pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southcentral Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0083623**
Facility Type	**Industrial**	APS ID	**35024**
Major / Minor	**Minor**	Authorization ID	**1281370**

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

Applicant and Facility Information

Applicant Name	**TB Woods Inc.**	Facility Name	**TB Woods Foundry**
Applicant Address	440 5th Avenue	Facility Address	440 5th Avenue
	Chambersburg, PA 17201-1763		Chambersburg, PA 17201-1763
Applicant Contact	Paul McCurdy	Facility Contact	Paul McCurdy
Applicant Phone	(717) 217-3847 ext. 3847	Facility Phone	(717) 217-3847 ext. 3847
Client ID	27061	Site ID	246342
SIC Code	3568	Municipality	Chambersburg Borough
SIC Description	Manufacturing - Power Transmission Equipment, Nec	County	Franklin
Date Application Received	July 1, 2019	EPA Waived?	Yes
Date Application Accepted	October 7, 2019	If No, Reason	
Purpose of Application	NPDES Renewal.		

Summary of Review

TB Woods Inc. (TB Woods) has applied to the Pennsylvania Department of Environmental Protection (DEP) for reissuance of its NPDES permit. The permit was last reissued on November 24, 2014 and became effective on December 1, 2014. The permit expired on November 30, 2019.

Based on the review, it is recommended that the permit be drafted.

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		*Jinsu Kim* Jinsu Kim / Environmental Engineering Specialist	April 22, 2020
X		*Daniel W. Martin* Daniel W. Martin, P.E. / Environmental Engineer Manager	July 7, 2020

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	0.360
Latitude	39° 56’ 27”	Longitude	77° 38’ 50”
Quad Name	Chambersburg	Quad Code	1924
Wastewater Description:	Non-contact cooling water		

Outfall No.	002 (formerly Outfall 001A)	Design Flow (MGD)	0.0028
Latitude	39° 56’ 26”	Longitude	77° 38’ 50”
Wastewater Description:	Non-contact cooling water		

Outfall No.	003 (formerly Outfall 001C)	Design Flow (MGD)	0.0576
Latitude	39° 56’ 29”	Longitude	77° 38’ 48”
Wastewater Description:	Non-contact cooling water		

Outfall No.	004 (formerly Outfall 001E)	Design Flow (MGD)	0.00144
Latitude	39° 56’ 32”	Longitude	77° 38’ 46”
Wastewater Description:	Non-contact cooling water		

Receiving Waters	UNT to Falling Spring Branch	Stream Code	60184
NHD Com ID	49479458	RMI	0.43
Drainage Area	1.51 sq. mi.	Yield (cfs/mi^2)	
Q_{7-10} Flow (cfs)	0.399	Q_{7-10} Basis	USGS StreamStats
Elevation (ft)		Slope (ft/ft)	
Watershed No.	13-C	Chapter 93 Class.	TSF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	

Secondary Waters	Falling Spring Branch	Stream Code	60183
NHD Com ID	49479458	RMI	0.70
Drainage Area	11.1 sq. mi.	Yield (cfs/mi2)	
Q7-10 Flow (cfs)	7.51	Q7-10 Basis	USGS StreamStats
Elevation (ft)		Slope (ft/ft)	
Watershed No.	13-C	Chapter 93 Class.	TSF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	

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

Nearest Downstream Public Water Supply Intake	City of Hagerstown, MD		
PWS Waters	Conococheague Creek	Flow at Intake (cfs)	
PWS RMI		Distance from Outfall (mi)	48

Drainage Area
The discharge from Outfalls 001, 002, 003 and 004 is to Unnamed Tributary to Falling Spring Branch. Because these outfalls are located very close to each other, RM is estimated to be 0.43 for all of these outfalls. A drainage area upstream of all of these outfalls is estimated to be 1.51 sq.mi. using USGS StreamStats available at https://streamstats.usgs.gov/ss/. DEP's Water Quality Biologist conducted a Point of First Use survey in 1994 and determined that the point of first use (POFU) is to be downstream from Outfall 001, at the confluence of this unnamed tributary and the main stem, Falling Spring Branch. The drainage area at this point (Falling Spring Branch) is estimated to be 11.1 sq.mi. also using USGS StreamStats.

Streamflow
USGS StreamStats produced a Q7-10 flow of 0.399 cfs at the point of discharge and Q7-10 flow of 7.51 cfs at the POFU.

Unnamed Tributary to Falling Spring Branch/Falling Spring Branch
Under 25 Pa Code §93.9z, the entire basin of Falling Spring Branch from Chambersburg-Guilford Township border to Mouth is designated as trout stocking fishes and supports migratory fishes. No special protection water is impacted by this discharge. The stream segment where the discharge is located is considered a trout natural reproduction area but is not considered a Class A Wild Trout fishery. DEP's latest integrated water quality report finalized in 2018 shows that both the receiving stream and Falling Spring Branch are not impaired.

