pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHEAST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0060046**
Facility Type	**Sewage**	APS ID	**849851**
Major / Minor	**Major**	Authorization ID	**1147367**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**CAN DO Inc.**	Facility Name	**CAN DO WWTP (AKA Humboldt Industrial Park WWTP)**
Applicant Address	One South Church Street 200 Renaissance Center Hazleton, PA 18201	Facility Address	901 Oak Ridge Road Humboldt Industrial Pike Hazleton, PA 18202
Applicant Contact	Gregory Kurtz	Facility Contact	Gregory Kurtz
Applicant Phone	(570) 455-1508	Facility Phone	(570) 455-1508
Client ID	82020	Site ID	262461
SIC Code	4952	Municipality	Hazle Township
SIC Description	Trans. & Utilities - Sewerage Systems	County	Luzerne
Date Published in PA Bulletin	February 23, 2019	EPA Waived?	No
Comment Period End Date	March 25, 2019 (extended to 9/10/2019 per Applicant request)	If No, Reason	Major Facility, Significant CB Discharge
Purpose of Application	Application for a renewal of an NPDES permit for discharge of treated Sewage		

Internal Review and Recommendations

This is a Redraft NPDES Permit being issued for public comment for a 1.0 MGD nonmunicipal Treatment Plant that services an Industrial Park in a mining-disturbed area. See the Draft NPDES Permit Fact Sheet for additional information on the facility and Draft NPDES requirements.

Changes to Redraft Permit:

- **General**: The NPDES Permit standard conditions have been updated to the current NPDES template. Some Part C permit conditions were renumbered in the regenerated NPDES Permit.
- **First Year of Quarterly WET Tests Condition (Part C.V.I)**: This condition was added per EPA request due to previous invalid WET Tests (laboratory issues outside permittee control).
- **Toxics Permit Limits & Toxics WQBEL condition**: Per updated Reasonable Potential Analysis (incorporating ten weeks of sampling data meeting DEP Target QLs; updated Toxic Screening Spreadsheet; and PENNTOXSD modeling with Boron LTAMEC/COV) showed permit limits and Toxics WQBEL condition deleted:
  - **Total Boron**: Will be monitored monthly.
  - **beta-BHC; Bis(2-Ethylhexyl) Phthalate**: No permit limits/monitoring required.
  - **Copper**: Annual monitoring (with Total Hardness monitoring) due to application's high Total Hardness effluent data in event that data is not representative of year-round discharge effluent quality. See discussion below.
- **New Internal Monitoring Point/Outfall No. 101 (Part A.I.C)**: A separate internal monitoring point No. 101 (Raw Sewage Influent) has been created to incorporate Raw Sewage Influent sampling requirements of Draft NPDES

Approve	Return	Deny	Signatures	Date
X			James D. Berger, P.E. / Environmental Engineer	March 4, 2020
X			Amy M. Bellanca, P.E. / Environmental Engineer Manager	
NA			NA – not required for Redraft NPDES permit Bharat Patel, P.E. / Environmental Program Manager	NA

Internal Review and Recommendations

permit (Outfall No. 001) to prevent any confusion. No change in requirements have been made from Draft NPDES Permit.

Public Comments: The Department received the following public comments on the 2/9/2019 Draft NPDES Permit:

Permittee Comments:

Entech (Applicant Consultant) E-mail asked extension of public comment period to 9/10/2019 to allow for additional sampling. Extension was granted. The applicant subsequently asked for additional time to perform a ten (10) week sampling program. **Additional time was granted. Additional sampling data was received via 9/26/2019 Entech E-mail.**

The March 13, 2019 and April 10, 2019 CAN DO Inc. (ENTECH) Letters included the following public comments (DEP responses in bold), with "no comment" comments omitted for brevity:

Item 1.c (NPDES Permit Part A.I.A, A.I.B, C.III: Total Boron, beta-BHC, Bis(2-Ethylhexyl)Phthalate Permit Limits and Toxics WQBEL condition): The permittee noted that 2 of the 3 sample results were non-detect samples, and asked if it could do an additional six (6) samples prior to permit issuance to determine if these constituents are "indeed present". The permittee then conducted Ten weeks sampling with results submitted 9/26/2019.

- **Total Boron**: Concentrations ranged from 400.0 ug/l to 1000.0 ug/l. They calculated the average at 600.0 ug/l. **DEP Target QL is 200 ug/l. The LTAMEC was calculated to be 826.1103970 with 0.2825029 COV. Monitoring required per updated Reasonable Potential Analysis incorporating LTAMEC and COV.**
- **Bis(2-Ethylhexyl) Phthalate:** All 10 samples were below 5.00 ug/l Non-detect Level. **DEP Target QL is 5.0 ug/l. No limits or monitoring per updated Reasonable Potential Analysis.**
- **Beta-BHC:** All 10 samples were below 0.05 ug/l Non-detect level. **DEP Target QL is 0.05 ug/l. No limits or monitoring per updated Reasonable Potential Analysis.**
- **Updated Reasonable Potential and Additional Annual Copper and Total Hardness Monitoring**: **See attached Toxic Screening Spreadsheet, TOXCONC Spreadsheet (Boron) and PENTOXSD modeling. The updated Reasonable Potential Analysis raised another potential concern. Due to high effluent Total Hardness (~341 mg/l), a sensitivity analysis was done in case the application effluent hardness data did not reflect year-round effluent quality (because assorted metal water quality criteria are hardness-dependent). Given the facility receives industrial park customers who are using AMD-impacted groundwater for process/sanitary waters, the effluent total hardness data is not unreasonable but not necessarily representative year-round.**
    - **At 200 mg/l Total Hardness (analytical – PENNTOXSD-calculated using both effluent and receiving stream hardness), the Toxic Screening Spreadsheet would require no additional constituents to be modeled.**
    - **At 100 mg/l Total Hardness (analytical), the Toxic Screening Spreadsheet would recommend water quality modeling for Copper. Copper is not an ELG Pretreatment constituent for the existing Industrial Users.**
    - **To address potential effluent quality variability, annual effluent Total Hardness and Copper monitoring will be required. The Department retains broad authority to take action in event the application sampling data proves non-representative of effluent quality.**

Item 2.b (NPDES Permit Part A.I.C: Total Dissolved Solids (TDS), Bromide, Chloride, Sulfate Monitoring Requirement): The permittee asked if it could do an additional six (6) samples prior to permit issuance to determine if these constituents are "indeed present". CAN DO subsequently dropped this sampling proposal. **The Department is now requiring monitoring for these constituents (under Chapter 92a.61) as a standard requirement based on the size of the facility and stream loadings. Additional sampling would not change the monitoring requirements**

Item 3: Stormwater Outfall No. 002: The permittee notes that there is no stormwater system in-place, with majority of rainwater infiltrating or sheet flowing into Tomhickon Creek. The permittee notes that if a point of concentrated flow becomes available, then it would do the required sampling. The permittee noted that its site PPC Plan will be updated in accordance with the Part C.V.B (PPC Plan) requirements on the Permit Effective Date. **As the permittee comments indicates its ability and willingness to comply with permit conditions, no further DEP comment is needed. In event that sheet**

Internal Review and Recommendations

flow stormwater sampling is ever required, there is stormwater sheet flow sampling guidance available on the EPA website.

Item 4 (Part C Site-specific Conditions): The permittee noted its acceptance of the permit conditions, and that it would submit a new Part II Water Quality Management Permit in event it decides to construct additional "solids" (sludge) management facilities. **As the permittee comments indicates its ability and willingness to comply with permit conditions, no further DEP comment is needed.**

Request to Eliminate Existing Zinc Limit: The 3/13/2019 CAN DO letter conclusion noted that it no longer accepts discharge from an indirect discharger facility with high concentrations of Total Zinc, and requested the Zinc limit be removed from the permit. **The Department could not grant this request.**

- **Updated Reasonable Potential Analysis showed Zinc limits are still required. There was a Zinc Exceedance in March 2019 (0.295 mg/l).**
- **CAN DO indicated that one source of zinc (a former truck washing company customer) was no longer present. However, Industrial User(s) subject to Zinc Pretreatment Limits continue to discharge to the facility. Previous consideration for going to zinc monitoring only had been due to a misunderstanding that the IU with zinc pretreatment limits might have ceased operations.**
- **CAN DO did not provide details regarding its internal pretreatment program in its 4/11/2019 response to the 3/26/2019 DEP (Berger) E-mail request. The truck washing company is an example of non-ELG customers who might be contributing zinc loadings to the facility.**
- **The Department will reevaluate Zinc Limits in the next NPDES Permit Renewal.**

USEPA Public Comments: The 3/7/2019 EPA (Dana Hales) E-mail public comments and 3/26/2019 Conference Call Public Comments included:

Whole Effluent Toxicity (WET) Testing-related:

- EPA noted all WET Tests has been done by a laboratory (Eurofins) whose WET Tests were deemed invalid by DEP Central Office, and requested the Fact Sheet note this, and the Final Permit include a requirement for quarterly testing for the first year of the NPDES Permit Term: **The Department has confirmed the 2016 WET Tests are invalid due to laboratory-specific issues. The Department is adding a new permit condition requiring quarterly testing for the first year of the new permit in response to EPA comments. CAN DO indicated it would do the quarterly testing.**
- Fact Sheet Page 20 requested clarification about March 2016 NOEC endpoint (C. Daphnia) which indicated failure (not passing) showing "No observable Effect Concentration" (NOEC) below the TIWC**: Given invalid WET Tests and the new Department permit condition (quarterly testing in the first year of the NPDES permit Term) in addition to the standard WET Test conditions, clarification regarding invalid test results, and any evaluation thereof, would be meaningless. The Department standard WET Test Conditions would also be triggered in event of a failure during the quarterly testing requirements.**

EPA Comment Regarding General Industrial Pretreatment Issues: EPA indicated a general concern that treatment plants' categorical industrial users/indirect dischargers (subject to 40 CFR 400 – 600 industry-specific Effluent Limitation Guidelines (ELG)) might not be meeting the applicable "BAT/BCT/BPT/NSPS ELG requirements" (ELG pretreatment requirements; other ELG requirements also applicable to industries without categorical pretreatment ELG limits). EPA estimated the Treatment Plant was receiving 30 – 40% of influent flows from Categorical Industrial User industries (12 customers per EPA estimate) subject to Federal Effluent Limitation Guidelines (ELGs). General EPA concerns include potential impacts on the Treatment Facility/receiving stream (via "pass-through" or "interference") and other potential Indirect Discharger (Categorical Industrial User) noncompliance (potentially impacting the treatment plant). EPA noted that this was general EPA concern due to experience with other sites (including privatization of former POTWs). EPA separately raised similar questions regarding other pending NPDES Permits. EPA asked for clarification regarding how the DEP is evaluating discharges with respect to ELGs, and a March 26, 2019 Conference Call (EPA, DEP NERO Clean Water Program, and DEP Central Office) discussed this general issue.

CAN DO Inc.-provided information on its Internal Pretreatment Program: The Department relayed EPA concerns to CAN DO via a 3/26/2019 E-mail and asked CAN DO to address the EPA concerns, including any provisions for monitoring Industrial User discharges. The 4/10/2019 CAN DO Inc. Letter indicated: "The facility currently institutes an internal pretreatment program to evaluate customers pretreatment requirements, any Industrial User Permit/approval

Internal Review and Recommendations

requirements, potential influent monitoring requirements, and potentials for causing plant upsets, pass through, interference, etc. This is an ongoing program that CAN DO is currently working on to monitor what is in the system."

The Department is not including Special Part C (Industrial Pretreatment Program (IPP)) permit conditions in this Redraft NPDES permit for a 1.0 MGD non-municipal NPDES Permit servicing an Industrial Park.

- **EPA IPP: The US EPA has not delegated the Industrial Pretreatment Program (IPP) to Pennsylvania. EPA retains all authority to invite this permittee into the EPA Industrial Pretreatment Program (IPP). The US EPA has not invited this permittee into the EPA IPP to date. In that event:**
  - **If invited prior to final permit action, the Department would incorporate the standard Part C IPP conditions into the Final NPDES Permit.**
  - **If invited after final permit action, the Department would require an NPDES Permit Amendment to incorporate the IPP conditions into the NPDES Permit.**
- **Recent EDMR violations: EDMR indicated Ammonia-N violations (March 2018, April 2018, May 2018, February 2019, March 2019) attributed to "interference" by an industrial user as the cause or partial cause. The March 2019 Zinc violation and April 2019 CBOD5 violation did not have an identified cause, but interference and passthrough are potential causes. CAN DO hired a consultant in April 2018 per EDMR comment, but no report on any investigation was submitted to the Department (corrective actions for Ammonia-N violations included increasing aeration). CAN DO did not submit any further information on these incidents.**
  - **The Department is requiring additional information via Redraft NPDES Permit Cover Letter request within thirty (30) days. The Department will follow-up on this issue as needed.**
  - **The NPDES Permitting already addresses these types of issues:**
    - **The Department Reasonable Potential Analysis addressed the priority pollutants including indirect discharger pretreatment ELG constituents. See Draft Fact Sheet for previous Reasonable Potential Analysis information and explanation of monitoring requirements.**
    - **The Standard WET Test conditions plus EPA-requested First Year Quarterly Whole Effluent Toxicity (WET) Testing condition have been incorporated into the Final NPDES Permit to address any synergistic/cumulative negative impacts.**
    - **The facility retains all responsibilities under the NPDES Permit. Applicable NPDES Permit Conditions include:**
      - **NPDES Permit Part A.III.A (Representative Sampling): These general requirements, including the EPA Sufficiently Sensitive Rule by reference, also apply to any facility monitoring of indirect dischargers (including categorical industrial users). See the DEP NPDES Permit Application Form Instructions for the existing DEP Target Quantitation Limits (QLs).**
      - **NPDES Permit Part A.III.B.7 (Reporting of Monitoring Results): This section would apply in event the facility conduct additional sampling at the NPDES permitted locations (influent/effluent sampling locations).**
      - **NPDES Permit Part A.III.C.2 (Planned Changes in Waste Streams): This requirement applies to both new Indirect Dischargers and/or changes in loadings on the Treatment Plant.**
      - **NPDES Permit Part A.III.C.3 (Hauled-in Wastes): These requirements would apply if the facility ever chooses to accept hauled-in wastes.**
      - **NPDES Permit Part A.III.C.4 (Unanticipated Noncompliance or Potential Pollution Reporting): This reporting requirement would apply in event of "pass through" or "interference" scenarios that resulted in a toxic substance or other substance impacting the receiving stream.**
      - **NPDES Permit Part B.I.C (Duty to provide Information): A pass-through or interference scenario could trigger this requirement.**
      - **NPDES Permit Part B.I.D (General Pretreatment Requirements): The facility is required to provide any site-specific limits developed for any indirect discharger.**
      - **NPDES Permit Part B.I.F (Duty to Mitigate): A pass-through or interference scenario could trigger this requirement.**
      - **NPDES Permit Part C.III (Whole Effluent Toxicity (WET)) and Part C.V.I (First Year Quarterly WET Testing): Standard WET Test failures can be the result from pass-through and/or interference scenarios. Please review the WET Test requirements**

Internal Review and Recommendations

carefully in terms of permit condition-required follow-up retesting and investigation for cause(s) of WET Test failures.

Compliance History: The 3/3/2020 WMS Query (Open Violations by Client Number) indicated no open violations.

Permit: PA0060046
Client ID: 82020
Client: All

Open Violations: 0

No data was found using the criteria entered. Please revise your choices and try again

Communications Log:

2/6/2019: Draft NPDES Permit issued
3/13/2019: CAN DO public comments received.
3/7/2019: EPA (Dana Hales) E-mail public comments on Draft NPDES Permit
3/26/2019: EPA/DEP conference call on IPP requirements.
3/26/2019: DEP (Berger) E-mail to Mr. Kurtz (CAN DO) asking for additional CAN DO input regarding its public comments and forwarding US EPA public comments to CAN DO (regarding invalid WET Tests & need for quarterly WET Tests during first year of permit term; general pretreatment program concerns with request for response explaining CAN DO Industrial User monitoring).
4/11/2019: CAN DO (Entech) E-mail indicating it would proceed with additional sampling, indicating that a former truck washing company customer had been a previous source of zinc influent loadings, and that CAN DO was instituting an internal pretreatment program.
8/6/2019: CAN DO (Entech) E-mail indicating a delay in submitting additional sampling data.
8/7/2019: DEP (Berger) E-mail asking for target date for sampling data submittal.
8/7/2019: CAN DO (Entech) E-mail indicating submittal in first week of September.
8/7/2019: DEP (Berger) E-mail extending public comment period to 9/10/2019 for sampling data submittal.
9/20/2019: DEP (Berger) E-mail asking for status of sampling data submittal.
9/26/2019: Additional sampling data submitted by CAN DO.

TOXICS SCREENING ANALYSIS
WATER QUALITY POLLUTANTS OF CONCERN
VERSION 2.7

Facility: CAN DO Inc. NPDES Permit No.: PA0060046 Outfall: 001
Analysis Hardness (mg/L): 318.9 Discharge Flow (MGD): 1 Analysis pH (SU): 5.933
Stream Flow, Q_{7-10} (cfs): 0.118

	Parameter		Maximum Concentration in Application or DMRs (µg/L)	Most Stringent Criterion (µg/L)	Candidate for PENTOXSD Modeling?	Most Stringent WQBEL (µg/L)	Screening Recommendation
Group 1	Total Dissolved Solids		1530000	500000	Yes		Monitor
	Chloride		679000	250000	Yes		Monitor
	Bromide		1100	N/A	No		Monitor
	Sulfate		81600	250000	No		Monitor
Group 2	Total Aluminum		53.1	750	No		
	Total Antimony		0.48	5.6	No		
	Total Arsenic		0.41	10	No		
	Total Barium		35.6	2400	No		
	Total Beryllium	<	0.11	N/A	No		
	Total Boron		626.11	1600	Yes	1722.043	Monitor
	Total Cadmium	<	0.2	0.639	No (Value < QL)		
	Total Chromium	<	0.7	N/A	No		
	Hexavalent Chromium		0.015	10.4	No		
	Total Cobalt		3.1	19	No		
	Total Copper		5.9	25.1	No		
	Free Available Cyanide	<	2	5.2	No		
	Total Cyanide	<	2.4	N/A	No		
	Dissolved Iron		136	300	No		
	Total Iron		270	1500	No		
	Total Lead		0.41	13.9	No		
	Total Manganese		41.6	1000	No		
	Total Mercury	<	0.05	0.05	No (Value < QL)		
	Total Nickel		17.7	139.1	No		
	Total Phenols (Phenolics)		16	5	Yes		
	Total Selenium	<	0.5	5.0	No (Value < QL)		
	Total Silver	<	0.12	27.8	No (Value < QL)		
	Total Thallium	<	0.16	0.24	No (Value < QL)		
	Total Zinc		222	320.1	Yes	320.1	Establish Limits
	Total Molybdenum		400	N/A	No		
Group 3	Acrolein	<	0.7	3	No (Value < QL)		
	Acrylonitrile	<	0.8	0.051	No (Value < QL)		
	Benzene	<	0.5	1.2	No (Value < QL)		
	Bromoform	<	0.5	4.3	No (Value < QL)		
	Carbon Tetrachloride	<	0.5	0.23	No (Value < QL)		
	Chlorobenzene	<	0.5	130	No (Value < QL)		
	Chlorodibromomethane		0.02	0.4	No		
	Chloroethane	<	0.5	N/A	No		
	2-Chloroethyl Vinyl Ether	<	0.5	3500	No (Value < QL)		
	Chloroform	<	0.5	5.7	No (Value < QL)		
	Dichlorobromomethane		0.1	0.55	No		
	1,1-Dichloroethane	<	0.5	N/A	No		
	1,2-Dichloroethane	<	0.5	0.38	No (Value < QL)		
	1,1-Dichloroethylene	<	0.5	33	No (Value < QL)		
	1,2-Dichloropropane	<	0.5	2200	No (Value < QL)		
	1,3-Dichloropropylene	<	0.5	0.34	No (Value < QL)		
	1,4-Dioxane	<	0.8	N/A	No		
	Ethylbenzene	<	0.5	530	No (Value < QL)		
	Methyl Bromide	<	0.5	47	No (Value < QL)		
	Methyl Chloride	<	0.5	5500	No (Value < QL)		
	Methylene Chloride	<	0.5	4.6	No (Value < QL)		
	1,1,2,2-Tetrachloroethane	<	0.5	0.17	No (Value < QL)		
	Tetrachloroethylene	<	0.5	0.69	No (Value < QL)		
	Toluene	<	0.5	330	No (Value < QL)		
	1,2-trans-Dichloroethylene	<	0.5	140	No (Value < QL)		
	1,1,1-Trichloroethane	<	0.5	610	No (Value < QL)		
	1,1,2-Trichloroethane	<	0.5	0.59	No (Value < QL)		
	Trichloroethylene	<	0.5	2.5	No (Value < QL)		
	Vinyl Chloride	<	0.5	0.025	No (Value < QL)		
Group 4	2-Chlorophenol	<	0.5	81	No (Value < QL)		
	2,4-Dichlorophenol	<	0.6	77	No (Value < QL)		
	2,4-Dimethylphenol	<	0.9	130	No (Value < QL)		
	4,6-Dinitro-o-Cresol	<	4	13	No (Value < QL)		
	2,4-Dinitrophenol	<	10	69	No (Value < QL)		
	2-Nitrophenol	<	0.6	1600	No (Value < QL)		
	4-Nitrophenol	<	5	470	No (Value < QL)		
	p-Chloro-m-Cresol	<	0.5	30	No (Value < QL)		
	Pentachlorophenol	<	3	0.27	No (Value < QL)		
	Phenol	<	0.4	10400	No (Value < QL)		
	2,4,6-Trichlorophenol	<	0.7	1.4	No (Value < QL)		

Group 5	Acenaphthene	<	0.8	17	No (Value < QL)		
	Acenaphthylene	<	0.7	N/A	No		
	Anthracene	<	0.7	8300	No (Value < QL)		
	Benzidine	<	20	0.000086	No (Value < QL)		
	Benzo(a)Anthracene	<	0.7	0.0038	No (Value < QL)		
	Benzo(a)Pyrene	<	0.6	0.0038	No (Value < QL)		
	3,4-Benzofluoranthene	<	0.9	0.0038	No (Value < QL)		
	Benzo(ghi)Perylene	<	0.5	N/A	No		
	Benzo(k)Fluoranthene	<	0.5	0.0038	No (Value < QL)		
	Bis(2-Chloroethoxy)Methane	<	0.8	N/A	No		
	Bis(2-Chloroethyl)Ether	<	0.7	0.03	No (Value < QL)		
	Bis(2-Chloroisopropyl)Ether	<	0.8	1400	No (Value < QL)		
	Bis(2-Ethylhexyl)Phthalate	<	5	1.2	No (Value < QL)		
	4-Bromophenyl Phenyl Ether	<	0.6	54	No (Value < QL)		
	Butyl Benzyl Phthalate	<	0.8	35	No (Value < QL)		
	2-Chloronaphthalene	<	0.7	1000	No (Value < QL)		
	4-Chlorophenyl Phenyl Ether	<	0.5	N/A	No		
	Chrysene	<	0.8	0.0038	No (Value < QL)		
	Dibenzo(a,h)Anthrancene	<	2.4	0.0038	No (Value < QL)		
	1,2-Dichlorobenzene	<	22.5	160	No		
	1,3-Dichlorobenzene	<	0.9	69	No		
	1,4-Dichlorobenzene	<	0.9	150	No		
	3,3-Dichlorobenzidine	<	0.9	0.021	No (Value < QL)		
	Diethyl Phthalate	<	0.8	800	No (Value < QL)		
	Dimethyl Phthalate	<	0.7	500	No (Value < QL)		
	Di-n-Butyl Phthalate	<	1.4	21	No (Value < QL)		
	2,4-Dinitrotoluene	<	0.7	0.05	No (Value < QL)		
	2,6-Dinitrotoluene	<	0.7	0.05	No (Value < QL)		
	Di-n-Octyl Phthalate	<	0.5	N/A	No		
	1,2-Diphenylhydrazine	<	4.8	0.036	No (Value < QL)		
	Fluoranthene	<	0.6	40	No (Value < QL)		
	Fluorene	<	0.6	1100	No (Value < QL)		
	Hexachlorobenzene	<	0.7	0.00028	No (Value < QL)		
	Hexachlorobutadiene	<	0.5	0.44	No (Value < QL)		
	Hexachlorocyclopentadiene	<	1.4	1	No (Value < QL)		
	Hexachloroethane	<	2	1.4	No (Value < QL)		
	Indeno(1,2,3-cd)Pyrene	<	0.7	0.0038	No (Value < QL)		
	Isophorone	<	0.8	35	No (Value < QL)		
	Naphthalene	<	0.9	43	No		
	Nitrobenzene	<	0.9	17	No (Value < QL)		
	n-Nitrosodimethylamine	<	2	0.00069	No (Value < QL)		
	n-Nitrosodi-n-Propylamine	<	0.7	0.005	No (Value < QL)		
	n-Nitrosodiphenylamine	<	0.6	3.3	No (Value < QL)		
	Phenanthrene	<	0.8	1	No (Value < QL)		
	Pyrene	<	0.6	830	No (Value < QL)		
	1,2,4-Trichlorobenzene	<	0.9	26	No		
Group 6	Aldrin	<	0.0043	0.000049	No (Value < QL)		
	alpha-BHC	<	0.0033	0.0026	No (Value < QL)		
	beta-BHC	<	0.05	0.0091	No (Value < QL)		
	gamma-BHC	<	0.0026	0.098	No (Value < QL)		
	delta BHC	<	0.0042	N/A	No		
	Chlordane	<	0.1103	0.0008	No (Value < QL)		
	4,4-DDT	<	0.0054	0.00022	No (Value < QL)		
	4,4-DDE	<	0.0052	0.00022	No (Value < QL)		
	4,4-DDD	<	0.0055	0.00031	No (Value < QL)		
	Dieldrin	<	0.0053	0.000052	No (Value < QL)		
	alpha-Endosulfan		0.01	0.056	No		
	beta-Endosulfan	<	0.011	0.056	No (Value < QL)		
	Endosulfan Sulfate	<	0.0052	N/A	No		
	Endrin	<	0.0073	0.036	No (Value < QL)		
	Endrin Aldehyde	<	0.021	0.29	No (Value < QL)		
	Heptachlor	<	0.0091	0.000079	No (Value < QL)		
	Heptachlor Epoxide	<	0.0027	0.000039	No (Value < QL)		
	Toxaphene	<	0.386	0.0002	No (Value < QL)		
	2,3,7,8-TCDD	<		0.000000005			
Group 7	Gross Alpha (pCi/L)	<		N/A			
	Total Beta (pCi/L)	<		N/A			
	Radium 226/228 (pCi/L)	<		N/A			
	Total Strontium	<		4000			
	Total Uranium	<		N/A			

PENTOXSD Analysis Results

Recommended Effluent Limitations

SWP Basin	Stream Code:	Stream Name:
05E	27567	TOMHICKEN CREEK

RMI	Name	Permit Number	Disc Flow (mgd)
30.00	CAN DO STP	PA0060046	1.0000

Parameter	Effluent Limit (µg/L)	Governing Criterion	Max. Daily Limit (µg/L)	Most Stringent WQBEL (µg/L)	Most Stringent WQBEL Criterion
BORON	826.11	INPUT	1103.028	1722.043	CFC
ZINC	220.812	AFC	344.502	220.812	AFC

Reviewer/Permit Engineer: Berger

Facility: CAN DO Inc
NPDES #: PA0060046
Outfall No: 001
n (Samples/Month): 4

Parameter	Distribution Applied	Coefficient of Variation (daily)	Avg. Monthly
Boron (µg/L)	Lognormal	0.2825029	826.1103970