRC Evaluation worksheet limits shall not exceed 200 No./100 mL as a geometric mean. Winter effluent limits shall not exceed 2000 No./100 mL as a geometric mean.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits shall not exceed 2000 No./100 mL as a geometric mean.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits shall not exceed 2000 No./100 mL as a geometric mean.	TSS	TBEL	Rationale:	permit limit for TSS is generally assigned similar effluent limits as CBOD or BOD. Since the TBEL					
TRC  WQBEL  Rationale: Chlorine in both combined (chloramine) and free form is extremely toxic to freshwater fish and oth forms of aquatic life (Implementation Guidance Total Residual Chlorine 1). The TRC effluent limitations to be imposed on a discharger shall be the more stringent of either the WQBEL or TBEL requirements and shall be expressed in the NPDES permit as an average monthly and instantaneous maximum effluent concentration (Implementation Guidance Total Residual Chlorine 4).  Based on the stream flow rate (lowest 7-day flow rate in 10 years) and the design flow rate of the subject faci calculated by the TRC Evaluation worksheet, the WQBEL is more stringent than the TBEL.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by TRC Evaluation worksheet  Monitoring: The monitoring frequency shall be 2x/month as a grab sample (Table 6-3).  Effluent Limit: Summer effluent limits shall not exceed 200 No./100 mL as a geometric mean. Winter effluent limits shall not exceed 2000 No./100 mL as a geometric mean.  The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by Chapter 92a.47(a)(4) and 92a.47(a)(5).			Monitoring:	The monitoring frequency shall be on a daily basis as a grab sample (Table 6-3).					
forms of aquatic life (Implementation Guidance Total Residual Chlorine 1). The TRC effluent limitations to be imposed on a discharger shall be the more stringent of either the WQBEL or TBEL requirements and shall be expressed in the NPDES permit as an average monthly and instantaneous maximum effluent concentration (Implementation Guidance Total Residual Chlorine 4).  Based on the stream flow rate (lowest 7-day flow rate in 10 years) and the design flow rate of the subject facilizated by the TRC Evaluation worksheet, the WQBEL is more stringent than the TBEL. The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by TRC Evaluation worksheet    Monitoring: The monitoring frequency shall be 2x/month as a grab sample (Table 6-3).			Effluent Limit:						
Fecal Coliform  TBEL  Effluent Limit: Summer effluent limits shall not exceed 200 No./100 mL as a geometric mean. Winter effluent limits shall not exceed 2000 No./100 mL as a geometric mean.  Rationale: The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by Chapter 92a.47(a)(4) and 92a.47(a)(5).	TRC	WQBEL	forms of aqua imposed on a expressed in t (Implementation Based on the calculated by The monitoring	tic life (Implementation Guidance Total Residual Chlorine 1). The TRC effluent limitations to be discharger shall be the more stringent of either the WQBEL or TBEL requirements and shall be the NPDES permit as an average monthly and instantaneous maximum effluent concentration on Guidance Total Residual Chlorine 4).  Stream flow rate (lowest 7-day flow rate in 10 years) and the design flow rate of the subject facility the TRC Evaluation worksheet, the WQBEL is more stringent than the TBEL.  In grequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by					
TBEL TBEL TBEL TBEL TBEL TBEL TBEL TBEL			Monitoring:						
Rationale: The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent line assigned by Chapter 92a.47(a)(4) and 92a.47(a)(5).		TBEL	Effluent Limit:	_					
Notes:	Comorni		Rationale:	The monitoring frequency has been assigned in accordance with Table 6-3 and the effluent limits assigned by Chapter 92a.47(a)(4) and 92a.47(a)(5).					
	Notes:								

<sup>1</sup> The NPDES permit was limited by (a) anti-Backsliding, (b) Anti-Degradation, (c) SOP, (d) TBEL, (e) TMDL, (f) WQBEL, (g) WET, or (h) Other 2 Monitoring frequency based on flow rate of 0.015 MGD.

