

Application Type Renewal
Facility Type Industrial
Major / Minor Minor

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

Application No. PA0215856
APS ID 1101702
Authorization ID 1463263

Applicant and Facility Information

Applicant Name	<u>Blairsville Municipal Authority Indiana County</u>	Facility Name	<u>Well Number 2</u>
Applicant Address	<u>203 E Market Street Blairsville, PA 15717-1120</u>	Facility Address	<u>251 Hillside Road Derry, PA 15627</u>
Applicant Contact	<u>Jody Poorbaugh</u>	Facility Contact	<u>Jody Poorbaugh</u>
Applicant Phone	<u>(724) 459-5020</u>	Facility Phone	<u>(724) 459-5020</u>
Client ID	<u>53197</u>	Site ID	<u>262083</u>
SIC Code	<u>4941</u>	Municipality	<u>Derry Township</u>
SIC Description	<u>Trans. & Utilities - Water Supply</u>	County	<u>Westmoreland</u>
Date Application Received	<u>November 29, 2023</u>	EPA Waived?	<u>No</u>
Date Application Accepted	<u>March 8, 2024</u>	If No, Reason	<u>DEP Discretion</u>
Purpose of Application	<u>NPDES Permit Renewal Application.</u>		

Summary of Review


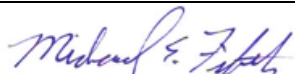
The Department received an NPDES permit application from the Blairsville Municipal Authority for Well Number 2 located in Derry Township of Westmoreland County on November 29, 2023. The facility is a potable public WTP with an SIC Code of 4941. Well Number 2 is a ground water well used by the Blairsville Municipal Authority to supplement water during low flow conditions to the Blairsville Reservoir which is designated as Cold-Water Fishes (CWF).

Blairsville Municipal Authority installed three (3) ground water wells to help augment flow during low flow conditions. Wells Number 1 and 2 were drilled in 1992 to provide flexibility to the WTP during low flow conditions. Well Number 3 was drilled in 1999 in Bear Cave Hollow and is seldom used. Wells Number 1 and 3 are piped directly to the WTP and Well Number 2 is piped to the WTP with a tee connection to provide the ability to discharge untreated ground water directly to the Blairsville Reservoir.

Well Number 2 is equipped with a 120 gallon/minute rated pump, which is generally activated only when the reservoir level is below the principal spillway elevation. Well Number 2 water that is discharged to the Blairsville Reservoir is untreated.

The Blairsville Water Treatment Plant's (WTP) operations are described below:

Surface water is gravity fed to a pump station and pumped to a Trident microfloc filtering system. Upon entering the building, chlorine, Del Pac, potassium permanganate, caustic soda, carbon, and fluoride are added. The water flows through a rapid mix tube and to an adsorption clarifier. The water overflows a weir and onto a mixed media filter consisting of charcoal and various size gravel. After filtration, caustic soda and chlorine are added before the clearwell.

Approve	Deny	Signatures	Date
X		 Curtis Holes, P.E. / Environmental Engineer	March 20, 2024
X		 Michael E. Fifth, P.E. / Environmental Engineer Manager	March 26, 2024

Summary of Review

From the clearwell, water flows to the distribution system's one (1) million-gallon storage tank and a 500,000-gal storage tank. All backwash and sink drain water are gravity fed to two (2) large lagoons to allow settling. The supernatant from the lagoons is recycled to the head of the treatment plant automatically when levels in the overflow reach a certain height.

The NPDES permit for this facility is for the discharge of untreated groundwater to augment the flow in the Blairsville Reservoir. The current permit has effluent limits for iron, aluminum, manganese, pH, and flow.

Residual waste disposal must meet solid waste regulations.

The client has no open violations.

The last DEP inspection of the facility was conducted by Kristin Gearhart on July 2, 2021 and no violation was noted.

It is recommended that a draft permit be published for public comment in response to this application.

Public Participation

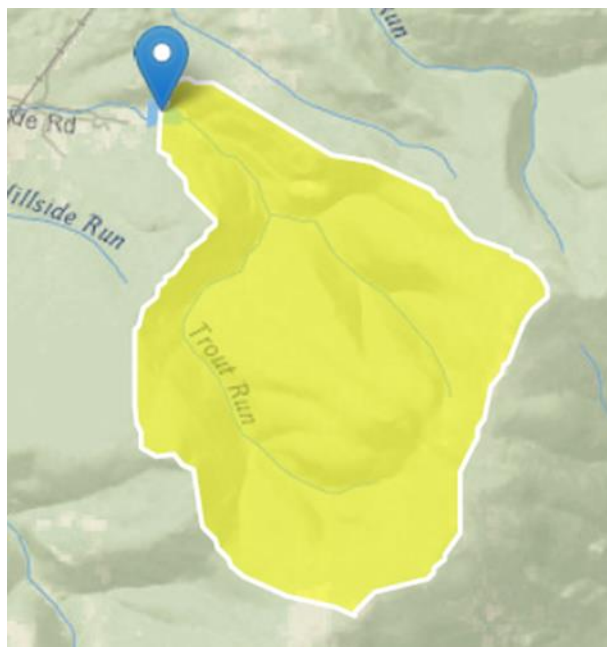
DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested 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)	0.173
Latitude	40° 22' 14"	Longitude	-79° 14' 58"
Quad Name	Blairsville	Quad Code	1511
Wastewater Description: Untreated groundwater to augment water levels during low flow periods.			
Receiving Waters	Blairsville Reservoir	Stream Code	43622
NHD Com ID	123725894	RMI	1.15
Drainage Area	2.38	Yield (cfs/mi ²)	0.0605
Q ₇₋₁₀ Flow (cfs)	0.144	Q ₇₋₁₀ Basis	USGS StreamStats
Elevation (ft)	1254	Slope (ft/ft)	
Watershed No.	18-D	Chapter 93 Class.	CWF
Existing Use	Potable Water Source	Existing Use Qualifier	None
Exceptions to Use	None	Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	Organic Enrichment/Low D.O.		
Source(s) of Impairment	Upstream Impoundment		
TMDL Status	Final	Name	Kiskiminetas-Conemaugh River Watersheds TMDL
Nearest Downstream Public Water Supply Intake	Saltsburg WTP		
PWS Waters	Conemaugh River	Flow at Intake (cfs)	82.2
PWS RMI	0.5	Distance from Outfall (mi)	25

Changes Since Last Permit Issuance: None

Other Comments: None

Figure 1: Basin Delineation for Outfall 001



Compliance History

DMR Data for Outfall 001 (from December 1, 2022 to October 31, 2023)

Parameter	Limit	OCT-23	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23	DEC-22
Flow (MGD) Average Monthly	Report	0.058	0.048	0.072	0.065	0.070	0.081	0.080	0.085	0.082	0.080	0.063
Flow (MGD) Daily Maximum	Report	0.061	0.073	0.073	0.067	0.073	0.088	0.084	0.085	0.087	0.087	0.070
pH (S.U.) Daily Minimum	6.0	7.6	7.9	7.5	7.5	7.25	7.7	7.6	7.9	7.3	7.0	7.8
pH (S.U.) Daily Maximum	9.0	7.7	8.1	7.8	7.8	7.7	7.9	8.0	7.92	8.1	7.8	7.89
Total Aluminum (mg/L) Average Monthly	0.75	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100
Total Aluminum (mg/L) Daily Maximum	0.75	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100	< 0.100
Total Iron (mg/L) Average Monthly	1.5	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200
Total Iron (mg/L) Daily Maximum	3.0	< 0.200	< 0.451	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200	< 0.200
Total Manganese (mg/L) Average Monthly	1.0	< 0.0200	< 0.0200	0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200
Total Manganese (mg/L) Daily Maximum	2.0	< 0.0200	< 0.0200	< 0.074	< 0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200	< 0.0200

Development of Effluent Limitations

Outfall No. <u>001</u>	Design Flow (MGD) <u>0.173</u>
Latitude <u>40° 22' 14"</u>	Longitude <u>-79° 14' 58"</u>
Wastewater Description: <u>Untreated groundwater to augment water levels during low flow periods.</u>	

Technology-Based Limitations

The Well Number 2 facility is not subject to Federal Effluent Limitation Guidelines (ELGs) as the activity of discharging groundwater to a surface waterbody is not captured under 40 CFR parts 405 through 471.

Regulatory Effluent Standards and Monitoring Requirements

The pH effluent range for all industrial waste process and non-process discharges pursuant of 25 Pa. Code § 95.2 is indicated in Table 1 below.

Flow monitoring is required pursuant to 25 Pa. Code § 92a.61(d)(1) as indicated in Table 1 below.

Pursuant to 25 Pa. Code § 95.2(4) effluent standards for industrial wastes may not contain more than 7 mg/L of dissolved iron as indicated in Table 1 below.

Pursuant to 25 Pa. Code § 92a.48(b) the imposition of technology-based Total Residual Chlorine (TRC) limits for facilities that use chlorination and that are not already subject to TRC limits based on applicable federal ELG's or a facility specific BPJ evaluation as indicated in Table 1 below. Chlorine is not used, only untreated groundwater is discharge therefore, the TRC limits do not apply.

The Department has recently commenced a new monitoring program targeting per and polyfluoroalkyl substances (PFAS), which is a multipronged strategy to better characterize and control PFAS in permitted discharges to surface waters by implementing monitoring and other requirements in National Pollutant Discharge Elimination System (NPDES) permits.

The PFAS Policy incorporates monitoring for PFAS parameters, PFOA, PFOS, HFPO-DA and PFBS, as a part of the screening analysis for all NPDES Individual Permit Facilities. ATI's renewed permit will include the following footnote: The permittee may discontinue monitoring for PFOA, PFOS, HFPO-DA, and PFBS if the results of 4 consecutive monitoring periods indicate non-detect results at or below Quantitation Limits of 4.0 ng/L for PFOA, 3.7 ng/L for PFOS, 3.5 ng/L for PFBS and 6.4 ng/L for HFPO-DA. When monitoring is discontinued, permittees must enter a No Discharge Indicator (NODI) Code of "GG" on DMRs.

Table 1. Regulatory Effluent Standards

Parameter	Monthly Avg.	Daily Max	IMAX
PFOA	----	----	Report
PFOS	----	----	Report
HFPO-DA	----	----	Report
PFBS	----	----	Report
Flow (MGD)	Monitor	Monitor	----
Iron, Dissolved	----	----	7.0 mg/L
pH (S.U.)	6-9 at all times		

Total Dissolved Solids (TDS)

Integral to the implementation of 25 Pa. Code § 95.10 is the principle that existing, authorized mass loadings of TDS are exempt from any treatment requirements under these provisions. Existing mass loadings of TDS up to and including the maximum daily discharge loading for any existing discharge, provided that the loading was authorized prior to August 21, 2010 are exempt. Discharge loadings of TDS authorized by the Department are typically exempt from the treatment requirements of Chapter 95.10 until the net TDS loading is increased, an existing discharge proposes a hydraulic expansion or a change in the waste stream. If there are existing mass or production-based TDS effluent limits, then these are used as the basis for the existing mass loading. The facility is not new or expanding waste loading of TDS, therefore, the facility is exempt from 25 Pa. Code § 95.10 treatment requirements.

Best Professional Judgment (BPJ) Limitations

Since this permit is for untreated groundwater augmenting the water level of the Blairsville Reservoir when the water level is below the principal spillway elevation and not for the activities of the WTP, the WTP technology-based control requirements do not apply.

Water Quality-Based Limitations

Total Maximum Daily Load for Streams Impaired by Acid Mine Drainage in the Kiskiminetas-Conemaugh River Watershed

On January 29, 2010, EPA approved the Kiskiminetas-Conemaugh Total Maximum Daily Load (TMDL) to address metals, pH, sediment impairments associated with abandoned mine drainage or other discharges in the Kiskiminetas-Conemaugh River watershed in southwestern Pennsylvania. The TMDL was established in accordance with Section 303(d)(1)(c) of the Clean Water Act to address impairments of water quality as identified on Pennsylvania's Section 303(d) lists. This TMDL covers all the streams covered by the 1996 Consent Decree in the Kiskiminetas River watershed. These segments were listed for their failure to attain the aquatic life use.

Section 303(d) of the Clean Water Act and the U.S. Environmental Protection Agency's (EPA) Water Quality Planning and Management Regulations (codified at Title 40 of the Code of Federal Regulations Part 130) require states to develop Total Maximum Daily Loads (TMDLs) for impaired water bodies. A TMDL establishes the amount of a pollutant that a water body can assimilate without exceeding its water quality standard for that pollutant. TMDLs provide the scientific basis for a state to establish water quality-based controls to reduce pollution from both point and nonpoint sources to restore and maintain the quality of the state's water resources (USEPA 1991a).

Modeled sub-watershed loadings were iteratively reduced to estimate the load reductions required to meet instream concentration targets for metals. The target concentrations were based on established water quality criteria of 0.750 mg/L total aluminum, 1.5 mg/L total iron, 0.3 mg/L dissolved iron, and 1.0 mg/L manganese. Streams placed on Pennsylvania's Section 303(d) list with a designated use of HQ or EV are subject to additional protection pursuant to the state's anti-degradation policy.

Blairsville Municipal Water System Well Number 2 was assigned wasteload allocations ("WLAs") from the Kiskiminetas-Conemaugh TMDL for iron, aluminum, and manganese at its outfall. The TMDL allocated loads and concentrations for Outfall 001 are shown in Table 2.

Table 2. TMDL WLAs for Outfall 001.

Pollutant	Allocated Load (lbs/yr.)	Allocated Concentration (mg/L)
Aluminum	116	0.22
Iron	106	0.20
Manganese	32	0.06

Pennsylvania Code Chapter 93 identifies two (2) designations for Trout Run. The Blairsville Reservoir is the transition point of these two (2) designations. Upstream of the source of the Blairsville Reservoir is designated as exceptional value (EV). From the source of the Blairsville Reservoir downstream Trout Run, the designation changes to Cold Water Fishes (CWF). The facility discharges directly to the Blairsville Reservoir designated as CWF, so the additional protection under Pennsylvania's antidegradation policy for HQ and EV streams does not apply. The TMDL applied the allocated concentrations for additional protection of HQ and EV streams to the facility. The Department's eFACTS system showed the Outfall 001 location incorrectly discharging to the EV portion of Trout Run. Blairsville Municipal Authority installed conveyance piping to the WTP with a tee connection to the Blairsville Reservoir designated as CWF. The tee connection provides the Authority the flexibility to direct untreated groundwater to the WTP or to the reservoir or to both the WTP and the reservoir at the same time.

The target concentrations from the TMDL should have been applied to the facility, which are 0.750 mg/L total aluminum, 1.5 mg/L total iron, 0.3 mg/L dissolved iron, and 1.0 mg/L manganese. The TMDL target concentrations will be applied.

Toxics Management Analysis

The Department’s Toxics Management Spreadsheet (TMS) was utilized to facilitate calculations necessary for completing a reasonable potential analysis and determine Water Quality-Based Effluent Limitations (WQBELs) for discharges containing toxic pollutant concentrations. TMS combines the functionality of two (2) of the Department’s analysis tools, Toxics Screening Analysis Spreadsheet and PENTOXSD water quality model.

DEP’s procedures for evaluating reasonable potential are as follows:

1. For IW discharges, the design flow to use in modeling is the average flow during production or operation and may be taken from the permit application.
2. Perform a Toxics Screening Analysis to identify toxic pollutants of concern. All toxic pollutants, as reported in the permit application or on DMRs, are modeled by the TMS to determine the parameters of concern. [This includes pollutants reported as "Not Detectable" or as "<MDL" where the method detection limit for the analytical method used by the applicant is greater than the most stringent water quality criterion].
 - Establish limits in the draft permit where the maximum reported concentration equals or exceeds 50% of the WQBEL. Use the average monthly and maximum daily limits for the permit as recommended by TMS. Establish an IMAX limit at 2.5 times the average monthly limit.
 - For non-conservative pollutants, establish monitoring requirements where the maximum reported concentration is between 25% - 50% of the WQBEL.
 - For conservative pollutants, establish monitoring requirements where the maximum reported concentration is between 10% - 50% of the WQBEL.

Discharges from Outfall 001 are evaluated based on concentrations reported on the application and contained in the DMRs; data from those sources are used as inputs into the TMS. A summary of TMS Inputs is contained in Table 3 below.

Table 3. TMS Inputs

Parameter	Value
Discharge Inputs	
Facility	Well Number 2
Evaluation Type	Industrial
NPDES Permit No.	PA0215856
Wastewater Description	Untreated Groundwater
Outfall ID	001
Design Flow (MGD)	0.173
Hardness (mg/L)	167
pH (S.U.)	9.0
Partial Mix Factors	Unknown – Calculated by TMS
Complete Mix Times	
Q ₇₋₁₀ (min)	
Q _h (min)	
Stream Inputs	
Receiving Surface Water	Blairsville Reservoir
Number of Reaches to Model	1
Stream Code	043622
RMI	1.15
Elevation (ft)	1254/1047*
Drainage Area (mi ²)	2.38
Slope (ft/ft)	
PWS Withdrawal (MGD)	
Apply Fish Criteria	Yes
Low Flow Yield (cfs/mi ²)	
Flows	
Stream (cfs)	0.567
Tributary (cfs)	N/A
Width (ft)	
Stream Hardness (mg/L)	100
Stream pH (S.U.)	7.0

* Denotes discharge location/downstream location values.

The TMS Model does not recommend any WQBEL Outfall 001. Analysis Report from the TMS run is included in Attachment B.

WQM 7.0 Model

The computer model WQM 7.0 is run to determine wasteload allocations and effluent limitations for CBOD₅, NH₃-N and Dissolved Oxygen for single and multiple point source discharge scenarios. In general, WQM 7.0 is run if the maximum BOD₅/CBOD₅ concentrations exceeds 30/25 mg/L respectively in the permit application or past DMRs. The permit application reports BOD₅ concentrations of <3 mg/L, therefore, WQM 7.0 Model is not required to be run.

Anti-Backsliding

Section 402(o) of the Clean Water Act (CWA), enacted in the Water Quality Act of 1987, establishes anti-backsliding rules governing two situations. The first situation occurs when a permittee seeks to revise a Technology-Based effluent limitation based on BPJ to reflect a subsequently promulgated effluent guideline which is less stringent. The second situation addressed by Section 402(o) arises when a permittee seeks relaxation of an effluent limitation which is based upon a State treatment standard of water quality standard.

Previous limits can be used pursuant to EPA's anti-backsliding regulation 40 CFR 122.44 (l) Reissued permits. (1) Except as provided in paragraph (l)(2) of this section when a permit is renewed or reissued, interim effluent limitations, standards or conditions must be at least as stringent as the final effluent limitations, standards, or conditions in the previous permit (unless the circumstances on which the previous permit was based have materially and substantially changed since the time the permit was issued and would constitute cause for permit modification or revocation and reissuance under §122.62). (2) In the case of effluent limitations established based on Section 402(a)(1)(B) of the CWA, a permit may not be renewed, reissued, or modified on the basis of effluent guidelines promulgated under section 304(b) subsequent to the original issuance of such permit, to contain effluent limitations which are less stringent than the comparable effluent limitations in the previous permit.

The facility is not seeking to revise the previously permitted effluent limits.

Effluent Limitations and Monitoring Requirements for Outfall 001

Effluent limits applicable at Outfall 001 are the more stringent of TBELs, WQBELs, regulatory effluent standards, and monitoring requirements as summarized in Table 4.

Table 4. Effluent limits and monitoring requirements for Outfall 001

Parameter	Mass (pounds)		Concentration (mg/L)			Basis
	Average Monthly	Daily Maximum	Average Monthly	Daily Maximum	Instant Maximum	
PFOA	-	-	-	Report		25 Pa. Code § 952.a.61(b)
PFOS	-	-	-	Report		25 Pa. Code § 952.a.61(b)
HFPO-DA	-	-	-	Report		25 Pa. Code § 952.a.61(b)
PFBS	-	-	-	Report		25 Pa. Code § 952.a.61(b)
Flow (MGD)	Report	Report	—	—	—	25 Pa. Code § 92a.61(d)(1)
Iron (total)	—	—	1.5	3.0	—	TMDL
Aluminum (total)	—	—	0.75	0.75	—	TMDL
Manganese (total)	—	—	1.0	2.0	—	TMDL
pH (S.U.)	Within the range of 6.0 to 9.0					25 Pa. Code § 95.2

Monitoring requirements are based on the previous permits monitoring requirements and displayed in Table 5 below.

Table 5. Monitoring Requirements for Outfall 001

Parameter	Sample Type	Minimum Sample Frequency
PFOA	Grab	1/year
PFOS	Grab	1/year
HFPO-DA	Grab	1/year
PFBS	Grab	1/year
Flow (MGD)	Meter	2/Month
Iron (total)	Grab	2/Month
Aluminum (total)	Grab	2/Month
Manganese (total)	Grab	2/Month
pH (S.U.)	Grab	2/Month

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	Average Weekly	Daily Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	XXX	XXX	XXX	Report	XXX	2/month	Measured
pH (S.U.)	XXX	XXX	6.0	XXX	9.0	XXX	2/month	Grab
Total Aluminum	XXX	XXX	XXX	0.75	0.75	XXX	2/month	Grab
Total Iron	XXX	XXX	XXX	1.5	3.0	XXX	2/month	Grab
Total Manganese	XXX	XXX	XXX	1.0	2.0	XXX	2/month	Grab
PFOA	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
PFOS	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
HFPO-DA	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
PFBS	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab

Compliance Sampling Location: Outfall 001

Other Comments: None

Tools and References Used to Develop Permit	
<input type="checkbox"/>	WQM for Windows Model (see Attachment)
<input checked="" type="checkbox"/>	Toxics Management Spreadsheet (see Attachment B)
<input type="checkbox"/>	TRC Model Spreadsheet (see Attachment)
<input type="checkbox"/>	Temperature Model Spreadsheet (see Attachment)
<input type="checkbox"/>	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
<input checked="" type="checkbox"/>	Technical Guidance for the Development and Specification of Effluent Limitations, 386-0400-001, 10/97.
<input type="checkbox"/>	Policy for Permitting Surface Water Diversions, 386-2000-019, 3/98.
<input type="checkbox"/>	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 386-2000-018, 11/96.
<input checked="" type="checkbox"/>	Technology-Based Control Requirements for Water Treatment Plant Wastes, 386-2183-001, 10/97.
<input type="checkbox"/>	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 386-2183-002, 12/97.
<input type="checkbox"/>	Pennsylvania CSO Policy, 386-2000-002, 9/08.
<input 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, 386-2000-008, 4/97.
<input type="checkbox"/>	Determining Water Quality-Based Effluent Limits, 386-2000-004, 12/97.
<input type="checkbox"/>	Implementation Guidance Design Conditions, 386-2000-007, 9/97.
<input type="checkbox"/>	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 386-2000-016, 6/2004.
<input type="checkbox"/>	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 386-2000-012, 10/1997.
<input type="checkbox"/>	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 386-2000-009, 3/99.
<input type="checkbox"/>	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 386-2000-015, 5/2004.
<input type="checkbox"/>	Implementation Guidance for Section 93.7 Ammonia Criteria, 386-2000-022, 11/97.
<input type="checkbox"/>	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 386-2000-013, 4/2008.
<input type="checkbox"/>	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 386-2000-011, 11/1994.
<input type="checkbox"/>	Implementation Guidance for Temperature Criteria, 386-2000-001, 4/09.
<input type="checkbox"/>	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 386-2000-021, 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, 386-2000-020, 10/97.
<input type="checkbox"/>	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 386-2000-005, 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, 386-2000-010, 3/1999.
<input type="checkbox"/>	Design Stream Flows, 386-2000-003, 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, 386-2000-006, 10/98.
<input type="checkbox"/>	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 386-3200-001, 6/97.
<input type="checkbox"/>	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
<input type="checkbox"/>	SOP:
<input type="checkbox"/>	Other:

ATTACHMENTS

ATTACHMENT A: STREAMSTATS DATA

ATTACHMENT B: TMS MODEL OUTPUT SUMMARY

ATTACHMENT C: SITE PLAN

**ATTACHMENT A
STREAMSTATS DATA**

Basin Characteristics			
Parameter Code	Parameter Description	Value	Unit
DRNAREA	Area that drains to a point on a stream	2.38	square miles
ELEV	Mean Basin Elevation	1998.9	feet
PRECIP	Mean Annual Precipitation	45	inches
CARBON	Percentage of area of carbonate rock	0	percent
FOREST	Percentage of area covered by forest	100	percent
URBAN	Percentage of basin with urban development	0	percent

Low-Flow Statistics Parameters <small>(Low Flow Region 3)</small>					
Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	2.38	square miles	2.33	1720
ELEV	Mean Basin Elevation	1998.9	feet	898	2700
PRECIP	Mean Annual Precipitation	45	inches	38.7	47.9

Low-Flow Statistics Flow Report <small>(Low Flow Region 3)</small>				
PII: Prediction Interval-Lower, PIU: Prediction Interval-Upper, SEp: Standard Error of Prediction, SE: Standard Error (other -- see report)				
Statistic	Value	Unit	SE	SEp
7 Day 2 Year Low Flow	0.327	ft ³ /s	43	43
30 Day 2 Year Low Flow	0.476	ft ³ /s	38	38
7 Day 10 Year Low Flow	0.144	ft ³ /s	54	54
30 Day 10 Year Low Flow	0.196	ft ³ /s	49	49
90 Day 10 Year Low Flow	0.289	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. (<http://pubs.usgs.gov/sir/2006/5130/>)

**ATTACHMENT B
TMS Model Output**



Discharge Information

Instructions Discharge Stream

Facility: Blairsville Well 2 NPDES Permit No.: PA0215856 Outfall No.: 001

Evaluation Type: Major Sewage / Industrial Waste Wastewater Description: Process Wastewater , NCCW, Misc wastew

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
0.173	187	9						

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	
Group 1	Total Dissolved Solids (PWS)	mg/L	214									
	Chloride (PWS)	mg/L	0.996									
	Bromide	mg/L	< 0.036									
	Sulfate (PWS)	mg/L	17.2									
	Fluoride (PWS)	mg/L	0.236									
Group 2	Total Aluminum	µg/L	< 8.7									
	Total Antimony	µg/L	< 0.348									
	Total Arsenic	µg/L	< 2.5									
	Total Barium	µg/L	77.6									
	Total Beryllium	µg/L	< 0.676									
	Total Boron	µg/L	< 0.0565									
	Total Cadmium	µg/L	< 0.123									
	Total Chromium (III)	µg/L	< 1.99									
	Hexavalent Chromium	µg/L	< 0.25									
	Total Cobalt	µg/L	< 0.119									
	Total Copper	mg/L	< 0.0021									
	Free Cyanide	µg/L										
	Total Cyanide	µg/L	< 0.006									
	Dissolved Iron	µg/L	< 20									
	Total Iron	µg/L	24.1									
	Total Lead	µg/L	< 0.172									
	Total Manganese	µg/L	8.01									
	Total Mercury	µg/L	< 0.0932									
	Total Nickel	µg/L	< 1.44									
	Total Phenols (Phenolics) (PWS)	µg/L	< 5									
Total Selenium	µg/L	< 2.5										
Total Silver	µg/L	< 0.274										
Total Thallium	µg/L	< 0.068										
Total Zinc	mg/L	< 0.00354										
Total Molybdenum	µg/L	0.597										
Acrolein	µg/L	<										
Acrylamide	µg/L	<										
Acrylonitrile	µg/L	<										
Benzene	µg/L	<										
Bromoform	µg/L											

Group 3	Carbon Tetrachloride	µg/L	<																	
	Chlorobenzene	µg/L	<																	
	Chlorodibromomethane	µg/L	<																	
	Chloroethane	µg/L	<																	
	2-Chloroethyl Vinyl Ether	µg/L	<																	
	Chloroform	µg/L																		
	Dichlorobromomethane	µg/L	<																	
	1,1-Dichloroethane	µg/L	<																	
	1,2-Dichloroethane	µg/L	<																	
	1,1-Dichloroethylene	µg/L	<																	
	1,2-Dichloropropane	µg/L	<																	
	1,3-Dichloropropylene	µg/L	<																	
	1,4-Dioxane	µg/L	<																	
	Ethylbenzene	µg/L	<																	
	Methyl Bromide	µg/L	<																	
	Methyl Chloride	µg/L	<																	
	Methylene Chloride	µg/L	<																	
	1,1,2,2-Tetrachloroethane	µg/L	<																	
	Tetrachloroethylene	µg/L	<																	
	Toluene	µg/L	<																	
1,2-trans-Dichloroethylene	µg/L	<																		
1,1,1-Trichloroethane	µg/L	<																		
1,1,2-Trichloroethane	µg/L	<																		
Trichloroethylene	µg/L	<																		
Vinyl Chloride	µg/L																			
Group 4	2-Chlorophenol	µg/L	<																	
	2,4-Dichlorophenol	µg/L	<																	
	2,4-Dimethylphenol	µg/L	<																	
	4,6-Dinitro-o-Cresol	µg/L	<																	
	2,4-Dinitrophenol	µg/L	<																	
	2-Nitrophenol	µg/L	<																	
	4-Nitrophenol	µg/L	<																	
	p-Chloro-m-Cresol	µg/L	<																	
	Pentachlorophenol	µg/L	<																	
	Phenol	µg/L	<																	
2,4,6-Trichlorophenol	µg/L	<																		
Group 5	Acenaphthene	µg/L	<																	
	Acenaphthylene	µg/L	<																	
	Anthracene	µg/L	<																	
	Benzidine	µg/L	<																	
	Benzo(a)Anthracene	µg/L	<																	
	Benzo(a)Pyrene	µg/L	<																	
	3,4-Benzofluoranthene	µg/L	<																	
	Benzo(ghi)Perylene	µg/L																		
	Benzo(k)Fluoranthene	µg/L	<																	
	Bis(2-Chloroethoxy)Methane	µg/L	<																	
	Bis(2-Chloroethyl)Ether	µg/L	<																	
	Bis(2-Chloroisopropyl)Ether	µg/L	<																	
	Bis(2-Ethylhexyl)Phthalate	µg/L	<																	
	4-Bromophenyl Phenyl Ether	µg/L	<																	
	Butyl Benzyl Phthalate	µg/L	<																	
	2-Chloronaphthalene	µg/L	<																	
	4-Chlorophenyl Phenyl Ether	µg/L	<																	
	Chrysene	µg/L																		
	Dibenzo(a,h)Anthracene	µg/L	<																	
	1,2-Dichlorobenzene	µg/L	<																	
	1,3-Dichlorobenzene	µg/L	<																	
	1,4-Dichlorobenzene	µg/L	<																	
	3,3-Dichlorobenzidine	µg/L	<																	
	Diethyl Phthalate	µg/L	<																	
Dimethyl Phthalate	µg/L	<																		
Di-n-Butyl Phthalate	µg/L	<																		
2,4-Dinitrotoluene	µg/L	<																		

	2,6-Dinitrotoluene	µg/L	<											
	Di-n-Octyl Phthalate	µg/L	<											
	1,2-Diphenylhydrazine	µg/L	<											
	Fluoranthene	µg/L	<											
	Fluorene	µg/L	<											
	Hexachlorobenzene	µg/L	<											
	Hexachlorobutadiene	µg/L	<											
	Hexachlorocyclopentadiene	µg/L	<											
	Hexachloroethane	µg/L	<											
	Indeno(1,2,3-cd)Pyrene	µg/L	<											
	Isophorone	µg/L	<											
	Naphthalene	µg/L	<											
	Nitrobenzene	µg/L	<											
	n-Nitrosodimethylamine	µg/L	<											
	n-Nitrosodi-n-Propylamine	µg/L	<											
	n-Nitrosodiphenylamine	µg/L	<											
	Phenanthrene	µg/L	<											
	Pyrene	µg/L	<											
	1,2,4-Trichlorobenzene	µg/L	<											
Group 6	Aldrin	µg/L	<											
	alpha-BHC	µg/L	<											
	beta-BHC	µg/L	<											
	gamma-BHC	µg/L	<											
	delta BHC	µg/L	<											
	Chlordane	µg/L	<											
	4,4-DDT	µg/L	<											
	4,4-DDE	µg/L	<											
	4,4-DDD	µg/L	<											
	Dieldrin	µg/L	<											
	alpha-Endosulfan	µg/L	<											
	beta-Endosulfan	µg/L	<											
	Endosulfan Sulfate	µg/L	<											
	Endrin	µg/L	<											
	Endrin Aldehyde	µg/L	<											
	Heptachlor	µg/L	<											
	Heptachlor Epoxide	µg/L	<											
	PCB-1016	µg/L	<											
	PCB-1221	µg/L	<											
	PCB-1232	µg/L	<											
	PCB-1242	µg/L	<											
	PCB-1248	µg/L	<											
	PCB-1254	µg/L	<											
	PCB-1280	µg/L	<											
PCBs, Total	µg/L	<												
Toxaphene	µg/L	<												
2,3,7,8-TCDD	ng/L	<												
Group 7	Gross Alpha	pCi/L	<											
	Total Beta	pCi/L	<											
	Radium 226/228	pCi/L	<											
	Total Strontium	µg/L	<											
	Total Uranium	µg/L	<											
	Osmotic Pressure	mOs/kg												



Stream / Surface Water Information

Bleairsville Well 2, NPDES Permit No. PA0215856, Outfall 001

Instructions Discharge **Stream**

Receiving Surface Water Name: Blairsville Reservoir

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	043822	1.15	1254	2.38			Yes
End of Reach 1	044739	0	1047	15.5			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	1.15	0.1	0.587									100	7		
End of Reach 1	0	0.1													

Q_n

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	1.15														
End of Reach 1	0														



Model Results

Bleairsville Well 2, NPDES Permit No. PA0215856, Outfall 001

Instructions

Results

RETURN TO INPUTS

SAVE AS PDF

PRINT

All

Inputs

Results

Limits

Hydrodynamics

Wasteload Allocations

AFC

CCT (min):

PMF:

Analysis Hardness (mg/l):

Analysis pH:

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 Dissolved Solids (PWS)	0	0		0	N/A	N/A	N/A	
Chloride (PWS)	0	0		0	N/A	N/A	N/A	
Sulfate (PWS)	0	0		0	N/A	N/A	N/A	
Fluoride (PWS)	0	0		0	N/A	N/A	N/A	
Total Aluminum	0	0		0	750	750	2,339	
Total Antimony	0	0		0	1,100	1,100	3,430	
Total Arsenic	0	0		0	340	340	1,080	Chem Translator of 1 applied
Total Barium	0	0		0	21,000	21,000	65,490	
Total Boron	0	0		0	8,100	8,100	25,281	
Total Cadmium	0	0		0	2.433	2.6	8.11	Chem Translator of 0.936 applied
Total Chromium (III)	0	0		0	688.215	2,115	6,595	Chem Translator of 0.316 applied
Hexavalent Chromium	0	0		0	16	16.3	50.8	Chem Translator of 0.982 applied
Total Cobalt	0	0		0	95	95.0	296	
Total Copper	0	0		0	16.144	16.8	52.4	Chem Translator of 0.96 applied
Dissolved Iron	0	0		0	N/A	N/A	N/A	
Total Iron	0	0		0	N/A	N/A	N/A	
Total Lead	0	0		0	79.771	105	326	Chem Translator of 0.763 applied
Total Manganese	0	0		0	N/A	N/A	N/A	
Total Mercury	0	0		0	1.400	1.65	5.14	Chem Translator of 0.85 applied
Total Nickel	0	0		0	552.037	553	1,725	Chem Translator of 0.998 applied
Total Phenols (Phenolics) (PWS)	0	0		0	N/A	N/A	N/A	
Total Selenium	0	0		0	N/A	N/A	N/A	Chem Translator of 0.922 applied
Total Silver	0	0		0	4.496	5.29	16.5	Chem Translator of 0.85 applied
Total Thallium	0	0		0	65	65.0	203	
Total Zinc	0	0		0	138.187	141	441	Chem Translator of 0.978 applied

CFC CCT (min): 0.716 PMF: 1 Analysis Hardness (mg/l): 121.48 Analysis pH: 7.17

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 Dissolved Solids (PWS)	0	0		0	N/A	N/A	N/A	
Chloride (PWS)	0	0		0	N/A	N/A	N/A	
Sulfate (PWS)	0	0		0	N/A	N/A	N/A	
Fluoride (PWS)	0	0		0	N/A	N/A	N/A	
Total Aluminum	0	0		0	N/A	N/A	N/A	
Total Antimony	0	0		0	220	220	686	
Total Arsenic	0	0		0	150	150	468	Chem Translator of 1 applied
Total Barium	0	0		0	4,100	4,100	12,786	
Total Boron	0	0		0	1,600	1,600	4,990	
Total Cadmium	0	0		0	0.282	0.31	0.97	Chem Translator of 0.901 applied
Total Chromium (III)	0	0		0	86.921	101	315	Chem Translator of 0.86 applied
Hexavalent Chromium	0	0		0	10	10.4	32.4	Chem Translator of 0.962 applied

--	--	--	--	--	--	--	--	--

THH CCT (min): PMF: Analysis Hardness (mg/l): Analysis pH:

