pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0062855**
Facility Type	**Industrial**	APS ID	**639188**
Major / Minor	**Minor**	Authorization ID	**1437580**

NPDES PERMIT FACT SHEET INDIVIDUAL INDUSTRIAL WASTE (IW) AND IW STORMWATER

Applicant and Facility Information

Applicant Name	**Mary D Community Association (MDCA)**	Facility Name	**Mary D Comm Association Water Treatment Plant (WTP)**
Applicant Address	PO Box 115	Facility Address	34-36 Forest Lane
	Mary D, PA 17952-0115		Mary-D, PA 17952
Applicant Contact	Christine Verdier	Facility Contact	Ron Novack
Applicant Phone	(570) 621-3400	Facility Phone	(570) 233-5859
Client ID	42724	Site ID	750
SIC Code	4941	Municipality	Schuylkill Township
SIC Description	Trans. & Utilities - Water Supply	County	Schuylkill
Date Application Received	March 17, 2023	EPA Waived?	Yes
Date Application Accepted	May 25, 2023	If No, Reason	-

Purpose of Application: RENEWAL OF EXISTING NPDES PERMIT.

Summary of Review

0.0017 MGD NPDES Permit Renewal Application for a Water Filtration Treatment Plant discharge (filter backwash flow).

- Facility Description:
  - Flows: The NPDES Permit has been updated to reflect an average flow of 1,700 GPD per application. The design flow of 3,800 was calculated by adding the maximum possible discharge values for the two turbidimeters, clarifier flushes, and filter backwashes.
  - Water Source: Water source is the Mary D Reservoir, which is fed by Swift Creek. There is no dam minimum release, with it being possible for the reservoir to cease discharging (when water surface level drops beneath the spillway during extreme drought conditions).
  - Outfall/IMP No. 101: The (influent to WTP) raw water sampling point is located inside the WTP before any treatment.
- No DRBC Docket found in available files or DRBC Interactive Maps.
- Application:
  - **Public Upload# 313717 (4/28/2025) – Additional sampling data**
  - **Public Upload# 274080 received 12/2/2024 – Response to Tech Def letter**
  - **On-Base No. 109241 – Complete application**.

Special Conditions:
Part A.I.D (Outfall/Internal Monitoring Point No. 101): WWTP raw reservoir water sampling point added in case the facility pursues Chapter 95.2(5) based limits (based on upstream stream quality) in future. Monitoring upon DEP request, with Part A.III requiring reporting of any optional permittee monitoring.
Part C Conditions: Bolding for new requirements:

- Part C.I.A, B, C, and D: Existing Necessary property rights; Residuals management; Relation to WQM permits; BAT/ELG

Approve	Deny	Signatures	Date
X		James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	June 13, 2025
X		Edward Dudick, P.E. / Environmental Engineer Manager	June 25, 2025

Summary of Review

- **Part C.I.E: New chlorine minimization condition due to usage of chlorine in the production process.**
- **Part C.I.F: New dry stream condition due to stream going underground downstream of facility in historic mining area, (with additional language for reporting if the Mary-D reservoir stops discharging upstream of Outfall No. 001).**
- **Part C.II**: **New WQBELs for Toxic Pollutants conditions (Cadmium, Copper, Zinc). In addition to Part C.II-stated options, the facility can also pursue Chapter 95.2(5) limits based on ambient stream conditions.**
- **Part C.III: New chemical additive conditions (in case of future usage, as none is proposed)**
- **Part C.IV: Existing** Sedimentation Basin Cleaning **(modified to explicitly also apply to sedimentation tanks used in lieu of Sedimentation basins).**

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.	001	Design Flow (MGD)	.0022
Latitude	40º 46' 13.12"	Longitude	-76º 3' 26.75"
Quad Name	Delano	Quad Code	1237
Wastewater Description:	Water Treatment Effluent		
Receiving Waters	Unnamed Tributary to Schuylkill River (CWF, MF) a.k.a. Swift Creek locally per application	Stream Code	02380
NHD Com ID	25969016	RMI	1.54 (per previous Fact Sheet)
Drainage Area	0.35 mi^2 (USGS StreamStats)	Yield (cfs/mi^2)	0.1 (statewide default)
Q_{7-10} Flow (cfs)	0.035	Q_{7-10} Basis	LFY method
Elevation (ft)	1145 (per previous fact sheet)	Slope (ft/ft)	-
Watershed No.	3-A	Chapter 93 Class.	CWF, MF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	--
Assessment Status	Impaired		
Cause(s) of Impairment	FLOW REGIME MODIFICATION, FLOW REGIME MODIFICATION, HABITAT ALTERATIONS, SILTATION, SILTATION		
Source(s) of Impairment	ACID MINE DRAINAGE, ACID MINE DRAINAGE, CHANNELIZATION, HIGHWAY/ROAD/BRIDGE RUNOFF (NON-CONSTRUCTION RELATED), URBAN RUNOFF/STORM SEWERS		
TMDL Status	Final	Name	Upper Schuylkill River (Metals)

Background/Ambient Data		Data Source
pH (SU)	5.6	NPDES Application (raw water sampling from reservoir)
Temperature (°F)	-	-
Hardness (mg/L)	3.21	See above
Total Aluminum (ug/l)	279	See above
Total Iron (ug/l)	50	See above
Total Manganese (ug/l)	58.5	See above
Total Cadmium (ug/l)	0.22	See above
Total Copper (ug/l)	7	See above
Total Zinc (ug/l)	31.9	See above

Nearest Downstream Public Water Supply Intake	Pottstown Borough Water Authority (per previous fact sheet)		
PWS Waters	Schuylkill	Flow at Intake (cfs)	-
PWS RMI	-	Distance from Outfall (mi)	80 miles

Changes Since Last Permit Issuance: None known.

Other Comments:

- Upstream: There is a spring-fed Reservoir No. 1 with Dam Permit No. 54-030 (C-4, 0.30 mile drainage area, no minimum release). The 1992 WQM Permit Application indicated two (2) on-stream intake dams. Application Raw water sampling (above) indicates AMD-impacts on reservoir water.

- Downstream: The 1992 WQM permit application file indicates the stream is from the dam spillway, which then flowed about 750 feet downstream before going underground in the extensively deep and stripped mined area. Per E-maps, there are orphan AMD discharges (Tuscarora sinkhole; Mary D mine) and mining-disturbed areas downstream of the WTP discharge. E-maps indicate UNT is now classified as a perennial stream.
- Q7-10 Low Flow and LFY: Statewide default (0.1 CFS/square mile) used. USGS PA Streamstats could not be used due to small drainage area at Outfall No. 001; small watershed area at confluence with Schuylkill River; and presence of orphan mine discharges & historical mine-disturbed areas downstream biasing stream gage information in the watershed. **Potential dry stream scenario due to downstream losing stream segment and/or extreme drought (when reservoir water level falls below spillway elevation).**
- TMDL: No WLAs for non-mining source(s), with Facility discharges mixing with downstream orphan AMD discharges and therefore accounted for indirectly in the TMDL.

Treatment Facility Summary

Treatment Facility Name: Mary-D Water Treatment Plant

WQM Permit No.	Issuance Date	Scope
5492204	6/9/1992	Installation of four (4) concrete settling tanks to settle 375 GPD of WTP filter backwash water. Public Water Supply Permit No. 5489509 covered the Water Filtration Plant construction. Max surface settling rate estimated at 0.33 gallons/day/ft^2.

Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Industrial	physical	settling	No Disinfection*	0.0022 (NPDES permit)

Hydraulic Capacity (MGD)	Organic Capacity (lbs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposal
Undefined*	NA	Not Overloaded	NA	NA

*See below.

Changes Since Last Permit Issuance: None known.

Other Comments:

WQM Permit-design flow: The facility is discharging above the WQM Permit Application-identified average (0.000195 MGD) and max daily (0.000325 MGD) design flow rates. See EDMR for current discharge rates.

Potable Water Treatment: Application indicated 20,000 GPD raw water is treated. Process chemicals include aluminum sulfate, soda ash, sodium hypochlorite, and lime. Adsorption clarifier/mixed media filter units treat the water.The WTP uses Sodium Hypochlorite as a process water chemical for the potable water supply (not wastewater treatment).

