

Application Type Renewal
 Facility Type Non-Municipal
 Major / Minor Minor

**NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE**

Application No. PA0057789
 APS ID 987716
 Authorization ID 1263725

Applicant and Facility Information

Applicant Name	<u>BPG Office VI River Park II, L.P.</u>	Facility Name	<u>River Park STP</u>
Applicant Address	<u>322 A Street</u> <u>Wilmington, DE 19801</u>	Facility Address	<u>River & Manor Roads</u> <u>Miguon, PA 19452</u>
Applicant Contact	<u>Paul Watts</u>	Facility Contact	<u>Paul Watts</u>
Applicant Phone	<u>(302) 691-2090</u>	Facility Phone	<u>(302) 691-2090</u>
Client ID	<u>133782</u>	Site ID	<u>502765</u>
Ch 94 Load Status	<u></u>	Municipality	<u>Whitemarsh Township</u>
Connection Status	<u></u>	County	<u>Montgomery</u>
Date Application Received	<u>February 1, 2019</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u></u>	If No, Reason	<u></u>
Purpose of Application	<u>Permit Renewal.</u>		

Summary of Review

Applicant requests renewal of a NPDES permit to discharge 0.015 mgd of treated sewage effluent from a multi-tenant office building that can accommodate approximately 1,500 employees. The permit was originally issued 7/8/99. The permit was amended during the previous permit cycle to change the reference to the sampling location for Outfall 001. The location was changed from Manhole No. 5 (MH5) located near Manor Creek to the chlorine contact tank, where samples are currently collected. Following treatment, the effluent is discharged through a gravity pipe and monitored at the chlorine contact tank and, from there, the effluent combines with leachate from a closed sludge lagoon impoundment covered under a separate permit. The combined flows travel through another 32-foot pipe that discharges to Manor Creek a few yards above its confluence with the Schuylkill River. Limits in the original permit and the renewal permits issued 7/9/04 and 8/5/09 (amended 7/26/11) were based on protection of the Schuylkill River. The Q7-10 in the Schuylkill River at its confluence with Manor Creek is 375.5 cfs. The dilution ratio is 16,182:1 and secondary treatment limits are considered adequate for protection of water quality. No change in current limits recommended.

Annual average flows from 2015 through 2018 averaged 0.0041-0.0069 MGD and the highest monthly average flow for the previous 12 months was 0.0054 MGD, occurring August 2018. Treatment is an activated sludge process consisting of equalization, aeration, clarification, disinfection with chlorine. Effluent results show few violations for Fecal Coliform, TRC and Dissolved Oxygen in past few years. Inspection report recommends that the facility should have some type of alarm to indicate the plant is not operating. It also recommends to keep an eye on treatment plant by working with owner/operator.

Per the SOP for New and Reissuance Sewage Individual NPDES Permit Applications, influent monitoring is included at a frequency of 1/quarter for CBOD5 and TSS to confirm that 85% reduction is achieved. Although facility does not serve municipal users, the SOP allows influent monitoring at the discretion of the application manager. Also, per the SOP for Establishing Effluent Limitations for Individual Sewage Permits, monitoring included at a frequency of 1/quarter for Total Phosphorus and Total Nitrogen. Reduced frequency is allowed since receiving stream is not listed as impaired for nutrients.

Approve	Deny	Signatures	Date
		Ketan Thaker / Project Manager	
		Pravin C. Patel, P.E. / Environmental Engineer Manager	

Summary of Review

Following are the Effluent Limits:

PARAMETERS	EFFLUENT LIMITS (MG/L)	BASIS
CBOD5	25	92a.47
Total Suspended Solids	30	92a.47
Ammonia- Nitrogen	20	BPJ
Dissolved Oxygen	2.0 Minimum	BPJ
Fecal Coliform (#/100 ml)	200 #/100 ml (Geo Mean)	92a.47
Total Residual Chlorine	0.5	92a.47 - 48
pH (SU)	6.0 to 9.0 SU	92a.47, 95.2
Total Phosphorus	Report	92a.61
Total Nitrogen	Report	92a.61

Act-14 to Montgomery County Commission and Whitemarsh Township on January 16, 2019.

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.	<u>001</u>	Design Flow (MGD)	<u>.015</u>
Latitude	<u>40° 3' 30.02"</u>	Longitude	<u>-75° 15' 56.18"</u>
Quad Name	_____	Quad Code	_____
Wastewater Description: <u>Sewage Effluent</u>			
Receiving Waters	<u>Unnamed Tributary to Schuylkill River (WWF, MF)</u>	Stream Code	_____
NHD Com ID	<u>25985600</u>	RMI	<u>0.0500</u>
Drainage Area	_____	Yield (cfs/mi ²)	_____
Q ₇₋₁₀ Flow (cfs)	_____	Q ₇₋₁₀ Basis	_____
Elevation (ft)	_____	Slope (ft/ft)	_____
Watershed No.	<u>3-F</u>	Chapter 93 Class.	<u>WWF, MF</u>
Existing Use	_____	Existing Use Qualifier	_____
Exceptions to Use	_____	Exceptions to Criteria	_____
Assessment Status	<u>Impaired</u>		
Cause(s) of Impairment	<u>FLOW REGIME MODIFICATION, FLOW REGIME MODIFICATION, SILTATION, SILTATION</u>		
Source(s) of Impairment	<u>HIGHWAY/ROAD/BRIDGE RUNOFF (NON-CONSTRUCTION RELATED), HIGHWAY/ROAD/BRIDGE RUNOFF (NON-CONSTRUCTION RELATED), REMOVAL OF RIPARIAN VEGETATION, REMOVAL OF RIPARIAN VEGETATION</u>		
TMDL Status	_____	Name	_____
Background/Ambient Data		Data Source	
pH (SU)	_____		_____
Temperature (°F)	_____		_____
Hardness (mg/L)	_____		_____
Other:	_____		_____
Nearest Downstream Public Water Supply Intake _____			
PWS Waters	_____	Flow at Intake (cfs)	_____
PWS RMI	_____	Distance from Outfall (mi)	_____

Treatment Facility Summary				
Treatment Facility Name: River Park STP				
WQM Permit No.		Issuance Date		
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary	Activated Sludge	Chlorine	0.015
Hydraulic Capacity (MGD)	Organic Capacity (lbs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposal
		Not overloaded		

Compliance History

DMR Data for Outfall 001 (from September 1, 2018 to August 31, 2019)

Parameter	AUG-19	JUL-19	JUN-19	MAY-19	APR-19	MAR-19	FEB-19	JAN-19	DEC-18	NOV-18	OCT-18	SEP-18
Flow (MGD) Average Monthly	0.0041	0.0047	0.0042	0.0044	0.0042	0.0025						
Flow (MGD) Daily Maximum	0.0093	0.0099	0.0134	0.0088	0.0088	0.0060						
pH (S.U.) Instantaneous Minimum	6.6	6.6	6.7	6.7	6.9	6.8						
pH (S.U.) Instantaneous Maximum	7.7	7.8	7.8	7.6	7.9	7.7						
DO (mg/L) Instantaneous Minimum	0.1	0.3	0.4	0.8	0.3	1.6						
DO (mg/L) Average Monthly	1.5	1.9	2.1	2.08	1.8	3.0						
TRC (mg/L) Average Monthly	0.3	0.3	0.4	0.5	0.2	0.4						
TRC (mg/L) Instantaneous Maximum	1.7	1.2	1.1	1.6	1.5	1.4						
CBOD5 (mg/L) Average Monthly	< 3.4	3.3	5.2	12.1	31.5	20.6						
CBOD5 (mg/L) Raw Sewage Influent Average Monthly			350			236						
TSS (mg/L) Average Monthly	14.0	7.8	8.6	13.2	16.6	24.7						
TSS (mg/L) Raw Sewage Influent Average Monthly			19000			230						
Fecal Coliform (No./100 ml) Geometric Mean	152	1400	14	2	1353.0	77.0						

**NPDES Permit Fact Sheet
River Park STP**

NPDES Permit No. PA0057789

Fecal Coliform (No./100 ml) 90% of Samples					12500.0	369.0						
Fecal Coliform (No./100 ml) Instantaneous Maximum	800	7400	39	5								
Total Nitrogen (mg/L) Average Monthly			< 665			99.81						
Ammonia (mg/L) Average Monthly	1.5	0.5	1.7	5.6	4.9	6.3						
Total Phosphorus (mg/L) Average Monthly			118			7.11						

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	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Metered
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	Daily when Discharging	Grab
DO	XXX	XXX	2.0 Inst Min	Report	XXX	XXX	Daily when Discharging	Grab
TRC	XXX	XXX	XXX	0.5	XXX	1.2	Daily when Discharging	Grab
CBOD5	XXX	XXX	XXX	25.0	XXX	50	2/month	24-Hr Composite
CBOD5 Raw Sewage Influent	XXX	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite
TSS	XXX	XXX	XXX	30.0	XXX	60	2/month	24-Hr Composite
TSS Raw Sewage Influent	XXX	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	200.0 Geo Mean	XXX	1000.0	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	XXX	XXX	1/quarter	24-Hr Composite
Ammonia	XXX	XXX	XXX	20.0	XXX	40	2/month	24-Hr Composite
Total Phosphorus	XXX	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite