Pennsylvania Department of Environmental Protection

**Southeast Regional Office**
**CLEAN WATER PROGRAM**

| | | | |
|---|---|---|---|
| Application Type | **Renewal** | Application No. | **PA0245186** |
| Facility Type | **Storm Water** | APS ID | **1132593** |
| Major / Minor | **Minor** | Authorization ID | **1518641** |

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

## Applicant and Facility Information

| | | | |
|---|---|---|---|
| Applicant Name | **Victory Brewing Company, LLC** | Facility Name | **Victory Brewing Development** |
| Applicant Address | 420 Acorn Lane | Facility Address | 3127 Lower Valley Road |
| | Downingtown, PA 19335 | | Parkesburg, PA 19365 |
| Applicant Contact | Ray Reiff | Facility Contact | Ray Reiff |
| Applicant Phone | (610) 514-7000 | Facility Phone | (610) 514-7000 |
| Client ID | 304462 | Site ID | 770150 |
| SIC Code | 2082 | Municipality | West Sadsbury Township |
| SIC Description | Manufacturing - Malt Beverages | County | Chester |
| Date Application Received | March 4, 2025 | EPA Waived? | Yes |
| Date Application Accepted | | If No, Reason | |

Purpose of Application: NPDES permit renewal application.

## Summary of Review

The Pa Department of Environmental Protection (PADEP/Department) received an NPDES permit renewal application from Victory Brewing Company, LLC (permittee) on March 4, 2025 permittee's Victory Brewing Development (facility). This is a minor individual industrial stormwater facility that discharges into Valley Creek (TSF, MF) in state watershed 7-K. The current permit will expire on August 31, 2025. The terms and conditions of the current permit is automatically extended since the renewal application is received at least 180 days prior to expiration date. Renewal NPDES permit application under Clean Water Program are not covered by PADEP's PDG per 021-2100-001. This fact sheet is developed in accordance with 40 CFR §124.56.

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 |
|---|---|---|---|
| √ | | Reza H. Chowdhury, E.I.T. / Project Manager | March 20, 2025 |
| X | | Pravin Patel<br>Pravin C. Patel, P.E. / Environmental Engineer Manager | 03/20/2025 |

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

| | | | |
|---|---|---|---|
| Outfall No. | 002 | Design Flow (MGD) | 0 (stormwater) |
| Latitude | 39º 57' 7.6" | Longitude | -75º 56' 10.5" |
| Quad Name | Parkesburg | Quad Code | 1938 |
| Wastewater Description: | Stormwater | | |
| Receiving Waters | Valley Creek (TSF, MF) | Stream Code | 07131 |
| NHD Com ID | 57464913 | RMI | 2.92 |
| Drainage Area | 1.37 mi2 | Yield (cfs/mi$^2$) | 0.146 |
| $Q_{7-10}$ Flow (cfs) | 0.2 | $Q_{7-10}$ Basis | 2020 fact sheet |
| Elevation (ft) | 508 | Slope (ft/ft) | 0.005 |
| Watershed No. | 7-K | Chapter 93 Class. | TSF, MF |
| Existing Use | **Trout Stocking** | Existing Use Qualifier | |
| Exceptions to Use | None | Exceptions to Criteria | None |
| Assessment Status | Impaired | | |
| Cause(s) of Impairment | SILTATION, SILTATION | | |
| Source(s) of Impairment | AGRICULTURE, AGRICULTURE | | |
| TMDL Status | Tentative | Name | Octoraro Creek Watershed TMDL |
| Nearest Downstream Public Water Supply Intake | Chester Water Authority, Southeast DELCO | | |
| PWS Waters | Octoraro Reservoir | Flow at Intake (cfs) | |
| PWS RMI | 12.41 | Distance from Outfall (mi) | 20 |

Changes Since Last Permit Issuance: None

Other Comments: The TMDL for Octoraro Creek Watershed is not finalized.

