

Southwest Regional Office CLEAN WATER PROGRAM

Application Type	New	NPDES PERMIT FACT SHEET	Application No.	PA0255823
Facility Type	Industrial	INDIVIDUAL INDUSTRIAL WASTE (IW)	APS ID	1054270
Major / Minor	Minor	AND IW STORMWATER	Authorization ID	1380802

	Applicant and Facility Information					
Applicant Name	The Al	MES Companies, Inc.	Facility Name	The AMES Companies, Inc. (Champion Facility)		
Applicant Address	135 Ro	paring Run Road	Facility Address	135 Roaring Run Road		
	Champ	oion, PA 15622-3095		Champion, PA 15622-3095		
Applicant Contact	Scott F	Ressler	Facility Contact	Patrick Cannin		
Applicant Phone	(717)-7	730-3081	Facility Phone	(724) 593-6124		
Client ID	144472	2	Site ID	465691		
SIC Code	2421		Municipality	Donegal Township		
SIC Description	Sawmi	lls and Planing Mills	County	Westmoreland		
Date Application Rece	eived	October 14, 2020	EPA Waived?	Yes		
Date Application Acce	pted	January 10, 2022	If No, Reason			
Purpose of Application	n	New NPDES Permit Coverage				

Summary of Review

The Department received a new NPDES Permit application from RETTEW on behalf of the AMES Companies, Inc for coverage of their Champion facility on October 14, 2020. The site originally applied for an Individual Stormwater Permit but the site does not qualify for the Individual Stormwater permit because the site operations consist of wet-decking and are subject to Federal Effluent Limitation Guidelines (ELGs), therefore, the site is considered a minor Industrial Waste facility with ELGs. An updated application was submitted on January 3, 2022 to reflect this distinction.

The site manufactures lawn and garden hand tools. The site is occupied by multiple manufacturing support buildings inclusive of an administrative building, two sawmills, one wheelbarrow handle shop, twelve wood kilns, three warehouse buildings, one sawdust storage silo, two lumber sheds, flow coat operation, log storage, log sediment pond, and maintenance shop.

The Ames Companies, Inc. Champion, PA facility site operates as a multi process production facility. Operations begin with receipt of delivered timbered logs for evaluation and processing, the logs are stored outside in the log yard with a seasonal log watering sprinkler to prevent potential quality concerns. Any slight runoff is directed to the onsite, man-made sediment pond. The logs are selected, processed through the debarker and then directed through the sawmill process (inside the building operations). The final green products (i.e. handles and dowels) are then loaded onto kiln racks. These racks are taken to the kiln building (inside) and dried for a preset specified length of time until the correct moisture content is attained. The dried woods are then warehoused until being shipped offsite. The only exposure to the environment is onsite truck traffic, storage tank exposure, log storage, the log watering process, debarking and bolt cutting operations.

The production cycle begins with a third-party log vendor delivery to the site with raw timber for evaluation and purchase. The logs are stored, wetted, and amassed for the production line. The water for the log watering process is derived from the onsite log sediment pond for recirculation to the storage yard. The raw timber logs are debarked and undergo bolt cutting.

Approve	Deny	Signatures	Date
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		Adam Olesnanik / Project Manager	January 24, 2022
Х		Mideral E. Fifet	
		Michael E. Fifth, P.E. / Environmental Engineer Manager	January 24, 2022

Summary of Review

The logs are then conveyed to the sawmill building where they undergo sawing, milling, and cutting actions. The raw woods are sized and customarily palletized. Once loaded on pallets, the racks of wood blanks are then taken to the wood kilns for the wood drying process. If production inventory requires, these dried wood blanks can then be honed to a dowel shape for use. These future handles and dowls are then assorted for shipping to other AMES Companies facilities for use in the wheelbarrows and hand tool raw material.

The log watering sprinklers are employed in the summer months (June, July, and August) to provide moisture to the dry logs to prevent log splitting, checks and drying of the logs. The amount of the runoff is minimal as the sprinklers are not industrial in design. The runoff from the log yard is captured in the onsite sediment pond, no chemical or preservatives are added to the logs or in the pond.

The site has three outfalls, Outfalls 001 and 002 discharge to Indian Creek and 003 discharges to an unnamed tributary to Indian Creek, both streams are designated in 25 Pa Code Chapter 93 as High-Quality Cold-Water Fisheries. Outfalls 001 and 003 discharge stormwater only. Outfall 002 has the potential to discharge water collected in the onsite sediment pond consisting of stormwater and wastewater associated with the wet-decking processes of the log storage area.

