pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northwest Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0033448**
Facility Type	**Non-Municipal**	APS ID	**1074502**
Major / Minor	**Minor**	Authorization ID	**1415544**

NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE

Applicant and Facility Information

Applicant Name	**Pennwood Estates MHC LLC**	Facility Name	**Pennwood Estates MHP**
Applicant Address	6810 Frogtown Road	Facility Address	6810 Frogtown Road
	Hermitage, PA 16148		Hermitage, PA 16148
Applicant Contact	Christopher Triantafelow	Facility Contact	
Applicant Phone	(724) 981-5390	Facility Phone	
Applicant E Mail	Admin@circlegroup/llc	Facility E Mail	
Client ID	345450	Site ID	452841
Municipality	Lackawanna Township	County	Mercer
Ch 94 Load Status	Not Overloaded	Connection Status	No Limitations
Date Application Received	October 25, 2022	EPA Waived?	Yes
Date Application Accepted	November 8, 2022	If No, Reason	
Purpose of Application	NPDES permit renewal		

Summary of Review

No violations on record.

0.05 dry ton sludge sent to Hermitage WPCP

Public Participation

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

Approve	Deny	Signatures	Date
X		*William H. Mentzer* William H. Mentzer, P.E. Environmental Engineering Specialist	January 24, 2023
X		Chad W. Yurisic, P.E. Environmental Engineer Manager	

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	0.009
Latitude DP	41º 12' 54.58"	Longitude DP	-80º 22' 42.96"
Latitudev NHD	41º 12' 54.14"	Longitude NHD	-80º 22' 42.58"
Quad Name	Sharon East	Quad Code	0902
Wastewater Description:	Treated sanitary wastewater		

Receiving Waters	West Branch Little Neshannock Creek	Stream Code	35547
NHD Com ID	130033567	RMI	9.82
Drainage Area	1.59	Yield (cfs/mi^2)	0.03084
Q_{7-10} Flow (cfs)	0.05	Q_{7-10} Basis	L Neshannock Creek
Elevation (ft)	1156.62	Slope (ft/ft)	0.01722
Watershed No.	20-A	Chapter 93 Class.	TSF
Existing Use	**statewide**	Existing Use Qualifier	none
Exceptions to Use	none	Exceptions to Criteria	none
Comments	Node RMI 1.45; Basin Data 17.4 Sq Mile 877.48 ft elevation		

Assessment Status	Attaining Use(s)
Cause(s) of Impairment	
Source(s) of Impairment	
TMDL Status	Name

Background/Ambient Data		Data Source
pH (SU)	7.5	7.45 (Pine Run 6/28/05) and 7.6 (Yellow Creek 8/24/86)
Temperature (°F)		
Hardness (mg/L)		
Other:		

Nearest Downstream Public Water Supply Intake	Beaver Falls		
PWS Waters	Beaver River	Flow at Intake (cfs)	NA
PWS RMI	5.39	Distance from Outfall (mi)	35

Changes Since Last Permit Issuance: none

Other Comments: none

Treatment Facility Summary				
Treatment Facility Name: Pennwood Estates MHP				
WQM Permit No.	**Issuance Date**			
4372415-T2	April 23, 1999			
4372415-T1	July 26, 1994			
Waste Type	**Degree of Treatment**	**Process Type**	**Disinfection**	**Avg Annual Flow (MGD)**
Sewage	Secondary With Ammonia Reduction	Activated Sludge	Hypochlorite	0.009
Hydraulic Capacity (MGD)	**Organic Capacity (lbs/day)**	**Load Status**	**Biosolids Treatment**	**Biosolids Use/Disposal**
0.009	25	Not Overloaded		

Changes Since Last Permit Issuance: none

Other Comments:

Treatment is: comminution with bypass screen, 9 000-gallon extended aeration tank, 1 500-gallon settling tank, flow splitter, two 1 500 -gallon dosing tanks, two 400-square foot intermittent open bed sand filters, and tablet chlorination with a 270-gallon contact tank.

Design is for 50 spaces (units), 25 PPD based on 0.5 lb per space per day and 2.6 people per space at 75 gpcd or180-gallons per space per day.

			Influent		Influent			Effluent			
	Month	Year	MGD Ave	PPD Ave	mg/L Mean	mg/L Max	#	mg/L Min	mg/L Mean	mg/L Max	#
Annual Average Design			0.009	25.0							
Annual Average		2019	0.007								
		2020	0.007								
		2021	0.007								
Highest Monthly Average	January	2018	0.007								
pH								6.5		7.8	387
TRC									04	0.6	383
Fecal Coliform									210	2420	48
CVOD5									7.4	46.7	47
TSS									6.7	29	47
Ammonia-N									1.7	11.1	47
Nitrogen									8.1	17.8	5
Phosphorus									1.1	1.9	5

Compliance History

DMR Data for Outfall 001 (from October 1, 2021 to September 30, 2022)

Parameter	SEP-22	AUG-22	JUL-22	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21
Flow (MGD) Average Monthly	0.007	0.007	0.007	0.007	0.007	0.007	0.007	0.007	0.007	0.007	0.007	0.007
pH (S.U.) Daily Minimum	7.0	7.0	7.0	6.9	6.9	6.8	6.7	6.6	6.5	6.6	6.7	6.5
pH (S.U.) Daily Maximum	7.1	7.1	7.2	7.2	7.3	7.2	7.1	7.0	6.9	6.8	6.8	6.9
DO (mg/L) Daily Minimum	4.4	4.4	4.5	4.8	4.8	4.8	4.7	4.3	4.3	4.2	4.4	4.2
TRC (mg/L) Average Monthly	0.5	0.5	0.5	0.4	0.45	0.5	0.5	0.4	0.4	0.4	0.4	0.4
TRC (mg/L) Instant Maximum	0.5	0.5	0.5	0.6	0.5	0.5	0.5	0.5	0.6	0.5	0.5	0.5
CBOD5 (mg/L) Average Monthly	< 12.1	< 4.0	< 2.0	< 7.0	< 2.0	< 2.0	< 2.0	< 2.0	< 2.15	< 2.0	5.8	< 12.0
CBOD5 (mg/L) Instant Maximum	18.2	< 6.0	< 2.0	< 12.0	< 2.0	< 2.0	< 2.0	< 2.0	2.29	< 2.0	6.05	12.0
TSS (mg/L) Average Monthly	9.0	< 6.0	5.5	7.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0	< 5.0
TSS (mg/L) Instant Maximum	13.0	6.0	6.0	8.0	< 5.0	< 5.0	< 5.0	5.0	< 5.0	5.0	< 5.0	< 5.0
F Coliform (#100 ml) Geometric Mean	< 1	< 11	< 5.0	< 5.0	< 25	< 2.0	< 3.0	< 11	< 5.0	63	< 2.0	1.0
F Coliform (#/100 ml) Instant Maximum	< 1	115	< 5.0	5.0	637	5.0	5.0	53	< 5.0	196	3.0	1.0
Total Nitrogen (mg/L) Average Quarterly	22.8			11.1			1.18			7.1		
Total Nitrogen (mg/L) Daily Maximum	22.8			11.1			1.18			7.1		
Ammonia (mg/L) Average Monthly	4.5	< 1.93	1.08	< 2.9	< 0.8	< 0.8	< 0.8	< 0.8	< 0.55	0.8	< 0.8	< 0.8
Ammonia (mg/L) Instant Maximum	6.8	3.05	1.4	7.0	< 0.8	< 0.8	< 0.8	< 0.8	< 1.01	0.8	< 0.8	< 0.8
Total Phosphorus (mg/L) Ave Quarterly	2.5			1.9			0.38			1.6		
Total Phosphorus (mg/L) Daily Maximum	2.5			1.9			0.38			1.6		

Summer pH median 7.1 annual pH median 7.0

Compliance History

No violations reported

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** .009
Latitude 41º 12' 54.58" **Longitude** -80º 22' 42.96"
Wastewater Description: 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)
	40	Average Weekly	133.102(a)(4)(ii)	92a.47(a)(2)
Total Suspended Solids	30	Average Monthly	133.102(b)(1)	92a.47(a)(1)
	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)
E Coli	report			
DO	4.0	Daily Minimum		BPJ

Comments: E Coli is a new parameter with reporting requirements

Water Quality-Based Limitations

A Sewerage program “Reasonable Potential Analysis” determined the following parameters were candidates for limitations: CBOD5, TSS, ammonia, DO and pH.

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

Parameter		Limit (mg/l)			SBC	Model		
Name	Period	Minimum	Average	Maximum		Minimum	Average	Maximum
CBOD5			25,0	50.0			25.0	50.0
TSS			30.0	60.0			30.0	60l0
Ammonia	summer		4.5	9.0			4.79	9.58
	winter		13.0	26.0			14.33	28.66
Nitrogen	report							
Dissolved Oxygen		4.0				4.0		
Fecal Coliform	summer		200#/100ml				200#/100ml	
	winter		2000#/100ml				2000#/100ml	
E. Coli	report							
pH		6.0		9.0		6.0		9.0
TRC			0.5	1,6			0.5	1.6

Comments: DO is technology based with monitoring recommended for nitrogen and e. coli modelling used a 25% safety factor and a 16-hour runoff period to verify the existing requirements

Best Professional Judgment (BPJ) Limitations

Comments: Applies to the DO requirements

Anti-Backsliding

Back sliding is not needed for compliance

1A	B	C	D	E	F	G	H	I	J	K	L	M
	Discharger		Pennwood Estates MHP						Wednesday, October 12, 2022			
	Site		Pennwood Estates MHP STP					Revised	Tuesday, November 8, 2022			
	Municipality		Lackawanna Township									
	County		Mercer									
	NPDES Permit		PA0033448									
	0.5											
2			**TRC EVALUATION**									
3	Input appropriate values in B4:B8 and E4:E7											
4	0.0490		**= Q stream (cfs)**			**0.5**	**= CV Daily**					
5	0.0090		**= Q discharge (MGD)**			**0.5**	**= CV Hourly**					
6	4		**= no. samples**			**1**	**= AFC_Partial Mix Factor**					
7	0.3		**= Chlorine Demand of Stream**			**1**	**= CFC_Partial Mix Factor**					
8	0		**= Chlorine Demand of Discharge**			**15**	**= AFC_Criteria Compliance Time (min)**					
9			**= BAT/BPJ Value**			**720**	**= CFC_Criteria Compliance Time (min)**					
	0		**= % Factor of Safety (FOS)**				**=Decay Coefficient (K)**					
10	Source		Reference	AFC Calculations			Reference		CFC Calculations			
11	TRC		**1.3.2.iii**		WLA afc = 1.142		**1.3.2.iii**		WLA cfc = 1.106			
12	PENTOXSD TRG		**5.1a**		LTAMULT afc = 0.373		**5.1c**		LTAMULT cfc = 0.581			
13	PENTOXSD TRG		**5.1b**		LTA_afc= 0.426		**5.1d**		LTA_cfc = 0.643			
14												
15	Source					Effluent Limit Calculations						
16	PENTOXSD TRG		5.1f			AML MULT = 1.720						
17	PENTOXSD TRG		5.1g			I LIMIT (mg/l) = 0.500			BAT/BPJ			
18						(LIMIT (mg/l) = 1.170						

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)
LTAMULT afc	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))
AVG MON LIMIT	MIN(BAT_BPJ,MIN(LTA_afc,LTA_cfc)*AML_MULT)
INST MAX LIMIT	**1.5*((av_mon_limit/AML_MULT)/LTAMULT_afc)**

(0.011/EXP(-K*CFC_tc/1440))+(((CFC_Yc*Qs*0.011)/(1.547*Qd)....
....*EXP(-K*CFC_tc/1440)))+Xd+(CFC_Yc*Qs*Xs/1.547*Qd))*(1-FOS/100)

	Chlorine Required			=	perennial	Chlorine Demand	+	Chlorine Residual
Stream	Reach/Node			1	1			
Stream	Flow	Conditions			perennial			
Stream	Code				35547			
	Function							
Samples					4			
reach	outfall		RMI		9.82			
	Reach End		RMI		0			
reach			feet		51849.6			
drainage			sq miles		1.59			
TRC	limitation	average	mg/L		0.148			
		maximum	mg/L		0.484			
elevation		modelled	feet		1156.26			
elevation		modelled	feet		877.48			
slope		modelled	foot/foot		0.005			
low flow			cfs/sq mi		0.031			
discharge			mgd		0.0090			
Runoff	Period		hours		24.000			
BAT should suffice								
stream	flow		cfs		0.04903			
stream	flow		MGD		0.031689			
stream	flow	total	MGD		0.040689			
stream	chlorine	demand	mg/L		0.3			
discharge	discharge	demand	mg/L					
stream	Total Stream/Waste		ratio		4.5			
BAT	TRC	mean	BAT		0.5			
BAT	TRC	maximum	BAT		1.6			
		Municipality						

Input Data WQM 7.0

SWP Basin	Stream Code	Stream Name	RMI	Elevation (ft)	Drainage Area (sq mi)	Slope (ft/ft)	PWS Withdrawal (mgd)	Apply FC
20A	35547	WEST BRANCH LITTLE NESHANNO	**0.000**	877.48	17.40	0.00000	0.00	☑

Stream Data

Design Cond.	LFY (cfsm)	Trib Flow (cfs)	Stream Flow (cfs)	Rch Trav Time (days)	Rch Velocity (fps)	WD Ratio	Rch Width (ft)	Rch Depth (ft)	Tributary Temp (°C)	Tributary pH	Stream Temp (°C)	Stream pH
Q7-10	0.031	0.00	0.00	0.000	0.000	0.0	0.00	0.00	20.00	7.50	0.00	0.00
Q1-10		0.00	0.00	0.000	0.000							
Q30-10		0.00	0.00	0.000	0.000							

Discharge Data

Name	Permit Number	Existing Disc Flow (mgd)	Permitted Disc Flow (mgd)	Design Disc Flow (mgd)	Reserve Factor	Disc Temp (°C)	Disc pH
		0.0000	0.0000	0.0000	0.000	25.00	7.00

Parameter Data

Parameter Name	Disc Conc (mg/L)	Trib Conc (mg/L)	Stream Conc (mg/L)	Fate Coef (1/days)
CBOD5	25.00	2.00	0.00	1.50
Dissolved Oxygen	3.00	8.24	0.00	0.00
NH3-N	25.00	0.00	0.00	0.70

Input Data WQM 7.0

SWP Basin	Stream Code	Stream Name	RMI	Elevation (ft)	Drainage Area (sq mi)	Slope (ft/ft)	PWS Withdrawal (mgd)	Apply FC
20A	35547	WEST BRANCH LITTLE NESHANNO	**9.820**	1156.62	1.59	0.00000	0.00	☑

Stream Data

Design Cond.	LFY (cfsm)	Trib Flow (cfs)	Stream Flow (cfs)	Rch Trav Time (days)	Rch Velocity (fps)	WD Ratio	Rch Width (ft)	Rch Depth (ft)	Tributary Temp (°C)	Tributary pH	Stream Temp (°C)	Stream pH
Q7-10	0.024	0.00	0.00	0.000	0.000	0.0	0.00	0.00	20.00	7.50	0.00	0.00
Q1-10		0.00	0.00	0.000	0.000							
Q30-10		0.00	0.00	0.000	0.000							

Discharge Data

Name	Permit Number	Existing Disc Flow (mgd)	Permitted Disc Flow (mgd)	Design Disc Flow (mgd)	Reserve Factor	Disc Temp (°C)	Disc pH
Pennwood Estate	PA0033448	0.0014	0.0135	0.0135	0.000	25.00	7.10

Parameter Data

Parameter Name	Disc Conc (mg/L)	Trib Conc (mg/L)	Stream Conc (mg/L)	Fate Coef (1/days)
CBOD5	25.00	2.00	0.00	1.50
Dissolved Oxygen	4.00	8.24	0.00	0.00
NH3-N	25.00	0.10	0.00	0.70

WQM 7.0 Modeling Specifications

Parameters	Both	Use Inputted Q1-10 and Q30-10 Flows	☑
WLA Method	Uniform Treatme	Use Inputted W/D Ratio	☐
Q1-10/Q7-10 Ratio	0.64	Use Inputted Reach Travel Times	☐
Q30-10/Q7-10 Ratio	1.36	Temperature Adjust Kr	☑
D.O. Saturation	95.00%	Use Balanced Technology	☑
D.O. Goal	5		

WQM 7.0 Wasteload Allocations

SWP Basin	Stream Code	Stream Name
20A	35547	WEST BRANCH LITTLE NESHANNOCK CREEK

NH3-N Acute Allocations

RMI	Discharge Name	Baseline Criterion (mg/L)	Baseline WLA (mg/L)	Multiple Criterion (mg/L)	Multiple WLA (mg/L)	Critical Reach	Percent Reduction
9.820	Pennwood Estate	NA	50	10.43	22.63	1	55

NH3-N Chronic Allocations

RMI	Discharge Name	Baseline Criterion (mg/L)	Baseline WLA (mg/L)	Multiple Criterion (mg/L)	Multiple WLA (mg/L)	Critical Reach	Percent Reduction
9.820	Pennwood Estate	NA	25	1.44	4.79	1	81

Dissolved Oxygen Allocations

RMI	Discharge Name	CBOD5		NH3-N		Dissolved Oxygen		Critical Reach	Percent Reduction
		Baseline (mg/L)	Multiple (mg/L)	Baseline (mg/L)	Multiple (mg/L)	Baseline (mg/L)	Multiple (mg/L)		
9.82	Pennwood Estate	25	25	4.79	4.79	4	4	0	0

WQM 7.0 D.O.Simulation

SWP Basin	Stream Code	Stream Name
20A	35547	WEST BRANCH LITTLE NESHANNOCK CREEK

RMI	Total Discharge Flow (mgd)	Analysis Temperature (°C)	Analysis pH
9.820	0.014	21.758	7.315
Reach Width (ft)	**Reach Depth (ft)**	**Reach WDRatio**	**Reach Velocity (fps)**
4.666	0.324	14.394	0.039
Reach CBOD5 (mg/L)	**Reach Kc (1/days)**	**Reach NH3-N (mg/L)**	**Reach Kn (1/days)**
10.09	0.098	1.75	0.801
Reach DO (mg/L)	**Reach Kr (1/days)**	**Kr Equation**	**Reach DO Goal (mg/L)**
6.751	20.784	Owens	5
Reach Travel Time (days)			
15.279			

Subreach Results

TravTime (days)	CBOD5 (mg/L)	NH3-N (mg/L)	D.O. (mg/L)
1.528	8.58	0.51	8.24
3.056	7.30	0.15	8.24
4.584	6.21	0.10	8.24
6.112	5.28	0.10	8.24
7.640	4.49	0.10	8.24
9.167	3.82	0.10	8.24
10.695	3.25	0.10	8.24
12.223	2.76	0.10	8.24
13.751	2.35	0.10	8.24
15.279	2.00	0.10	8.24

WQM 7.0 Effluent Limits

SWP Basin	Stream Code	Stream Name
20A	35547	WEST BRANCH LITTLE NESHANNOCK CREEK

RMI	Name	Permit Number	Disc Flow (mgd)	Parameter	Effl. Limit 30-day Ave. (mg/L)	Effl. Limit Maximum (mg/L)	Effl. Limit Minimum (mg/L)
9.820	Pennwood Estate	PA0033448	0.001	CBOD5	25		
				NH3-N	4.79	9.58	
				Dissolved Oxygen			4

Proposed Effluent Limitations and Monitoring Requirements

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

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

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		
Flow (MGD)	Report	XXX	XXX	XXX	XXX	XXX	1/week	Estimate
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	4.0 Daily Min	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	0.5	XXX	1.6	1/day	Grab
CBOD5	XXX	XXX	XXX	25.0	XXX	50.0	2/month	8-Hr Composite
TSS	XXX	XXX	XXX	30.0	XXX	60.0	2/month	8-Hr Composite
E Coli	XXX	XXX	XXX	XXX	XXX	Report Annual	1/year	Grab
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
Total Nitrogen	XXX	XXX	XXX	Report Avg Qrtly	Report Daily Max	XXX	1/quarter	8-Hr Composite
Ammonia Nov 1 - Apr 30	XXX	XXX	XXX	13.0	XXX	26.0	2/month	8-Hr Composite
Ammonia May 1 - Oct 31	XXX	XXX	XXX	4.5	XXX	9.0	2/month	8-Hr Composite
Total Phosphorus	XX	XXX	XXX	Report Avg Qrtly	Report Daily Max	XXX	1/quarter	8-Hr Composite

Compliance Sampling Location: Outfall 001 after disinfection