

Application Type Renewal  
Facility Type Storm Water  
Major / Minor Minor

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

Application No. PA0232874  
APS ID 1082856  
Authorization ID 1430069

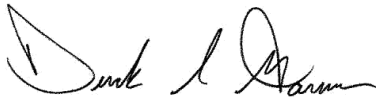

**Applicant and Facility Information**

Applicant Name	<u>American Rock Salt Company, LLC</u>	Facility Name	<u>DuBois Salt Storage Facility</u>
Applicant Address	<u>PO Box 190</u> <u>Mount Morris, NY 14510-0190</u>	Facility Address	<u>Twp Road #372</u> <u>DuBois, PA 15801</u>
Applicant Contact	<u>Sharon Hinkson</u>	Facility Contact	<u>Chip Pascuzzo</u>
Applicant Phone	<u>(585) 991-6851</u>	Facility Phone	<u>(585) 749-6700</u>
Client ID	<u>112334</u>	Site ID	<u>536525</u>
SIC Code	<u>5169</u>	Municipality	<u>Sandy Township</u>
SIC Description	<u>Wholesale Trade - Chemicals And Allied Products, NEC</u>	County	<u>Clearfield</u>
Date Application Received	<u>March 1, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>March 13, 2023</u>	If No, Reason	<u></u>

Purpose of Application Renewal of an existing NPDES permit for the discharge of industrial stormwater.

**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.

Approve	Deny	Signatures	Date
X		 Derek S. Garner / Project Manager	March 15, 2024
X		 Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	March 18, 2024

**Facility Summary**

This salt storage and distribution facility is located one-quarter mile east of Route 255 of Platt Road, approximately one-half mile east of DuBois, Pennsylvania. Salt is delivered to the site by truck and rail from the Hampton Corners Mine in New York. The salt is unloaded from trucks directly on the pad and from the rail cars through a hopper under the railroad tracks on to a conveyor belt constructed in a sealed under track concrete pit. Once the pile is established, a waterproof tarp is used to shield the salt pile from the elements. The salt is loaded onto trucks by front end loaders for highway de-icing. The site features a sealed asphalt pad storage pile of approximately 2.25 acres. The pad is bounded by a continuous 6" curb. On the outside of the curbing there is an eight-foot asphalt apron. The stormwater holding pond has a 248,725-gallon capacity. It is lined with a 30 mil PVC liner to inhibit groundwater contamination. Stormwater from the pond is discharged to an Unnamed Tributary of the Sandy Lick Creek.

**Discharge, Receiving Waters and Water Supply Information**

Outfall No.	<u>001</u>	Design Flow (MGD)	<u>n/a</u>
Latitude	<u>41° 7' 30.04"</u>	Longitude	<u>-78° 42' 28.76"</u>
Quad Name	<u>Sabula</u>	Quad Code	<u>0916</u>
Wastewater Description: <u>Stormwater</u>			
Receiving Waters	<u>Sandy Lick Creek</u>	Stream Code	<u>48527</u>
NHD Com ID	<u>123863087</u>	RMI	<u>Unavailable <sup>(1)</sup></u>
Drainage Area	<u>n/a</u>	Yield (cfs/mi <sup>2</sup> )	<u>n/a</u>
Q <sub>7-10</sub> Flow (cfs)	<u>n/a</u>	Q <sub>7-10</sub> Basis	<u>n/a</u>
Elevation (ft)	<u>n/a</u>	Slope (ft/ft)	<u>n/a</u>
Watershed No.	<u>17-C</u>	Chapter 93 Class.	<u>TSF</u>
Existing Use	<u>n/a</u>	Existing Use Qualifier	<u>n/a</u>
Exceptions to Use	<u>n/a</u>	Exceptions to Criteria	<u>n/a</u>
Assessment Status	<u>Not Assessed <sup>(1)</sup></u>		
Cause(s) of Impairment	<u>n/a</u>		
Source(s) of Impairment	<u>n/a</u>		
TMDL Status	<u>Final, 6/9/2009</u>	Name	<u>Redbank Creek TMDL <sup>(2)</sup></u>

<sup>(1)</sup> On August 27, 2020 DEP evaluated site conditions at the American Rock Salt ("ARS") facility to determine if a biological survey was possible at the existing and proposed locations of Outfall 001. The evaluation is detailed in a memo dated September 4, 2020. As part of the site evaluation, the memo states that Sandy Lick Creek splits into two branches approximately 1,300 feet upstream of the facility near the I-80 bridge. The western branch appears to be natural and the east channel (location of the proposed outfall) appears to be channelized and straightened, following the railroad tracks. Since the creek is split into two segments, there is no way to designate an RMI for the channelized branch.

Additionally, an assessment status cannot be designated for the channelized section of Sandy Lick Creek. The memo concludes that, "Sandy Lick Creek in the vicinity of the ARS facility is essentially a large swamp with channels that have been excavated along the railroad tracks. The floodplain of the stream and associated wetlands are extensive, and the low gradient condition and ponding make it impossible to conduct a cause and effect survey or assessment using Department methods."

<sup>(2)</sup> Sandy Lick Creek is included in the Redbank Creek's watershed TMDL. No specific loads or wasteloads are assigned to this discharge.

**Compliance History**

The following resolved violations occurred during the existing permit's term:

Violation ID	Violation Date	Violation Type	Violation Type Description	Resolved Date	Inspection ID	Inspection Date
854287	5/24/2019	92A.46	NPDES - Violation of Part C permit condition(s)	7/1/2019	2893546	5/24/2019
871652	8/5/2019	92A.46	NPDES - Violation of Part C permit condition(s)	12/23/2019	2922438	8/5/2019
888680	7/9/2020	92A.41(A)5	NPDES - Failure to properly operate and maintain all facilities which are installed or used by the permittee to achieve compliance	7/14/2020	3054460	7/9/2020
987319	3/8/2023	CSL611	CSL - Failure to comply with terms and conditions of a WQM permit	3/8/2023	3515519 <sup>(1)</sup>	3/8/2023

<sup>(1)</sup> Violation of Part C.II.1.b of NPDES Permit - Failure to tarp for longer than 15 days. This resulted in DEP and ARS entering into a Consent Assessment of Civil Penalty on May 11, 2023 to collect a civil penalty of \$5,150 dollars.

A review of eDMR submissions shows the Discharge Monitoring Report for the June 2019 monitoring period was submitted one month late.

The facility was most recently inspected by DEP on May 20, 2021. The inspection report notes that there have been several benchmark exceedances reported since the previous inspection.

There are no open violations associated with the permittee.

**Development of Effluent Limitations**

<b>Outfall No.</b> <u>001</u> <b>Latitude</b> <u>41° 7' 30.04"</u> <b>Wastewater Description:</b> <u>Stormwater</u>	<b>Design Flow (MGD)</b> <u>n/a</u> <b>Longitude</b> <u>-78° 42' 28.76"</u>
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Currently, all pollutant reporting and monitoring requirements are established at IMP 102 (see below). Outfall 001 is only used for reporting total monthly rainfall (inches) and total monthly flow (million gallons). Rainfall and flow are documented to estimate total volume discharged from the site and perform mass balance calculations.

**Anti-Backsliding**

No limits or monitoring requirements have been made less stringent. Anti-backsliding regulations should not impact the permit's renewal.

<b>IMP No.</b> <u>102</u> <b>Latitude</b> <u>41° 7' 29.77"</u> <b>Wastewater Description:</b> <u>Stormwater</u>	<b>Design Flow (MGD)</b> <u>n/a</u> <b>Longitude</b> <u>78° 42' 29.30"</u>
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**Technology-Based Limitations**

There are no applicable technology-based effluent limitations for industrial stormwater associated with SIC Code 5169.

**Water Quality-Based Limitations**

DEP does not have an established procedure for modeling stormwater discharges. Accordingly, no water quality-based limitations are proposed.

**Best Professional Judgment (BPJ)**

The fact sheet developed during the permit's previous renewal identified seven parameters of concern. As a result, reporting requirements and benchmark values were developed to ensure that the BMPs in place are protective of the receiving surface waters. The previous justification is as follows:

**Total Dissolved Solids (TDS), mg/L:** TDS in-stream ceilings of 500 mg/L as a monthly average and 750 mg/L as a maximum at nearest downstream Public Water Supply (PWS)(§ 93.7); for permits previously without mass loads, 2,000 mg/L TDS as a monthly average (§ 95.10(c)).

Based upon a reverse mass-balance of an average discharge of 29,400 gallons per measurable rain event, a Q<sub>7-10</sub> of 0.914 cfs, a background TDS in-stream estimated to be 390 mg/L, the ceiling for discharge from ARS to protect the stream as a potential PWS is 5,750 mg/L.

This value assumes Clearfield Creek is representative of background conditions similar to Sandy Lick Creek and further assumes ARS is consuming all available capacity for this potential use in the area downstream of the site. Due to these generalized assumptions, DEP is not recommending a limit but providing a benchmark for which ARS may use to evaluate the general quality of discharge from the site.

**Osmotic Pressure, mosm/kg:** Osmotic Pressure shall not exceed 50 milliosmoles per kilogram as an in-stream criteria (§ 93.7).

Based upon a reverse mass-balance of an average discharge of 29,400 gallons per measurable rain event, a Q<sub>7-10</sub> of 0.914 cfs, a background Osmotic Pressure in-stream estimated to be 5 mosm/kg, the ceiling for discharge from ARS to protect the stream is 2,223 mg/L.

This value assumes Clearfield Creek is representative of background conditions similar to Sandy Lick Creek and further assumes ARS is consuming all available capacity. Due to these generalized assumptions, DEP is not recommending a limit but providing a milestone for which ARS may use to evaluate the general quality of discharge from the site.

**Oil & Grease, mg/L:** Shall not exceed 15 mg/L on a daily average basis nor 30 mg/L at any time per § 95.2(2)

**pH:** Shall be within the range of 6.0 – 9.0 per § 95.2(1)

**Free Cyanide:** The limiting criterion for a Free Available Cyanide discharge to a stream is 5.2 micrograms per liter (0.0052 mg/L) as an in-stream criteria. Background data is not readily available and is therefore estimated to be one half of the 1.0 ug/L Quantitation Limit, or 0.5 ug/L.

Based upon a reverse mass-balance of an average discharge of 29,400 gallons per measurable rain event, a  $Q_{7-10}$  of 0.914 cfs, an estimated background Free Available CN in-stream estimated to be 0.5 ug/L, the ceiling for discharge from ARS to protect the stream is 231 ug/L.

This value assumes Clearfield Creek is representative of background conditions similar to Sandy Lick Creek and further assumes ARS is consuming all available capacity. Due to these generalized assumptions, DEP is not recommending a limit but providing a milestone for which ARS may use to evaluate the general quality of discharge from the site.

**Total Suspended Solids (TSS), mg/L:** A benchmark of 100 mg/L has been established in the PAG-03 permit (September 2016) as indicative of an acceptable discharge concentration from sites with SIC codes applicable to Appendix K.

**Chloride, mg/L:** A benchmark of 2,000 mg/L has been established in the PAG-03 permit (September 2016) as indicative of an acceptable discharge concentration from sites with SIC codes applicable to Appendix K.

#### **Anti-Backsliding**

No limits or monitoring requirements have been made less stringent. Anti-backsliding regulations should not impact the permit's renewal.

### **Part C Discussion**

The existing permit includes numerous best management practices requirements in Part C.II. These conditions have been negotiated by DEP and the permittee through several previous renewals and amendments. DEP is unaware of any substantial changes to the site that would necessitate any revisions to the existing conditions. Accordingly, DEP recommends Part C.II. remains in the permit unchanged as follows:

#### **II. BEST MANAGEMENT PRACTICES (BMPs)**

The permittee shall implement and, as necessary, maintain the following BMPs to remain in compliance with this permit.

##### **A. Pollution Prevention and Exposure Minimization**

The permittee shall minimize the exposure of manufacturing, processing, and material storage areas (including loading and unloading, storage, disposal, cleaning, maintenance, and fueling operations) to rain, snow, snowmelt, and runoff in order to minimize pollutant discharges by either locating industrial materials and activities inside or protecting them with storm resistant coverings wherever feasible. The permittee shall implement and maintain the following measures, at a minimum:

1. Use grading, berming or curbing to prevent runoff of polluted stormwater and divert run-on away from areas that contain polluted stormwater.
2. Locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge to surface waters.
3. Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants to surface waters.
4. Store leaky vehicles and equipment indoors or, if stored outdoors, use drip pans and absorbents to prevent the release of pollutants to the environment.

5. Use spill/overflow protection equipment.
6. Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent runoff and run-on and also that capture any overspray.
7. Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least monthly for leaks.
8. Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids, ensure that discharges have a control (e.g., secondary containment, treatment). This permit does not authorize dry weather discharges from dumpsters or roll off boxes.
9. Minimize contamination of stormwater runoff from fueling areas by implementing the following BMPs where determined to be feasible: cover fueling areas; install oil/water separators or oil and grease traps in fueling area storm drains; use berms to prevent run-on to and runoff from fueling areas; use spill/overflow protection and cleanup equipment; use dry cleanup methods; and/or treat and/or recycle collected stormwater runoff.
10. Train employees routinely (no less than annually) on pollution prevention practices as contained in the PPC Plan.

B. Good Housekeeping

The permittee shall perform good housekeeping measures in order to minimize pollutant discharges including the routine implementation of the following measures, at a minimum:

1. Implement a routine cleaning and maintenance program for all impervious areas of the facility where particulate matter, dust or debris may accumulate to minimize the discharge of pollutants in stormwater. The cleaning and maintenance program must encompass, as appropriate, areas where material loading and unloading, storage, handling and processing occur.
2. Store materials in appropriate containers.
3. Minimize the potential for waste, garbage and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.
4. Eliminate floor drain connections to storm sewers.
5. Use drip pans, drain boards, and drying racks to direct drips back into a fluid holding tank for reuse. Drain fluids from all equipment and parts prior to disposal. Promptly transfer used fluids to the proper container; do not leave full drip pans or other open containers around the shop. Empty and clean drip pans and containers.
6. Label and track the recycling of waste material (e.g., used oil, spent solvents, batteries).
7. Prohibit the practice of hosing down an area where the practice would result in the discharge of pollutants to a municipal or other storm water collection system that conveys pollutants off-site without proper treatment.

C. Erosion and Sediment Controls

1. The permittee shall minimize erosion and pollutant discharges by stabilizing exposed soils and placing flow velocity dissipation devices at discharge locations to minimize channel and stream bank erosion and scour in the immediate vicinity of stormwater outfalls.
2. The permittee shall conduct all earth disturbance activities and, when applicable, shall maintain all post-construction stormwater management (PCSM) BMPs in accordance with 25 Pa. Code Chapter 102.
3. The permittee may not utilize polymers or other chemicals to treat stormwater unless written permission is obtained from DEP.

D. Spill Prevention and Responses

The permittee shall minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop a plan consistent with Part C IV for effective responses to such releases. The permittee shall conduct the following spill prevention and response measures, at a minimum:

1. Maintain an organized inventory of materials on-site. Plainly label containers (e.g., "Used Oil," "Spent Solvents," "Fertilizers and Pesticides") that could be susceptible to spillage or leakage to encourage proper handling and facilitate rapid response if spills or leaks occur.
2. Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas.
3. Develop and implement employee and contractor training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. The permittee shall conduct periodic training, no less than annually, and document the training on the Annual Report required by Part A III.C.1.
4. Keep spill kits on-site, located near areas where spills may occur or where a rapid response can be made.
5. Notify appropriate facility personnel when a leak, spill, or other release occurs.
6. To the extent possible, eliminate or reduce the number and amount of hazardous materials and waste by substituting non-hazardous or less hazardous materials of equal function, as determined by the permittee.
7. Clean up leaks, drips, and other spills without using large amounts of water or liquid cleaners. Use absorbents for dry cleanup whenever possible.

When a leak, spill or other release occurs during a 24-hour period that contains a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under 40 CFR Parts 110, 117 or 302, the permittee shall, in addition to the notification requirements contained in Part A III.C.3 of this permit, notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR Parts 110, 117, and 302 as soon as the permittee becomes aware of the discharge.

E. Sector- and Site-Specific BMPs

1. Surface and Cover.

- a. The permittee shall store salt stockpiles and conduct loading/unloading activities on a synthetic, impermeable surface (i.e.,  $< 10^{-7}$  cm/sec).
- b. All stockpiles must be covered to prevent precipitation contact except when receiving salt, building the stockpile, or loading out to customers. To minimize contact with precipitation, the stockpile must be covered in sections or stages as salt is added to the stockpile. No section of the pile shall remain uncovered for greater than 15 days. If salt is being loaded or unloaded, the pile section can be uncovered, but in no circumstances can it be left uncovered for greater than 15 days if loading/unloading (i.e., the pile is static) is not occurring.

2. Material Management

- a. Remove covering at the working face just high enough to load out the day's shipment. This will minimize moisture absorption and secure the cover if wind direction shifts toward the working face.
- b. Maintain the working face perpendicular to the long axis of the pile by loading alternately left/right and right/left.
- c. Avoid creating a horseshoe-shaped working face that results from removing the center of the pile and leaving extended edges or aprons.

- d. Maintain adequate cover to permit maximum possible resealing of the edge of the cover when operations are completed for the day. Take care to avoid cover damage caused by cascading salt from the upper section of the working face.
- e. Establish and maintain the working face at the downwind end of the stockpile whenever operationally feasible.
- f. Clean up material spills from loading/unloading areas at the end of the work day.

3. Stormwater Management

- a. If stormwater collection ponds or basins are installed and utilized, such ponds shall contain a synthetic liner and be managed to limit discharges to only those times where surface water flows are elevated.
- b. The permittee shall recycle collected stormwater that may have come into contact with salt materials when determined by the permittee to be feasible.

F. ARS DuBois BMPs

1. Site-specific housekeeping

- a. All places of employment, passageways, storerooms, and service rooms are kept clean, orderly and in sanitary condition.
- b. Means of egress are kept clear of tools, materials, and debris.
- c. Equipment is visually checked and maintained on a daily basis.
- d. Wherever possible, materials are stored inside to prevent exposure to weather conditions so as to avoid impacts to the extent possible.
- e. Trash and rubbish are removed to dumpster on an as-needed basis.
- f. Drip pans, absorbent pads, and/or other means are used under hose connections and in other situations where minor drips or spills are likely.
- g. Incidental drips and spills of regulated substances will be cleaned up immediately.

2. Preventative Maintenance

- a. Routinely clean the drainage channel leading into the retention pond and other conveyances of stormwater to prevent debris and silt accumulation.
- b. Replace or repair waste collection bins if damaged or leaking.
- c. If indications of leaks, spills, or drips are evident anywhere in the facility, identify and correct the problem.

3. Visual Inspections

Routine facility inspections shall be conducted. If conditions are discovered which could impact stormwater quality, corrective action will be taken. Records of corrective actions will be maintained.

4. Spill Prevention and Response

All employees should receive initial and refresher training in spill response and related environmental issues.



If a discharge of a regulated substance occurs, appropriate measures to prevent adverse environmental impacts will be taken.

5. Runoff Management Practices

- a. Grading and paving in operating areas to divert stormwater away from areas that could potentially impact stormwater and prevent mixing with runoff.
- b. Parking areas are gravel which allows stormwater to absorb into the ground and also minimizes erosion.

6. Record Keeping and Reporting

Records of discharges of regulated substances, monitoring, inspection, and maintenance activities will be retained onsite.

7. Additional BMPs

The applicable BMPs and stormwater controls from the "Salt Institute Voluntary Salt Storage Guidelines for Distribution Stockpiles" have been incorporated into the facility's PPC Plan as required by the Authorization to Discharge under the NPDES General Permit for Discharges of Stormwater Associated with Industrial Activities.

In addition to the BMPs listed above, Part C.III. of the permit establishes routine inspection requirements. As with the BMPs above, DEP is unaware of any changes to the site that would require revising the existing inspection requirements. Accordingly, DEP proposes the routine inspection requirements remain in the permit unchanged as follows:

**III. ROUTINE INSPECTIONS**

A. The permittee shall visually inspect the following areas and BMPs on a semiannual basis (calendar periods), at a minimum:

1. Areas where industrial materials or activities are exposed to stormwater.
2. Areas identified in the PPC Plan as potential pollutant sources.
3. Areas where spills or leaks have occurred in the past three years.
4. Stormwater outfalls and locations where authorized non-stormwater discharges may commingle.
5. Physical BMPs used to comply with this permit.

At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring.

B. The permittee shall evaluate and document the following conditions, at a minimum, in the Annual Report required by Part A III.C.1 through required inspections:

1. Raw materials, products or wastes that may have or could come into contact with stormwater.
2. Leaks or spills from equipment, drums, tanks and other containers.
3. Off-site tracking of industrial or waste materials, or sediment where vehicles enter or exit the site.
4. Tracking or blowing of raw, final or waste materials from areas of no exposure to exposed areas.
5. Control measures or BMPs needing replacement, maintenance or repair.
6. The presence of authorized non-stormwater discharges that were not identified in the permit application and non-stormwater discharges not authorized by this permit.

- C. The permittee shall visually inspect the following areas and BMPs on a weekly basis (calendar periods), at a minimum, and submit documentation of the inspections to the Department annually on the anniversary of the Permit Effective Date of this permit. The permittee shall utilize the inspections forms titled "Self-Inspection Report – Operating Areas" and "Self-Inspection Report – BMP Checklist".
1. Salt pile coverage, based on tonnage:
    - a. Tonnage Received
    - b. Tonnage Loaded Out
    - c. Tonnage Currently On-Site
    - d. Stages Covered
  2. BMP Conditions:
    - a. Impervious Pad
    - b. Tarp Integrity
    - c. Jersey barrier gaps (to prevent salt release)
    - d. Pond

**Existing Effluent Limitations and Monitoring Requirements**

The existing effluent limitations and monitoring requirements are as follows:

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

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Total Monthly	Daily Maximum	Minimum	Average Monthly	Maximum	Instant. Maximum		
Total Flow (M Gal)	Report	Report	XXX	XXX	XXX	XXX	See Permit <sup>(1)</sup>	Calculation
Rainfall (In)	Report	Report	XXX	XXX	XXX	XXX	See Permit <sup>(2)</sup>	See Permit <sup>(2)</sup>

Compliance Sampling Location: Outfall 001

- (1) The total runoff volume may be estimated by multiplying the liquid equivalent rainfall by the receiving impervious area.
- (2) The total monthly rainfall and maximum daily rainfall may be taken by direct measurement at the site or may be obtained from published rain data at a nearby airport or weather station.

**IMP 102, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Daily Maximum	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	Report Inst Min	Report	XXX	XXX	1/month	Grab
TSS	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Total Dissolved Solids	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Free Cyanide (ug/L)	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Chloride	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab

Compliance Sampling Location: IMP 102

**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)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Total Monthly	Daily Maximum	Minimum	Average Monthly	Maximum	Instant. Maximum		
Total Flow (M Gal)	Report	Report	XXX	XXX	XXX	XXX	See Permit <sup>(1)</sup>	Calculation
Rainfall (In)	Report	Report	XXX	XXX	XXX	XXX	See Permit <sup>(2)</sup>	See Permit <sup>(2)</sup>

Compliance Sampling Location: Outfall 001

- (1) The total runoff volume may be estimated by multiplying the liquid equivalent rainfall by the receiving impervious area.
- (2) The total monthly rainfall and maximum daily rainfall may be taken by direct measurement at the site or may be obtained from published rain data at a nearby airport or weather station.

**IMP 102, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Daily Maximum	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	Report Inst Min	Report	XXX	XXX	1/month	Grab
TSS	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Total Dissolved Solids	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Free Cyanide (ug/L)	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Chloride	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab

Compliance Sampling Location: IMP 102