<sup>3</sup> Table 6-3 (Self Monitoring Requirements for Sewage Discharges) in Technical Guidance for the Development and Specification of Effluent

Limitations and Other Permit Conditions in NPDES Permits) (Document # 362-0400-001) Revised 10/97

<sup>4</sup> Water Quality Antidegradation Implementation Guidance (Document # 391-0300-002)

<sup>5</sup> Phase 2 Watershed Implementation Plan Wastewater Supplement, Revised September 6, 2017

**Phosphorus** 

Notes:

# 6.1.2 Nitrogen Species and Phosphorus

### Summary of Proposed NPDES Parameter Details for Nitrogen Species and Phosphorus Holtwood MHP, PA0082147 **Permit Limitation** Recommendation **Parameter** Required by1: The monitoring frequency shall be 2x/mo as an 8-hr composite sample Monitoring: During the months of May 1 to October 31, effluent limits shall not exceed 3.5 mg/l as an average Ammonia-**WQBEL** Effluent Limit: monthly. During the months of November 1 to April 30, effluent limits shall not exceed 10.5 mg/l Nitrogen as an average monthly. Rationale: Water quality modeling recommends effluents limits Monitoring: The monitoring frequency shall be 1x/yr as an 8-hr composite sample Effluent Limit: No effluent requirements. Nitrate-Chesapeake Bay Nitrite as N **TMDL** Due to the Chesapeake Bay Implementation Plan, the facility is required to be monitored on a Rationale: frequency at least 1x/yr. Monitoring: The monitoring frequency shall be 1x/yr as an 8-hr composite sample Total Chesapeake Bay Effluent Limit: No effluent requirements. Nitrogen **TMDL** Due to the Chesapeake Bay Implementation Plan, the facility is required to be monitored on a Rationale: frequency at least 1x/yr. Monitoring: The monitoring frequency shall be 1x/yr as an 8-hr composite sample Effluent Limit: No effluent requirements. Chesapeake Bay **TKN** TMDI Due to the Chesapeake Bay Implementation Plan, the facility is required to be monitored on a Rationale: frequency at least 1x/yr. Monitoring: The monitoring frequency shall be 2x/mo as an 8-hr composite sample **Total** Effluent Limit: Effluent limits shall not exceed 2.0 mg/l as an average monthly. Anti-Backsliding

Due to antibacksliding regulations, the current phosphorus limit shall continue to the proposed

Rationale:

permit

# 6.2 Summary of Changes From Existing Permit to Proposed Permit

A summary of how the proposed NPDES permit differs from the existing NPDES permit is summarized as follows.

There are no changes to the monitoring frequency or effluent limits.

<sup>1</sup> The NPDES permit was limited by (a) anti-Backsliding, (b) Anti-Degradation, (c) SOP, (d) TBEL, (e) TMDL, (f) WQBEL, (g) WET, or (h) Other 2 Monitoring frequency based on flow rate of 0.015 MGD.

<sup>3</sup> Table 6-3 (Self Monitoring Requirements for Sewage Discharges) in Technical Guidance for the Development and Specification of Effluent Limitations and Other Permit Conditions in NPDES Permits) (Document # 362-0400-001) Revised 10/97

<sup>4</sup> Water Quality Antidegradation Implementaton Guidance (Document # 391-0300-002)

<sup>5</sup> Phase 2 Watershed Implementation Plan Wastewater Supplement, Revised September 6, 2017

# **6.3.1 Summary of Proposed NPDES Effluent Limits**

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.

The proposed NPDES effluent limitations are summarized in the table below.

PART	A - EFFLUENT LIMITA	TIONS, MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS
I. A.	For Outfall 001	NA (to
	Receiving Waters:	Muddy Run (TSF)
	Type of Effluent:	Sewage Effluent

Based on the anticipated wastewater characteristics and flows described in the permit application and its supporting documents and/or amendments, the following effluent limitations and monitoring requirements apply (see also Additional Requirements and Footnotes).