Wastewater Treatment Process: Filter backwash passes through settling tanks before discharging to Swift Creek. The wastewater from influent turbidimeter, production turbidimeter, clarifier flush, filter backwash are combined and collected into four (4) 2,000 gallon settling tanks. Lime is added to the water before it settles to aid in coagulation and flocculation. The floc settles and the supernatant discharges into Swift Creek. The tanks only discharge effluent while the plant is running, approximately 8 to 10 hours per day

Compliance History

DMR Data for Outfall 001 (from March 1, 2022 to February 28, 2023)

Parameter	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22	JUL-22	JUN-22	MAY-22	APR-22	MAR-22
Flow (MGD) Average Monthly	0.00153	0.00144	0.00145	0.00129	0.00153	0.00136	0.00145	0.00154	0.00166	0.00157	0.00198	0.00162
Flow (MGD) Daily Maximum	0.00305	0.00305	0.00305	0.0026	0.00305	0.00305	0.00305	0.00305	0.0045	0.00305	0.00305	0.00305
pH (S.U.) Instantaneous Minimum	6.97	6.4	6.74	6.62	6.1	6.83	6.72	6.67	6.65	6.88	6.35	6.22
pH (S.U.) Instantaneous Maximum	7.1	6.61	6.87	6.85	6.85	6.92	6.89	6.9	6.92	6.95	6.59	6.35
TRC (mg/L) Average Monthly	0.01	0.02	0.01	0.01	< 0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
TRC (mg/L) Instantaneous Maximum	0.01	0.02	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01	0.01
TSS (mg/L) Average Monthly	3.0	< 3.0	< 3.0	< 5.0	4.5	< 3.0	3.0	25.5	5.0	< 3.0	3.5	3.0
TSS (mg/L) Daily Maximum	3	3.0	< 3.0	7.0	6.0	3.0	3.0	48.0	6.0	< 3.0	4.0	3.0
Total Aluminum (lbs/day) Average Monthly	0.003	0.006	0.001	0.005	0.001	0.0005	0.002	0.02	0.01	0.008	0.01	0.005
Total Aluminum (mg/L) Average Monthly	0.79	1.88	0.4	0.4	0.2	0.1	0.2	2.6	1.7	0.5	0.7	0.9
Total Aluminum (mg/L) Daily Maximum	0.8	1.1	0.63	0.45	0.23	0.16	0.21	4.97	2.85	0.66	0.91	0.91
Total Iron (lbs/day) Average Monthly	0.0002	0.0004	0.0001	0.001	0.001	0.0005	0.004	0.01	0.002	0.0007	0.0004	0.0001
Total Iron (mg/L) Average Monthly	0.05	0.1	0.03	0.1	0.2	0.1	0.3	1.2	0.3	0.04	0.03	0.02
Total Iron (mg/L) Daily Maximum	0.1	0.11	0.03	0.09	0.12	0.16	0.32	2.01	0.41	0.06	0.03	0.02
Total Manganese (lbs/day) Average Monthly	0.0002	0.007	0.0003	0.001	0.0005	0.0002	0.001	0.002	0.0003	0.0009	0.0009	0.0003

Total Manganese (mg/L) Average Monthly	0.06	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Total Manganese (mg/L) Daily Maximum	0.1	0.07	0.08	0.08	0.08	0.07	0.08	0.16	0.06	0.06	0.06	0.06

Compliance History

Inspection History: 1/28/2020 Inspection Report indicated no violations. Flow is calculated by adding the clarifier rinse flows and backwash flows for each day. The clarifier rinse occurs every 5 hours, generating 450 gallons. The backwash cycle occurs every 40 hours and produces 1700 gallons. Settling tanks are pumped out on an as needed basis. The Inspection Report referenced two (2) settling basins.

Compliance History: Eighteen (18) Safe Drinking Water Program open violations per 6/13/2025 WMS query on client #. No permit limits exceedances in last 12 months, but there were TRC exceedances in February 2024 and Aluminum exceedances in November 2023 per WMS.

CLIENT	INSP PROGRAM	PROGRAM SPECIFIC ID	VIOLATION ID	VIOLATION DATE	VIOLATION CODE	VIOLATION
MARY D COMM ASSN	Safe Drinking Water	3540027	8213054	12/18/2024	D10	FAILURE TO PROVIDE RECORDS OR DATA REQUESTED BY THE DEPARTMENT OR ALLOW THE DEPARTMENT TO CONDUCT INSPECTIONS OF THE PUBLIC WATER SYSTEM
MARY D COMM ASSN	Safe Drinking Water	3540027	8213055	12/18/2024	D6A	FAILURE OF A COMMUNITY WATER SYSTEM TO DEVELOP AND/OR UPDATE AN OPERATION AND MAINTENANCE PLAN
MARY D COMM ASSN	Safe Drinking Water	3540027	8213056	12/18/2024	C3D	FAILURE TO FILTER-TO-WASTE AS REQUIRED
MARY D COMM ASSN	Safe Drinking Water	3540027	8213057	12/18/2024	C1A	FAILURE TO MEET DESIGN AND CONSTRUCTION STANDARDS
MARY D COMM ASSN	Safe Drinking Water	3540027	8213058	12/18/2024	C1D	FAILURE TO USE CHEMICALS, MATERIALS OR EQUIPMENT THAT ARE CERTIFIED BY ANSI/NSF STANDARD 60 OR 61
MARY D COMM ASSN	Safe Drinking Water	3540027	8213059	12/18/2024	C4A	FAILURE TO OPERATE AND MAINTAIN THE WATER SYSTEM
MARY D COMM ASSN	Safe Drinking Water	3540027	8213060	12/18/2024	B8A	CHRONIC FAILURE TO MONITOR
MARY D COMM ASSN	Safe Drinking Water	3540027	8213063	12/18/2024	D6E	FAILURE OF A CWS TO DEVELOP AND/OR UPDATE AN

						EMERGENCY RESPONSE PLAN
MARY D COMM ASSN	Safe Drinking Water	3540027	8213064	12/18/2024	C3E	FAILURE TO IMPLEMENT A FILTER BED EVALUATION PROGRAM
MARY D COMM ASSN	Safe Drinking Water	3540027	8213065	12/18/2024	C2B	FAILURE TO FOLLOW APPROVED METHODS FOR SAMPLING AND ANALYSIS
MARY D COMM ASSN	Safe Drinking Water	3540027	8213066	12/18/2024	B6D	CHRONIC FAILURE TO CALIBRATE TURBIDIMETERS USED FOR COMPLIANCE MONITORING
MARY D COMM ASSN	Safe Drinking Water	3540027	8213067	12/18/2024	D3	FAILURE TO ACCURATELY REPORT DATA
MARY D COMM ASSN	Safe Drinking Water	3540027	8213068	12/18/2024	C4A	FAILURE TO OPERATE AND MAINTAIN THE WATER SYSTEM
MARY D COMM ASSN	Safe Drinking Water	3540027	8213069	12/18/2024	B8A	CHRONIC FAILURE TO MONITOR
MARY D COMM ASSN	Safe Drinking Water	3540027	8213070	12/18/2024	C4A	FAILURE TO OPERATE AND MAINTAIN THE WATER SYSTEM
MARY D COMM ASSN	Safe Drinking Water	3540027	8229531	04/17/2025	C4A	FAILURE TO OPERATE AND MAINTAIN THE WATER SYSTEM
MARY D COMM ASSN	Safe Drinking Water	3540027	8229532	04/17/2025	C4A	FAILURE TO OPERATE AND MAINTAIN THE WATER SYSTEM
MARY D COMM ASSN	Safe Drinking Water	3540027	8229533	04/17/2025	C9	EXCEEDANCE OF A SECONDARY MCL

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** .0022
Latitude 40º 46' 13.00" **Longitude** -76º 3' 27.00"
Wastewater Description: Water Treatment Effluent

Permit Limits and/or Monitoring (Changes bolded): UPDATE TO SITE-SPECIFIC Limits.

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
TSS	**Report (lb/d)** 30.0 60.0 75.0	**Daily Max** Monthly Average Daily Max IMAX	Existing Technology limit per 10/1/97 DEP Policy ID# 362-2183-003 (Technology-based control requirements for water treatment plant wastes) for filter backwash plants. Application data: 48 mg/l max, 25.5 mg/l max monthly, with <4.667 mg/l LTA value (51 samples).
pH	6.0 – 9.0 SU	**Inst. Min** - Max	Existing Technology limits (Chapter 95.2). Application data: 6.00 – 7.10 SU (105 samples)
Total Iron	**Report (lb/d)** 2,0**00 ug/l** 4,0**00 ug/l** 5,0**00 ug/l**	**Monthly Average** Monthly Average Daily Max IMAX	Existing Technology limit **(significant digits added).** Application data: 2010 ug/l max**,** and 157.6 ug/l average (51 samples). **Influent sample: 50 ug/l (1 sample)**
Total Manganese	**Report (lb/d)** 1,0**00 ug/l** 2,0**00 ug/l** 2,5**00 ug/l**	**Monthly Average** Monthly Average Daily Max IMAX	Existing Technology limit Application data: 800 ug/l max and 84.3 ug/l average (51 samples). **Influent sample: 58.5 ug/l (1 sample)**
Total Aluminum	**Report (lb/d)** 3,800 **ug/l** 7,600 **ug/l** 9,500 **ug/l**	Daily Max Monthly Average Daily Max IMAX	Existing Technology limits. Application data: 4970 ug/l max and 661.4 ug/l average (51 samples). **Influent sample: 279 ug/l (1 sample)**
Total Residual Chlorine	0.5**0** 1.17	Average Monthly IMAX	Existing technology limit **with significant digit added.** Application data: 0.01 mg/l max and 0.02 mg/l average (24 samples). See EDMR for additional sample data.
Total Dissolved Solids	**Report (lb/d)** **Report** **Report**	**Monthly Average** **Monthly Average** **Daily Max**	**Annual monitoring per Chapter 92a.61 due to siltation impairments plus being a DRBC constituent of interest.** Application data: 18 mg/l max and 10 mg/l LTA average (3 samples)
Total Cadmium (final limits effective in fourth year)	**Report (lb/d)** **0.24 ug/l** **0.38 ug/l** **0.60 ug/l**	**Monthly Average** **Monthly Average** **Daily Max** **IMAX**	**See Reasonable Potential Analysis. Interim monitoring, with final limits effective in fourth year.** Application data: 0.24 ug/l max, 0.2233 ug/l average (3 samples). **Influent sample: 0.22 ug/l (1 sample)** Resampling: 0.28 ug/l max effluent and 0.27 ug/l max influent (5 samples)
Total Copper (final limits effective in fourth year)	**Report (lb/d)** **4.03 ug/l** **6.29 ug/l** **10.1 ug/l**	**Monthly Average** **Monthly Average** **Daily Max** **IMAX**	**See Reasonable Potential Analysis. Interim monitoring, with final limits effective in fourth year.**

			Application data: **16.0 ug/l max, 10.0 ug/l** average (3 samples). **Influent sample: 7 ug/l (1 sample)** Resampling: 19.0 ug/l max effluent and 18.0 ug/l max influent (5 samples)
Total Mercury (final limits effective in fourth year)	**Report (lb/d) 0.56 ug/l 0.88 ug/l 1.41 ug/l**	**Monthly Average Monthly Average Daily Max IMAX**	**See Reasonable Potential Analysis. Interim monitoring, with final limits effective in fourth year.** Application data: **<0.3385** ug/l max, <0.2461 ug/l average (3 samples, 2 ND). **Influent sample: <0.2 ug/l (1 sample)** with DEP TQL at 0.2 ug/l. Resampling: <0.2 ug/l max effluent and 0.1 ug/l max influent (5 samples)
Total Zinc (final limits effective in fourth year)	**Report (lb/d) 47.7 74.4 119.0**	**Monthly Average Monthly Average Daily Max IMAX**	**See Reasonable Potential Analysis. Interim monitoring, with final limits effective in fourth year.** Application data: 29.9 ug/l max, 28.83 ug/l average (3 samples) **Influent sample: 31.9 ug/l (1 sample)** Resampling: 41.6 ug/l max effluent and 40.0 ug/l max influent (5 samples)