Public Water Supply Intake
The fact sheet developed for the last permit renewal shows that the nearest downstream public water supply intake is located on the Conococheague Creek near the City of Hagerstown, MD about 40 miles from the discharge. Given the distance, the discharge is not expected to impact the water supply.

Treatment Facility Summary				
Treatment Facility Name: TB Woods Foundry				
Waste Type	**Degree of Treatment**	**Process Type**	**Disinfection**	**Avg Annual Flow (MGD)**
Industrial	N/A	N/A	N/A	
Hydraulic Capacity (MGD)	**Organic Capacity (lbs/day)**	**Load Status**	**Biosolids Treatment**	**Biosolids Use/Disposal**
N/A	N/A	N/A	N/A	N/A

Under NAICS code 333613, TB Woods is a foundry, machine shop and warehouse for components used in power transmission. The facility mainly manufactures cast iron. The facility discharges non-contact cooling water (NCCW) and stormwater. No process wastewater and sanitary wastewater have been reported to be discharged from this facility. The fact sheet prepared for the last permit renewal provided the following information:

- Outfall 001 receives non-contact cooling water (NCCW). The NCCW is derived from two wells and is used to cool air compressors. The NCCW discharges into an enclosed culvert that contains spring water that originates within the plant. The combined spring and well water discharges into a swale that leads to UNT Falling Spring Branch. The pump rate of the two wells is 100 gpm and 150 gpm, which is equivalent to 0.360 MGD. According to the previous protection report, it is impossible to determine the amount of spring water that is combined with this flow prior to discharge. The culvert is covered within the plant. Greg Cook of TB Wood's indicated that the spring probably goes dry in the summer and the discharge contains only the cooling water.

- Outfall 002 receives NCCW from the "Molding #2" area of the plant. The molding machines are cooled with municipal water. The estimated maximum daily flow from this outfall is 0.0028 MGD. The outfall is a 2-inch metal pipe about two feet upstream of outfall 001.

- Outfall 003 contains only groundwater based on past investigations at the facility. Sampling is not required for this outfall, but it will remain on the list for historical and informational purposes. The estimated flow has been listed in previous permits as 0.0576 MGD.

- Outfall 004 receives municipality-derived NCCW from an air compressor. This compressor is only used in the event of a power failure or if the outside temperature exceeds 90 degrees. The estimated flow from this outfall is 0.00144 MGD.

Given the locations of these outfalls, the permit requirements have been developed based on the total flow of 0.422 MGD. In addition to these outfalls, TB Woods also utilizes six (6) stormwater outfalls. The more details on these stormwater outfalls will be discussed later in this fact sheet.

The application shows that the facility has not used any chemicals for wastewater treatment nor any chemical additives that are expected to be present in the effluent.

Compliance History	
Summary of DMRs:	A summary of past 12-month DMR data is presented on the next page.
Summary of Inspections:	12/8/2017: Patrick Bowen, former DEP Water Quality Specialist, conducted a routine inspection. No violations were noted at the time of inspection.
Other Comments:	DEP's database revealed that there is no open violation associated with this facility or permittee. Since the last permit reissuance, the facility had one (1) permit violation: A failure to submit the timely application.

Effluent Data

DMR Data for Outfall 001 (from March 1, 2019 to February 29, 2020)

Parameter	FEB-20	JAN-20	DEC-19	NOV-19	OCT-19	SEP-19	AUG-19	JUL-19	JUN-19	MAY-19	APR-19	MAR-19
Flow (MGD) Average Monthly	0.360	0.360	0.360	0.360	0.360	0.360	0.360	0.0360	0.0360	0.0360	0.360	0.360
Flow (MGD) Daily Maximum	0.360	0.360	0.360	0.360	0.360	0.360	0.360	0.0360	0.0360	0.360	0.360	0.360
pH (S.U.) Minimum	7.3	7.2	7.6	6.9	7.2	7.1	7.2	7.1	7.2	7.2	6.5	6.9
pH (S.U.) Maximum	7.7	8.1	8.4	7.9	7.5	7.7	7.7	7.6	7.6	7.5	7.7	7.8
Temperature (ºF) Daily Maximum	61	60	60	61	67	65	66	63	63	64	64	6.1

DMR Data for Outfall 004 (from March 1, 2019 to February 29, 2020)

Parameter	FEB-20	JAN-20	DEC-19	NOV-19	OCT-19	SEP-19	AUG-19	JUL-19	JUN-19	MAY-19	APR-19	MAR-19
Flow (MGD) Average Monthly	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144
Flow (MGD) Daily Maximum	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144	0.00144
pH (S.U.) Minimum	7.4	7.2	7.7	6.8	7.3	7.2	7.3	7.2	7.3	7.3	6.6	7.2
pH (S.U.) Maximum	7.7	8.3	8.3	8.3	7.7	7.8	7.8	7.7	7.7	7.6	7.8	7.7
Temperature (ºF) Daily Maximum	60	60	58	61	68	67	67	64	64	65	63	59

Annual DMR Data for Outfall 007 and 008 (December 2019)

Stormwater Outfalls	pH (S.U.)	CBOD5 (mg/L)	COD (mg/L)	TSS (mg/L)	Oil and Grease (mg/L)	TKN (mg/L)	Total Phosphorus (mg/L)	Total Chromium (mg/L)	Total Copper (mg/L)	Dissolved Iron (mg/L)	Total Lead (mg/L)	Total Nickel (mg/L)	Total Zinc (mg/L)
Outfall 007	6.37	4.30	14	27.0	< 5.0	< 1.00	0.64	< 0.005	< 0.005	< 0.05	< 0.005	< 0.005	0.026
Outfall 008	6.47	4.79	23	18	< 5.0	< 1.00	0.27	< 0.005	0.007	< 0.05	< 0.005	0.043	0.096

Existing Effluent Limits and Monitoring Requirements

A table below summarizes effluent limits and monitoring requirements specified in the existing permit:

Outfalls 001, 002 and 004

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report	XXX	XXX	XXX	XXX	1/day	Estimate
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/day	Grab
Temperature (ºF) Jul 1-31	XXX	XXX	XXX	XXX	85	XXX	1/day	I-S
Temperature (ºF) Aug 1 - Jun 30	XXX	XXX	XXX	XXX	110	XXX	1/day	I-S

For Stormwater Outfalls 005, 006, 007, 008 and 009, 1/year grab sampling of pH, CBOD5, COD, TSS, Oil and Grease, TKN, TP, Total Chromium, Total Copper, Dissolved Iron, Total Lead, Total Nickel, Total Zinc is required.

Development of Effluent Limitations and Monitoring Requirements

Outfall No.	001, 002, 003, and 004	**Design Flow (MGD)**	0.422
Latitude	39° 56' 27"	**Longitude**	77° 38' 50"

Wastewater Description: Non-contact cooling water

Technology-Based Limitations

The federal effluent guidelines and effluent limitations (ELGs) are not applicable for NCCW discharges from this facility. The facility is subject to the state effluent standard for pH found in 25 Pa Code §95.2(1).

Water Quality-Based Limitations

No WQM and PENTOXSD instream models have been utilized for this facility as NCCW is the only wastewater generated from this facility for a stream discharge. This permit review approach is also consistent with the latest application instructions in which the instructions indicate the following:

Facilities that discharge only non-process wastewater not regulated by an ELG or new source performance standard can, in lieu of completing three analyses for all Group 1 pollutants, complete three analyses for the following pollutants: 5-Day Biochemical Oxygen Demand (BOD5), Total Suspended Solids (TSS), Total Dissolved Solids (TDS), Fecal Coliform (if believed present or if sanitary waste is or will be discharged), Total Residual Chlorine (TRC) (if chlorine is used), Oil and Grease, Chemical Oxygen Demand (COD) (if non-contact cooling water is or will be discharged), Total Organic Carbon (TOC) (if non-contact cooling water is or will be discharged), Ammonia-Nitrogen, pH, and Temperature (winter and summer).

Three (3) grab samples were collected and analyzed for above-referenced pollutants and show that none of these pollutants is discharged at a level of concern.

DEP's Thermal Discharge Limit worksheet was utilized for NCCW and indicates that existing effluent limits are still adequate. No change is therefore recommended.

Additional Considerations

Flow Monitoring
Flow monitoring will remain in the permit and is required by 40 CFR § 122.44(i)(1)(ii).

Outfall 003 Discharges
Sampling has not been required for this outfall as this is only groundwater from a sump pump. This is a reasonable approach and the upcoming permit renewal will still not require sampling for this outfall.

Chemical Additive
The facility does not utilize a chemical additive.

Anti-Degradation requirements
The effluent limits for this discharge have been developed to ensure the existing in-stream uses and the level of water quality necessary to protect the existing uses are maintained and protected.

Class A Wild Trout Fishery
No Class A Wild Trout is impacted by this discharge.

Development of Effluent Limitations and Monitoring Requirements

TB Woods utilizes the following stormwater outfalls:

Outfall No.	005 (formerly Outfall SW02)	Receiving Water	UNT Falling Spring Branch
Latitude	39° 56’ 32”	Longitude	77° 38’ 46”
Drainage Area	42,350 sq. ft.	RMI	0.43
Drainage Description:	Northeast side of the plant’s blacktop area.		