Outfall 001 discharges stormwater from the southern portion of the property, consisting of the main entrance, employee parking lot, offices, wood kilns, boiler building, storage sheds, covered fuel storage shed and milling operations. No raw materials are stored outside in this area.

Outfall 002 is the discharge from the site sedimentation pond. Operations in this drainage area consist of milling operations, warehousing, dust silo, log debarking and initial production activities. The site sediment pond is an accumulation pond for the log storage yard. This pond is rated for a catastrophic flood event. There are no chemicals applied in the storage yard, but any precipitation and or log wetting waters are drained to this sediment pond. The water collected in the pond is recycled and used for log wetting. It is equipped with a spillway on the northeast side of the pond. This pond is rated for a catastrophic flood event and it has not discharged even with a high volume of precipitation, so it is unlikely that it will discharge under anything but rare extreme weather conditions. This outfall generally has no flow but there is still the potential to discharge, so the outfall will still need to be permitted. Additionally, because the outfall has the potential to discharge wastewater associated with wet decking, the Federal Effluent Limitation Guidelines (ELGs) for Timber Products Processing Point Source category, Wet Storage Subcategory (40 CFR 429.104) apply to the discharge from this outfall. Under these circumstances, discharge monitoring will be required whenever discharges occur.

Outfall 003 discharges stormwater from the northern and eastern areas of the property. Milling and storage shed operations are conducted in these areas. There is a potential for some log storage in this area however the predominate log storage runoff flows are to Outfall 002.

The site is within a High-quality watershed, so an anti-degradation module was submitted with the application. Based on the Anti-degradation model, non-discharge alternatives were considered, and the recycle/reuse of stormwater (and wet decking wastewater) is currently being employed at the site. Because of this the wet decking discharge is unlikely to occur and the only wastewater that will actively discharge from the site is stormwater. The permittee concluded that because the only active discharge is stormwater, there are no technically feasible, cost effective or environmentally sound alternatives to the stormwater discharge. Non-degrading limitations were not developed or imposed because the discharge consists of stormwater only. To ensure that the discharge does not degrade the receiving streams, no exposure benchmark values will be used in place of the standard stormwater benchmark values in the permit. The goal for the permittee is to consistently achieve these benchmark values; doing this shows that the discharges are uncontaminated stormwater and will maintain and protect the existing quality of the receiving waters. A Part C condition is included in the Draft Permit requiring a Corrective Action Plan when there is an exceedance of the benchmark values, which are also included in the Part C condition. As described above, if there is an exceedance of the benchmark values, a Corrective Action Plan must be conducted to evaluate site stormwater controls and BMPs. Benchmark monitoring is a feedback tool, along with routine inspections and visual assessments, for assessing the effectiveness of stormwater controls and BMPs.

Additionally, a Part C condition is included in the permit requiring the permittee to develop and submit a Pollutant Reduction Report to the Department within 90 days of the Permit Effective Date. This requirement is due to the elevated levels of Total Suspended Solids that was reported in the application. The Pollutant Reduction Report will require the permittee to survey the plant to identify the source of these pollutants and implement measures to eliminated or reduce the pollutants. In the report the permittee shall identify the sources of the pollutants; describe those measures that were tried after issuance of the permit and their effectiveness in meeting the discharge limitations and/or eliminating or reducing the pollutants; and describe and submit schedules for those measures that will be put into effect.

Summary of Review

Public Participation

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

Outfall No. <u>001</u>		_ Design Flow (MGD)	NA
Latitude 40°	04' 33.18"	_ Longitude	-79º 21' 18.38"
Quad Name Se	even Springs	Quad Code	1811
Wastewater Descr	iption: Stormwater		
Receiving Waters	Indian Creek	Stream Code	38235
NHD Com ID	69915279	RMI	20.6
Watershed No.	_19-E	Chapter 93 Class.	HQ-CWF
	am Public Water Supply Intake	Indian Creek Valley Water Au Mill Run Reservoir WTP	thority,
Nearest Downstrea	and traiter capping intente		
	Indian Creek	Flow at Intake (cfs)	3.59

Outfall No. 002		Design Flow (MGD)	NA
Latitude 40° ()4' 41.72"	Longitude	-79º 21' 11.51"
Quad Name Se	even Springs	Quad Code	1811
Wastewater Descri	ption: Stormwater and Wastew	rater Associated with Wet Decking	
Receiving Waters	Indian Creek	Stream Code	38235
NHD Com ID	69915279	RMI	20.9
Drainage Area	20.6	Yield (cfs/mi²)	0.022
Q ₇₋₁₀ Flow (cfs)	0.463	Q ₇₋₁₀ Basis	USGS StreamStats
Elevation (ft)	1485	Slope (ft/ft)	0.001
Watershed No.	19-E	Chapter 93 Class.	HQ-CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Attaining Use(s)		
Nearest Downstrea	am Public Water Supply Intake	Indian Creek Valley Water Au Mill Run Reservoir WTP	thority,
PWS Waters	Indian Creek	Flow at Intake (cfs)	3.59
PWS RMI	4.86	Distance from Outfall (mi)	15.74

Outfall No. 003		Design Flow (MGD)	NA
Latitude 40°	04' 39.18"	Longitude	-79° 21' 04.65"
Quad Name Se	even Springs	Quad Code	1811
Wastewater Descr	iption: Stormwater		
Receiving Waters	Unnamed Tributary to Indian Cree	k Stream Code	38391
Receiving Waters NHD Com ID	Unnamed Tributary to Indian Cree 69915303	k Stream Code RMI	38391 0.23
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NHD Com ID Watershed No.	69915303	RMI	0.23 HQ-CWF
NHD Com ID Watershed No. Nearest Downstrea	69915303 19-E	RMI Chapter 93 Class. Indian Creek Valley Water Au	0.23 HQ-CWF

	Development of Effluent Limitations							
Outfall No.	001 and 003							
Wastewater [Description:	Stormwater						

Technology-Based Limitations

Stormwater Technology Limits

Outfalls 001 and 003 will be subject to PAG-03 General Stormwater Permit conditions as a minimum requirement because the outfalls receive stormwater. The SIC code for the site is 2421 and the corresponding appendix of the PAG-03 that would apply to the facility is Appendix D. The reporting requirements applicable to stormwater discharges are shown in Table 1 below. Along with the monitoring requirements, sector specific BMPs included in Appendix D of the PAG-03 will also be included in Part C of the Draft Permit.

Table 1: PAG-03 Appendix (D) Monitoring Requirements

Parameter	Max Daily Concentration	Measurement Frequency	Sample Type
pH	Monitor and Report	1/6 Months	Grab
Chemical Oxygen Demand (COD)	Monitor and Report	1/6 Months	Grab
Total Suspended Solids (TSS)	Monitor and Report	1/6 Months	Grab

Water Quality-Based Limitations

Stormwater WQBELs

Water quality analyses are typically performed under low-flow (Q7-10) conditions. Stormwater discharges occur at variable rates and frequencies but not however during Q7-10 conditions. Since the discharges from Outfalls 001 and 003 are composed entirely of stormwater, a formal water quality analysis cannot be accurately conducted. Accordingly, water quality-based effluent limitations based on water quality analyses are not proposed.

Anti-Degradation

Antidegradation regulations under Chapter 93.4c(a)(l)(i) required discharges to protect the existing use of receiving waters. Chapter 93.4c(b) requires dischargers to consider non-discharge alternatives, public participation and social/economic justification when proposing new, additional or increased discharges to high quality or exceptional value streams. Existing use protection required under Chapter 93.4c(a)(l)(i) is ensured for discharges to high quality streams imposing the most stringent of technology-based, water quality based and non-degrading effluent limitations. In this case, non-degradation effluent limitations are not applicable because the discharge is stormwater only. To ensure that the discharge does not degrade the stream, the no exposure benchmark values will be used as the benchmark value for TSS and COD in the permit. The goal for the permittee is to discharge wastewater consistently below these benchmark values; doing this shows that the discharges are uncontaminated stormwater and will maintain and protect the existing quality of the receiving waters.

Proposed Effluent Limitations and Monitoring Requirements

The proposed effluent monitoring requirements for Outfalls 001 and 003 are displayed in Table 2 below, they are the most stringent values from the above effluent limitation development. A Part C condition is included in the Draft Permit requiring submission of a Corrective Action Plan whenever there is an exceedance of the benchmark values, which are also included in the Part C condition. The benchmark values are also displayed below in Table 2. These values are not effluent limitations, an exceedance of the benchmark value is not a violation. As describe above, if there is an exceedance of the benchmark values, a Corrective Action Plan must be conducted to evaluate site stormwater controls and BMPs. Benchmark monitoring is a feedback tool, along with routine inspections and visual assessments, for assessing the effectiveness of stormwater controls and BMPs. An exceedance of the benchmark provides permittees with an indication that the facility's controls may not be sufficiently controlling pollutants in stormwater. To ensure that the discharge is not degrading the high-quality waters, the no exposure benchmark values will be used as the benchmark values in the permit.

Table 2: Proposed Effluent Monitoring Requirements

Parameter	Max Daily Concentration	Benchmark Values (mg/L)	Measurement Frequency	Sample Type
pH	Monitor and Report	-	1/6 Months	Grab
Chemical Oxygen Demand (COD)	Monitor and Report	30	1/6 Months	Grab
Total Suspended Solids (TSS)	Monitor and Report	30	1/6 Months	Grab

Development of Effluent Limitations							
Outfall No	000		Design Flow (MCD)	NIA			
Outfall No.	002		Design Flow (MGD)	NA			
Latitude	40° 04' 41.76	6"	Longitude	-79º 21' 11.51"			
Wastewater D	Wastewater Description: Stormwater and Wastewater Associated with Wet Decking						

Technology-Based Limitations

Federal Effluent Limitation Guidelines

Outfall 002 has the potential to discharge wastewater associated with wet decking; and is therefore subject to the Federal Effluent limitation Guidelines (ELGs) from 40 CFR 429.104, Timber products processing point source category, Subpart I – Wet Storage Subcategory. Any new source subject to this subpart must achieve the following new sources performance standards: there shall be no debris discharged and the pH shall be within the range of 6.0 to 9.0 S.U.

Technology-Based Limitations

Stormwater Technology Limits

Outfall 002 will be subject to PAG-03 General Stormwater Permit conditions as a minimum requirement because the outfalls receive stormwater. The SIC code for the site is 2421 and the corresponding appendix of the PAG-03 that would apply to the facility is Appendix D. The reporting requirements applicable to stormwater discharges are shown in Table 3 below. Along with the monitoring requirements, sector specific BMPs included in Appendix D of the PAG-03 will also be included in Part C of the Draft Permit.

Table 3: PAG-03 Appendix (D) Monitoring Requirements

Parameter	Max Daily Concentration	Measurement Frequency	Sample Type
рН	Monitor and Report	1/6 Months	Grab
Chemical Oxygen Demand (COD)	Monitor and Report	1/6 Months	Grab
Total Suspended Solids (TSS)	Monitor and Report	1/6 Months	Grab

Water Quality-Based Limitations

Stormwater WQBELs

If discharges occur from Outfall 002 it would be during a storm event. Water quality analyses are typically performed under low-flow (Q7-10) conditions. Stormwater discharges occur at variable rates and frequencies but not however during Q7-10 conditions. Since the discharges from Outfall 002 are storm induced, a formal water quality analysis cannot be accurately conducted. Accordingly, water quality-based effluent limitations based on water quality analyses are not proposed.

Anti-Degradation

Antidegradation regulations under Chapter 93.4c(a)(l)(i) required discharges to protect the existing use of receiving waters. Chapter 93.4c(b) requires dischargers to consider non-discharge alternatives, public participation and social/economic justification when proposing new, additional or increased discharges to high quality or exceptional value streams. Existing use protection required under Chapter 93.4c(a)(l)(i) is ensured for discharges to high quality streams imposing the most stringent of technology-based, water quality based and non-degrading effluent limitations. In this case, non-degradation effluent limitations are not applicable because the discharge is stormwater only. To ensure that the discharge does not degrade the stream, the no exposure benchmark values will be used as the benchmark value for TSS ad COD in the permit. The goal for the permittee is to be consistently below these benchmark values; doing this shows that the discharges are uncontaminated stormwater and will maintain and protect the existing quality of the receiving waters.

Proposed Effluent Limitations and Monitoring Requirements

The proposed effluent monitoring requirements for Outfall 002 are displayed in Table 4 below, they are the most stringent values from the above effluent limitation development. Because the likely hood of Outfall 002 discharge is low, the monitoring frequency for the discharges from Outfall 002 will be once per discharge. A Part C condition is included in the Draft Permit requiring a Corrective Action Plan whenever there is an exceedance of the benchmark values, which are also included in the Part C condition. The benchmark values are also displayed below in Table 4. These values are not effluent limitations, an exceedance of the benchmark value is not a violation. As described above, if there is an exceedance of the benchmark values, a Corrective Action Plan must be developed to evaluate site stormwater controls and implement additional BMPs. Benchmark monitoring is a feedback tool, along with routine inspections and visual assessments, for assessing the effectiveness of stormwater controls and BMPs. An exceedance of the benchmark value provides permittees with an indication that the facility's controls may not be sufficiently controlling pollutants in stormwater. To ensure that the discharge is not degrading the high-quality waters, the no exposure benchmark values will be used as the benchmark values in the permit. An additional requirement will also be added to part A of the permit stating "the permittee may not discharge debris consisting of woody material such as bark, twigs, branches, heartwood or sapwood that will not pass through a 2.54 cm (1.0 in) diameter round opening and is present in the discharge from a wet storage facility. (40 CFR § 429.104)"

Table 4: Proposed Effluent Monitoring Requirements

Parameter	Instantaneous Minimum	Daily Maximum	Instantaneous Maximum	Benchmark Values (mg/L)	Measurement Frequency	Sample Type
pH (S.U.)	6.0	-	9.0	-	1/Discharge	Grab
Chemical Oxygen Demand (COD)	-	Monitor and Report	-	30	1/Discharge	Grab
Total Suspended Solids (TSS)	-	Monitor and Report	-	30	1/Discharge	Grab

Tools and References Used to Develop Permit			
L	<u> </u>	WQM for Windows Model (see Attachment)	
		Toxics Management Spreadsheet (see Attachment)	
L		TRC Model Spreadsheet (see Attachment)	
		Temperature Model 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.	
		SOP:	
	1	Othori	

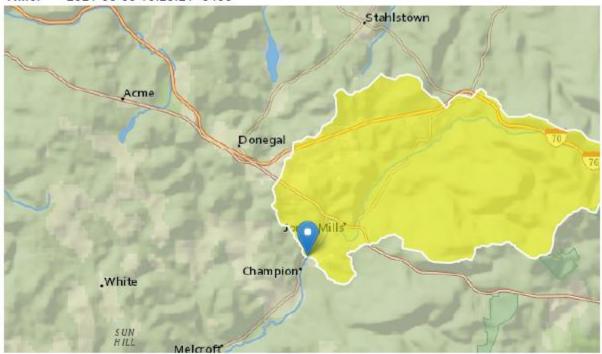
StreamStats Report

Region ID: PA

Workspace ID: PA20210803142805149000

Clicked Point (Latitude, Longitude): 40.07878, -79.35528

Time: 2021-08-03 10:28:21 -0400



Parameter Code	Parameter Description	Value	Unit
DRNAREA	Area that drains to a point on a stream	20.6	square miles
ELEV	Mean Basin Elevation	2046	feet

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	20.6	square miles	2.26	1400

NPDES Permit Fact Sheet The Ames Companies Inc.

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
ELEV	Mean Basin Elevation	2046	feet	1050	2580

Low-Flow Statistics Flow Report [99.9 Percent (20.6 square miles) Low Flow Region 4]

PII: Prediction Interval-Lower, Plu: Prediction Interval-Upper, ASEp: Average Standard Error of Prediction, SE: Standard Error (other -- see report)

Statistic	Value	Unit	SE	ASEp
7 Day 2 Year Low Flow	1.38	ft^3/s	43	43
30 Day 2 Year Low Flow	2.38	ft^3/s	38	38
7 Day 10 Year Low Flow	0.463	ft^3/s	66	66
30 Day 10 Year Low Flow	0.829	ft^3/s	54	54
90 Day 10 Year Low Flow	1.65	ft^3/s	41	41

Low-Flow Statistics Citations

Stuckey, M.H.,2006, Low-flow, base-flow, and mean-flow regression equations for Pennsylvania streams: U.S. Geological Survey Scientific Investigations Report 2006-5130, 84 p. (http://pubs.usgs.gov/sir/2006/5130/)

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Application Version: 4.6.1

StreamStats Services Version: 1.2.22

NSS Services Version: 2.1.2