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 Dissolved Solids (PWS)	0	0		0	500,000	500,000	N/A	
Chloride (PWS)	0	0		0	250,000	250,000	N/A	
Sulfate (PWS)	0	0		0	250,000	250,000	N/A	
Fluoride (PWS)	0	0		0	2,000	2,000	N/A	
Total Aluminum	0	0		0	N/A	N/A	N/A	
Total Antimony	0	0		0	5.6	5.6	17.5	
Total Arsenic	0	0		0	10	10.0	31.2	
Total Barium	0	0		0	2,400	2,400	7,485	
Total Boron	0	0		0	3,100	3,100	9,668	
Total Cadmium	0	0		0	N/A	N/A	N/A	
Total Chromium (III)	0	0		0	N/A	N/A	N/A	
Hexavalent Chromium	0	0		0	N/A	N/A	N/A	
Total Cobalt	0	0		0	N/A	N/A	N/A	
Total Copper	0	0		0	N/A	N/A	N/A	
Dissolved Iron	0	0		0	300	300	936	
Total Iron	0	0		0	N/A	N/A	N/A	
Total Lead	0	0		0	N/A	N/A	N/A	
Total Manganese	0	0		0	1,000	1,000	3,119	
Total Mercury	0	0		0	0.050	0.05	0.16	
Total Nickel	0	0		0	610	610	1,902	
Total Phenols (Phenolics) (PWS)	0	0		0	5	5.0	N/A	
Total Selenium	0	0		0	N/A	N/A	N/A	
Total Silver	0	0		0	N/A	N/A	N/A	
Total Thallium	0	0		0	0.24	0.24	0.75	
Total Zinc	0	0		0	N/A	N/A	N/A	

CRL CCT (min): 0.437 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 Dissolved Solids (PWS)	0	0		0	N/A	N/A	N/A	
Chloride (PWS)	0	0		0	N/A	N/A	N/A	
Sulfate (PWS)	0	0		0	N/A	N/A	N/A	
Fluoride (PWS)	0	0		0	N/A	N/A	N/A	
Total Aluminum	0	0		0	N/A	N/A	N/A	
Total Antimony	0	0		0	N/A	N/A	N/A	
Total Arsenic	0	0		0	N/A	N/A	N/A	
Total Barium	0	0		0	N/A	N/A	N/A	
Total Boron	0	0		0	N/A	N/A	N/A	
Total Cadmium	0	0		0	N/A	N/A	N/A	
Total Chromium (III)	0	0		0	N/A	N/A	N/A	
Hexavalent Chromium	0	0		0	N/A	N/A	N/A	
Total Cobalt	0	0		0	N/A	N/A	N/A	
Total Copper	0	0		0	N/A	N/A	N/A	
Dissolved Iron	0	0		0	N/A	N/A	N/A	
Total Iron	0	0		0	N/A	N/A	N/A	
Total Lead	0	0		0	N/A	N/A	N/A	
Total Manganese	0	0		0	N/A	N/A	N/A	
Total Mercury	0	0		0	N/A	N/A	N/A	

Total Nickel	0	0		0	N/A	N/A	N/A
Total Phenols (Phenolics) (PWS)	0	0		0	N/A	N/A	N/A
Total Selenium	0	0		0	N/A	N/A	N/A
Total Silver	0	0		0	N/A	N/A	N/A
Total Thallium	0	0		0	N/A	N/A	N/A
Total Zinc	0	0		0	N/A	N/A	N/A

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

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 Dissolved Solids (PWS)	N/A	N/A	PWS Not Applicable
Chloride (PWS)	N/A	N/A	PWS Not Applicable
Bromide	N/A	N/A	No WQS
Sulfate (PWS)	N/A	N/A	PWS Not Applicable
Fluoride (PWS)	N/A	N/A	PWS Not Applicable
Total Aluminum	N/A	N/A	Discharge Conc < TQL
Total Antimony	N/A	N/A	Discharge Conc < TQL
Total Arsenic	N/A	N/A	Discharge Conc < TQL
Total Barium	7,485	µg/L	Discharge Conc ≤ 10% WQBEL
Total Beryllium	N/A	N/A	No WQS
Total Boron	4,990	µg/L	Discharge Conc < TQL
Total Cadmium	0.97	µg/L	Discharge Conc < TQL
Total Chromium (III)	315	µg/L	Discharge Conc < TQL
Hexavalent Chromium	32.4	µg/L	Discharge Conc < TQL
Total Cobalt	59.3	µg/L	Discharge Conc < TQL
Total Copper	0.034	mg/L	Discharge Conc < TQL
Total Cyanide	N/A	N/A	No WQS
Dissolved Iron	936	µg/L	Discharge Conc < TQL
Total Iron	4,878	µg/L	Discharge Conc ≤ 10% WQBEL
Total Lead	12.7	µg/L	Discharge Conc < TQL
Total Manganese	3,119	µg/L	Discharge Conc ≤ 10% WQBEL
Total Mercury	0.16	µg/L	Discharge Conc < TQL
Total Nickel	192	µg/L	Discharge Conc < TQL

Total Phenols (Phenolics) (PWS)		µg/L	Discharge Conc < TQL
Total Selenium	15.6	µg/L	Discharge Conc < TQL
Total Silver	10.6	µg/L	Discharge Conc < TQL
Total Thallium	0.75	µg/L	Discharge Conc < TQL
Total Zinc	0.28	mg/L	Discharge Conc < TQL
Total Molybdenum	N/A	N/A	No WQS

ATTACHMENT C

Site Plan

Site Plan