Outfall No.	006 (formerly Outfall SW03)	Receiving Water	UNT Falling Spring Branch
Latitude	39° 56’ 20”	Longitude	77° 38’ 54”
Drainage Area	36,875 sq. ft.	RMI	0.89
Drainage Description:	West parking area and warehouse.		

Outfall No.	007 (formerly Outfall SW04)	Receiving Water	UNT Falling Spring Branch
Latitude	39° 56’ 22”	Longitude	77° 38’ 59”
Drainage Area	100,000 sq. ft.	RMI	0.81
Drainage Description:	Parking area and office complex.		

Outfall No.	008 (formerly Outfall SW05)	Receiving Water	UNT Falling Spring Branch
Latitude	39° 56’ 34”	Longitude	77° 38’ 47”
Drainage Area	21,875 sq. ft.	RMI	0.31
Drainage Description:	Foundry and machine shop area.		

Outfall No.	009 (formerly Outfall SW02A)	Receiving Water	UNT Falling Spring Branch
Latitude	39° 56’ 27”	Longitude	77° 38’ 50”
Drainage Area	78,100 sq. ft.	RMI	0.43
Drainage Description:	East side of the plant’s blacktop area.		

Outfall No.	010 (formerly Outfall SW02B)	Receiving Water	UNT Falling Spring Branch
Latitude	39° 56’ 30”	Longitude	77° 38’ 47”
Drainage Area	15,750 sq. ft.	RMI	0.43
Drainage Description:	Roof of the foundry and office complex.		

Outfall No.	011 (formerly Outfall SW02C)	Receiving Water	UNT Falling Spring Branch
Latitude	39° 56’ 32”	Longitude	77° 38’ 48”
Drainage Area	9,120 sq. ft.	RMI	0.43
Drainage Description:	Roof of the office complex.		

All existing monitoring requirements will remain unchanged. Outfalls 010 and 011 have not been required to be sample as these outfalls only receive stormwater drained from the rooftop of the office complex and foundry. The latest standard stormwater monitoring requirements will be included in Part C of the permit.

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.

Outfalls 001, 002, and 004, 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	Instant. Minimum	Average Monthly	Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	1/day	Estimate
pH (S.U.)	XXX	XXX	6.0	XXX	9.0	XXX	1/day	Grab
Temperature (ºF) Aug 1 - Jun 30	XXX	XXX	XXX	XXX	110 Daily Max	XXX	1/day	I-S
Temperature (ºF) Jul 1 - 31	XXX	XXX	XXX	XXX	85 Daily Max	XXX	1/day	I-S

Outfalls 005, 006, 007, 008 and 009, 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		Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
CBOD5	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Chemical Oxygen Demand	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Suspended Solids	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Kjeldahl Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Chromium	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) [1]		Concentrations (mg/L)				Minimum [2] Measurement Frequency	Required Sample Type
	Average Monthly		Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Copper	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Dissolved Iron	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Lead	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Nickel	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
Total Zinc	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab

Tools and References Used to Develop Permit	
☐	WQM for Windows Model (see Attachment)
☐	PENTOXSD for Windows Model (see Attachment)
☐	TRC Model Spreadsheet (see Attachment)
☐	Temperature Model Spreadsheet (see Attachment)
☐	Toxics Screening Analysis Spreadsheet (see Attachment)
☐	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
☐	Technical Guidance for the Development and Specification of Effluent Limitations, 362-0400-001, 10/97.
☐	Policy for Permitting Surface Water Diversions, 362-2000-003, 3/98.
☐	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 362-2000-008, 11/96.
☐	Technology-Based Control Requirements for Water Treatment Plant Wastes, 362-2183-003, 10/97.
☐	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 362-2183-004, 12/97.
☐	Pennsylvania CSO Policy, 385-2000-011, 9/08.
☐	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
☐	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 391-2000-002, 4/97.
☐	Determining Water Quality-Based Effluent Limits, 391-2000-003, 12/97.
☐	Implementation Guidance Design Conditions, 391-2000-006, 9/97.
☐	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 391-2000-007, 6/2004.
☐	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997.
☐	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 391-2000-010, 3/99.
☐	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 391-2000-011, 5/2004.
☐	Implementation Guidance for Section 93.7 Ammonia Criteria, 391-2000-013, 11/97.
☐	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 391-2000-014, 4/2008.
☐	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 391-2000-015, 11/1994.
☐	Implementation Guidance for Temperature Criteria, 391-2000-017, 4/09.
☐	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 391-2000-018, 10/97.
☐	Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 391-2000-019, 10/97.
☐	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 391-2000-021, 3/99.
☐	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 391-2000-022, 3/1999.
☐	Design Stream Flows, 391-2000-023, 9/98.
☐	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 391-2000-024, 10/98.
☐	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 391-3200-013, 6/97.
☐	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
☐	SOP:
☐	Other: