

Application Type Renewal
Facility Type Municipal
Major / Minor Minor

**NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE**

Application No. PA0084425
APS ID 275692
Authorization ID 1338434

Applicant and Facility Information

Applicant Name	<u>Conewago Township Sewer Authority York County</u>	Facility Name	<u>Conewago Township STP</u>
Applicant Address	<u>600 Locust Point Road York, PA 17406-6056</u>	Facility Address	<u>600 Locust Point Road York, PA 17406-6056</u>
Applicant Contact	<u>Pamela Mease</u>	Facility Contact	<u>Pamela Mease</u>
Applicant Phone	<u>(717) 266-5518</u>	Facility Phone	<u>(717) 266-5518</u>
Client ID	<u>3571</u>	Site ID	<u>252946</u>
Ch 94 Load Status	<u>Not Overloaded</u>	Municipality	<u>Conewago Township</u>
Connection Status	<u>No Limitations</u>	County	<u>York</u>
Date Application Received	<u>December 21, 2020</u>	EPA Waived?	<u>No</u>
Date Application Accepted	<u>January 12, 2021</u>	If No, Reason	<u>Significant CB Discharge</u>
Purpose of Application	<u>NPDES Renewal.</u>		

Summary of Review

Buchart-Horn, Inc., on behalf of Conewago Township Sewer Authority (CTSA), has applied to the Pennsylvania Department of Environmental Protection (DEP) for reissuance of the NPDES permit. This permit renewal application was received on December 21, 2020. The permit was last reissued on June 22, 2016 and became effective on July 1, 2016. The permit expired on June 30, 2021. The permit NPDES PA0084425 A-1 amendment was issued on 1/24/2020 to request a delay to the Start of Construction date until the Summer of 2020 (previously Summer of 2016) with an End of Construction Date of Spring 2022 (previously Spring of 2018) scheduled due to financial difficulties, however to present, there has been no start to the construction upgrade.

This facility is owned and operated by CTSA and serves Conewago Township (100 %). The annual average design flow and hydraulic design capacity are 0.5 MGD, and the organic capacity is 1,364 lbs/day.

The WQM Part II permit No. 6790418 was issued on January 30, 1991, and 6790418 07-1 amendment was issued on January 30, 2008. The WQM Part II permit No. 6716401 was issued on June 22, 2016 to upgrade the CTSA existing treatment plant capacity to 0.840 MGD. However, the CTSA hasn't moved forward with the upgrade due to the proposed development of 2500 EDUs will cause the STP to be overloaded even at the new capacity of 0.84 MGD, and the new planning will establish the needed capacity for the future (*this factsheet, pages # 26*).

Sludge use and disposal description and location(s): N/A due to hauled by Kline's Services LLC and the Harrisburg AWTF.

Changes from the previous permit: Unit of Fecal Coliform changed from CFU/100 ml to No./100 ml. The E. Coli. monitoring and report requirements will add to the permit. The upgrade flow of 0.84 MGD pollutants limits and Schedule of Compliance in previous permit will remove in the proposed permit.

Based on the review outline in this fact sheet, it is recommended that the permit be drafted and published in the Pennsylvania Bulletin for public comments for 30 days.

Approve	Deny	Signatures	Date
X		<i>Hilaryle</i> Hilary H. Le / Environmental Engineering Specialist	October 28, 2022
X		/s/ Daniel W. Martin, P.E. / Environmental Engineer Manager	November 16, 2022

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	001	Design Flow (MGD)	0.5
Latitude	40° 4' 17.28"	Longitude	-76° 45' 5.15"
Quad Name	Dover	Quad Code	
Wastewater Description: Sewage Effluent			
Receiving Waters	Little Conewago Creek (TSF & MF)	Stream Code	08309
NHD Com ID	57465183	RMI	4.18 miles
Drainage Area	60.7 mi. ²	Yield (cfs/mi ²)	0.04
Q ₇₋₁₀ Flow (cfs)	2.34	Q ₇₋₁₀ Basis	USGS StreamStats
Elevation (ft)	300	Slope (ft/ft)	
Watershed No.	7-F	Chapter 93 Class.	TSF & MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	FLOW REGIME MODIFICATION		
Source(s) of Impairment	URBAN RUNOFF/STORM SEWERS		
TMDL Status	Name		
Nearest Downstream Public Water Supply Intake	Wrightsville Borough Municipal Authority, York County		
PWS Waters	Susquehanna River	Flow at Intake (cfs)	
PWS RMI	43.54 miles	Distance from Outfall (mi)	Approximate 21.0 miles

Changes Since Last Permit Issuance:

Drainage Area

The discharge is to Gardner Run at RMI 4.18 miles. A drainage area upstream of the discharge is estimated to be 60.7 mi.², according to USGS PA StreamStats available at <https://streamstats.usgs.gov/ss/>.

Stream Flow

According to USGS StreamStats, the discharge point has a Q₇₋₁₀ of 2.34 cfs and a drainage area of 60.7 mi.², which results in a Q₇₋₁₀ low flow yield of 0.039 (0.04) cfs/mi.². This information is used to obtain a chronic or 30-day (Q₃₀₋₁₀), and an acute or 1-day (Q₁₋₁₀) exposure stream flow for the discharge point as follows (Guidance No. 391-2000-023):

$$\begin{aligned}
 Q_{7-10} &= 2.34 \text{ cfs} \\
 \text{Low Flow Yield} &= 2.34 \text{ cfs} / 60.7 \text{ mi.}^2 = 0.04 \text{ cfs/mi.}^2 \\
 Q_{30-10} &= 1.36 * 2.34 \text{ cfs} = 3.18 \text{ cfs} \\
 Q_{1-10} &= 0.64 * 2.34 \text{ cfs} = 1.5 \text{ cfs}
 \end{aligned}$$

The resulting Q₇₋₁₀ dilution ratio is: $Q_{\text{stream}} / Q_{\text{discharge}} = 2.34 \text{ cfs} / [0.50 \text{ MGD} * (1.547 \text{ cfs/MGD})] = 3.03:1$

Public Water Supply

The closest water supply intake is located downstream from the discharge in the Wrightsville Water Supply Co., York County approximately 21.0 miles from the point of discharge. Given the nature and dilution, the discharge is not expected to significantly impact the water supply.

Little Conewago Creek

Little Conewago Creek (08309) is a tributary of West Conewago Creek (08303). Under 25 Pa Code §93.9o, it is designated as trout stocking & migratory fishes (TSF & MF). It is not classified as a Class A Trout stream. DEP's 2022 PA Integrated Water Quality Monitoring and Assessment report provides the following stream impairment information:

Category	Use Assessed	RMI	Source	Cause	Date Listed	TMDL Date
Category 4c – Impaired, not needing TMDL	Aquatic Life	0.469	Surface Mining	Other Habitat Alterations	2006	N/A
	Aquatic Life	2.185	Surface Mining	Other Habitat Alterations	2006	N/A
	Aquatic Life	0.092	Flow Regulation/Modification	Flow Regime Modification	2006	N/A
	Aquatic Life	0.868	Flow Regulation/Modification	Flow Regime Modification	2006	N/A
	Aquatic Life	1.433	Rural (Residential Area)	Flow Regime Modification	2006	N/A
	Aquatic Life	0.04	Rural (Residential Area)	Flow Regime Modification	2006	N/A
	Aquatic Life	0.191	Rural (Residential Area)	Flow Regime Modification	2006	N/A
	Aquatic Life	0.261	Rural (Residential Area)	Flow Regime Modification	2006	N/A
	Aquatic Life	0.07	Rural (Residential Area)	Flow Regime Modification	2006	N/A
	Aquatic Life	1.058	Rural (Residential Area)	Flow Regime Modification	2006	N/A
	Aquatic Life	1.130	Rural (Residential Area)	Flow Regime Modification	2006	N/A
	Aquatic Life	0.209	Rural (Residential Area)	Flow Regime Modification	2006	N/A
	Aquatic Life	1.659	Rural (Residential Area)	Flow Regime Modification	2006	N/A
	Category 5 – Impaired, Requiring TMDL	Aquatic Life	2.674	Agriculture	Siltation	2006
Aquatic Life		0.469	Surface Mining	Siltation	2006	
Aquatic Life		2.185	Surface Mining	Siltation	2006	
Aquatic Life		0.092	Crop Production	Siltation	2006	
Aquatic Life		0.868	Crop Production	Siltation	2006	
Aquatic Life		1.43	Land Development	Siltation	2006	
Aquatic Life		0.04	Land Development	Siltation	2006	
Aquatic Life		1.659	Land Development	Siltation	2006	
Aquatic Life		0.209	Flow Regulation/Modification	Siltation	2006	
Aquatic Life		1.130	Golf Courses	Siltation	2006	
Aquatic Life		1.058	Golf Courses	Siltation	2006	
Aquatic Life		0.07	Land Development	Siltation	2006	
Aquatic Life		0.261	Land Development	Siltation	2006	
Aquatic Life		0.191	Land Development	Siltation	2006	

As shown above, none of the sources identified is directly related to the facility. A Total Maximum Daily Load (TMDL) is expected to be developed to address siltation (suspended solids) impairment in 2019. Appropriate permit requirements for Total Suspended Solids (TSS) will be established in the draft permit to ensure that the discharge will not contribute significantly to this impairment. Based on the current status of stream uses, no special protection waters (HQ & EV) will be impacted by this discharge. No Class A Wild Trout Fishery will be impacted by this discharge.

For modeling purposes, background stream data from water quality network station No. 210 on the West Conewago Creek was obtained from <http://waterqualitydata.us/portal/>. Although the station collects West Conewago Creek samples, the distance from this station to the mouth of the receiving stream is less than a mile which is relatively close enough to have representative stream samples of Little Conewago Creek. As shown below, the collected data have been averaged in accordance with DEP's guidance 391-2000-006.

- pH = 7.7 SU; the 2020 renewal application data is on page 6 (total 974 data),
- Hardness = 100 mg/L; default
- Temperature = 62.8 °F; the 2020 renewal application data is on page 6.

Treatment Facility Summary				
Treatment Facility Name: Conewago Township STP				
WQM Permit No.		Issuance Date		
6790418		01/1991		
6790418 07-1		07/2008		
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary	Sequencing Batch Reactor	Gas Chlorine	0.5
Hydraulic Capacity (MGD)	Organic Capacity (lbs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposal
0.5	1,364	Not Overloaded	Aerobic Digestion	Combination of methods

Changes Since Last Permit Issuance: The CTSA hasn't moved forward with the upgrade WQM No. 6716401 A-2 (which was issued on 6/22/2016) because proposed development of 2500 Equivalent Dwelling Units (EDUs) will cause the STP to be overloaded even at the new capacity of 0.84 MGD, (*this factsheet, pages # 26*).

The current treatment process is as follows:

Influent pump station → mechanical bar screen → Sequencing Batch Reactors (2) → Chlorine Contact Tank → Cascade → Outfall to Little Conewago Creek

Alum is added for phosphorous removal & aid in sludge setting, and Polymer is used for settling control.

Compliance History	
Summary of DMRs:	A summary of past 12-month DMR from September 1, 2021 to August 31, 2022 data is presented on the next page.
Summary of Inspections:	<p>05/14/2019: Austen Randecker, DEP Water Quality Specialist, conducted a compliance evaluation inspection. There were no violations noted during inspection. The recommendation was please update (notify) the Department on the progress of the future upgrades. The field test results were within permitted limits. The future upgrade is to be completed at the treatment plant, which includes replacing three (3) pumps at the Locust Point influent pump station, construction of new screening building, two (2) new SBR units, new blower building, covert existing digesters to Post EQ tanks, convert existing SBRs to digesters, and construct a new UV disinfection system. The part 2 permit has been administratively extended from June 22, 2018 and June 22, 2020. If no construction or modification has begun by June 22, 2020, then the Part 2 permit will terminate. No construction had been started at the time of the inspection.</p> <p>7/27/2020: Michael Benham, DEP WQS, conducted an incident inspection. The incident report received by the Department on 7/27/2020 at 820 hours described a sewer main break. The sanitary sewer overflow (SSO) was an 8" force-main break located at GPS coordinates 40.064162, -76.766728. There was violation noted – 25 Pa Code 92a.47(c)-NPDES -Illegal discharge to waters of the Commonwealth from a sanitary sewer overflow force main break along N. Susquehanna Trail that discharged to UNT of Little Conewago Creek.</p>
Other Comments:	There are no open violations associated with the permittee or the facility.

Other Comments:

Compliance History

DMR Data for Outfall 001 (from September 1, 2021 to August 31, 2022)

Parameter	AUG-22	JUL-22	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21
Flow (MGD) Average Monthly	0.3106	0.2904	0.2966	0.4809	0.4466	0.3746	0.3769	0.4167	0.3085	0.3357	0.3300	0.5727
Flow (MGD) Daily Maximum	0.3580	0.3259	0.3500	1.8066	1.2215	0.4804	0.8477	0.6465	0.3493	0.4095	0.7011	2.2908
pH (S.U.) Instantaneous Minimum	6.8	6.8	6.8	6.9	6.8	6.9	7.1	6.8	6.8	6.9	6.9	7.0
pH (S.U.) Instantaneous Maximum	7.4	7.2	7.9	7.4	7.2	7.1	6.7	7.3	7.3	7.4	7.3	7.5
DO (mg/L) Instantaneous Minimum	5.0	5.1	5.6	5.9	5.6	5.4	5.3	5.4	5.8	5.3	5.3	5.2
TRC (mg/L) Average Monthly	0.16	0.09	0.11	0.09	0.07	0.06	0.07	0.07	0.1	0.08	0.07	0.06
TRC (mg/L) Instantaneous Maximum	0.60	0.17	0.28	0.32	0.20	0.10	0.17	0.21	0.45	0.21	0.28	0.34
CBOD5 (lbs/day) Average Monthly	< 6.63	< 7.98	8.98	< 7.29	< 12.32	20.01	< 12.71	11.87	< 8.0	< 6.68	< 6.09	< 22.96
CBOD5 (lbs/day) Weekly Average	7.30	9.06	10.57	< 8.48	23.58	24.71	23.23	15.72	10.23	< 7.61	6.44	64.96
CBOD5 (mg/L) Average Monthly	< 2.5	< 3.2	3.5	< 2.4	< 3.6	6.5	< 4.4	3.6	< 3.1	< 2.4	< 2.5	< 2.9
CBOD5 (mg/L) Weekly Average	2.9	3.5	4.1	< 2.4	5.5	7.7	7.7	3.9	4.0	2.5	2.6	3.4
BOD5 (lbs/day) Raw Sewage Influent Average Monthly	610.9	615.8	703.3	597.3	629.5	676.7	686.2	849.8	765.5	699.6	636.1	1525.8
BOD5 (lbs/day) Raw Sewage Influent Daily Maximum	703.7	747.7	870.5	711.2	814.6	836.2	775.3	883.7	812.2	866.1	854.8	4222.3
BOD5 (mg/L) Raw Sewage Influent Average Monthly	231	246	275	203	194	221	245	260	293	253	345	202
TSS (lbs/day) Average Monthly	15.04	11.3	7.69	13.32	18.9	25.71	24.58	16.53	16.9	10.34	13.09	9.52

**NPDES Permit Fact Sheet
Conewago Township STP**

NPDES Permit No. PA0084425

TSS (lbs/day) Raw Sewage Influent Average Monthly	661.8	659.7	882.0	907.2	820.3	892.0	863.4	994.7	1442.2	985.7	886.5	1770.0
TSS (lbs/day) Raw Sewage Influent Daily Maximum	750.6	849.1	1208.5	1272.1	1217.7	1217.6	1013.6	1148.8	3135.4	1201.6	951.0	4623.5
TSS (lbs/day) Weekly Average	34.52	17.74	8.11	34.01	30.01	39.39	30.17	29.74	28.3	24.70	25.22	19.11
TSS (mg/L) Average Monthly	5.6	4.5	3.0	4.3	5.5	8.0	8.5	4.8	6.0	4.0	5.3	1.4
TSS (mg/L) Raw Sewage Influent Average Monthly	249	262	343	302	247	286	310	309	540	361	388	242
TSS (mg/L) Weekly Average	13.0	7.0	3.0	10.0	7.0	11.0	11.0	7.0	10.0	10.0	10.0	2.0
Fecal Coliform (No./100 ml) Geometric Mean	< 3.5	12.5	< 2.2	< 1.3	< 1.2	< 1.0	< 1.0	< 2.7	< 2.2	< 1.3	1.2	< 2.0
Fecal Coliform (No./100 ml) Instantaneous Maximum	12	119	17	3	2.0	1.0	1	50	27	3.0	2.0	12
Nitrate-Nitrite (mg/L) Average Monthly	4.5	6.1	4.2	4.31	4.04	3.94	4.61	4.26	2.79	3.12	3.93	4.32
Nitrate-Nitrite (lbs) Total Monthly	368.5	465.8	317.2	393.6	405.3	356.7	350.0	428.2	227.1	258.9	294.7	659.4
Total Nitrogen (mg/L) Average Monthly	5.71	7.85	6.23	6.37	7.27	7.66	9.68	7.01	6.27	4.66	< 5.69	6.69
Total Nitrogen (lbs) Effluent Net Total Monthly	471.9	604.0	470.1	587.9	744	690.1	728.6	705.2	508.6	382.5	429.3	1020.9
Total Nitrogen (lbs) Total Monthly	471.9	604.0	470.1	587.9	744.0	690.1	728.6	705.2	508.6	328.5	< 429.3	1020.9
Total Nitrogen (lbs) Effluent Net Total Annual												< 9132
Total Nitrogen (lbs) Total Annual												< 9132
Ammonia (lbs/day) Average Monthly	< 0.91	1.20	1.06	< 1.19	3.88	2.57	5.77	2.6	3.47	< 0.76	< 0.7	2.82
Ammonia (mg/L) Average Monthly	< 0.33	0.481	0.421	< 0.346	1.0	0.933	2.22	0.81	1.33	< 0.284	< 0.284	0.647
Ammonia (lbs) Total Monthly	< 28.3	37.1	31.9	< 36.8	116.5	79.5	161.5	81.1	107.5	22.8	< 21.7	84.6
Ammonia (lbs) Total Annual												< 1992

**NPDES Permit Fact Sheet
Conewago Township STP**

NPDES Permit No. PA0084425

TKN (mg/L) Average Monthly	1.2	1.8	2.0	2.1	3.2	3.7	5.1	2.8	3.49	1.5	1.8	2.4
TKN (lbs) Total Monthly	103.5	138.2	153.0	194.3	338.7	333.3	378.6	277	281.5	123.6	134.6	361.5
Total Phosphorus (lbs/day) Average Monthly	1.48	1.46	0.91	0.8	1.67	2.52	2.06	1.9	0.71	0.50	0.81	3.03
Total Phosphorus (mg/L) Average Monthly	0.55	0.59	0.36	0.28	0.5	0.86	0.76	0.57	0.28	0.18	0.33	0.64
Total Phosphorus (lbs) Effluent Net Total Monthly	45.8	45.2	27.3	24.8	50	78.1	57.6	59.4	22.1	15.1	25.1	90.9
Total Phosphorus (lbs) Total Monthly	45.8	45.2	27.3	24.8	50	78.1	57.6	59.4	22.1	15.1	25.1	90.9
Total Phosphorus (lbs) Effluent Net Total Annual												< 609
Total Phosphorus (lbs) Total Annual												< 609

Development of Effluent Limitations

Outfall No. <u>001</u>	Design Flow (MGD) <u>0.5</u>
Latitude <u>40° 4' 17.28"</u>	Longitude <u>-76° 45' 5.15"</u>
Wastewater Description: <u>Sewage Effluent</u>	

Technology-Based Limitations

The following technology-based limitations apply, subject to water quality analysis and BPJ where applicable:

Pollutant	Limit (mg/l)	SBC	Federal Regulation	State Regulation
CBOD ₅	25	Average Monthly	133.102(a)(4)(i)	92a.47(a)(1)
	40	Average Weekly	133.102(a)(4)(ii)	92a.47(a)(2)
Total Suspended Solids	30	Average Monthly	133.102(b)(1)	92a.47(a)(1)
	45	Average Weekly	133.102(b)(2)	92a.47(a)(2)
pH	6.0 – 9.0 S.U.	Min – Max	133.102(c)	95.2(1)
Fecal Coliform (5/1 – 9/30)	200 / 100 ml	Geo Mean	-	92a.47(a)(4)
Fecal Coliform (5/1 – 9/30)	1,000 / 100 ml	IMAX	-	92a.47(a)(4)
Fecal Coliform (10/1 – 4/30)	2,000 / 100 ml	Geo Mean	-	92a.47(a)(5)
Fecal Coliform (10/1 – 4/30)	10,000 / 100 ml	IMAX	-	92a.47(a)(5)
Total Residual Chlorine	0.5	Average Monthly	-	92a.48(b)(2)

Comments:

Water Quality-Based Limitations

Ammonia (NH₃-N):

NH₃-N calculations were based on the Department's Implementation Guidance of Section 93.7 Ammonia Criteria, dated 11/4/97 (Document No. 391-2000-013). The following data is necessary to determine the in-stream NH₃-N criteria used in the attached computer model of the stream:

- Discharge pH 7.0 (Default per 391-2000-007)
- Discharge Temperature 20°C (Default per 391-2000-007)
- Stream pH 7.0 (Default per 391-2000-006)
- Stream Temperature 20°C (Default for WWF per 391-2000-003)
- Background NH₃-N 0 mg/L (Assumed since no upstream WWTPs)

The detailed model results are attached. The above method indicates that at a discharge of 0.50 MGD, limits (rounded according to the NPDES Technical Guidance 362-0400-001) of 1.5 mg/L NH₃-N as a monthly average (AML) and 3.0 mg/L NH₃-N instantaneous maximum (IMAX) are necessary to protect the aquatic life from toxicity effects. However, the existing permit of 1.5 mg/L NH₃-N AML and 3.0 mg/L NH₃-N IMAX are same and will remain unchanged in the proposed permit. Recent DMR and inspection data indicate that the facility is consistently meeting these limits under proper operation. Mass limits are calculated as follows:

Summer average monthly mass limit: 1.5 mg/L x 0.50 MGD x 8.34 = 6.26 (6.0) lbs/day
 Winter average monthly mass limit: 4.5 mg/L x 0.50 MGD x 8.34 = 18.77 (18.0) lbs/day

Dissolved Oxygen (D.O.):

A minimum of 5.0 mg/L for D.O. is an existing effluent limit and will remain unchanged in the draft permit as recommended by DEP's SOP No. BCW-PMT-033, version 1.9 revised March 22, 2021. This requirement has also been assigned to other major sewage facilities in the region. 5.0 mg/L is taken directly from 25 Pa. Code § 93.7(a) (i.e., water quality criteria for TSF waters) and it is also determined to be appropriate according to water quality modeling.

Carbonaceous Biochemical Oxygen Demand (CBOD₅):

The attached computer printout of the WQM 7.0 stream model indicates that an average monthly limit of 10.0 mg/L, or secondary treatment, is adequate to protect the water quality of the stream. Due to anti-backsliding policy, the existing Nov 1 – Apr 30 average monthly limit (AML) of 20.0 mg/L, average weekly limit (AWL) of 30.0 mg/L and IMAX of 40.0 mg/L; and May 1-Oct 31 average monthly limit (AML) of 10.0 mg/L, average weekly limit (AWL) of 15.0 mg/L and IMAX of 20.0 mg/L will remain in the proposed permit. Recent DMRs and inspection reports show that the facility has been consistently achieving concentrations below this limit. Mass limits are calculated as follows:

- Nov 1 – Apr 30:** Average monthly mass limit: $20.0 \text{ mg/L} \times 0.50 \text{ MGD} \times 8.34 = 83.4 \text{ (80.0) lbs/day}$
Average weekly mass limit: $30.0 \text{ mg/L} \times 0.50 \text{ MGD} \times 8.34 = 125.1 \text{ (125.0) lbs/day}$
- May 1 – Oct 30:** Average monthly mass limit: $10.0 \text{ mg/L} \times 0.50 \text{ MGD} \times 8.34 = 41.7 \text{ (41.0) lbs/day}$
Average weekly mass limit: $15.0 \text{ mg/L} \times 0.50 \text{ MGD} \times 8.34 = 62.55 \text{ (60.0) lbs/day}$

pH:

The effluent discharge pH should remain above 6.0 and below 9.0 standard units according to 25 Pa. Code § 95.2(1).

Total Suspended Solids (TSS):

The existing limits of 30.0 mg/L average monthly, 45.0 mg/L average weekly, and 60.00 mg/L instantaneous maximum will remain in the proposed permit based on the minimum level of effluent quality attainable by secondary treatment based on 25 Pa. Code § 92a.47. Recent DMRs and inspection reports show that the facility has been consistently achieving concentrations below these limits. Mass limits are calculated as follows:

- Average monthly mass limit: $30.0 \text{ mg/L} \times 0.50 \text{ MGD} \times 8.34 = 125.1 \text{ (125.0) lbs/day}$
- Average weekly mass limit: $45.0 \text{ mg/L} \times 0.50 \text{ MGD} \times 8.34 = 187.7 \text{ (185.0) lbs/day}$

Fecal Coliform:

The recent coliform guidance in 25 Pa. Code § 92a.47(a)(4) requires a summer technology limit of 200/100 ml as a geometric mean and an instantaneous maximum not greater than 1,000/100ml and 25 Pa. Code § 92a.47(a)(5) requires a winter limit of 2,000/100ml as a geometric mean and an instantaneous maximum not greater than 10,000/100ml.

E. Coli:

As recommended by DEP's SOP No. BCW-PMT-033, version 1.9 revised March 22, 2021, a routine monitoring for E. Coli will be included in the permit under 25 Pa. Code § 92a.61. This requirement applies to all sewage dischargers greater than 0.002 MGD in their new and reissued permits. A monitoring frequency of 1/quarter will be included in the permit to be consistent with the recommendation from this SOP.

Total Residual Chlorine (TRC):

The attached printout indicates that an average monthly water quality limit of 0.45 mg/l and instantaneous maximum limit of 1.48 mg/l would be needed to prevent toxicity concerns (*this factsheet, pages # 16*). However, the existing TRC limits of 0.2 mg/L of monthly average & 0.66 mg/L of IMAX were more stringent and will remain in the proposed permit. Minimum monitoring frequency will be 1/day.

Influent BOD₅ and TSS Monitoring:

The permit will include influent BOD₅ and TSS monitoring at the same frequency as is done for effluent in order to implement 25 Pa. Code § 94.12 and assess percent removal requirements, per DEP policy.

Total Phosphorus:

The existing permit has phosphorus limitations of 2.0 mg/L average monthly and 4.0 mg/L instantaneous maximum. The most recent 12 months of DMR data indicate consistent compliance with the existing limits, which will remain in the proposed permit. Mass limit is calculated as follows:

- Average monthly mass limit: $2.0 \text{ mg/L} \times 0.50 \text{ MGD} \times 8.34 = 8.34 \text{ (8.0) lbs/day}$

**NPDES Permit Fact Sheet
Conewago Township STP**

NPDES Permit No. PA0084425

The table below summarizes the influent/effluent testing results submitted along with the application.

<i>Influent Testing Results</i>			<i>Effluent Testing Results</i>		
Parameter	Min/Max Value	Average Value	Parameter	Min/Max Value	Average Value
BOD ₅ (mg/L)	496 mg/L	225.23 mg/L	pH (minimum)	6.6 S.U.	
BOD ₅ (lbs/day)	1679 lbs/day	697 lbs/day	pH (maximum)	7.7 S.U.	
TSS (mg/L)	797 mg/L	117 mg/L	D.O (minimum)	5.2 mg/L	6.8 mg/L
TSS (lbs/day)	102 lbs/day	281.1 lbs/day	TRC	0.7 mg/L	0.12 mg/L
TN (mg/L)	45.3 mg/L	45.3 mg/L	Fecal Coliform	11000 No./100mL	111.4 No./100 mL
TN (lbs/day)	85.0lbs/day	23.0lbs/day	CBOD ₅	13.1 mg/L	4.56 mg/L
TP (mg/L)	9.0 mg/L	6.32 mg/L	TSS	19.0 mg/L	6.73 mg/L
TP (lbs/day)	12.0 lbs/day	1.4 lbs/day	NH ₃ -N	11.0 mg/L	1.16 mg/L
NH ₃ -N (mg/L)	60.6 mg/L	33.39 mg/L	TN	14.9 mg/L	6.92 mg/L
NH ₃ -N (lbs/day)	29.0 lbs/day	3.7 lbs/day	TP	2.5 mg/L	0.42 mg/L
TDS (mg/L)	426 mg/L	426 mg/L	Temp	62.8 F	62.8 F
TDS (lbs/day)	1,189 lbs/day	1,189 lbs/day	TKN	12.9 mg/L	2.74 mg/L
TKN	65.1 mg/L	48.09 mg/L	NO ₂ -N + NO ₃ -N	12.6 mg/L	4.2 mg/L
NO ₂ -N + NO ₃ -N	0.2 mg/L	0.2 mg/L	TDS	464 mg/L	464 mg/L
			Chloride	93.2 mg/L	93.2 mg/L
			Bromide	0.2 mg/L	0.2 mg/L
			Sulfate	62.5 mg/L	62.5 mg/L
			Oil and Grease	3.9 mg/L	3.9 mg/L
			Total Copper	0.0025 mg/L	0.0025 mg/L
			Total Lead	0.001 mg/L	0.001 mg/L
			Total Zinc	0.056 mg/L	0.056 mg/L

**NPDES Permit Fact Sheet
Conewago Township STP**

NPDES Permit No. PA0084425

Toxics:

Total Copper, Total Lead, and Total Zinc samples results were reported on the renewal application. These results were entered into DEP's Toxics Screening Analysis and DEP has determined that none of these toxic pollutants is a pollutant of concern (*this factsheet, pages # 24-25*). No requirements for toxic pollutants are therefore needed for this permit renewal.

Stormwater:

There is no stormwater outfall associated with this facility.

Chesapeake Bay Strategy:

In the Phase 3 WIP Wastewater Supplement revised on July 29, 2022, Table 5, page 13, of this document shows that Conewago Township Sewer Authority has been allocated 9,132 lbs/year of TN and 1,218 lbs/year of TP. This approach is consistent with the Chesapeake Bay TMDL was based on the actual performance data previously evaluated by the Department. Since the permittee is easily capable of achieving compliance with these loads, the Department determines that no "compliance schedule" for the requirements associated with the Chesapeake Bay Strategy is necessary. Accordingly, the Chesapeake Bay nutrient existing limitations and monitoring requirements will remain in the proposed permit.

**Phase 3 WIP Wastewater Supplement
Revised, July 29, 2022**

NPDES Permit No.	Phase	Facility	Latest Permit Issuance Date	Permit Expiration Date	Cap Load Compliance Start Date	TN Cap Load (lbs/yr)	TN Offsets Included in Cap Load (lbs/yr)	TP Cap Load (lbs/yr)	TN Delivery Ratio	TP Delivery Ratio
PA0080225	3	Washington Township Municipal Authority	1/12/2018	1/31/2023	10/1/2013	35,433	-	4,724	0.908	0.725
PA0080314	1	Hampden Township Sewer Authority	7/1/2019	6/30/2024	10/1/2014	117,696	-	14,441	0.831	0.492
PA0080438	3	Northern Lancaster County Authority	1/1/2019	12/31/2023	10/1/2013	8,219	-	1,096	0.552	0.563
PA0080519	3	Antrim Township	2/21/2020	4/30/2023	10/1/2011	21,918	-	2,922	0.987	0.802
PA0080748	2	Northern Lebanon County Authority	6/23/2022	6/30/2027	10/1/2013	7,397	-	989	0.745	0.434
PA0081001	3	St. Thomas Township Municipal Authority	8/8/2017	8/31/2022	10/1/2013	7,306	-	974	0.921	0.742
PA0081574	2	Salisbury Township	12/13/2019	12/31/2024	10/1/2012	13,150	-	1,643	0.552	0.553
PA0081591	2	Eastern York County Sewer Authority	11/16/2021	11/30/2026	10/1/2012	9,132	-	1,218	0.711	0.387
PA0081868	1	Fairview Township	4/29/2022	1/31/2027	10/1/2010	14,322	-	2,262	0.791	0.504
PA0081949	3	Lancaster Area Sewer Authority – Brownstown WWTP	1/14/2021	12/31/2023	10/1/2010	8,219	-	1,096	0.632	0.563
PA0082392	2	Derry Township Municipal Authority – Southwest	5/26/2022	5/31/2027	10/1/2012	10,959	-	1,461	0.808	0.468
PA0082589	2	Fairview Township	4/26/2021	8/31/2021	10/1/2012	9,132	-	1,218	0.680	0.410
PA0083011	2	Newberry Township	2/23/2017	2/28/2022	10/1/2012	23,744	-	3,166	0.828	0.464
PA0083593	3	Silver Spring Township	6/3/2021	6/30/2026	10/1/2010	21,918	-	2,922	0.831	0.492
PA0084026	2	Northwestern Lancaster County Authority	8/12/2020	8/31/2025	10/1/2008	14,612	-	1,827	0.819	0.477
PA0084212	3	Leacock Township	11/16/2021	11/30/2026	10/1/2012	7,306	-	974	0.502	0.571
PA0084425	3	Conewago Township Sewer Authority	1/24/2020	6/30/2021	10/1/2011	9,132	-	1,218	0.617	0.185
PA0085511	2	West Hanover	10/12/2016	10/31/2021	10/1/2012	14,246	-	1,900	0.681	0.409
PA0086304	3	Earl Township STP	1/14/2022	1/31/2027	10/1/2018	7,306	-	974	0.563	0.571
PA0086860	3	Springfield Township Sewer Authority	1/30/2020	1/31/2025	10/1/2012	12,785	-	1,704	0.685	0.397
PA0087181	1	Ephrata Borough Authority (#2)	7/28/2021	7/31/2026	10/1/2008	54,550	-	6,818	0.628	0.552

Biosolids Management:

Digested Sludge is sent out periodically to the drying beds.

Antidegradation (93.4):

The effluent limits for this discharge have been developed to ensure that existing in-stream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. No High-Quality Waters are impacted by this discharge. No Exceptional Value Waters are impacted by this discharge.

303d Listed Streams:

The discharge is not located on a 303d listed stream segment. The stream segment that receive the discharge is listed as attaining its used for aquatic life and fish consumption.

Class A Wild Trout Fisheries:

No Class A Wild Trout Fisheries are impacted by this discharge.

WQM 7.0 Data:

The following data is necessary to determine the in-stream NH₃-N criteria used in the attached computer model of the stream:

*	Discharge pH	7.0	(Default per 391-2000-007)
*	Discharge Temperature	20°C	(Default per 391-2000-007)
*	Stream pH	7.0	(Default per 391-2000-006)
*	Stream Temperature	20°C	(Default for WWF per 391-2000-003)
*	Background NH ₃ -N	0 mg/L	(Assumed since no upstream WWTPs)

DO Goal: 5.0 mg/L

Node 1: Outfall 001 on Little Conewago Creek (08309)
 Elevation: 300 ft (USGS National Map Viewer)
 Drainage Area: 60.7 mi.² (USGS PA StreamStats)
 River Mile Index: 4.18 (PA DEP eMapPA)
 Low Flow Yield: 0.04 cfs/mi.²
 Discharge Flow: 0.5 MGD

Node 2: Just before confluence with UNT 08313 to Little Conewago Creek
 Elevation: 299 ft (USGS National Map Viewer)
 Drainage Area: 63.7 mi.² (USGS PA StreamStats)
 River Mile Index: 4.12 (PA DEP eMapPA)
 Low Flow Yield: 0.04 cfs/mi.²
 Discharge Flow: 0.0 MGD

Basin Characteristics

Parameter Code	Parameter Description	Value	Unit
BSLOPD	Mean basin slope measured in degrees	3.1176	degrees
DRNAREA	Area that drains to a point on a stream	60.7	square miles
ROCKDEP	Depth to rock	4.3	feet
URBAN	Percentage of basin with urban development	8.5088	percent

Low-Flow Statistics

Low-Flow Statistics Parameters [Low Flow Region 1]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	60.7	square miles	4.78	1150
BSLOPD	Mean Basin Slope degrees	3.1176	degrees	1.7	6.4
ROCKDEP	Depth to Rock	4.3	feet	4.13	5.21
URBAN	Percent Urban	8.5088	percent	0	89

Low-Flow Statistics Flow Report [Low Flow Region 1]

PI: Prediction Interval-Lower, PIu: Prediction Interval-Upper, ASEp: Average Standard Error of Prediction, SE: Standard Error (other -- see report)

Statistic	Value	Unit	SE	ASEp
7 Day 2 Year Low Flow	5.65	ft ³ /s	46	46
30 Day 2 Year Low Flow	8.36	ft ³ /s	38	38
7 Day 10 Year Low Flow	2.34	ft ³ /s	51	51
30 Day 10 Year Low Flow	3.55	ft ³ /s	46	46
90 Day 10 Year Low Flow	6.87	ft ³ /s	41	41

Low-Flow Statistics Citations

> Basin Characteristics

Parameter Code	Parameter Description	Value	Unit
BSLOPD	Mean basin slope measured in degrees	3.198	degrees
DRNAREA	Area that drains to a point on a stream	63.7	square miles
ROCKDEP	Depth to rock	4.3	feet
URBAN	Percentage of basin with urban development	8.4984	percent

> Low-Flow Statistics

Low-Flow Statistics Parameters [Low Flow Region 1]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	63.7	square miles	4.78	1150
BSLOPD	Mean Basin Slope degrees	3.198	degrees	1.7	6.4
ROCKDEP	Depth to Rock	4.3	feet	4.13	5.21
URBAN	Percent Urban	8.4984	percent	0	89

Low-Flow Statistics Flow Report [Low Flow Region 1]

PIl: Prediction Interval-Lower, PIu: Prediction Interval-Upper, ASEp: Average Standard Error of Prediction, SE: Standard Error (other -- see report)

Statistic	Value	Unit	SE	ASEp
7 Day 2 Year Low Flow	6.13	ft ³ /s	46	46
30 Day 2 Year Low Flow	9	ft ³ /s	38	38
7 Day 10 Year Low Flow	2.57	ft ³ /s	51	51
30 Day 10 Year Low Flow	3.86	ft ³ /s	46	46
90 Day 10 Year Low Flow	7.38	ft ³ /s	41	41

Low-Flow Statistics Citations

Stuckey, M.H., 2006, Low-flow, base-flow, and mean-flow regression equations for Pennsylvania streams: U.S. Geological Survey Scientific Investigations Report 2006-5130, 84 p.

Analysis Results WQM 7.0

Hydrodynamics
NH3-N Allocations
D.O. Allocations
D.O. Simulation
Effluent Limitations

RMI	Discharge Name	Permit Number	Disc Flow (mgd)
4.18	Conewago Twp	PA0084425	0.5000

Parameter	Effluent Limit	Effluent Limit	Effluent Limit
	30 Day Average (mg/L)	Maximum (mg/L)	Minimum (mg/L)
CBOD5	10		
NH3-N	1.5	3	
Dissolved Oxygen			5

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rptEffLimits

WQM 7.0 Effluent Limits

SWP Basin	Stream Code	Stream Name	LITTLE CONEWAGO CREEK				
07F	8309						
RMI	Name	Permit Number	Disc Flow (mgd)	Parameter	Eff. Limit 30day Avg. (mg/L)	Eff. Limit Maximum (mg/L)	Eff. Limit Minimum (mg/L)
4.180	Conewago Twp	PA0084425	0.500	CBCOD5	10		
				NH3-N	1.5	3	
				Disolved Oxygen			5

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rpt_WLA

WQM 7.0 Wasteload Allocations

SWP Basin	Stream Code	Stream Name	LITTLE CONEWAGO CREEK						
07F	8309								
NH3-N Acute Allocations									
RMI	Discharge Name	Baseline Criterion (mg/L)	Baseline WLA (mg/L)	Multiple Criterion (mg/L)	Multiple WLA (mg/L)	Critical Reach	Percent Reduction		
4.180	Conewago Twp	16.76	3	16.76	3	0	0		
NH3-N Chronic Allocations									
RMI	Discharge Name	Baseline Criterion (mg/L)	Baseline WLA (mg/L)	Multiple Criterion (mg/L)	Multiple WLA (mg/L)	Critical Reach	Percent Reduction		
4.180	Conewago Twp	1.89	1.5	1.89	1.5	0	0		
Dissolved Oxygen Allocations									
RMI	Discharge Name	CBCOD5 Baseline (mg/L)	Multiple (mg/L)	NH3-N Baseline (mg/L)	Multiple (mg/L)	Disolved Oxygen Baseline (mg/L)	Multiple (mg/L)	Critical Reach	Percent Reduction
4.180	Conewago Twp	10	10	1.5	1.5	5	5	0	0

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rptDOSim

WQM 7.0 D.O. Simulation

SWP Basin	Stream Code	Stream Name	LITTLE CONEWAGO CREEK			
07F	8309					
RMI	Total Discharge Flow (mgd)	Analysis Temperature (°C)	Analysis pH			
4.180	0.500	20.000	7.000			
Reach Width (ft)	Reach Depth (ft)	Reach WDR Rate	Reach Velocity (ft/s)			
70.919	0.939	75.564	0.922			
Reach CBCOD5 (mg/L)	Reach K1 (1/day)	Reach NH3-N (mg/L)	Reach K1 (1/day)			
2.10	0.090	0.02	0.700			
Reach DO (mg/L)	Reach W (1/day)	No Equation	Reach DO Goal (mg/L)			
8.222	54.308	Ts=0.00v	6			
Reach Travel Time (days)	Subreach Results					
0.004	TravTime (days)	CBCOD5 (mg/L)	NH3-N (mg/L)	D.O. (mg/L)		
	0.000	2.10	0.02	8.22		
	0.001	2.10	0.02	8.24		
	0.001	2.10	0.02	8.24		
	0.002	2.10	0.02	8.24		
	0.002	2.10	0.02	8.24		
	0.002	2.10	0.02	8.24		
	0.003	2.10	0.02	8.24		
	0.003	2.10	0.02	8.24		
	0.004	2.10	0.02	8.24		
	0.004	2.10	0.02	8.24		

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rptModelSpecs

WQM 7.0 Modeling Specifications

Parameters	Both	Use Inputed Q1-10 and Q30-10 Flows	<input checked="" type="checkbox"/>
WLA Method	EMPR	Use Inputed WDR Ratio	<input type="checkbox"/>
Q1-10/Q7-10 Ratio	0.64	Use Inputed Reach Travel Times	<input type="checkbox"/>
Q30-10/Q7-10 Ratio	1.36	Temperature AdjustKr	<input checked="" type="checkbox"/>
D.O. Saturation	90.00%	Use Balanced Technology	<input checked="" type="checkbox"/>
D.O. Goal	6		

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rptHydro

WQM 7.0 Hydrodynamic Outputs

SWP Basin	Stream Code	Stream Name	RMI	Elevation (ft)	Drainage Area (sq mi)	Slope (ft/ft)	PWS Withdrawal (mgd)	Apply FC
07F	8308	LITTLE CONEWAGO CREEK	4.120	303.00	60.70	0.00000	0.00	<input checked="" type="checkbox"/>

Design Cond.	LFY (dam)	Trib Flow (cfs)	Stream Flow (cfs)	Rch Trav Time (days)	Rch Velocity (ft/s)	WD Ratio	Rch Width (ft)	Rch Depth (ft)	Trib Temp (°C)	Stream Temp (°C)	pH		
Q7-10 Flow	4.180	60.60	0.00	60.60	.7735	0.01263	.99	70.92	75.56	0.92	0.004	20.00	7.00
Q1-10 Flow	4.180	38.78	0.00	38.78	.7735	0.01263	NA	NA	NA	0.72	0.005	20.00	7.00
Q30-10 Flow	4.180	82.42	0.00	82.42	.7735	0.01263	NA	NA	NA	1.09	0.003	20.00	7.00

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rptGeneral

Input Data WQM 7.0

SWP Basin	Stream Code	Stream Name	RMI	Elevation (ft)	Drainage Area (sq mi)	Slope (ft/ft)	PWS Withdrawal (mgd)	Apply FC
07F	8309	LITTLE CONEWAGO CREEK	4.180	303.00	60.70	0.00000	0.00	<input checked="" type="checkbox"/>

Design Cond.	LFY (dam)	Trib Flow (cfs)	Stream Flow (cfs)	Rch Trav Time (days)	Rch Velocity (ft/s)	WD Ratio	Rch Width (ft)	Rch Depth (ft)	Trib Temp (°C)	Stream Temp (°C)	pH	
Q7-10	0.040	0.00	60.60	0.000	0.000	0.0	0.00	0.00	20.00	7.00	0.00	0.00
Q1-10	0.00	0.00	0.00	0.000	0.000							
Q30-10	0.00	0.00	0.00	0.000	0.000							

Discharge Data							
Name	Permit Number	Existing Disc Flow (mgd)	Permitted Disc Flow (mgd)	Design Disc Flow (mgd)	Reserve Factor	Disc Temp (°C)	Disc pH
Conewago Twp	PA0084425	0.0000	0.0000	0.0000	0.000	20.00	7.00

Parameter Data				
Parameter Name	Disc Conc (mg/L)	Trib Conc (mg/L)	Stream Conc (mg/L)	Fate Coef (1/days)
CBOD5	10.00	2.00	0.00	1.50
Dissolved Oxygen	5.00	8.24	0.00	0.00
NH3-N	1.50	0.00	0.00	0.70

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rptGeneral

Input Data WQM 7.0

SWP Basin	Stream Code	Stream Name	RMI	Elevation (ft)	Drainage Area (sq mi)	Slope (ft/ft)	PWS Withdrawal (mgd)	Apply FC
07F	8309	LITTLE CONEWAGO CREEK	4.120	299.00	63.70	0.00000	0.00	<input checked="" type="checkbox"/>

Design Cond.	LFY (dam)	Trib Flow (cfs)	Stream Flow (cfs)	Rch Trav Time (days)	Rch Velocity (ft/s)	WD Ratio	Rch Width (ft)	Rch Depth (ft)	Trib Temp (°C)	Stream Temp (°C)	pH
Q7-10	0.040	0.00	63.54	0.000	0.000	0.0	0.00	0.00	20.00	7.00	0.00
Q1-10	0.00	0.00	0.00	0.000	0.000						
Q30-10	0.00	0.00	0.00	0.000	0.000						

Discharge Data							
Name	Permit Number	Existing Disc Flow (mgd)	Permitted Disc Flow (mgd)	Design Disc Flow (mgd)	Reserve Factor	Disc Temp (°C)	Disc pH
Conewago TWP	PA0084425	0.0000	0.0000	0.0000	0.000	20.00	7.00

Parameter Data				
Parameter Name	Disc Conc (mg/L)	Trib Conc (mg/L)	Stream Conc (mg/L)	Fate Coef (1/days)
CBOD5	25.00	2.00	0.00	1.50
Dissolved Oxygen	5.00	8.24	0.00	0.00
NH3-N	25.00	0.00	0.00	0.70

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TRC EVALUATION					
Input appropriate values in A3:A9 and D3:D9					
2.34	= Q stream (cfs)	0.5	= CV Daily	0.5	= CV Hourly
0.5	= Q discharge (MGD)	1	= AFC_Partial Mix Factor	1	= CFC_Partial Mix Factor
30	= no. samples	15	= AFC_Criteria Compliance Time (min)	720	= CFC_Criteria Compliance Time (min)
0.3	= Chlorine Demand of Stream		= Decay Coefficient (K)		
0	= Chlorine Demand of Discharge				
0.5	= BAT/BPJ Value				
0	= % Factor of Safety (FOS)				
Source	Reference	AFC Calculations		Reference	CFC Calculations
TRC	1.3.2.iii	WLA_afc = 0.984		1.3.2.iii	WLA_cfc = 0.952
PENTOXSD TRG	5.1a	LTAMULT_afc = 0.373		5.1c	LTAMULT_cfc = 0.581
PENTOXSD TRG	5.1b	LTA_afc = 0.367		5.1d	LTA_cfc = 0.553
Source		Effluent Limit Calculations			
PENTOXSD TRG	5.1f	AML_MULT = 1.231			
PENTOXSD TRG	5.1g	AVG MON LIMIT (mg/l) = 0.451		AFC	
		INST MAX LIMIT (mg/l) = 1.476			
WLA_afc	$(.019/e^{-k \cdot AFC_tc}) + [(AFC_Yc \cdot Qs \cdot .019/Qd \cdot e^{-k \cdot AFC_tc}) \dots + Xd + (AFC_Yc \cdot Qs \cdot Xs/Qd)] \cdot (1-FOS/100)$				
LTAMULT_afc	$EXP((0.5 \cdot LN(cvh^2+1)) - 2.326 \cdot LN(cvh^2+1)^{0.5})$				
LTA_afc	wla_afc * LTAMULT_afc				
WLA_cfc	$(.011/e^{-k \cdot CFC_tc}) + [(CFC_Yc \cdot Qs \cdot .011/Qd \cdot e^{-k \cdot CFC_tc}) \dots + Xd + (CFC_Yc \cdot Qs \cdot Xs/Qd)] \cdot (1-FOS/100)$				
LTAMULT_cfc	$EXP((0.5 \cdot LN(cvd^2/no_samples+1)) - 2.326 \cdot LN(cvd^2/no_samples+1)^{0.5})$				
LTA_cfc	wla_cfc * LTAMULT_cfc				
AML_MULT	$EXP(2.326 \cdot LN((cvd^2/no_samples+1)^{0.5}) - 0.5 \cdot LN(cvd^2/no_samples+1))$				
AVG MON LIMIT	MIN(BAT_BPJ, MIN(LTA_afc, LTA_cfc) * AML_MULT)				
INST MAX LIMIT	$1.5 \cdot ((av_mon_limit/AML_MULT)/LTAMULT_afc)$				

Existing Effluent Limitations and Monitoring Requirements

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Measured
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	5.0	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	0.2	XXX	0.66	1/day	Grab
CBOD ₅ May 1 - Oct 31	41	60	XXX	10.0	15.0	20	1/week	24-Hr Composite
CBOD ₅ Nov 1 - Apr 30	80	125	XXX	20.0	30.0	40	1/week	24-Hr Composite
BOD ₅ Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS	125	185	XXX	30.0	45.0	60	1/week	24-Hr Composite
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	1/week	Grab
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	1/week	Grab
Ammonia May 1 - Oct 31	6.0	XXX	XXX	1.5	XXX	3	2/week	24-Hr Composite
Ammonia Nov 1 - Apr 30	18	XXX	XXX	4.5	XXX	9	2/week	24-Hr Composite
Total Phosphorus	8.0	XXX	XXX	2.0	XXX	4	2/week	24-Hr Composite

Existing Effluent Limitations and Monitoring Requirements

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Monthly	Annual	Monthly	Monthly Average	Maximum	Instant. Maximum		
Ammonia (lbs)	Report	Report	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Kjeldahl--N	Report	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Nitrate-Nitrite as N	Report	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Total Nitrogen	Report	Report	XXX	Report	XXX	XXX	1/month	Calculation
Total Phosphorus	Report	Report	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Net Total Nitrogen	Report	9,132	XXX	XXX	XXX	XXX	1/month	Calculation
Net Total Phosphorus	Report	1,218	XXX	XXX	XXX	XXX	1/month	Calculation

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (362-0400-001), SOPs and/or BPJ.

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

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Measured
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	5.0	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	0.2	XXX	0.66	1/day	Grab
CBOD ₅ May 1 - Oct 31	41.0	60.0	XXX	10.0	15.0	20.0	1/week	24-Hr Composite
CBOD ₅ Nov 1 - Apr 30	80.0	125.0	XXX	20.0	30.0	40.0	1/week	24-Hr Composite
BOD ₅ Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS	125.0	185.0	XXX	30.0	45.0	60.0	1/week	24-Hr Composite
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1,000	1/week	Grab
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2,000 Geo Mean	XXX	10,000	1/week	Grab
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab
Ammonia May 1 - Oct 31	6.0	XXX	XXX	1.5	XXX	3.0	2/week	24-Hr Composite
Ammonia Nov 1 - Apr 30	18.0	XXX	XXX	4.5	XXX	9.0	2/week	24-Hr Composite
Total Phosphorus	8.0	XXX	XXX	2.0	XXX	4.0	2/week	24-Hr Composite

Compliance Sampling Location:

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (362-0400-001), SOPs and/or BPJ.

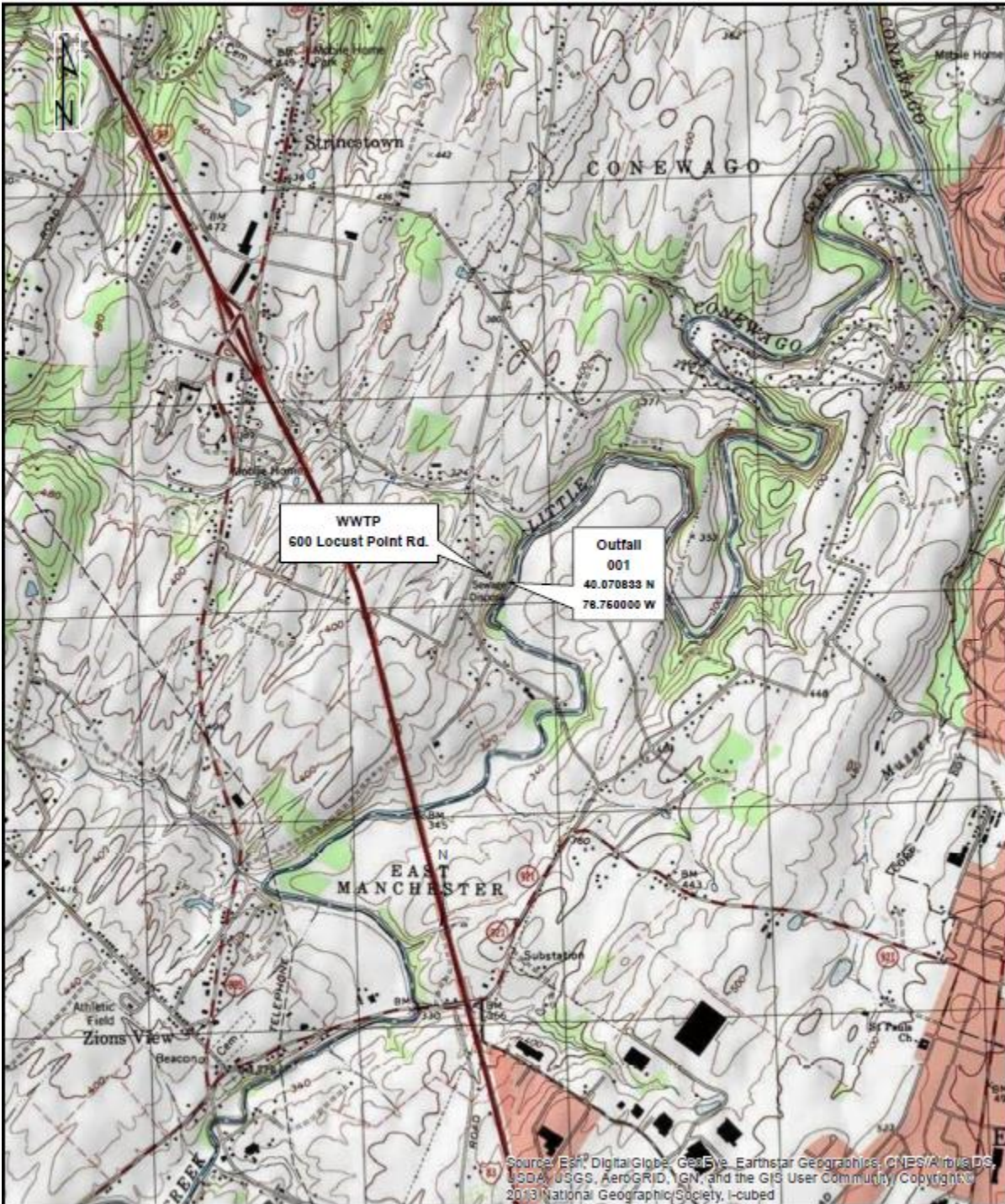
Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Monthly	Annual	Monthly	Monthly Average	Maximum	Instant. Maximum		
Ammonia (lbs)	Report	Report	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Kjeldahl--N	Report	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Nitrate-Nitrite as N	Report	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Total Nitrogen	Report	Report	XXX	Report	XXX	XXX	1/month	Calculation
Total Phosphorus	Report	Report	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Net Total Nitrogen	Report	9,132	XXX	XXX	XXX	XXX	1/month	Calculation
Net Total Phosphorus	Report	1,218	XXX	XXX	XXX	XXX	1/month	Calculation

Compliance Sampling Location:

Other Comments:

Tools and References Used to Develop Permit	
<input checked="" type="checkbox"/>	WQM for Windows Model (see Attachment [redacted])
<input checked="" type="checkbox"/>	Toxics Management Spreadsheet (see Attachment [redacted])
<input checked="" type="checkbox"/>	TRC Model Spreadsheet (see Attachment [redacted])
<input type="checkbox"/>	Temperature Model Spreadsheet (see Attachment [redacted])
<input checked="" type="checkbox"/>	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
<input type="checkbox"/>	Technical Guidance for the Development and Specification of Effluent Limitations, 362-0400-001, 10/97.
<input type="checkbox"/>	Policy for Permitting Surface Water Diversions, 362-2000-003, 3/98.
<input type="checkbox"/>	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 362-2000-008, 11/96.
<input type="checkbox"/>	Technology-Based Control Requirements for Water Treatment Plant Wastes, 362-2183-003, 10/97.
<input type="checkbox"/>	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 362-2183-004, 12/97.
<input type="checkbox"/>	Pennsylvania CSO Policy, 385-2000-011, 9/08.
<input checked="" type="checkbox"/>	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
<input type="checkbox"/>	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 391-2000-002, 4/97.
<input type="checkbox"/>	Determining Water Quality-Based Effluent Limits, 391-2000-003, 12/97.
<input type="checkbox"/>	Implementation Guidance Design Conditions, 391-2000-006, 9/97.
<input checked="" type="checkbox"/>	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.
<input type="checkbox"/>	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 391-2000-008, 10/1997.
<input type="checkbox"/>	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 391-2000-010, 3/99.
<input type="checkbox"/>	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 391-2000-011, 5/2004.
<input checked="" type="checkbox"/>	Implementation Guidance for Section 93.7 Ammonia Criteria, 391-2000-013, 11/97.
<input type="checkbox"/>	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 391-2000-014, 4/2008.
<input checked="" type="checkbox"/>	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 391-2000-015, 11/1994.
<input type="checkbox"/>	Implementation Guidance for Temperature Criteria, 391-2000-017, 4/09.
<input type="checkbox"/>	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 391-2000-018, 10/97.
<input type="checkbox"/>	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.
<input type="checkbox"/>	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 391-2000-021, 3/99.
<input type="checkbox"/>	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.
<input type="checkbox"/>	Design Stream Flows, 391-2000-023, 9/98.
<input type="checkbox"/>	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.
<input type="checkbox"/>	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 391-3200-013, 6/97.
<input checked="" type="checkbox"/>	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
<input type="checkbox"/>	SOP: [redacted]
<input type="checkbox"/>	Other: [redacted]



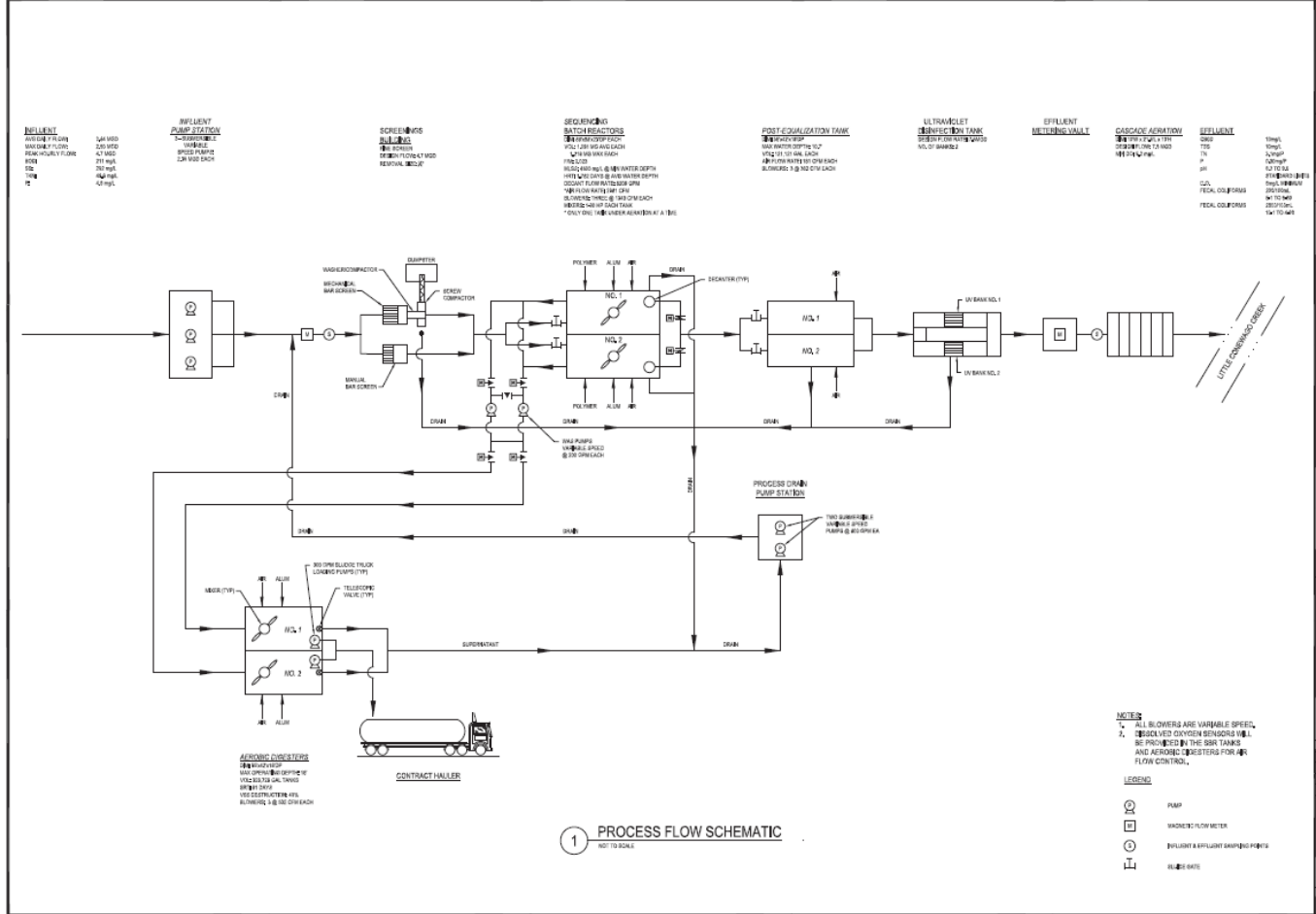
Permit



WASTEWATER TREATMENT FACILITY UPGRADE
 CONEWAHO TOWNSHIP SEWER AUTHORITY
 YORK, PA 17403

NO.	REVISION	DATE

PROJECT NO: 3800-PM-BPNP0011
 DRAWN BY: JH
 CHECKED BY: DDC
 PROJECT TITLE: WASTEWATER TREATMENT FACILITY UPGRADE
 SHEET NO: DI061





Discharge Information

Instructions Discharge Stream

Facility: Conewago Township WWTP NPDES Permit No.: PA0084425 Outfall No.: 001
 Evaluation Type: Custom / Additives Wastewater Description: Little Conewago Creek

Discharge Characteristics												
Design Flow (MGD)*	Hardness (mg/l)*	pH (SU)*	Partial Mix Factors (PMFs)				Complete Mix Times (min)					
			AFC	CFC	THH	CRL	Q ₇₋₁₀	Q _h				
0.5	100	7.7										

Discharge Pollutant	Units	Max Discharge Conc	0 if left blank		0.5 if left blank		0 if left blank			1 if left blank		
			Trib Conc	Stream Conc	Daily CV	Hourly CV	Stream CV	Fate Coeff	FOS	Criteria Mod	Chem Transl	
Total Copper	mg/L	0.0025										
Total Lead	mg/L	0.001										
Total Zinc	mg/L	0.056										



Stream / Surface Water Information

Conewago Township WWTP, NPDES Permit No. PA0084425, Outfall 001

Instructions Discharge Stream

Receiving Surface Water Name: Little Conewago Creek No. Reaches to Model: 1

- Statewide Criteria
- Great Lakes Criteria
- ORSANCO Criteria

Location	Stream Code*	RMI*	Elevation (ft)*	DA (mi ²)*	Slope (ft/ft)	PWS Withdrawal (MGD)	Apply Fish Criteria*
Point of Discharge	008309	4.18	300	60.7			Yes
End of Reach 1	008309	4.12	299	63.7			Yes

Q₇₋₁₀

Location	RMI	LFY (cfs/mi ²)*	Flow (cfs)		W/D Ratio	Width (ft)	Depth (ft)	Velocity (fps)	Travel Time (days)	Tributary		Stream		Analysis	
			Stream	Tributary						Hardness	pH	Hardness*	pH*	Hardness	pH
Point of Discharge	4.18	0.04										100	7		
End of Reach 1	4.12	0.04													

Q_h

Location	RMI	LFY (cfs/mi ²)*	Flow (cfs)		W/D Ratio	Width (ft)	Depth (ft)	Velocity (fps)	Travel Time (days)	Tributary		Stream		Analysis	
			Stream	Tributary						Hardness	pH	Hardness	pH	Hardness	pH
Point of Discharge	4.18														
End of Reach 1	4.12														



Model Results

Conewago Township WWTP, NPDES Permit No. PA0084425, Outfall 001

Instructions

Results

RETURN TO INPUTS

SAVE AS PDF

PRINT

All

Inputs

Results

Limits

Hydrodynamics

Wasteload Allocations

AFC

CCT (min): 15

PMF: 0.773

Analysis Hardness (mg/l): 100

Analysis pH: 7.12

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Total Copper	0	0		0	13.439	14.0	48.0	Chem Translator of 0.96 applied
Total Lead	0	0		0	64.581	81.6	280	Chem Translator of 0.791 applied
Total Zinc	0	0		0	117.180	120	410	Chem Translator of 0.978 applied

CFC

CCT (min): 25.113

PMF: 1

Analysis Hardness (mg/l): 100

Analysis pH: 7.09

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Total Copper	0	0		0	8.956	9.33	38.6	Chem Translator of 0.96 applied
Total Lead	0	0		0	2.517	3.18	13.2	Chem Translator of 0.791 applied
Total Zinc	0	0		0	118.139	120	496	Chem Translator of 0.986 applied

THH

CCT (min): 25.113

PMF: 1

Analysis Hardness (mg/l): N/A

Analysis pH: N/A

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Total Copper	0	0		0	N/A	N/A	N/A	
Total Lead	0	0		0	N/A	N/A	N/A	
Total Zinc	0	0		0	N/A	N/A	N/A	

CRL

CCT (min): 13.257

PMF: 1

Analysis Hardness (mg/l): N/A

Analysis pH: N/A

Pollutants	Stream Conc (µg/L)	Stream CV	Trib Conc (µg/L)	Fate Coef	WQC (µg/L)	WQ Obj (µg/L)	WLA (µg/L)	Comments
Total Copper	0	0		0	N/A	N/A	N/A	

Model Results

9/30/2022

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Total Lead	0	0		0	N/A	N/A	N/A	
Total Zinc	0	0		0	N/A	N/A	N/A	

Recommended WQBELs & Monitoring Requirements

No. Samples/Month: 4

Pollutants	Mass Limits		Concentration Limits				Governing WQBEL	WQBEL Basis	Comments
	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units			
#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!	#VALUE!

Other Pollutants without Limits or Monitoring

The following pollutants do not require effluent limits or monitoring based on water quality because reasonable potential to exceed water quality criteria was not determined and the discharge concentration was less than thresholds for monitoring, or the pollutant was not detected and a sufficiently sensitive analytical method was used (e.g., <= Target QL).

Pollutants	Governing WQBEL	Units	Comments
Total Copper	30.7	µg/L	Discharge Conc ≤ 10% WQBEL
Total Lead	13.2	µg/L	Discharge Conc ≤ 10% WQBEL
Total Zinc	263	µg/L	Discharge Conc ≤ 10% WQBEL

Model Results

9/30/2022

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Permit

Outlook ribbon with File, Message, Help, and various tool icons like Ignore, Reply, Forward, Meeting, etc.

[External] Re: act 537 amendment to create the freedom Square sewer treatment plant

Timothy Pasch <Tim@paschcompanies.com>
To: Derek Rinaldo
Cc: Stephen R. McDonald, Terry Myers, jkopp@conewagotwp.com, Fritz Neufeld, Dan Hershey, Tshudy, David J., Chris Venarchick, Nick Grand, Len Bradley, Wagner, Timothy

Reply, Reply All, Forward buttons and date/time: Wed 9/7/2022 6:57 PM

ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.

Thanks Derek

We will work on that info and get it to you and DEP as soon as it is available

As you know the biggest issue is under the current act 537 plan the sewer authority was supposed to build an expansion in 2018 that would've provided 500 Edus for my site

They haven't done anything and there are saying that they might get to some of that capacity by 2025 which is in direct violation of the DEP rules and as you know they still have not provided a detailed information of how many ED use they even have at the present time

So I don't think it will be difficult to provide information for DEP

As to why it would be better served for the township and freedom Square community to build a private facility for this community so we can progress and not wait 10 more years for the sewer authority to even act

Please excuse the spelling this is a voice email I'm driving

Thanks again Derek for moving this along as we've discussed previously

Tim Pasch
President
717-757-4859 Ext. 303
www.PaschCompanies.com

This message was sent from the road

On Sep 7, 2022, at 5:32 PM, Derek Rinaldo <dr@davidson.com> wrote:

Hi Tim,

I spoke with Tim Wagner at DEP this afternoon, who I have copied on this correspondence. Tim and I discussed that the most appropriate route for the Freedom Square project to proceed is through the submission of a planning module for the entire buildout of the site.

Please let me know if you would like to discuss further,

Derek

Derek J. Rinaldo, E.I.T.
Client Representative
C.S. DAVIDSON, INC.

Outlook ribbon with File, Message, Help, Attachments, and icons for Open, Quick Print, Remove, Save, Upload, Select, Copy, Show Message.

RE: Conewago Township Sewer Authority NPDES PA0084425 renewal question on schedule of compliance

Wagner, Timothy
To: Martin, Daniel, Kumar, Dharmendra
Cc: Le, Hilary

Reply, Reply All, Forward buttons and date/time: Thu 9/22/2022 10:33 AM

[External] Re: act 537 amendment to create the freedom Square sewer treatment plant

Attached e-mail is why they haven't moved forward with the upgrade. Proposed development of 2500 EDUs will cause STP to be overloaded even at the new capacity of 0.84 mgd.

From: Martin, Daniel <danielmarti@pa.gov>
Sent: Wednesday, September 21, 2022 11:21 AM
To: Kumar, Dharmendra <dkumar@pa.gov>
Cc: Le, Hilary <hle@pa.gov>; Wagner, Timothy <twagner@pa.gov>

I'm not sure why they haven't moved forward with it. We gave them a two year extension on the WQM in 2018 but that has since expired in 2020 so they would need to submit a new WQM application.

From: Kumar, Dharmendra <dkumar@pa.gov>
Sent: Wednesday, September 21, 2022 11:10 AM
To: Martin, Daniel <danielmarti@pa.gov>
Cc: Le, Hilary <hle@pa.gov>; Wagner, Timothy <twagner@pa.gov>

See our review letter to them. The one organic loading exceedance was considered anomaly. They had an approved WQM in issued on 26/22/2016 (attached). I do not know why they are not moving with this.

Hydraulic overload definition in the Chapter 94 is as under

"Hydraulic overload—The condition that occurs when the monthly average flow entering a plant exceeds the hydraulic design capacity for 3-consecutive months out of the preceding 12 months or when the flow in a portion of the sewer system exceeds its hydraulic carrying capacity."

So even if they have more monthly average flow beyond the hydraulic design capacity but if they are not for three consecutive months during 12 months they are fine. Meaning no overload condition.

From: Martin, Daniel <danielmarti@pa.gov>
Sent: Wednesday, September 21, 2022 10:27 AM
To: Kumar, Dharmendra <dkumar@pa.gov>
Cc: Le, Hilary <hle@pa.gov>

Is the projected overload only because of the planned development? Yes Summer initially told us they were not under a COA with them see her email below. It looks like they had 4 hydraulics and 1 organic overload in past 5 years.