

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

**NPDES PERMIT FACT SHEET  
INDIVIDUAL SEWAGE**

Application No. PA0057789  
 APS ID 1112829  
 Authorization ID 1483488

**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><br><u>Wilmington, DE 19801</u> | Facility Address | <u>River &amp; Manor Roads</u><br><u>Miguon, PA 19452</u> |
| Applicant Contact         | <u>Anthony Russo</u>                               | Facility Contact | <u>Anthony Russo</u>                                      |
| Applicant Phone           | <u>(610) 717-3047</u>                              | Facility Phone   | <u>(610) 717-3047</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>May 1, 2024</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 1,000 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 major change in current effluent limits recommended.

Annual average flows from 2021 through 2023 averaged 0.0014 - 0.0017 MGD and the highest monthly average flow for the previous 12 months was 0.0027 MGD, occurring May 2023. Treatment is an activated sludge process consisting of equalization, aeration, clarification, disinfection with chlorine. Effluent is generally in compliance with permit limits. There were few exceedances for pH, TRC in last few months. The inspection of treatment plant was conducted on 7/26/2022 by Bernard Krasnisky. The plant was operating well, and no violations were noted.

Per the SOP for New and Reissuance Sewage Individual NPDES Permit Applications, influent monitoring was included at a frequency of 1/quarter for CBOD5 and TSS to confirm that 85% reduction is achieved during last permit renewal. 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 and will continue for the permit renewal. We have revised Dissolved Oxygen (DO) limit to 4.0 mg/l from 2.0 mg/l based on SOP. The e-DMRs show that effluent is consistently meeting limit of

| Approve | Deny | Signatures  | Date       |
|---------|------|---|------------|
| X       |      | <i>Ketan Thaker</i><br>Ketan Thaker / Project Manager                         | 5/28/2024  |
| X       |      | <i>Pravin Patel</i><br>Pravin C. Patel, P.E. / Environmental Engineer Manager | 05/28/2024 |

**Summary of Review**

4.0 mg/l for DO. We have added quarterly monitoring requirement for E. Coli for this permit renewal, which is consistent with our SOP.

Following are the effluent limits:

| PARAMETERS               | EFFLUENT LIMITS (MG/L)  | BASIS          |
|--------------------------|-------------------------|----------------|
| CBOD5                    | 25                      | Pa 92a.47      |
| Total Suspended Solids   | 30                      | Pa 92a.47      |
| Ammonia-Nitrogen         | 20                      | BPJ            |
| Dissolved Oxygen         | 4.0 minimum             | BPJ            |
| Fecal Coliform (#/100ml) | 200 #/100 ml (Geo Mean) | Pa 92a.47      |
| Total Residual Chlorine  | 0.5                     | Pa 92a.47 - 48 |
| pH (SU)                  | 6.0 to 9.0 SU           | 92a.47, 95.2   |
| Total Phosphorus         | Report                  | Pa 92a.61      |
| Total Nitrogen           | Report                  | Pa 92a.61      |
| E. Coli                  | Report                  | Pa 92a.47      |

Sludge use and disposal description and location(s): Sludge sent Pottstown WWTP for disposal.

Act-14 Notification to Whitmarsh Township on March 15, 2024  
Act-14 Notification to Montgomery County Office on March 15, 2024.

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>0.015</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 <sup>2</sup> ) | _____          |
| Q <sub>7-10</sub> Flow (cfs) | _____  | Q <sub>7-10</sub> 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), 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                     |                                   |                      |                            |                               |
|--|-----------------------------------|----------------------|----------------------------|-------------------------------|
| <b>Treatment Facility Name:</b> River Park STP |                                   |                      |                            |                               |
| <b>WQM Permit No.</b>                          |                                   | <b>Issuance Date</b> |                            |                               |
| 4699414  |                                   | 7/13/1999            |                            |                               |
| <b>Waste Type</b>                              | <b>Degree of Treatment</b>        | <b>Process Type</b>  | <b>Disinfection</b>        | <b>Avg Annual Flow (MGD)</b>  |
| Sewage   | Secondary                         | Activated Sludge     | Chlorine                   | 0.015                         |
| <b>Hydraulic Capacity (MGD)</b>                | <b>Organic Capacity (lbs/day)</b> | <b>Load Status</b>   | <b>Biosolids Treatment</b> | <b>Biosolids Use/Disposal</b> |
|  |                                   | Not overloaded       |                            |                               |

Compliance History

DMR Data for Outfall 001 (from April 1, 2023 to March 31, 2024)

| Parameter   | MAR-24 | FEB-24 | JAN-24 | DEC-23 | NOV-23 | OCT-23 | SEP-23 | AUG-23 | JUL-23 | JUN-23 | MAY-23 | APR-23 |
|---|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|--------|
| Flow (MGD)<br>Average Monthly                                     | 0.0013 | 0.0181 | 0.0016 | 0.0073 | 0.0013 | 0.0001 | 0.0001 | 0.0001 | 0.0019 | 0.0021 | 0.0027 | 0.0022 |
| Flow (MGD)<br>Daily Maximum                                       | 0.0029 | 0.0185 | 0.0046 | 0.0084 | 0.0031 | 0.0004 | 0.0002 | 0.0009 | 0.0410 | 0.0054 | 0.0067 | 0.0081 |
| pH (S.U.)<br>Instantaneous<br>Minimum                             | 6.1    | 6.5    | 5.8    | 6.1    | 6.2    | 6.5    | 6.9    | 6.7    | 6.8    | 6.6    | 6.5    | 6.5    |
| pH (S.U.)<br>Instantaneous<br>Maximum                             | 7.9    | 8.9    | 8.3    | 8.1    | 8.5    | 9.3    | 7.9    | 8.1    | 8.2    | 8.5    | 7.8    | 8.1    |
| DO (mg/L)<br>Instantaneous<br>Minimum                             | 6.2    | 7.0    | 9.0    | 7.8    | 5.7    | 5.3    | 5.7    | 5.1    | 4.3    | 5.2    | 4.8    | 6.3    |
| DO (mg/L)<br>Average Monthly                                      | 8.27   | 9.64   | 11.14  | 9.89   | 8.2    | 7.14   | 7.1    | 6.72   | 5.92   | 6.7    | 6.95   | 7.17   |
| TRC (mg/L)<br>Average Monthly                                     | 0.1    | 0.1    | < 0.2  | 0.1    | 0.1    | 0.2    | < 0.1  | 0.1    | < 0.1  | < 0.1  | < 0.04 | < 0.03 |
| TRC (mg/L)<br>Instantaneous<br>Maximum                            | 0.2    | 0.21   | 2.2    | 0.18   | 0.3    | 3.3    | 0.6    | 0.2    | 0.32   | 0.2    | 0.1    | 0.1    |
| CBOD5 (mg/L)<br>Average Monthly                                   | 15.0   | 11.0   | 13.0   | 9.0    | 9.0    | 7.0    | 4.0    | 7.0    | 6.0    | 5.0    | 7.0    | 18.0   |
| CBOD5 (mg/L)<br>Raw Sewage Influent<br><br/> Average<br>Quarterly | 279    |        |        | 1060   |        |        | 162    |        |        | 188    |        |        |
| TSS (mg/L)<br>Average Monthly                                     | 31.0   | 45.0   | 34.0   | 14.0   | 16.0   | 6.0    | 6.0    | 11.0   | 15.0   | 14.0   | 20.0   | 14.0   |
| TSS (mg/L)<br>Raw Sewage Influent<br><br/> Average<br>Quarterly   | 82     |        |        | 460    |        |        | 773    |        |        | 350    |        |        |
| Fecal Coliform<br>(No./100 ml)<br>Geometric Mean                  | 19.0   | 8.0    | < 2.0  | 7.0    | 5.0    | 11.0   | < 2    | < 15   | < 2    | < 2    | < 7    | < 2.0  |

**NPDES Permit Fact Sheet  
River Park STP**

**NPDES Permit No. PA0057789**

|  |         |     |     |         |     |       |      |      |      |        |     |       |
|--|---------|-----|-----|---------|-----|-------|------|------|------|--------|-----|-------|
| Fecal Coliform<br>(No./100 ml)<br>Instantaneous<br>Maximum | 44.0    | 7.0 | 3.0 | 15.0    | 7.0 | 25.0  | < 2  | 110  | < 2  | < 2    | 23  | < 2.0 |
| Total Nitrogen (mg/L)<br>Average Quarterly                 | < 111.5 |     |     | < 109.5 |     |       | 90.4 |      |      | 139.97 |     |       |
| Ammonia (mg/L)<br>Average Monthly                          | 4.0     | 7.0 | 2.0 | 2.0     | 1.0 | 0.105 | 0.13 | 0.13 | 0.29 | 0.08   | 3.0 | < 0.1 |
| Total Phosphorus<br>(mg/L)<br>Average Quarterly            | 11.3    |     |     | 11.3    |     |       | 8.11 |      |      | 15.6   |     |       |

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

| Parameter                                     | Effluent Limitations                |                     |                       |                     |         |                     | Monitoring Requirements                            |                            |
|---|-------------------------------------|---------------------|-----------------------|---------------------|---------|---------------------|--|----------------------------|
|   | Mass Units (lbs/day) <sup>(1)</sup> |                     | Concentrations (mg/L) |                     |         |                     | Minimum <sup>(2)</sup><br>Measurement<br>Frequency | Required<br>Sample<br>Type |
|   | Average<br>Monthly                  | Average<br>Weekly   | Minimum               | Average<br>Monthly  | Maximum | Instant.<br>Maximum |  |                            |
| Flow (MGD)                                    | Report                              | Report<br>Daily Max | XXX                   | XXX                 | XXX     | XXX                 | Continuous   | Metered                    |
| pH (S.U.)                                     | XXX                                 | XXX                 | 6.0<br>Inst Min       | XXX                 | XXX     | 9.0                 | Daily when<br>Discharging                          | Grab                       |
| DO  | XXX                                 | XXX                 | 4.0<br>Inst Min       | Report              | XXX     | XXX                 | Daily when<br>Discharging                          | Grab                       |
| TRC   | XXX                                 | XXX                 | XXX                   | 0.5                 | XXX     | 1.2                 | Daily when<br>Discharging                          | Grab                       |
| CBOD5   | XXX                                 | XXX                 | XXX                   | 25.0                | XXX     | 50                  | 2/month  | 24-Hr<br>Composite         |
| CBOD5<br>Raw Sewage Influent                  | XXX                                 | XXX                 | XXX                   | Report<br>Avg Qrtly | XXX     | XXX                 | 1/quarter  | 24-Hr<br>Composite         |
| TSS   | XXX                                 | XXX                 | XXX                   | 30.0                | XXX     | 60                  | 2/month  | 24-Hr<br>Composite         |
| TSS<br>Raw Sewage Influent                    | XXX                                 | XXX                 | XXX                   | Report<br>Avg Qrtly | XXX     | XXX                 | 1/quarter  | 24-Hr<br>Composite         |
| Fecal Coliform (No./100 ml)<br>Oct 1 - Apr 30 | XXX                                 | XXX                 | XXX                   | 200.0<br>Geo Mean   | XXX     | 1000.0              | 2/month  | Grab                       |
| Fecal Coliform (No./100 ml)<br>May 1 - Sep 30 | XXX                                 | XXX                 | XXX                   | 200<br>Geo Mean     | XXX     | 1000                | 2/month  | Grab                       |
| E. Coli (No./100 ml)                          | XXX                                 | XXX                 | XXX                   | XXX                 | XXX     | Report              | 1/quarter  | Grab                       |
| Total Nitrogen                                | XXX                                 | XXX                 | XXX                   | Report<br>Avg Qrtly | XXX     | XXX                 | 1/quarter  | 24-Hr<br>Composite         |
| Ammonia                                       | XXX                                 | XXX                 | XXX                   | 20.0                | XXX     | 40                  | 2/month  | 24-Hr<br>Composite         |

Outfall 001 , Continued (from Permit Effective Date through Permit Expiration Date )

| Parameter        | Effluent Limitations                |                   |                       |                     |         |                     | Monitoring Requirements                            |                            |
|------------------|-------------------------------------|-------------------|-----------------------|---------------------|---------|---------------------|--|----------------------------|
|                  | Mass Units (lbs/day) <sup>(1)</sup> |                   | Concentrations (mg/L) |                     |         |                     | Minimum <sup>(2)</sup><br>Measurement<br>Frequency | Required<br>Sample<br>Type |
|                  | Average<br>Monthly                  | Average<br>Weekly | Minimum               | Average<br>Monthly  | Maximum | Instant.<br>Maximum |  |                            |
| Total Phosphorus | XXX                                 | XXX               | XXX                   | Report<br>Avg Qrtly | XXX     | XXX                 | 1/quarter  | 24-Hr<br>Composite         |

Compliance Sampling Location: Chlorine Contact Tank