

Application Type Renewal
Facility Type Storm Water
Major / Minor Minor

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

Application No. PA0244546
APS ID 1058051
Authorization ID 1387163

Applicant and Facility Information

Applicant Name	<u>Chester Downs & Marina, LLC D. B. A. Harrah's Philadelphia Casino & Racetrack</u>	Facility Name	<u>Harrah's Philadelphia Casino & Racetrack</u>
Applicant Address	<u>777 Harrah's Boulevard Chester, PA 19013-4505</u>	Facility Address	<u>777 Harrah's Boulevard Chester, PA 19013-4505</u>
Applicant Contact	<u>Michael Zanghi</u>	Facility Contact	<u>Michael Zanghi</u>
Applicant Phone	<u>(484) 490-2213</u>	Facility Phone	<u>(484) 490-2213</u>
Client ID	<u>238613</u>	Site ID	<u>649245</u>
SIC Code	<u>7948, 7999</u>	Municipality	<u>Chester City</u>
SIC Description	<u>Services - Racing, Including Track Operation. Services - Amusement and Recreation</u>	County	<u>Delaware</u>
Date Application Received	<u>February 10, 2022</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u></u>	If No, Reason	<u></u>
Purpose of Application	<u>Permit Renewal</u>		

Summary of Review

Applicant requests approval for renewal of an NPDES permit to discharge stormwater from Harrah's Philadelphia Casino & Racetrack facility to Delaware River. The receiving water is classified as a warm water fishery.

The operation is an existing racetrack which houses up to 130 racehorses for 150 race days per year and two marshal horses for 34 weeks per year. The racehorses are brought into the track and taken back out each day. The two marshal horses are kept onsite 24 hours per day during the race season. Manure is collected and stored in a roll off storage container in a roofed manure storage facility.

There are seven stormwater outfalls at the site.

Outfall 001 discharges stormwater from the parking area. A part of the stormwater from the parking area will be discharged through curb openings to a grass filter strip prior to flowing as overland flow to the Delaware River.

Outfall 002 discharges stormwater from paddock area located between the housing facility and the track.

Outfalls 003, 004 and 005 discharge stormwater from the racetrack area. Stormwater from the racetrack will flow towards the center of the track to a grassy filter area. A series of stormwater pipe inlets collect stormwater from the grass filter area and discharge directly to Delaware River.

Outfall 006 discharges stormwater from loading dock.

Approve	Deny	Signatures	Date
X		<i>Sara Abraham</i> Sara Reji Abraham, E.I.T. / Project Manager	May 18, 2022
X		<i>Pravin Patel</i> Pravin C. Patel, P.E. / Environmental Engineer Manager	05/18/2022

Outfall 007 discharges stormwater from casino building roof, maintenance, boiler and chiller areas and cinder storage.

Outfalls 006 and 007 are new outfalls incorporated in the permit at this renewal.

Facility follows the best management practices (BMPs) to prevent manure contamination and runoff from the site according to their PPC plan. The BMPs used at the site are rain garden, curb cutout, rock filter, grass filter, and isolation of stormwater inlets. The details are in the PPC plan.

According to the past inspection reports the overall conditions at the facility were good.

The existing stormwater parameters Oil and Grease, BOD5, COD, TSS, Total Nitrogen, Total Phosphorus and pH are continued semiannually in the draft permit. These are in consistent with the Industrial Waste Stormwater module.

Benchmark values for COD (120 mg/l), TSS (100 mg/l) and Oil and Grease (30 mg/l) are also included in part C of the permit. This is based on PAG03 General Permit for Discharges of Stormwater associated with industrial activity.

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.

Act 14 Notifications:

City of Chester - January 27, 2022
Delaware County - January 27, 2022

Permit Conditions:

- A. Stormwater Outfalls
- B. Best Management Practices
- C. Routine Inspections
- D. PPC Plan
- E. Stormwater Monitoring Requirements
- F. Other Requirements
 - (a) Acquire Necessary Property Rights
 - (b) Proper Sludge Disposal

Compliance History

DMR Data for Outfall 001 (from April 1, 2021 to March 31, 2022)

Parameter	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21
pH (S.U.) Maximum				7.28						7.21		
BOD5 (mg/L) Maximum				< 2.0						< 1		
COD (mg/L) Maximum				16.0						< 1		
TSS (mg/L) Maximum				104						54		
Oil and Grease (mg/L) Maximum				< 1.00						< 1		
Total Nitrogen (mg/L) Maximum				< 1.00						< 1		
Total Phosphorus (mg/L) Maximum				0.24						< 1		

DMR Data for Outfall 002 (from April 1, 2021 to March 31, 2022)

Parameter	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21
pH (S.U.) Maximum				7.32						7.27		
BOD5 (mg/L) Maximum				< 2.00						< 1		
COD (mg/L) Maximum				< 15.0						< 1		
TSS (mg/L) Maximum				134						26		
Oil and Grease (mg/L) Maximum				< 1.00						< 1		
Total Nitrogen (mg/L) Maximum				< 1.00						< 1		
Total Phosphorus (mg/L) Maximum				0.35						< 1		

DMR Data for Outfall 003 (from April 1, 2021 to March 31, 2022)

Parameter	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21
pH (S.U.) Maximum				7.26						7.25		
BOD5 (mg/L) Maximum				< 2.00						4.80		
COD (mg/L) Maximum				84.0						< 1		
TSS (mg/L) Maximum				103						487		
Oil and Grease (mg/L) Maximum				1.80						< 1		
Total Nitrogen (mg/L) Maximum				2.00						< 1		
Total Phosphorus (mg/L) Maximum				0.63						< 1		

DMR Data for Outfall 004 (from April 1, 2021 to March 31, 2022)

Parameter	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21
pH (S.U.) Maximum				7.29						7.23		
BOD5 (mg/L) Maximum				< 2.00						< 1		
COD (mg/L) Maximum				35.0						< 1		
TSS (mg/L) Maximum				227						27		
Oil and Grease (mg/L) Maximum				< 1.00						< 1		
Total Nitrogen (mg/L) Maximum				2.90						< 1		
Total Phosphorus (mg/L) Maximum				0.72						< 1		

DMR Data for Outfall 005 (from April 1, 2021 to March 31, 2022)

Parameter	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21
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NPDES Permit Fact Sheet
Harrah's Philadelphia Casino & Racetrack

NPDES Permit No. PA0244546

pH (S.U.) Maximum				7.31						7.22		
BOD5 (mg/L) Maximum				< 2.00						< 1		
COD (mg/L) Maximum				18.0						< 1		
TSS (mg/L) Maximum				39.0						36		
Oil and Grease (mg/L) Maximum				< 1.00						< 1		
Total Nitrogen (mg/L) Maximum				5.10						< 1		
Total Phosphorus (mg/L) Maximum				0.66						< 1		

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	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
BOD5	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

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Outfall 002, 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	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
BOD5	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

Proposed Effluent Limitations and Monitoring Requirements

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Outfall 003, 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	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
BOD5	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

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 004, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
BOD5	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

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 005, 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	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
BOD5	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

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 006, 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	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
BOD5	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab

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 007, 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	Daily Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
BOD5	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
COD	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
TSS	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Oil and Grease	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/6 months	Grab