	Effluent Limitations							quirements
Parameter	Mass Units (lbs/day) (1)			Concentrat	Minimum (2)	Required		
raiametei	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
Dissolved Oxygen	XXX	XXX	5.0 Inst Min	XXX	XXX	XXX	1/day	Grab
Total Residual Chlorine (TRC)	XXX	XXX	XXX	0.21	XXX	0.69	1/day	Grab
Carbonaceous Biochemical Oxygen Demand (CBOD5)	XXX	XXX	XXX	25	XXX	50	2/month	8-Hr Composite
Total Suspended Solids	XXX	XXX	XXX	30	XXX	60	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) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	2/month	Grab
Nitrate-Nitrite as N (lbs/year)	XXX	Report Total Annual	XXX	Report Annl Avg	XXX	xxx	1/vear	8-Hr Composite
Total Nitrogen (lbs/year)	XXX	Report Total Annual	XXX	Report Annl Avg	XXX	XXX	1/year	Calculation

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

		Monitoring Requirements						
Parameter	Mass Units (lbs/day) (1)			Concentrat	Minimum (2)	Required		
Farameter	Average	Average		Average		Instant.	Measurement	Sample
	Monthly	Weekly	Minimum	Monthly	Maximum	Maximum	Frequency	Type
Ammonia-Nitrogen								8-Hr
Nov 1 - Apr 30	XXX	XXX	XXX	10.5	XXX	21	2/month	Composite
Ammonia-Nitrogen								8-Hr
May 1 - Oct 31	XXX	XXX	XXX	3.5	XXX	7	2/month	Composite
Total Kjeldahl Nitrogen		Report		Report				8-Hr
(lbs/year)	XXX	Total Annual	XXX	Anni Avg	XXX	XXX	1/year	Composite
	Report							8-Hr
Total Phosphorus (lbs/mo)	Total Mo	XXX	XXX	2.0	XXX	4	2/month	Composite
Total Phosphorus (Total Load,		Report						
lbs) (lbs)	XXX	Total Annual	XXX	XXX	XXX	XXX	1/year	Calculation

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

at Outfall 001

<sup>1.</sup> The permittee is authorized to discharge during the period from Permit Effective Date through Permit Expiration Date.

# **6.3.2 Summary of Proposed Permit Part C Conditions**

The subject facility has the following Part C conditions.

- Chlorine Minimization
- Chesapeake Bay Nutrient Definitions
- Solids Management for Non-Lagoon Treatment Systems

	Tools and References Used to Develop Permit
	T
	WQM for Windows Model (see Attachment )
<u> </u>	PENTOXSD for Windows Model (see Attachment )
<u> </u>	TRC Model Spreadsheet (see Attachment )
	Temperature Model Spreadsheet (see Attachment )
<u> <u> </u></u>	Toxics Screening Analysis Spreadsheet (see Attachment )
	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
	Technical Guidance for the Development and Specification of Effluent Limitations, 362-0400-001, 10/97.
	Policy for Permitting Surface Water Diversions, 362-2000-003, 3/98.
	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 362-2000-008, 11/96.
	Technology-Based Control Requirements for Water Treatment Plant Wastes, 362-2183-003, 10/97.
	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 362-2183-004, 12/97.
	Pennsylvania CSO Policy, 385-2000-011, 9/08.
	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 391-2000-002, 4/97.
	Determining Water Quality-Based Effluent Limits, 391-2000-003, 12/97.
	Implementation Guidance Design Conditions, 391-2000-006, 9/97.
	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 391-2000-007, 6/2004.
	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997.
	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 391-2000-010, 3/99.
	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 391-2000-011, 5/2004.
	Implementation Guidance for Section 93.7 Ammonia Criteria, 391-2000-013, 11/97.
	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 391-2000-014, 4/2008.
	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 391-2000-015, 11/1994.
	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.
	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 391-2000-022, 3/1999.
	Design Stream Flows, 391-2000-023, 9/98.
	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 391-2000-024, 10/98.
	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 391-3200-013, 6/97.
	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
$\overline{\boxtimes}$	SOP: New and Reissuance Sewage Individual NPDES Permit Applications, rev January 6, 2020
	Other:

# Attachment A Stream Stats/Gauge Data

# 14 Selected Streamflow Statistics for Streamgage Locations in and near Pennsylvania

Table 1. List of U.S. Geological Survey streamgage locations in and near Pennsylvania with updated streamflow statistics.—Continued [Latitude and Longitude in decimal degrees; mi², square miles]

Streamgage number	Streamgage name	Latitude	Longitude	Drainage area (mi²)	Regulated <sup>1</sup>
01561000	Brush Creek at Gapsville, Pa.	39.956	-78.254	36.8	N
01562000	Raystown Branch Juniata River at Saxton, Pa.	40.216	-78.265	756	N
01562500	Great Trough Creek near Marklesburg, Pa.	40.350	-78.130	84.6	N
01563200	Raystown Branch Juniata River below Rays Dam nr Huntingdon, Pa.	40.429	-77.991	960	Y
01563500	Juniata River at Mapleton Depot, Pa.	40.392	-77.935	2,030	Y
01564500	Aughwick Creek near Three Springs, Pa.	40.213	-77.925	205	N
01565000	Kishacoquillas Creek at Reedsville, Pa.	40.655	-77.583	164	N
01565700	Little Lost Creek at Oakland Mills, Pa.	40.605	-77.311	6.52	N
01566000	Tuscarora Creek near Port Royal, Pa.	40.515	-77.419	214	N
01566500	Cocolamus Creek near Millerstown, Pa.	40.566	-77.118	57.2	N
01567000	Juniata River at Newport, Pa.	40.478	-77.129	3,354	Y
01567500	Bixler Run near Loysville, Pa.	40.371	-77.402	15.0	N
01568000	Sherman Creek at Shermans Dale, Pa.	40.323	-77.169	207	N
01568500	Clark Creek near Carsonville, Pa.	40.460	-76.751	22.5	LF
01569000	Stony Creek nr Dauphin, Pa.	40.380	-76.907	33.2	N
01569800	Letort Spring Run near Carlisle, Pa.	40.235	-77.139	21.6	N
01570000	Conodoguinet Creek near Hogestown, Pa.	40.252	-77.021	470	LF
01570500	Susquehanna River at Harrisburg, Pa.	40.255	-76.886	24,100	Y
01571000	Paxton Creek near Penbrook, Pa.	40.308	-76.850	11.2	N
01571500	Yellow Breeches Creek near Camp Hill, Pa.	40.225	-76.898	213	N
01572000	Lower Little Swatara Creek at Pine Grove, Pa.	40.538	-76.377	34.3	N
01572025	Swatara Creek near Pine Grove, Pa.	40.533	-76.402	116	N
01572190	Swatara Creek near Inwood, Pa.	40.479	-76.531	167	N
01573000	Swatara Creek at Harper Tavern, Pa.	40.403	-76.577	337	N
01573086	Beck Creek near Cleona, Pa.	40.323	-76.483	7.87	N
01573160	Quittapahilla Creek near Bellegrove, Pa.	40.343	-76.562	74.2	N
01573500	Manada Creek at Manada Gap, Pa.	40.397	-76.709	13.5	N
01573560	Swatara Creek near Hershey, Pa.	40.298	-76.668	483	N
01574000	West Conewago Creek near Manchester, Pa.	40.082	-76.720	510	N
01574500	Codorus Creek at Spring Grove, Pa.	39.879	-76.853	75.5	Y
01575000	South Branch Codorus Creek near York, Pa.	39.921	-76.749	117	Y
01575500	Codorus Creek near York, Pa.	39.946	-76.755	222	Y
01576000	Susquehanna River at Marietta, Pa.	40.055	-76.531	25,990	Y
01576085	Little Conestoga Creek near Churchtown, Pa.	40.145	-75.989	5.82	N
01576500	Conestoga River at Lancaster, Pa.	40.050	-76.277	324	N
01576754	Conestoga River at Conestoga, Pa.	39.946	-76.368	470	N
01578310	Susquehanna River at Conowingo, Md.	39.658	-76.174	27,100	Y
01578400	Bowery Run near Quarryville, Pa.	39.895	-76.114	5.98	N
01580000	Deer Creek at Rocks, Md.	39.630	-76.403	94.4	N
01581500	Bynum Run at Bel Air, Md.	39.541	-76.330	8.52	N
01581700	Winters Run near Benson, Md.	39.520	-76.373	34.8	N
01582000	Little Falls at Blue Mount, Md.	39.604	-76.620	52.9	N
01582500	Gunpowder Falls at Glencoe, Md.	39.550	-76.636	160	Y
01583000	Slade Run near Glyndon, Md.	39.495	-76.795	2.09	N
01583100	Piney Run at Dover, Md.	39.521	-76.767	12.3	N

Table 2. Selected low-flow statistics for streamgage locations in and near Pennsylvania.—Continued [ft<sup>1</sup>/s; cubic feet per second; —, statistic not computed; <, less than]

Streamgage number	Period of record used in analysis¹	Number of years used in analysis	1-day, 10-year (ft³/s)	7-day, 10-year (ft³/s)	7-day, 2-year (ft³/s)	30-day, 10-year (ft⅓s)	30-day, 2-year (ft³/s)	90-day 10-yea (ft∛s)
01565000	1941-2008	37	17.6	18.6	28.6	20.3	32.4	24.4
01565700	1965-1981	17	.4	.4	.9	.5	1.1	3
01566000	1913-2008	52	4.3	7.9	18.8	12.4	25.6	19.
01566500	1932-1958	27	1.7	2.4	4.0	3.2	5.7	4.
01567000	21974-2008	35	504	534	725	589	857	727
01567000	31901-1972	72	311	367	571	439	704	547
01567500	1955-2008	54	2.0	2.2	3.3	2.6	3.8	3.
01568000	1931-2008	78	12.7	15.5	25.5	19.2	32.0	26.
01568500	21943-1997	55	1.8	2.3	4.3	2.7	5.0	3.
01569000	1939–1974	14	2.6	4.0	7.4	5.1	9.4	7.
01569800	1978-2008	31	15.9	17.0	24.4	18.4	26.1	20.
01570000	31913-1969	35	15.5	63.1	110	76.1	124	95.
01570000	21971-2008	38	63.1	69.3	109	78.3	125	97.
01570500	31901-1972	72	2,310	2,440	4.000	2.830	4.950	3.850
01570500	21974-2008	35	3.020	3,200	5.180	3.690	6.490	4,960
01570300	1941–1995	16	.1	.2	.6	3,090	1.2	4,900
	1911-2008				115		1.2	105
01571500		62	81.6	86.8 2.3		94.0		
01572000	1921–1984	14	2.1		4.8	3.0	6.5	4.
01572025	1990-2008	17	15.2	16.4	26.7	18.5	34.6	27.
01572190	1990-2008	17	19.1	20.5	36.2	23.9	45.8	35.
01573000	1920-2008	89	18.0	22.0	52.0	30.8	69.2	50.
01573086	1965-1981	17	.5	.6	2.6	.8	3.3	1.
01573160	1977–1994	18	26.9	29.6	46.4	33.6	51.9	39.
01573500	1939-1958	20	1.3	1.4	2.5	1.8	3.2	2.
01573560	1977–2008	30	50.3	62.0	104	76.9	131	108
01574000	1930-2008	79	8.0	11.1	32.0	17.7	47.0	33.
01574500	21968-2008	41	14.2	24.0	35.9	29.4	42.0	33.
01574500	31930-1966	34	2.3	7.1	11.5	9.3	14.8	12.
01575000	<sup>2</sup> 1973–1995	23	.7	1.4	6.7	3.2	12.0	9.
01575000	31929-1971	43	.1	.6	10.3	2.3	15.0	6.
01575500	<sup>2</sup> 1948–1996	49	12.1	18.7	41.3	23.9	50.0	33.
01576000	31933-1972	40	2,100	2,420	4,160	2,960	5,130	4,100
01576000	<sup>2</sup> 1974–2008	35	2,990	3,270	5,680	3,980	7,180	5,540
01576085	1984-1995	12	.4	.5	.8	.7	1.2	1.
01576500	1931-2008	78	27.2	38.6	79.4	49.1	97.3	66.
01576754	1986-2008	23	74.2	84.9	151	106	189	147
401578310	1969-2008	40	549	2,820	5,650	4,190	7,380	6,140
01578400	1964-1981	18	1.4	1.5	2.7	1.9	3.2	2.
401580000	1928-2008	81	19.7	22.8	48.1	28.1	51.8	35.
401581500	1946-2008	28	.2	.3	1.2	.8	1.7	1.
401581700	1969-2008	40	4.7	5.5	17.5	8.1	18.3	12.
401582000	1946-2008	63	11.3	12.5	25.0	15.5	28.0	20.
401582500	1979-2008	27	41.2	43.9	78.8	53.8	90.6	74.
401583000	1949-1981	33	.3	.3	.7	.3	1.0	
401583100	1984-2008	15	2.1	2.4	5.5	3.2	6.0	4.

# Attachment B<br/> WQM 7.0 Modeling Output Values

# Attachment C TRC Evaluation

Holtwood MHP

January 2021

PA0082147 1A С D Ε F G TRC EVALUATION Input appropriate values in B4:B8 and E4:E7  $0.032 = \mathbf{Qstream(cfs)}$ 0.5 = CV Daily 5 05 =CV Hourly 0.015 = Q discharge (MGD) 6 30 = no. samples = AFC Partial Mix Factor = Chlorine Demand of Stream = CFC Partial Mix Factor 8 = Chlorine Demand of Discharge 15 = AFC Criteria Compliance Time (min) 9 0.5 = BAT/BPJ Value 720 = CFC\_Criteria Compliance Time (min) = % Factor of Safety (FOS) ⇒Decay Coefficient (K) Reference **CFC Calculations** 10 Source Heference : AFC Calculations 11 TRC 1.3.2.iii WLA afc = 0.459 1.3.2iii WLA cfc = 0.440 PENTOXSD TRG 51a LTAMULT afc = 0.373 5.1c LTAMULT cfc = 0.581 13 PENTOXSD TRG 5.1b 5 1d LTA afc= 0.171 LTA\_cfc = 0.256 14 15 Source Effluent Limit Calculations 16 PENTOXSD TRG 5.1f AML MULT = 1.231 17 PENTOXSD TRG 5.1g AVG MON LIMIT (mg/l) = 0.210AFC 18 INST MAX LIMIT (mg/l) = 0.688 WLA afc (.019/e(-k\*AFC\_tc)) + [(AFC\_Yc\*Qs\*.019/Qd\*e(-k\*AFC\_tc))... ...+Xd+(AFC\_Yc\*Qs\*Xs/Qd)]\*(1-FOS/100) LTAMULTafc EXP((0.5\*LN(cvh^2+1))-2.326\*LN(cvh^2+1)^0.5) LTA\_afc wla\_afc\*LTAMULT\_afc WLA cfc (.011/e(-k\*CFC tc)+[(CFC Yc\*Qs\*.011/Qd\*e(-k\*CFC tc))... ...+Xd+(CFC Yc\*Qs\*Xs/Qd)]\*(1-FOS/100) LTAMULT\_cfc EXP((0.5\*LN(cvd^2/no\_samples+1))-2.326\*LN(cvd^2/no\_samples+1)^0.5) LTA cfc wla\_cfc\*LTAMULT\_cfc AML MULT EXP(2.326\*LN((cvd^2/no samples+1)^0.5)-0.5\*LN(cvd^2/no samples+1)) MIN(BAT BPJ, MIN(LTA afc, LTA cfc)\*AML MULT) AVG MON LIMIT INST MAX LIMIT 1.5\*((av\_mon\_limit/AML\_MULT)/LTAMULT\_afc)