pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0011657**
Facility Type	**Industrial**	APS ID	**1058822**
Major / Minor	**Major**	Authorization ID	**1388481**

NPDES PERMIT FACT SHEET INDIVIDUAL INDUSTRIAL WASTE (IW) AND IW STORMWATER

Applicant and Facility Information

Applicant Name	**Vicinity Energy Philadelphia Inc.**	Facility Name	**Vicinity Energy Schuylkill Gen Station**
Applicant Address	2600 Christian Street	Facility Address	2600 Christian Street
	Philadelphia, PA 19146		Philadelphia, PA 19146-2316
Applicant Contact	James Carty	Facility Contact	Jessica Hartley
Applicant Phone	(484) 431-4599	Facility Phone	(267) 350-5819
Client ID	179943	Site ID	491656
SIC Code	4961	Municipality	Philadelphia City
SIC Description	Trans. & Utilities - Steam And Air Conditioning Supply	County	Philadelphia
Date Application Received	February 28, 2022	EPA Waived?	No
Date Application Accepted		If No, Reason	Major Facility

Purpose of Application: Renewal of the NPDES permit.

Summary of Review

The permittee has requested a renewal of the permit to discharge industrial wastewater from their site to Schuylkill River (WWF, MF) through Outfall 001.

The facility is formerly known as Schuylkill River Generating Station and operates as Combined Heat and Power and District Energy system to support hospitals, campuses of City of Philadelphia buildings.

There are 4 different monitoring points for various wastewater streams (Noncontact cooling water, boiler blowdown, steam condensate, intake screen backwash, stormwater): The approximate discharge flow and type of wastewater at each Monitoring Point are as follows:

MP101: Non-contact cooling and miscellaneous waters (0.024 MGD)
MP201: Stormwater from Greys Ferry cogeneration facility (0.41 MGD)
MP301: Cooling water from Greys Ferry cogeneration facility (44 MGD)
MP401: RO reject water and UF clarifier overflow (1.53 MGD)

In 2021, facility has added MP 401 for their new waste stream of RO reject water and UF clarifier overflow.

Delaware River Basin Commission has renewed the dockets for the facility's discharge and withdrawal on June 9, 2021 and March 10, 2021, respectively. All previously established effluent limits and monitoring requirements are consistent with both dockets.

Approve	Deny	Signatures	Date
X		Begay Omuralieva / Environmental Engineering Specialist	September 25, 2023
X		Pravin Patel Pravin C. Patel, P.E. / Environmental Engineer Manager	09/26/2023

Summary of Review

Clean Water Act § 316(b) – Cooling Water Intake Structures

On August 15, 2014, EPA promulgated Clean Water Act Section 316(b) regulations applicable to cooling water intake structures. The regulations established best technology available (BTA) standards to reduce impingement mortality and entrainment of all life stages of fish and shellfish at existing power generating and manufacturing facilities. The Final Rule took effect on October 14, 2014. Regulations implementing the 2014 Final Rule (and the previously promulgated Phase I Rule) are provided in 40 CFR Part 125, Subparts I and J for new facilities and existing facilities, respectively. Associated NPDES permit application requirements for facilities with cooling water intake structures are provided in 40 CFR Part 122, Subpart B – Permit Application and Special NPDES Program Requirements (§ 122.21(r)).

Applicability Criteria for Existing Facilities

As an existing facility, Vicinity Energy Philadelphia Inc. Schuylkill Generating Station falls under 40 CFR part 125, Subpart J – Requirements Applicable to Cooling Water Intake Structures for Existing Facilities Under Section 316(b) of the Clean Water Act (§§ 125.90 – 125.99). Pursuant to the applicability criteria given by § 125.91(a), Vicinity would be subject to the requirements of §§ 125.94 – 125.99 if:

(1) The facility is a point source;

(2) The facility uses or proposes to use one or more cooling water intake structures with a cumulative design intake flow (DIF) of greater than 2 million gallons per day (mgd) to withdraw water from waters of the United States; and

(3) Twenty-five percent or more of the water the facility withdraws on an actual intake flow basis is used exclusively for cooling purposes.