Comments:

- Monitoring Requirements:
  - Additional mass loading reporting (no additional sampling requirement) in this permit term.
  - Going to mg/l limits in renewal for Toxic pollutants to be consistent. Adding significant digits to older metal limits as needed.
  - Going to flow-proportional 24-hour composite sampling to eliminate any potential biasing, with facility generally discharging 8 – 10 hours per day. See Part A.II definition for requirements.
  - Retaining 2/month sampling frequency for Tech-based limits. Standard minimum weekly monitoring for new toxic pollutants when limits become effective.
- Resampling data: The Pre-Draft Survey indicated copper influent concentrations exceeded potential WQBEL, with Cadmium below but near the potential WQBEL. Mercury dropped out of the Reasonable Potential Analysis due to updated sampling data. No new Total Hardness Data provided.

Sampling Date	Cadmium (mg/l)	Copper (mg/l)	Mercury (mg/l)	Zinc (mg/l)	Total Hardness* (mg/l)
Previous Influent Sample	0.00022 influent	0.0070 influent	<0.0002 influent	0.0391 influent	See above.
1/12/2025	0.00025 influent 0.00028 effluent	0.018 influent 0.012 effluent	<0.0002 influent <0.0002 effluent	0.0304 influent 0.0416 effluent	-
1/20/2025	0.00028 influent 0.00024 effluent	0.013 influent 0.016 effluent	<0.001 influent <0.001 effluent	0.0385 influent 0.0295 effluent	-
1/26/2025	0.00027 influent 0.00024 effluent	0.015 influent 0.015 influent	<0.0002 influent <0.0001 effluent	0.0400 influent 0.0320 effluent	-
2/2/2025	0.00026 influent 0.00026 effluent	0.015 influent 0.019 effluent	0.0001 influent <0.0001 effluent	0.0376 influent 0.010 effluent	-
2/10/2025	0.00026 influent 0.00024 effluent	0.012 influent 0.015 effluent	<0.0001 influent <0.0001 effluent	0.0334 influent 0.0285 effluent	-
TQL	0.0002	0.0040	0.0002	0.0050	-

*No data provided in the Resampling.

- Reasonable Potential Analysis: The facility does not believe it can meet the proposed WQBELs for Total Copper. The following WQBELs were calculated, using available information, assuming 0.1 CFS/square mile LFY (not a dry stream scenario) as it is unclear if the reservoir dams can cease discharge. In practical terms, the facility discharge would be the stream in such a scenario, but maintaining minimum site discharge would help keep aquatic life alive in that scenario.
    - PFAS: No PFAS treatment unit in WTP. No known source of PFAS in the upstream watershed. Therefore no PFAS monitoring is being required at this time.
    - Old Application Data: Previous NPDES permit only required grab sampling and Original application sampling data was grab-sampled during an 8 – 10 hour discharge, not 24-hour composite sampling, therefore potential biasing.
    - Application Total Hardness Data: Influent Total Hardness was 3.21 mg/l. Effluent Total Hardness was 3.6333 mg/l average (3 samples)
    - Potential for Chapter 95.2(5) limits: Influent data indicates that Chapter 95.2(5) limits might be applicable, based on Resampling influent data (reservoir raw water prior to potable water treatment), and can be pursued during the Part C.II (WQBELs for Toxic Pollutant) schedule of compliance. Chapter 95.2(5) states: When surface waters are used in the industrial plant, the quality of the effluent need not exceed the quality of the raw water supply if the source or supply would normally drain to the point of effluent discharge, unless otherwise required under the act or Federal Act or regulations promulgated thereunder.
    - Retained Limits: Antibacksliding prohibition prevents relaxation of existing permit limits:
        - The existing technology-based limits for TSS, Iron (Total), Manganese (Total), pH, and TRC are consistent with Department guidance (Technology-Based Control Requirements for Water Treatment Plant Wastes, Doc. No. 362-2183-003) and Chapter 92a.48.
        - The existing Aluminum limits are existing WQBELs, with the antibacksliding prohibition not allowing for less stringent limits.
    - Updated TMS Output (at revised 0.0017 MGD NPDES Permit Basis Flow):

☑ ***Recommended WQBELs & Monitoring Requirements***

No. Samples/Month: 4

	Mass Limits		*Concentration Limits*						
Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL	WQBEL Basis	Comments
Total Aluminum	0.098	0.15	6,878	10,731	17,196	µg/L	6,878	AFC	Discharge Conc ≥ 50% WQBEL (RP)
Total Cadmium	0.000004	0.000007	0.31	0.48	0.77	µg/L	0.31	CFC	Discharge Conc ≥ 50% WQBEL (RP)
Total Copper	0.00007	0.0001	5.09	7.94	12.7	µg/L	5.09	AFC	Discharge Conc ≥ 50% WQBEL (RP)
Total Zinc	0.0009	0.001	60.3	94.1	151	µg/L	60.3	AFC	Discharge Conc ≥ 50% WQBEL (RP)

    - Updated TMS Output (at revised 0.0017 MGD NPDES Permit Basis Flow but zero stream low flow – i.e. assumed 0.001 CFS/square mile LFY): This scenario might take place during extreme drought conditions if reservoir water level fell below spillway elevation (as the facility has no means to otherwise cease reservoir discharging). Chapter 95.2(5) considerations would apply for this hypothetical scenario, plus benefit of even minimum flows during otherwise dry stream conditions. Special condition will be added to require notification in event of cessation of reservoir discharge (as part of dry stream condition).

☑ ***Recommended WQBELs & Monitoring Requirements***

No. Samples/Month: 4

	Mass Limits		*Concentration Limits*						
Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL	WQBEL Basis	Comments
Total Aluminum	0.011	0.012	750	850	850	µg/L	750	AFC	Discharge Conc ≥ 50% WQBEL (RP)
Total Cadmium	3.82E-07	5.96E-07	0.027	0.042	0.067	µg/L	0.027	CFC	Discharge Conc ≥ 50% WQBEL (RP)
Total Cobalt	Report	Report	Report	Report	Report	µg/L	21.5	CFC	Discharge Conc > 10% WQBEL (no RP)
Total Copper	0.000009	0.00001	0.64	0.72	0.72	µg/L	0.64	AFC	Discharge Conc ≥ 50% WQBEL (RP)
Total Iron	0.024	0.038	1,700	2,652	4,249	µg/L	1,700	CFC	Discharge Conc ≥ 50% WQBEL (RP)
Total Manganese	0.016	0.025	1,133	1,768	2,833	µg/L	1,133	THH	Discharge Conc ≥ 50% WQBEL (RP)
Total Zinc	0.0001	0.0001	7.43	8.42	8.42	µg/L	7.43	AFC	Discharge Conc ≥ 50% WQBEL (RP)

Communications Log:
3/17/2023: Initial renewal application received
4/28/2023: Incompleteness Letter issued.
5/24/2023: Mary D (Zachary Steckler) E-mail indicated response to incompleteness letter uploaded. On-Base No. 109241

8/28/2024: Technical Deficiency Letter issued.
9/24/2024: Mary D (Haley Robb, Benesch) E-mail request for 60 day extension to November 26 for response to Tech Def letter.
11/26/2024: Mary D (Haley Robb, Benesch) E-mail indicating difficulty in uploading to Public Upload.
12/2/2024: Partial Response to Tech Def letter received (including revised application). Public Upload 274080.
1/3/2025: Mary D (Haley Robb, Benesch) E-mail with preliminary sampling plan
1/3/2025: DEP (Berger) E-mail requiring submittal of 4 sample results and any proposed site-specific data collection work plan by 2/28/2025. Preliminary comments on sampling plan included.
1/15/2025: Mary D (Haley Robb, Benesch) E-mail indicating sampling results would be submitted by 2/28/2025.
3/21/2025: DEP (Berger) E-mail reminder to submit missing sampling data
4/17/2025: DEP (Berger) E-mail reminder to submit missing sampling data
4/28/2025: Additional sampling data received. Public Upload# 313717

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