pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Northwest Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0220779**
Facility Type	**Non-Municipal**	APS ID	**1100635**
Major / Minor	**Minor**	Authorization ID	**1461300**

NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE

Applicant and Facility Information

Applicant Name	**ASH West Springfield Properties, LLC**	Facility Name	**ASH West Springfield MHP**
Applicant Address	7427 Chestnut Street	Facility Address	13079 Ridge Road
	Fairview, PA 16415-1132		West Springfield, PA 16443-9732
Applicant Contact	Ethen Armstrong, Managing Member (ethen@ashrealestateinvestments.com)	Facility Contact	Ethen Armstrong, Managing Member (ethen@ashrealestateinvestments.com)
Applicant Phone	(814) 795-8676	Facility Phone	(814) 795-8676
Client ID	360141	Site ID	264272
Ch 94 Load Status	Not Overloaded	Municipality	Springfield Township
Connection Status	No Limitations	County	Erie
Date Application Received	October 20, 2023	EPA Waived?	Yes
Date Application Accepted	November 9, 2023	If No, Reason	-
Purpose of Application	Renewal of an existing NPDES Permit for an existing discharge of treated sanitary wastewater from a non-municipal sewer system serving a MHP.		

Summary of Review

Act 14 - Proof of Notification was submitted and received.

A Part II Water Quality Management permit amendment has been submitted and will be issued with the Final NPDES Permit.

The applicant should be able to meet the limits of this permit, which will protect the uses of the receiving stream.

I. OTHER REQUIREMENTS:

- A. Stormwater into Sewers
- B. Right of Way
- C. Solids Handling
- D. Public Sewerage Availability
- E. Little or No Assimilative Capacity

SPECIAL CONDITIONS:

II. Solids Management

There are 4 open violations in efacts associated with the subject Client ID (360141) as of 2/7/2024 (see Attachment 1).

Approve	Deny	Signatures	Date
X		Stephen A. McCauley Stephen A. McCauley, E.I.T. / Environmental Engineering Specialist	2/7/2024
X		 *Vacant* / Environmental Engineer Manager	Okay to Draft JCD 2/12/2024

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	0.01185
Latitude	41º 57' 13.6"	Longitude	-80º 26' 56.9"
Quad Name	-	Quad Code	-
Wastewater Description:	Sewage Effluent		
Receiving Waters	Unnamed Tributary to the Raccoon Creek (CWF, MF)	Stream Code	62695
NHD Com ID	123922149	RMI	0.49
Drainage Area	0.24	Yield (cfs/mi^2)	0.067
Q_{7-10} Flow (cfs)	0.016	Q_{7-10} Basis	calculated
Elevation (ft)	695	Slope (ft/ft)	0.01546
Watershed No.	15-A	Chapter 93 Class.	CWF, MF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment	-		
Source(s) of Impairment	-		
TMDL Status	-	Name	-

Background/Ambient Data		Data Source
pH (SU)	-	-
Temperature (°F)	-	-
Hardness (mg/L)	-	-
Other:	-	-

Nearest Downstream Public Water Supply Intake	Pennsylvania - Canada international border		
PWS Waters	Lake Erie	Flow at Intake (cfs)	-
PWS RMI	-	Distance from Outfall (mi)	27.0

Sludge use and disposal description and location(s): All sludge is hauled by the Graden Septic Service to the McKean Township WWTP where it is disposed of at an approved landfill.

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.

Narrative: This Fact Sheet details the determination of draft NPDES permit limits for an existing discharge of 0.01185 MGD of treated sewage from an existing non-municipal STP in Springfield Township, Erie County.

Treatment permitted under Water Quality Management (WQM) Permits No. 2593413 T-4 and 2599412 A-1, T-2 consists of the following:

One 500 gallon, four 1,500 gallon, one 2,500 gallon, two 3,000 gallon, and one 4,000 gallon septic tank (combined capacity of 19,000 gallons), a 4,000 gallon dosing tank, soda ash and alum addition, two intermittent surface sand filters, and ultraviolet (UV) light disinfection.

An amendment application for WQM 2599412 that was received on August 28, 2023 proposes the addition of two new dosing pumps, modifications to the dosing tank, a new manhole to house the new pumps, a new splitter box, and the replacement of the two surface sand filters with two 2,730 square foot surface sand filters. The permitted flow will not change with the upgrades proposed.

WQM Permit 2599412 will permit the entire sewage treatment plant. Therefore, WQM Permit 2593413 will be cancelled with the Final NPDES Permit issuance.

1. Streamflow:

Brandy Run near Girard, PA (1988-2008) - USGS Gage 04213075:

Drainage Area:	4.45	sq. mi.	(USGS StreamStats)
Q_{7-10}:	0.3	cfs	(USGS StreamStats)
Yieldrate:	0.067	cfsm	Calculated)

Unnamed Tributary to the Raccoon Creek at Outfall 001:

Yieldrate:	0.067	cfsm	
Drainage Area:	0.24	sq. mi.	(USGS StreamStats)
% of stream allocated:	100%	Basis:	No nearby discharges
Q_{7-10}:	0.016	cfs	(USGS StreamStats)

2. Wasteflow:

Maximum discharge: 0.01185 MGD = 0.018 cfs

Runoff flow period: 24 hours Basis: Runoff flow with equalization

The calculated stream flow is less than the discharge flow. In accordance with the SOP, since there is less than 3 parts stream flow (Q7-10) to 1 part effluent (design flow), the treatment requirements in document number 391-2000-014, titled, “Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers”, dated April 12, 2008, were evaluated. Based on eDMR data, the treatment requirements are not attainable, so they will not be implemented in this NPDES Permit renewal.

Flow will be required to be monitored as authorized under Chapter 92a.61, and as recommended in the SOP.

3. Parameters:

The following parameters were evaluated: pH, Total Suspended Solids, Fecal Coliform, E. Coli, Total Phosphorus, Total Nitrogen, NH_3-N, $CBOD_5$, Dissolved Oxygen, and Disinfection.

a. pH

Between 6.0 and 9.0 at all times

Basis: Application of Chapter 93.7 technology-based limits.

The measurement frequency will remain as 1/day as recommended in the SOP, based on Table 6-3 in the "Technical Guidance for the Development and Specification of Effluent Limitations" (362-0400-001).

b. Total Suspended Solids

Limits are 30.0 mg/l as a monthly average and 60.0 as an instantaneous maximum.

Basis: Application of Chapter 92a47 technology-based limits.

c. Fecal Coliform

05/01 - 09/30:	200/100ml	(monthly average geometric mean)
	1,000/100ml	(instantaneous maximum)
10/01 - 04/30:	2,000/100ml	(monthly average geometric mean)
	10,000/100ml	(instantaneous maximum)

Basis: Application of Chapter 92a47 technology-based limits

d. E. Coli

Monitoring was added for E. Coli at a frequency of 1/year.

Basis: Application of Chapter 92a.61 as recommended by the SOP for flows between 0.002 MGD and 0.05 MGD.

e. Total Phosphorus

The previous limits for Total Phosphorus set for Lake Erie are based on the 1969 International Joint Committee (IJC) agreement, under the authority of Chapter 96.5, will be retained.

f. Total Nitrogen

The previous monitoring for Total Nitrogen will be retained in accordance with the SOP, based on Chapter 92a.61.

g. Ammonia-Nitrogen (NH_3-N)

Median discharge pH to be used:	7.6	Standard Units (S.U.)
		Basis: eDMR data from previous 12 months
Discharge temperature:	25°C	(default value used in the absence of data)
Median stream pH to be used:	7.0	Standard Units (S.U.)
		Basis: default value used in the absence of data
Stream Temperature:	20˚C	(default value used for CWF modeling)
Background NH_3-N concentration:	0.1	mg/l
		Basis: Default value

Calculated NH_3-N Summer limits: 3.2 mg/l (monthly average)
6.4 mg/l (instantaneous maximum)

Calculated NH_3-N Winter limits: 9.6 mg/l (monthly average)
19.2 mg/l (instantaneous maximum)

Result: WQ modeling resulted in the summer limits above (see Attachment 2). The winter limits are calculated as three times the summer limits. The calculated limits are less restrictive than the previous permit. Based on the eDMR data, the more restrictive limits are attainable, so they will be retained with this renewal.

h. $CBOD_5$

Median discharge pH to be used: 7.6 Standard Units (S.U.)

Basis: eDMR data from previous 12 months

Discharge temperature: 25°C (default value used in the absence of data)

Median stream pH to be used: 7.0 Standard Units (S.U.)

Basis: default value used in the absence of data

Stream Temperature: 20˚C (default value used for CWF modeling)

Background $CBOD_5$ concentration: 2.0 mg/l

Basis: Default value

Calculated $CBOD_5$ limits: 25.0 mg/l (monthly average)
50.0 mg/l (instantaneous maximum)

Result: WQ modeling resulted in the limits above (see Attachment 2). The calculated limits are the same as the previous permit and will be retained.

i. Dissolved Oxygen (DO)

The technology-based minimum of 5.0 mg/l is recommended by the WQ Model (see Attachment 2) and the SOP based on Chapter 93.7, under the authority of Chapter 92a.61. However, since it is being attained, the Dissolved Oxygen minimum of 6.0 mg/l will be retained with this renewal

The measurement frequency will remain as 1/day as recommended in the SOP, based on Table 6-3 in the "Technical Guidance for the Development and Specification of Effluent Limitations" (362-0400-001).

j. Disinfection

☒ Ultraviolet (UV) light

☐ Total Residual Chlorine (TRC): _____ mg/l (monthly average)
_____ mg/l (instantaneous maximum)

Basis: UV Transmittance (%) reporting will be retained with this renewal.

The measurement frequency will remain as 1/day as recommended in the SOP, based on Table 6-3 in the "Technical Guidance for the Development and Specification of Effluent Limitations" (362-0400-001).

4. Reasonable Potential Analysis for Receiving Stream:

A Reasonable Potential Analysis was not performed in accordance with State practices for Outfall 001 using the Department's Toxics Management Spreadsheet since no sampling other than sewage-related parameters was performed for this facility with the renewal application.

5. Reasonable Potential for Downstream Public Water Supply (PWS):

The Department's Toxics Management Spreadsheet does not calculate limits for parameters that are based on PWS criteria (TDS, Chloride, Bromide, and Sulfate). Since no relevant sampling was provided, mass-balance calculations were not performed.

Nearest Downstream potable water supply (PWS): Pennsylvania - Canada international border
Distance downstream from the point of discharge: 27.0 miles

Result: No limits or monitoring are necessary as there is significant dilution available.

6. Anti-Backsliding:

Since all the permit limits in this renewal are the same or more restrictive than the previous NPDES Permit, anti-backsliding is not applicable.

7. Attachment List:

Attachment 1 - WMS Open Violations by Client

Attachment 2 - WQ Modeling Printouts

(The Attachments above can be found at the end of this document)

Compliance History

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

Parameter	DEC-23	NOV-23	OCT-23	SEP-23	AUG-23	JUL-23	JUN-23	MAY-23	APR-23	MAR-23	FEB-23	JAN-23
Flow (MGD) Average Monthly	0.005	0.005	0.004	0.003	0.008	0.008	0.009	0.008	0.003	0.007	0.012	0.017
pH (S.U.) Instantaneous Minimum	7.38	7.45	7.5	7.5	7.35	7.31	7.5	7.5	6.86	7.09	8.05	7.94
pH (S.U.) Instantaneous Maximum	7.67	7.85	7.66	7.65	7.6	7.68	7.81	7.8	7.85	7.83	9.14	8.97
DO (mg/L) Daily Minimum	6.8	6.4	7.25	7.29	6.0	5.89	5.95	6.48	6.99	8.74	10.01	9.18
CBOD5 (mg/L) Average Monthly	< 2.2	5.3	< 2.0	< 3.4	< 2.0	< 3.2	< 3.3	< 3.0	2.5	< 2.0	< 4.8	< 4.7
TSS (mg/L) Average Monthly	14.5	< 5.0	6.0	< 6.5	11.0	< 5.5	< 6.5	< 6.0	< 8.5	< 5.0	< 5.0	< 5.0
Fecal Coliform (No./100 ml) Geometric Mean	66.0	116	510	98.0	389	1207	66.0	3.0	15.0	< 7.0	43.0	43
UV Transmittance (%) Average Monthly	100	100	100	100	100	100	100	100	100	100	100	100.0
Total Nitrogen (mg/L) Average Monthly	13.2	12	17.4	11.6	9.88	< 0.91	19.6	4.78	5.83	5.52	8.4	6.4
Ammonia (mg/L) Average Monthly	3.2	5.5	4.2	< 0.4	5.8	< 0.5	8.2	4.1	6.0	< 3.4	4.5	< 0.8
Total Phosphorus (mg/L) Average Monthly	0.6	0.6	0.6	0.5	< 0.6	< 0.3	0.8	0.9	1.1	0.6	0.8	0.6

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" (386-0400-001), 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	Minimum	Average Monthly	Maximum	Instant. Maximum		
Flow (MGD)	Report	XXX	XXX	XXX	XXX	XXX	1/week	Measured
pH (S.U.)	XXX	XXX	6.0 Daily Min	XXX	9.0 Daily Max	XXX	1/day	Grab
DO	XXX	XXX	6.0 Daily Min	XXX	XXX	XXX	1/day	Grab
CBOD5	XXX	XXX	XXX	25.0	XXX	50	2/month	8-Hr Composite
TSS	XXX	XXX	XXX	30.0	XXX	60	2/month	8-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	2/month	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	2/month	Grab
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/year	Grab
UV Transmittance (%)	XXX	XXX	XXX	Report	XXX	XXX	1/day	Metered
Total Nitrogen	XXX	XXX	XXX	Report	XXX	XXX	2/month	8-Hr Composite
Ammonia Nov 1 - Apr 30	XXX	XXX	XXX	4.5	XXX	9	2/month	8-Hr Composite
Ammonia May 1 - Oct 31	XXX	XXX	XXX	1.5	XXX	3	2/month	8-Hr Composite
Total Phosphorus	XXX	XXX	XXX	1.0	XXX	XXX	2/month	8-Hr Composite

Compliance Sampling Location: at Outfall 001, after ultraviolet (UV) light disinfection.

Flow is monitor only based on Chapter 92a.61. The limits for pH and Dissolved Oxygen are technology-based on Chapter 93.7. The limits for $CBOD_5$, Total Suspended Solids (TSS), and Fecal Coliforms are technology-based on Chapter 92a.47. Monitoring for E. Coli, UV Transmittance (%), and Total Nitrogen is based on Chapter 92a.61. The limits for Ammonia-Nitrogen are water quality-based on Chapter 93.7. The limits for Total Phosphorus for Lake Erie are based on the 1969 International Joint Committee (IJC) agreement.

Attachment 1

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

WATER MANAGEMENT SYSTEM
OPEN VIOLATIONS BY CLIENT

Client ID: 360141
Client: All

Open Violations: 4

CLIENT ID	CLIENT	PF ID	FACILITY	PF KIND	PF STATUS	INSP PROGRAM	PROGRAM SPECIFIC ID
360141	ASH WEST SPRINGFIELD PROP LLC	283980	SPRINGFIELD VILLAGE	Community	Active	Safe Drinking Water	6250005
360141	ASH WEST SPRINGFIELD PROP LLC	283980	SPRINGFIELD VILLAGE	Community	Active	Safe Drinking Water	6250005
360141	ASH WEST SPRINGFIELD PROP LLC	283980	SPRINGFIELD VILLAGE	Community	Active	Safe Drinking Water	6250005
360141	ASH WEST SPRINGFIELD PROP LLC	283980	SPRINGFIELD VILLAGE	Community	Active	Safe Drinking Water	6250005

INSP ID	VIOLATION ID	INSPECTION CATEGORY	VIOLATION DATE	VIOLATION CODE	VIOLATION	PF INSPECTOR	INSP REGION
3642210	8164538	PF	11/07/2023	C9	EXCEEDANCE OF A SECONDARY MCL	HADDEN,MICHAEL	NWRO
3642210	8164539	PF	11/07/2023	C7	FAILURE TO COMPLY WITH A PERMIT CONDITION	HADDEN,MICHAEL	NWRO
3642210	8164540	PF	11/07/2023	C7	FAILURE TO COMPLY WITH A PERMIT CONDITION	HADDEN,MICHAEL	NWRO
3655394	8167273	PF	12/06/2023	C2F	FAILURE TO SAMPLE AT APPROPRIATE LOCATIONS OR FOLLOW SAMPLE COLLECTION PROTOCOLS	HADDEN,MICHAEL	NWRO

Attachment 2

WQM 7.0 Effluent Limits

SWP Basin	Stream Code	Stream Name
15	62695	Trib 62695 to Raccoon Creek

RMI	Name	Permit Number	Disc Flow (mgd)	Parameter	Effl. Limit 30-day Ave. (mg/L)	Effl. Limit Maximum (mg/L)	Effl. Limit Minimum (mg/L)
0.490	ASH West MHP	PA0220779	0.012	CBOD5	25		
				NH3-N	3.29	6.58	
				Dissolved Oxygen			5

WQM 7.0 D.O.Simulation

SWP Basin	Stream Code	Stream Name
15	62695	Trib 62695 to Raccoon Creek

RMI	Total Discharge Flow (mgd)	Analysis Temperature (°C)	Analysis pH
0.490	0.012	22.664	7.221
Reach Width (ft)	**Reach Depth (ft)**	**Reach WDRatio**	**Reach Velocity (fps)**
2.391	0.301	7.952	0.048
Reach CBOD5 (mg/L)	**Reach Kc (1/days)**	**Reach NH3-N (mg/L)**	**Reach Kn (1/days)**
14.25	1.335	1.75	0.859
Reach DO (mg/L)	**Reach Kr (1/days)**	**Kr Equation**	**Reach DO Goal (mg/L)**
6.515	27.861	Owens	6
Reach Travel Time (days)			
0.626			

Subreach Results

TravTime (days)	CBOD5 (mg/L)	NH3-N (mg/L)	D.O. (mg/L)
0.063	12.97	1.66	7.24
0.125	11.80	1.57	7.46
0.188	10.74	1.49	7.58
0.250	9.77	1.41	7.68
0.313	8.89	1.34	7.77
0.375	8.09	1.27	7.85
0.438	7.36	1.20	7.85
0.500	6.70	1.14	7.85
0.563	6.10	1.08	7.85
0.626	5.55	1.02	7.85

WQM 7.0 Modeling Specifications

Parameters	Both	Use Inputted Q1-10 and Q30-10 Flows	☑
WLA Method	EMPR	Use Inputted W/D Ratio	☐
Q1-10/Q7-10 Ratio	0.64	Use Inputted Reach Travel Times	☐
Q30-10/Q7-10 Ratio	1.36	Temperature Adjust Kr	☑
D.O. Saturation	90.00%	Use Balanced Technology	☑
D.O. Goal	6		

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
15	62695	Trib 62695 to Raccoon Creek	**0.490**	695.00	0.24	0.00000	0.00	☑

Stream Data

Design Cond.	LFY (cfsm)	Trib Flow (cfs)	Stream Flow (cfs)	Rch Trav Time (days)	Rch Velocity (fps)	WD Ratio	Rch Width (ft)	Rch Depth (ft)	Tributary Temp (°C)	Tributary pH	Stream Temp (°C)	Stream pH
Q7-10	0.067	0.00	0.00	0.000	0.000	0.0	0.00	0.00	20.00	7.00	0.00	0.00
Q1-10		0.00	0.00	0.000	0.000							
Q30-10		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
ASH West MHP	PA0220779	0.0119	0.0000	0.0000	0.000	25.00	7.60

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	4.00	8.24	0.00	0.00
NH3-N	25.00	0.00	0.00	0.70

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
15	62695	Trib 62695 to Raccoon Creek	**0.000**	655.00	3.03	0.00000	0.00	☑

Stream Data

Design Cond.	LFY (cfsm)	Trib Flow (cfs)	Stream Flow (cfs)	Rch Trav Time (days)	Rch Velocity (fps)	WD Ratio	Rch Width (ft)	Rch Depth (ft)	Tributary Temp (°C)	Tributary pH	Stream Temp (°C)	Stream pH
Q7-10	0.067	0.00	0.00	0.000	0.000	0.0	0.00	0.00	20.00	7.00	0.00	0.00
Q1-10		0.00	0.00	0.000	0.000							
Q30-10		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
		0.0000	0.0000	0.0000	0.000	25.00	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	3.00	8.24	0.00	0.00
NH3-N	25.00	0.00	0.00	0.70

WQM 7.0 Hydrodynamic Outputs

SWP Basin	Stream Code	Stream Name
15	62695	Trib 62695 to Raccoon Creek

RMI	Stream Flow (cfs)	PWS With (cfs)	Net Stream Flow (cfs)	Disc Analysis Flow (cfs)	Reach Slope (ft/ft)	Depth (ft)	Width (ft)	W/D Ratio	Velocity (fps)	Reach Trav Time (days)	Analysis Temp (°C)	Analysis pH
Q7-10 Flow												
0.490	0.02	0.00	0.02	.0183	0.01546	.301	2.39	7.95	0.05	0.626	22.66	7.22
Q1-10 Flow												
0.490	0.01	0.00	0.01	.0183	0.01546	NA	NA	NA	0.04	0.694	23.20	7.28
Q30-10 Flow												
0.490	0.02	0.00	0.02	.0183	0.01546	NA	NA	NA	0.05	0.573	22.28	7.18

WQM 7.0 Wasteload Allocations

SWP Basin	Stream Code	Stream Name
15	62695	Trib 62695 to Raccoon Creek

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
0.490	ASH West MHP	9.53	14.88	9.53	14.88	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
0.490	ASH West MHP	1.5	3.29	1.5	3.29	0	0

Dissolved Oxygen Allocations

RMI	Discharge Name	CBOD5		NH3-N		Dissolved Oxygen		Critical Reach	Percent Reduction
		Baseline (mg/L)	Multiple (mg/L)	Baseline (mg/L)	Multiple (mg/L)	Baseline (mg/L)	Multiple (mg/L)		
0.49	ASH West MHP	25	25	3.29	3.29	5	5	0	0