

Northeast Regional Office CLEAN WATER PROGRAM

Application Type	Renewal
Facility Type	Municipal
Major / Minor	Major

NPDES PERMIT FACT SHEET INDIVIDUAL SEWAGE

 Application No.
 PA0029289

 APS ID
 723786

 Authorization ID
 1279529

Applicant and Facility Information

Applicant Name	Brodhead Creek Region Authority	Facility Name	Brodhead Creek Regional Authority STP
Applicant Address	410 Mill Creek Road	Facility Address	20 South Fourth Street
	East Stroudsburg, PA 18301-1126		Stroudsburg, PA 18360
Applicant Contact	David Horton	Facility Contact	Michael Reisenwitz
Applicant Phone	(570) 421-3232	Facility Phone	(570) 421-2270
Client ID	87465	Site ID	238612
Ch 94 Load Status	Not Overloaded	Municipality	Stroudsburg Borough
Connection Status	No Limitations	County	Monroe
Date Application Rece	ivedJune 27, 2019	EPA Waived?	No
Date Application Acce	oted June 27, 2019	If No, Reason	Major Facility
Purpose of Application	Renewal of an existing NPDES	Permit for treated Sewage	

Summary of Review

This application is for the Stroudsburg Borough Sewage Treatment Plant's NPDES permit renewal for the discharge of 4.5 MGD of treated sewage and stormwater into McMichael Creek. McMichael Creek is a TSF-MF receiving stream in the Brodhead Creek watershed 1E and is classified for Migratory Fishes / Trout Stocking, aquatic life, water supply and recreation. Per the Department's current existing use list, the receiving stream does not have an existing use classification that is more protective than their designated use. The discharge is not expected to affect public water supplies.

The Facility serves Stroudsburg Borough, Stroud Township, Pocono Township, Hamilton Borough, and Tobyhanna Township. The SBRs discharge through Outfall 001. Outfall 002 is for stormwater only and stormwater Outfalls 003 & 004 have been turned back to the Borough of Stroudsburg. The existing limits will be retained from the Present Permit including the Part C language concerning stream temperature:

• The discharge of wastewater shall not increase the ambient temperatures of the receiving waters by more than 5°F, nor shall such discharge result in stream temperatures exceeding 87°F.

Mercury limits will be introduced in year 4 of the permit. The limitations and monitoring requirements specified for the draft permit 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) and/or BPJ.

The WMS Report query "Water Management System Inspections" was run. On 06/19/2019 a Compliance Evaluation was done with No Violations noted.

The WMS "Open Violations by Client Report" was run and there are No Open Violations.

The Existing Permit expires on January 31, 2020 and the renewal was submitted June 27, 2019.

Approve	Deny	Signatures	Date
х		Bernard Feist, P.E. / Environmental Engineer /s/	August 1, 2019
х		Amy M. Bellanca, P.E. / Environmental Engineer Manager /s/	August 1, 2019

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.

Discharge, Receiving Waters and Water Supply Inform	mation	
	/	
Outfall No. 001	Design Flow (MGD)	4.5
Latitude40° 59' 14.72"	Longitude	-75º 11' 11.32"
Quad Name	Quad Code	
Wastewater Description: Sewage Effluent		
Receiving Waters <u>McMichael Creek (TSF, MF)</u>	Stream Code	4778
NHD Com ID26175214	RMI	0.2
Drainage Area <u>114 mi²</u>	Yield (cfs/mi ²)	0.197
Q ₇₋₁₀ Flow (cfs) 22.5 cfs	Q7-10 Basis	DFlow Gage 01442500
Elevation (ft) 376	Slope (ft/ft)	
Watershed No. 1-E	Chapter 93 Class.	TSF, MF
Existing Use	Existing Use Qualifier	
Exceptions to Use	Exceptions to Criteria	
Assessment Status Impaired		
Cause(s) of Impairment PATHOGENS		
Source(s) of Impairment SOURCE UNKNOWN		
TMDL Status	Name	
Background/Ambient Data	Data Source	
pH (SU)		
Temperature (°F)		
Hardness (mg/L)		
Other:		
Nearest Downstream Public Water Supply Intake	City of Easton	
PWS Waters	Flow at Intake (cfs)	· · · · · · · · · · · · · · · · · · ·
PWS RMI	Distance from Outfall (mi)	> 30 miles

McMichael Creek RMI 0.2 WRDS: 4778 HUC 8 Code: 02040104

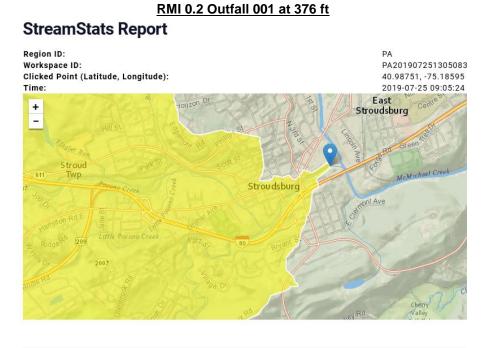
USGS STATION .-- 01442500 BRODHEAD CREEK AT MINISINK HILLS, PA

LOCATION.--Lat 40`59'55", long 75`08'35", Monroe County, Hydrologic Unit 02040104, on left bank at Minisink Hills, 500 ft upstream from Marshall Creek, 0.8 mi upstream from mouth, and 3.0 mi southeast of East Stroudsburg. DRAINAGE AREA.--259 square miles.

PERIOD OF RECORD.--November 1950 to current year.

Magnetic DFLOW Results			_		\times
<u>F</u> ile Edit View Help					
All available data from Apr 1, 1995 through Mar 31, 201 Climatic year defined as Apr 1 - Mar 31.	8 are included in analysis.				
Gage	Period	Days in +	7Q10	Harmor	nic
01442500 - Brodhead Creek at Minisink Hills, PA	1994/04/01 - 2018/04/01	8,766	50.9	2.52E+0)2
Double-click on biological flow value for excursion analy	sis				

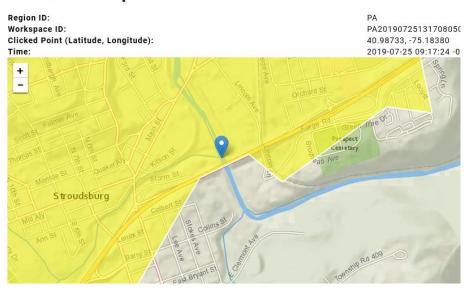
Q₇₋₁₀ LowFlowYield (cfs/mi²)= 50.9 / 259 = 0.197



Low-Flow Statistics Parameter Sig Percent (8.9 square miles) Low Flow Region 2] Parameter Code Parameter Name Value Units DRNAREA Drainage Area 114 square miles

Stream Q7-10 Flow (cfs) = 0.197 * 114 = 22.5 cfs

RMI 0.0 at 370 ft



StreamStats Report

Low-Flow Statistics Parameters [5 Percent (12.1 square miles) Low Flow Region 2]				
Parameter Code	Parameter Name	Value	Units	
DRNAREA	Drainage Area	258	square miles	

Treatment Facility Summary

Treatment Facility Na	ne: Brodhead Creek Re	gional Authority WWTP		
	Degree of			Avg Annual
Waste Type	Treatment	Process Type	Disinfection	Flow (MGD)
	Secondary With			
	Ammonia And	Sequencing Batch		
Sewage	Phosphorus	Reactor	Ultraviolet	4.5
Hydraulic Capacity	Organic Capacity			Biosolids
(MGD)	(lbs/day)	Load Status	Biosolids Treatment	Use/Disposal
4.5	11400	Not Overloaded	Combination	Landfill

Changes Since Last Permit Issuance: Construction Completion. WQM # 4509405.(SBRs).

Development of Effluent Limitations

Outfall No.	001		Design Flow (MGD)	4.5
Latitude	40° 59' 16.0	0"	Longitude	-75º 11' 10.00"
Wastewater De	escription:	Sewage Effluent		

Technology-Based Limitations

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

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

Comments: UV disinfection

Water Quality-Based Limitations

The following limitations were determined through water quality modeling (output files attached):

Hydrodynamics	NH3-N Allocations	D.O. Allocations	D.O. Simulation	Effluent Lin	nitations	
Г					,	
	RMI Discharg		umber Disc Flow (mgd)			
[0.20 BCRA	√ 00292	4.5000			
	Parameter	Effluent Limit 30 Day Averag (mg/L)		nt Limit imum g/L)		
	CBOD5	25				
	NH3-N	9.66	19.32	_		
	Dissolved Oxygen	I	1 1	3		
1	Record: I + 1 of 1	› ► ► No Filte	Search			
,						

			WATER QUALITY POL	EENING ANALY LUTANTS OF SION 2.6			CLEAR FORM
	Facility: BCRA			NPDES Permit N	o.: PA0029	289	Outfall: 001
	Analysis Hardness (mg/L): 116			Discharge Flow (I	MGD): 4.5	Analy	/sis pH (SU): 7
	Stream Flow, Q7-10 (cfs): 22.5						
	Parameter		aximum Concentration in pplication or DMRs (µg/L)	Most Stringent Criterion (µg/L)	Candidate for PENTOXSD Modeling?	Most Stringent WQBEL (µg/L)	Screening Recommendation
-	Total Dissolved Solids		693000	500000	Yes	na	#VALUE!
đ	Chloride		118000	250000	No		#VALUE!
Group	Bromide	<	1000	N/A	No		#VALUE!
0	Sulfate		64000	250000	No		#VALUE!
	Total Aluminum	<	100	750	No		
	Total Antimony		0.4	5.6	No		
	Total Arsenic	<	1	10	No (Value < QL)		
	Total Barium		12	2400	No		
	Total Beryllium	<	0.4	N/A	No		
	Total Boron		142	1600	No		
	Total Cadmium	<	0.08	0.302	No (Value < QL)		
	Total Chromium	<	1	N/A	No		
	Hexavalent Chromium	<	0.047	10.4	No (Value < QL)		
	Total Cobalt	<	1	19	No (Value < QL)		
2	Total Copper		4	10.6	No		
	Free Available Cyanide		5	5.2	No		
Group	Total Cyanide	<	5	N/A	No		
G	Dissolved Iron		87	300	No		
	Total Iron		104	1500	No		
	Total Lead	<	1	3.8	No (Value < QL)		
	Total Manganese		23	1000	No		
	Total Mercury		0.497	0.05	Yes	0.211	Establish Limits

			Effluent Li	mits			
Hydrodynamics	Wasteloa	d Allocatio	ıs	Effluent Limi	ts		
RMI Na	me	Permit Num	iber Disc Flow (mgd)				
0.2 BCRA	~	/ 0029289	9 4.500	00			
Paramete		Effluent Limit (μg/L)	Governing Criterion	Max. Daily Limit (μg/L)	Most S WQBEL (µg/L)	Stringent WQBEL Criterion	
▶ 1,1-DICHLOROETHYL		0.5	INPUT	0.78	139.459	THH	
BIS(2-ETHYLHEXYL)	PHTHALATE	1.29	INPUT	2.013	20.634	CRL	
MERCURY		0.211	THH	0.33	0.211	THH	
TOTAL DISSOLVED S	OLIDS (PWS)	693000	INPUT	1080000	NA	NA	
VANADIUM		1	INPUT	1.56	422.603	CFC	

2008 Modelling ->





Comments: 2019 Modelling pdf ->

Best Professional Judgment (BPJ) Limitations

Comments: Delay Mercury limits for 3 years for the development of a TRE

Anti-Backsliding

DOCKET NO. D-1986-011 CP-4 DELAWARE RIVER BASIN COMMISSION EFFLUENT TABLE A-1: DRBC Parameters Included in NPDES permit

	DUTFALL 001 (McMichael Creek)	
PARAMETER	LIMIT	MONITORING
pH (Standard Units)	6 to 9 at all times	As required by NPDES permit
Total Suspended Solids	85% minimum removal 10 mg/l; 375 lbs/day	As required by NPDES permit
CBOD (5-Day at 20º C)	10 mg/l; 375 lbs/day 85% minimum removal*	As required by NPDES permit
Ammonia-Nitrogen (5/1 to 10/31)	1.5 mg/l, 56.3 lbs/day	As required by NPDES permit
Ammonia-Nitrogen (11/1 to 4/30)	4.5 mg/l; 169 lbs/day	As required by NPDES permit
Fecal Coliform	200 colonies per 100 ml	As required by NPDES permit
Dissolved Oxygen	7.0 mg/l (minimum at all times)	As required by NPDES permit
Nitrate-Nitrogen (5/1 - 10/31)	4.0 mg/l;150 lbs/day	As required by NPDES permit
Total Phosphorous	1.0 mg/l; 37.5 lbs/day	As required by NPDES permit
Total Dissolved Solids**	1,000 mg/l	As required by NPDES permit

* Per the NPDES permit, 85% minimum removal of CBOD5 or BOD5 **

EFFLUENT TABLE A-2: DRBC Parameters Not Included in NPDES permit

OUTFALL 001 (McMichael Creek)									
PARAMETER	LIMIT	MONITORING							
Total Kjeldahl Nitrogen (TKN)	Monitor & Report	Monthly							
Nitrite+Nitrate-Nitrogen	Monitor & Report	Monthly							

Whole Effluent Toxicity (WET)

For Outfall 001, \boxtimes Acute \boxtimes Chronic WET Testing was completed:

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$\overline{\boxtimes}$	

For the permit renewal application (4 tests).

Quarterly throughout the permit term.

Quarterly throughout the permit term and a TIE/TRE was conducted. Other: Yearly

The dilution series used for the tests was:

Sub Fac 204	4539	001	OUTFALL #001	j
General TM	/IDL Str	eams Location	NHD Additives WETT	
Q7-10 Flow* 27 IWCa 32		cfs PMF Test Type Chronic	Fa* 0.515 PMFc* 1.0 WETT Required by Permit? Test Type for Failures(s) WETT Failure(s)?	
IWCc 19 TIWC 20		1st Dilution Series 5	2nd 3rd 4th 5th Test Type (Other) 21 10 20 60 100 Comments From 2008 Polution Report; SBRs we 21	
	Species T	ype*	Species	
	CDUBI	Ceriodaphnia Dubi	ia 📃 🗎	
	PPROM	Pimephales Prom	ielas 📃 🛃 🖉	

Summary of Four Most Recent Test Results

NOEC/LC50 Data Analysis

	Ceriodap	hnia Results (% E	ffluent)	Pimephale			
Test Date	NOEC Survival	NOEC Reproduction	LC50	NOEC Survival	NOEC Growth	LC50	Pass? *
8/21/2018	100	100	100	100	100	100	Pass
8/28/2017	100	100	100	100	100	100	Pass
7/19/2016	100	100	100	100	100	100	Pass
7/14/2015	100	100	100	100	100	100	Pass
7/7/2014	100	100	100	100	100	100	Pass
4/15/2014	100	100	100	100	100	100	Pass

* A "passing" result is that which is greater than or equal to the TIWC value.

Is there reasonable potential for an excursion above water quality standards based on the results of these tests? (NOTE – In general, reasonable potential is determined anytime there is at least one test failure in the previous four tests).

Evaluation of Test Type, IWC and Dilution Series for Renewed Permit

		<u>2019 update</u>	
Sub Fac 20	4539	001 OUTFALL #001	
General TM	MDL Strea	eams Location NHD Additives WETT	
Q7-10 Flow* 22 IWCa 38		cfs PMFa* 0.491 PMFc* 1.0 WETT Required Test Type Chronic Test Type for Failures(s) WETT	by Permit? ☑ Failure(s)? □
IWCc 23	.63 %	1st 2nd 3rd 4th 5th Test Type (Other)	2
TIWC 24	% D	Dilution Series 6 12 24 62 100 Comments From 2019 Polution Report	t; SBRs we 🚀
	Species Typ	ype* Species	
	CDUBI	Ceriodaphnia Dubia	
	PPROM	Pimephales Promelas	

Acute Partial Mix Factor (PMFa): 0.491

Chronic Partial Mix Factor (PMFc): 1.0

WET Limits

Has reasonable potential been determined?	🗌 YES	\boxtimes	NO
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Will WET limits be established in the permit? \Box YES \boxtimes NO

Compliance History

DMR Data for Outfall 001 (from June 1, 2018 to May 31, 2019)

Parameter	MAY- 19	APR- 19	MAR- 19	FEB- 19	JAN- 19	DEC- 18	NOV- 18	OCT- 18	SEP- 18	AUG- 18	JUL-18	JUN- 18
Flow (MGD) Average Monthly	2.753	2.568	2.612	2.388	2.653	2.698	2.851	2.284	2.404	2.304	1.966	1.926
Flow (MGD) Daily Maximum	4.292	3.922	3.622	2.736	5.102	5.379	3.448	3.099	3.352	3.609	3.246	2.493
pH (S.U.) Minimum	6.9	6.8	6.8	6.7	6.7	6.8	6.8	6.9	7.0	7.4	6.9	7.0
pH (S.U.) Maximum	7.3	7.3	7.2	7.3	7.2	7.3	7.4	7.6	7.4	7.8	7.4	7.3
DO (mg/L) Instantaneous Minimum	7.8	8.0	9.1	9.3	9.3	9.2	8.6	7.9	7.5	7.4	7.5	7.5
CBOD5 (lbs/day) Average Monthly	< 47	< 48	< 44	< 50	< 42	54	< 99	< 59	63	58	< 50	< 51
CBOD5 (lbs/day) Weekly Average	< 62	< 77	47	< 83	< 49	57	< 194	< 74	86	66	66	61
CBOD5 (mg/L) Average Monthly	< 2.0	< 2.2	< 2.0	< 2.6	< 2.0	2.6	< 4.1	< 3.1	2.9	3.0	< 2.9	< 3.1
CBOD5 (mg/L) Weekly Average	< 2.0	< 2.8	< 2.0	< 4.2	< 2.0	3.2	< 8.6	< 3.7	3.6	3.0	< 3.0	3.6
BOD5 (lbs/day) Raw Sewage Influent br/> Average Monthly	8665	8473	5793	4974	3816	3877	4548	6317	4646	4052	1901	3095
BOD5 (mg/L) Raw Sewage Influent Average Monthly	340	364	260	232	172	177	179	301	206	197	102	171
TSS (lbs/day) Average Monthly	< 95	< 84	< 90	< 83	< 84	83	< 111	< 75	76	57	< 56	< 45

NPDES Permit Fact Sheet Brodhead Creek Regional Authority STP

TSS (lbs/day)												
Raw Sewage												
Influent 												
Average Monthly	9640	9289	6332	5586	4954	4346	4616	5705	7069	5552	7111	9734
TSS (lbs/day)												
Weekly Average	< 123	< 108	< 101	< 92	< 98	96	< 140	< 91	117	99	90	< 51
TSS (mg/L)												
Average Monthly	< 4.0	< 4.0	< 4.1	< 4.2	< 4.0	3.9	< 4.5	< 4.1	3.5	3.0	< 3.3	< 2.8
TSS (mg/L)												
Raw Sewage												
Influent 												
Average Monthly	379	407	284	261	223	200	182	279	467	270	388	538
TSS (mg/L)		-										
Weekly Average	< 4.0	< 4.0	< 4.3	< 4.9	< 4.0	4.0	< 4.5	< 5.0	5.0	5.3	5.8	< 3.2
Total Dissolved		4					1 110		0.0	0.0	0.0	10.2
Solids (lbs/day)												
Average Monthly	10619	9701	12480	9788	8134	8927	11083	9650	10103	9786	11335	9290
Total Dissolved		0101	.2.00	0.00	0.01	002.		0000		0.00		0200
Solids (mg/L)												
Average Monthly	452	467	563	493	390	426	454	500	474	511	693	576
Fecal Coliform										0.11		0.0
(CFU/100 ml)												
Geometric Mean	< 2	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
Fecal Coliform	~ -											
(CFU/100 ml)												
Instantaneous												
Maximum	5	3	3	2.0	4	2	< 2	1.5	< 1	2.0	1	1
Nitrate-Nitrite	0	0	0	2.0		L	~ 2	1.0		2.0		· ·
(lbs/day)												
Average Monthly	< 72	< 75	< 59	< 51	< 52	< 52	< 54	< 40	45	47	36	42
Nitrate-Nitrite			. 00		< 02	4 0L		10	10			
(mg/L)												
Average Monthly	< 3.0	< 3.5	< 2.6	< 2.56	< 2.482	< 2.45	< 2.158	< 2.105	2.15	< 2.46	2.065	2.63
Total Nitrogen	< 0.0	< 0.0	× 2.0	< 2.00	< 2.40Z	× 2.40	< 2.100	< 2.100	2.10	\$ 2.40	2.000	2.00
(lbs/day)												
Average Monthly	< 98	107	< 92	< 53	< 76	< 69	86	< 61	60	67	57	72
Total Nitrogen	< 00	107	< 0Z	< 00	<10	< 00	00	< 01	00	01	07	12
(mg/L)												
Average Monthly	< 4.1	5.0	< 4.1	< 2.7	< 3.638	< 3.27	3.453	< 3.24	2.877	3.47	3.367	4.48
Ammonia (lbs/day)	× 1 .1	5.0	× 1 .1	< Z.1	< 0.000	< 0.21	0.400	< 0.24	2.011	5.47	0.007	+0
Average Monthly	< 2.7	< 2.1	< 2.3	< 2.8	< 5.2	< 5.3	< 7.5	< 4.2	< 3.4	9.6	< 8.5	< 10.6
Ammonia (mg/L)	<u> </u>	<u> </u>	N 2.0	<u> </u>	< J.∠	< 0.0	< 1.5	₹.∠	× 0.4	0.0	< 0.0	< 10.0
Average Monthly	< 0.11	< 0.1	< 0.1	< 0.14	< 0.23	< 0.26	< 0.283	< 0.2	< 0.16	< 0.5	< 0.5	< 0.65
Nitrate (lbs/day)	< v.11	< U. I	< U.1	< 0.14	< 0.20	< 0.20	~ 0.200	< 0.Z	< 0.10	< 0.0	< 0.0	< 0.00
Average Monthly	69							< 37	44	46	35	41
Nitrate (mg/L)	03							< JI	77			1 -
Average Monthly	2.9							< 1.93	2.1	< 2.41	2.04	2.6
	۷.3							< 1.30	۷.۱	N 2.41	2.04	2.0
I KN (lbs/day) Average Monthly	32	32	< 33	< 34	24	< 17	< 25	< 21	16	< 21	22	30
TKN (mg/L)	52	52	< 00	<i>د</i> ۲۵	24	517	< 20	521	10	521	22	30
Average Monthly	1.4	1.6	~ 15	< 1.7	1.16	< 0.83	< 1.011	< 1.135	< 0.793	< 1.1	1.3	1.9
	1.4	1.0	< 1.5	<u> <u> </u></u>	1.10	< 0.00	< 1.011	51.100	< 0.193	< 1.1	1.3	1.9
Total Phosphorus												
(lbs/day) Average Monthly	. 2 5				101	. 2 0	- 1.6	. 27	- 2 0	-11	- 1 5	126
	< 2.5	< 2.2	< 2.2	< 2.2	< 2.1	< 2.8	< 1.6	< 2.7	< 3.9	< 1.4	< 1.5	< 2.6
Total Phosphorus												
(mg/L)	101	10.11	-01	10.11	101	-014	10.07	1011	- 0.40	- 0.07	- 0.00	10.16
Average Monthly	< 0.1	< 0.11	< 0.1	< 0.11	< 0.1	< 0.14	< 0.07	< 0.14	< 0.18	< 0.07	< 0.09	< 0.16

DMR Data for Outfall 002 (from June 1, 2018 to May 31, 2019)

Parameter	MAY- 19	APR- 19	MAR- 19	FEB-19	JAN-19	DEC- 18	NOV- 18	OCT- 18	SEP-18	AUG- 18	JUL-18	JUN-18
TSS (mg/L) Daily Maximum						44.2						
TKN (mg/L) Daily Maximum						< 1.00						
Total Iron (mg/L) Daily Maximum						0.758						