Vicinity Energy Philadelphia Inc. operates a steam and power generation plant that utilizes water from a cooling water intake structure (CWIS) located on the tidal portion of the Schuylkill River. The CWIS draws water from the shoreline through typical trash racks and entering 10’ diameter pipe leading to the screening structure. There are two conventional traveling screens with 3/8 inch mesh and a spray wash system for the removal of debris. The intake has a 51.6 MGD DIF and an AIF of 48.84 MGD.

The facility operates a once through non-contact cooling system that operates 24 hours a day, seven days a week. All water is used exclusively for cooling purposes. Calculated through screen velocity (TSV) was calculated in an attachment to the permit renewal. TSV of the 2 screens during AIF is 0.44 fps, and TSV during DIF is 0.46 fps.

To meet BTA requirements to minimize adverse impacts from impingement mortality and entrainment the permittee will continue to operate a CWIS with a design TSV <0.5 fps. In addition, the facility will conduct one year of seasonal entrainment sampling. This meets the required alternatives for impingement mortality and satisfies the site-specific entrainment standards based on required considerations discussed below.

1.) Numbers and types of organisms entrained

The facility conducted entrainment sampling between April and September in 2022. During that time samples were collected every six hours over a 24-hour period on 25 different days resulting in 100 samples. 100 cubic meters of intake water were collected during each event. Below is a table showing the numbers and types of organisms collected during sampling.

Summary of Review

Table 5. Total Number of Each Life Stage of Fish Collected in Schuylkill Generating Station in 2022

Taxon	Life Stage						Total Number
	Egg	YSL	PYSL	YOY	YROL	Und.	
American Eel				2	2		4
Bluegill					1		1
Cyprinidae	21		11			20	52
Common Carp	3						3
Creek Chubsucker			2	1		2	5
Freshwater Drum	246						246
Fundulus spp.	1						1
Gizzard Shad	9						9
Clupeidae	21	9	31			12	73
Lepomis spp.		2	96			2	100
Shield Darter			2				2
Tessellated Darter		3	17				20
White Perch	5						5
White Sucker	2						2
Yellow Perch		1					1
Lepomis/Pomoxis			1				1
Osteichthyes	1					3	4
Total Number	**309**	**15**	**160**	**3**	**3**	**39**	**529**
Percent Composition	58.4	2.8	30.2	0.6	0.6	7.4	

No eggs or larvae of state or federally listed threatened or endangered species were collected during entrainment sampling. The most abundant taxa entrained during the study were Freshwater Drum making up about 46% of the abundance. The next most abundant taxa included species in the genus *Lepomis* (sunfish) and members of the Clupeidae (herrings) and Cyprinidae (minnows) families making up an additional 42.5% combined. The submitted study report described the taxa sampled as not recreationally important and, besides the Freshwater Drum, common throughout the Schuylkill River. Further details are provided in the Entrainment BTA Worksheet.

2.) Impact of changes in particulate emission or other pollutants

Permit application materials do not include a description of changes in particulate emission or other pollutants associated with alternative technologies.

3.) Land Availability

Permit application materials do not include a description of land availability in regard to installation of alternative technologies.

4.) Remaining useful plant life

Permit application materials do not include an estimation of the remaining useful plant life.

5.) Social Benefits and Cost of Technologies

R (10) report was not submitted.

Services Comments

The services did not provide comment after a 60-day review period.

Summary of Review

Conclusion

The selected method of compliance with the impingement mortality BTA standard was a <0.5fps through screen design velocity. The design through screen velocity provided in the application was 0.46 fps. As stated, no state or federally listed threatened or endangered species were identified during the 2022 entrainment sampling effort. The entrainment sampling report concluded that the number of age-1 equivalent individuals for each species observed was a small number given the likely sizes of the populations in the Schuylkill River. Also, the facility withdraws a small percentage of the source waterbody, equating to between 1.15% and 2.37% or the river. An additional year of entrainment sampling will be required to continue to inform future permit renewals incorporating the once through cooling system used at the facility.

Therefore, Special Requirement for Part C of the permit regarding the CWA 316b will be proposed as following:

I. COOLING WATER INTAKE STRUCTURE(S)

A. Nothing in this permit authorizes a take of endangered or threatened species under the Endangered Species Act.

B. Technology and operational measures currently employed at the cooling water intake structure(s) must be operated in a way that minimizes impingement mortality and entrainment to the fullest extent possible.

C. The permittee shall not alter the location, design, construction or capacity of the intake structure(s) without prior approval of DEP.

D. Best Technology Available (BTA) Requirements

1. To meet BTA requirements to minimize adverse impacts from impingement, the permittee shall operate a cooling water intake structure (CWIS) with a maximum design though screen velocity of 0.46 feet per second (fps).

2. To meet BTA requirements for entrainment the facility will continue to operate the once through cooling system in a manner to minimize impacts and continue to monitor impacts to aquatic life via sampling described in section I.E.

E. Entrainment Sampling

1. The permittee shall collect 1 year of entrainment data in 2027 (simple enumeration) for each species over a 24 hour period and no less than biweekly during the primary period of reproduction, larval recruitment, and peak abundance identified in the waterbody.

2. An entrainment sampling plan shall be submitted to the Department by December 31, 2026.

3. Entrainment sampling shall be conducted following approval of the entrainment sampling plan. Results shall be submitted to the Department by December 31, 2027.

F. If DEP determines the methods to meet impingement and entrainment BTA requirements are not sufficient, the permittee shall employ additional controls to reduce adverse impacts from impingement and entrainment.

G. The permittee shall, on an annual basis, submit a report describing any modifications to the operation of any unit at the facility that impacts cooling water withdrawals or operation of the cooling water intake structure(s) during a calendar year. If not applicable, the permittee shall submit a statement certifying that no modifications have occurred in lieu of a report. The annual report or statement is due by January 28 of each year.

H. If the permittee wishes to submit a request for a reduction in permit application requirements as specified in 40 CFR § 125.95(c), the request must be submitted to DEP at least two years and six months before the permit expiration date.

Summary of Review

I. The permittee shall retain data and other records for any information developed pursuant to Section 316(b) of the Clean Water Act for a minimum of ten years.

J. New Units.

The permittee must submit applicable information in 40 CFR § 122.21(r) at least 180 days prior to the planned commencement of cooling water withdrawals associated with the operation of a new unit (as defined in 40 CFR § 125.92(u)).

There are no changes to the effluent characteristics of the discharge, therefore all previously established effluent limits and monitoring requirements will be proposed as listed on pages. 11-15 (except for TN and TP for IMP as per newly established monitoring requirements for Stormwater discharges for Appendix H -STEAM ELECTRIC GENERATING FACILITIES).
Accordingly, benchmark values are added in Part C of the permit as per Appendix H requirements of statewide PAG03 permit:

Parameter	Benchmark Values
Total Suspended Solids (TSS) (mg/L)	100
Oil and Grease (mg/L)	30
pH	9 STU

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.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	49.32
Latitude	39Âº 56' 35.90"	Longitude	-75Âº 11' 29.12"
Quad Name		Quad Code	
Wastewater Description:	IW Process Effluent with ELG		
Receiving Waters	Schuylkill River (WWF, MF)	Stream Code	00833
NHD Com ID	25988858	RMI	5.6 mi
Drainage Area		Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)		Q_{7-10} Basis	
Elevation (ft)		Slope (ft/ft)	
Watershed No.	3-F	Chapter 93 Class.	WWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	POLYCHLORINATED BIPHENYLS (PCBS), POLYCHLORINATED BIPHENYLS (PCBS),		
Source(s) of Impairment	SOURCE UNKNOWN		
TMDL Status	Final	Name	Schuylkill River PCB TMDL

Changes Since Last Permit Issuance:

Compliance History

DMR Data for Outfall 001 (from August 1, 2022 to July 31, 2023)

Parameter	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22
Temperature (ºF) Instantaneous Maximum	108	101.2	95.9	97.9	83.7	71.7	56.3	64.1	75.74	81.99	98.02	101.6

DMR Data for Outfall 101 (from August 1, 2022 to July 31, 2023)

Parameter	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22
Flow (MGD) Average Monthly	0.018	0.018	0.012	0.016	0.013	0.014	0.014	0.014	0.019	0.020	0.025	0.026
Flow (MGD) Daily Maximum	0.022	0.024	0.021	0.019	0.017	0.018	0.017	0.019	0.022	0.024	0.030	0.030
pH (S.U.) Instantaneous Minimum	6.0	6.0	6.0	6.0	6.03	5.83	6.17	6.24	6.13	6.74	6.11	6.0
pH (S.U.) Instantaneous Maximum	7.58	7.57	7.67	6.57	7.01	7.73	7.64	8.11	8.66	8.24	8.02	8.6
TRC (mg/L) Average Monthly	0.015	0.01	0.012	0.19	0.172	0.125	0.04	0.04	0.064	0.168	0.04	0.03
TRC (mg/L) Instantaneous Maximum	0.03	0.01	0.02	0.28	0.53	0.25	0.15	0.11	0.14	0.36	0.07	0.06
TSS (mg/L) Average Monthly	8.25	44.25	24.6	11.0	15.0	6.0	14.25	5.0	2.0	3.5	2.0	2.0
TSS (mg/L) Daily Maximum	10.0	91.0	97.0	24.0	41.0	13.0	33.0	10.0	5.0	8.0	3.0	4.0
Oil and Grease (mg/L) Average Monthly	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
Oil and Grease (mg/L) Daily Maximum	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0

DMR Data for Outfall 201 (from August 1, 2022 to July 31, 2023)

Parameter	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22

pH (S.U.) Daily Maximum		8.3						7.47				
TSS (mg/L) Daily Maximum		9.0						16				
Oil and Grease (mg/L) Daily Maximum		< 5.0						< 5.0				
Total Iron (mg/L) Daily Maximum		0.28						0.48				
PCBs (Wet Weather) (pg/L) Daily Maximum								7080.0				

DMR Data for Outfall 301 (from August 1, 2022 to July 31, 2023)

Parameter	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22
Flow (MGD) Average Monthly	50.47	47.42	30.10	30.36	30.12	31.51	28.44	33.41	39.01	43.94	43.96	45.6
Flow (MGD) Daily Maximum	55.46	50.10	50.07	42.0	42.0	42.0	41.92	38.87	43.05	49.70	48.22	48.24
pH (S.U.) Instantaneous Minimum	7.27	7.1	6.98	6.75	6.97	7.11	6.97	7.33	7.13	7.28	7.5	7.15
pH (S.U.) Instantaneous Maximum	7.67	7.46	7.47	7.73	7.55	7.54	7.59	7.69	7.73	7.48	7.59	7.44
TSS (mg/L) Average Monthly	17.25	5.75	13.0	11.25	4.4	4.5	2.0	4.5	5.2	7.75	11.75	5.2
TSS (mg/L) Effluent Net Average Monthly	0.0	0.0	0.0	1.5	0.8	1.25	0.0	0.25	1.6	0.0	0.5	0.0
TSS (mg/L) Intake Average Monthly	20.25	10.75	17.25	29.25	4.0	6.25	4.0	10.5	5.0	13.0	56	14.0
TSS (mg/L) Daily Maximum	50.0	11	34.0	17.0	8.0	7.0	4.0	6.0	12.0	13.0	18.0	8.0
TSS (mg/L) Effluent Net Daily Maximum	0.0	0.0	0.0	4.0	2.0	4.0	0.0	1.0	6.0	0.0	2.0	0.0
TSS (mg/L) Intake Daily Maximum	55.0	22.0	40.0	88.0	10.0	13.0	13.0	21.0	10.0	18.0	190	34.0
Oil and Grease (mg/L) Average Monthly	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0

Oil and Grease (mg/L) Daily Maximum	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0

DMR Data for Outfall 401 (from August 1, 2022 to July 31, 2023)

Parameter	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22
pH (S.U.) Instantaneous Minimum	7.5	7.6	7.6	7.6	7.5							
pH (S.U.) Instantaneous Maximum	8.1	8.0	7.85	8.1	8.1							
TSS (mg/L) Average Monthly	2.25	2.25	1.6	1.0	1.2							
Total Dissolved Solids (mg/L) Average Monthly	882.25	857.75	762.8	874.25	754							
Total Dissolved Solids (mg/L) Daily Maximum	994.0	1080	1040	951.0	835							
Oil and Grease (mg/L) Average Monthly	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0							
Oil and Grease (mg/L) Daily Maximum	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0							
Total Aluminum (mg/L) Average Monthly	0.04	0.04	0.02	0.02	0.024							
Total Aluminum (mg/L) Daily Maximum	0.1	0.10	0.02	0.02	0.03							
Total Copper (mg/L) Average Monthly	0.00625	0.00925	0.0082	0.0075	0.0052							
Total Copper (mg/L) Daily Maximum	0.007	0.01	0.013	0.009	0.006							
Total Lead (mg/L) Average Monthly	0.001	< 0.001	< 0.001	< 0.001	< 0.001							
Total Lead (mg/L) Daily Maximum	0.001	< 0.001	< 0.001	< 0.001	< 0.001							
Total Zinc (mg/L) Average Monthly	0.012	0.01275	0.0226	0.009	0.008							
Total Zinc (mg/L) Daily Maximum	0.022	0.025	0.09	0.013	0.011							

Compliance History

Effluent Violations for Outfall 101, from: September 1, 2022 To: July 31, 2023

Parameter	Date	SBC	DMR Value	Units	Limit Value	Units
pH	02/28/23	Inst Min	5.83	S.U.	6.0	S.U.
TSS	06/30/23	Avg Mo	44.25	mg/L	30.0	mg/L
TSS	06/30/23	Daily Max	91.0	mg/L	60.0	mg/L
TSS	05/31/23	Daily Max	97.0	mg/L	60.0	mg/L

Summary of Inspections:

Proposed Effluent Limitations and Monitoring Requirements

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

Outfall 001, Effective Period: Start of Final Period through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
pH STD	XXX	XXX	6.0	XXX	XXX	9.0	1/day	Grab
Temperature (deg F) *, **	XXX	XXX	XXX	98	XXX	110	Continuous	Metered
Heat Rejection Rate (MBTUs/day) **	XXX	Report ***	XXX	XXX	XXX	XXX	1/day	Calculation
Total Suspended Solids	XXX	XXX	XXX	30.0	XXX	100	1/week	24-Hr Composite
Total Dissolved Solids	XXX	XXX	1000.0 Avg Mo	2000.0 Daily Max	XXX	2500.0	1/week	24-Hr Composite
Oil and Grease	XXX	XXX	XXX	15.0	20.0 Daily Max	30	1/week	Grab
Total Phosphorus	XXX	XXX	XXX	Report	XXX	XXX	1/week	24-Hr Composite
Iron, Total	XXX	XXX	XXX	Report	XXX	XXX	1/week	24-Hr Composite

* See Part C. I. Other Requirement: E.
** See Part C I, Other Requirements G., and H and Part C Other Requirement. I - Heat Rejection Rate Limitations.
*** See Part C I. Other Requirement I.

Compliance Sampling Location: Outfall 001

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

IMP 101, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	1/day	Estimate
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/day	Grab
TRC	XXX	XXX	XXX	0.5	XXX	1.2	1/week	Grab
TSS	XXX	XXX	XXX	30.0	60.0	75	1/week	Grab
Oil and Grease	XXX	XXX	XXX	15.0	30.0	30	1/week	Grab

Compliance Sampling Location: at IMP 101

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

Outfall 201, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
PCBs (Wet Weather) (pg/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab

Compliance Sampling Location: MP 201

Other Comments: None

Proposed Effluent Limitations and Monitoring Requirements

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

IMP 301, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Average Monthly	Daily Maximum	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	1/day	Estimate
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/week	Grab
TSS Effluent Net	XXX	XXX	XXX	30.0 Avg Mo	60.0	75	2/month	Calculation
TSS Intake	XXX	XXX	Report	Report	XXX	Report	2/month	Grab
TSS	XXX	XXX	Report	Report	XXX	Report	2/month	Grab
Oil and Grease	XXX	XXX	XXX	15.0 Avg Mo	30.0	30	2/month	Grab

Compliance Sampling Location: at IMP 301

Proposed Effluent Limitations and Monitoring Requirements

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

IMP 401, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/week	Grab
TSS	XXX	XXX	XXX	30.0	XXX	100	1/week	Grab
Total Dissolved Solids	XXX	XXX	XXX	Report	Report	XXX	1/week	Grab
Oil and Grease	XXX	XXX	XXX	15	20	XXX	1/week	Grab
Total Aluminum	XXX	XXX	XXX	Report	Report	XXX	1/week	Grab
Total Copper	XXX	XXX	XXX	Report	Report	XXX	1/week	Grab
Total Lead	XXX	XXX	XXX	Report	Report	XXX	1/week	Grab
Total Zinc	XXX	XXX	XXX	Report	Report	XXX	1/week	Grab

Compliance Sampling Location: at IMP 401