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

| | | | |
|---|---|---|---|
| Outfall No. | 003 | Design Flow (MGD) | 0 |
| Latitude | 39º 57' 13.6" | Longitude | -75º 56' 16.5" |
| Quad Name | Parkesburg | Quad Code | 1938 |
| Wastewater Description: | Stormwater | | |
| Receiving Waters | Valley Creek (TSF, MF) | Stream Code | 07131 |
| NHD Com ID | 57464913 | RMI | 2.92 |
| Drainage Area | | Yield (cfs/mi$^2$) | |
| $Q_{7-10}$ Flow (cfs) | | $Q_{7-10}$ Basis | |
| Elevation (ft) | | Slope (ft/ft) | |
| Watershed No. | 7-K | Chapter 93 Class. | TSF, MF |
| Existing Use | | Existing Use Qualifier | |
| Exceptions to Use | | Exceptions to Criteria | |
| Assessment Status | Impaired | | |
| Cause(s) of Impairment | SILTATION, SILTATION | | |
| Source(s) of Impairment | AGRICULTURE, AGRICULTURE | | |
| TMDL Status | Tentative | Name | Octoraro Creek Watershed TMDL |

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

| | | | |
|---|---|---|---|
| Outfall No. | 005 | Design Flow (MGD) | 0 |
| Latitude | 39º 57' 12.50" | Longitude | -75º 56' 3.9" |
| Quad Name | Parkesburg | Quad Code | 1938 |
| Wastewater Description: | Stormwater | | |
| Receiving Waters | Valley Creek (TSF, MF) | Stream Code | 07131 |
| NHD Com ID | 57464913 | RMI | 2.92 |
| Drainage Area | | Yield (cfs/mi$^2$) | |
| $Q_{7-10}$ Flow (cfs) | | $Q_{7-10}$ Basis | |
| Elevation (ft) | | Slope (ft/ft) | |
| Watershed No. | 7-K | Chapter 93 Class. | TSF, MF |
| Existing Use | | Existing Use Qualifier | |
| Exceptions to Use | | Exceptions to Criteria | |
| Assessment Status | Impaired | | |
| Cause(s) of Impairment | SILTATION, SILTATION | | |
| Source(s) of Impairment | AGRICULTURE, AGRICULTURE | | |
| TMDL Status | Tentative | Name | Octoraro Creek Watershed TMDL |

| Treatment Facility Summary | | | | |
|---|---|---|---|---|
| **Treatment Facility Name:** Victory Brewing Parkesburg Facility | | | | |
| **WQM Permit No.** | **Issuance Date** | | | |
| | | | | |
| | | | | |
| **Waste Type** | **Degree of Treatment** | **Process Type** | **Disinfection** | **Avg Annual Flow (MGD)** |
| Storm Water | | | | |
| | | | | |
| **Hydraulic Capacity (MGD)** | **Organic Capacity (lbs./day)** | **Load Status** | **Biosolids Treatment** | **Biosolids Use/Disposal** |
| | | | | |

Changes Since Last Permit Issuance: The NPDES permit was amended in 2022 to add four new outfalls 002 through 005 and marking Outfalls 001 and 004 as no-exposure outfalls.

**Industrial Activities BMP summary**

Victory Brewing Company is a brewery and distribution center for the production, packaging, and shipping of beer. Unit operations include brewing, cellaring and filtration, a bottling line, a keg line, a canning line, labeling, case packaging, and palletizing. Other operations at the facility include indoor/outdoor dining. The brew house, cellaring, and filling equipment are cleaned by an automated clean in place (CIP) system. The system uses a sodium hydroxide blend for removing organic soils and a nitric/phosphoric acid blend for removing mineral deposit, and a halogenated iodine sanitizer. Peracetic acid is also used to prevent mold growth.

Wastes generated include office paper and cardboard (recycled), food waste, waste oil (recycled/reused on site), spent grain (given to farmers), and misc. industrial waste (paper and plastic not recycled). Waste is stored in covered dumpsters on site. Chemicals are stored indoors except for ammonia tank that is stored outdoors. Waste oil is stored in 55-gallon drums in the maintenance area. The industrial activities that might come in contact with stormwater is the grain silos. Victory has grain silos and grain is loaded into the silos from trucks. Spent grain (mash) is pumped into tanker trucks for transport and reuse. Covered dumpsters and compactors are located outside of the warehouse for disposal of residual waste and municipal waste from the brewing process and the restaurant. Sales representatives from the servicing company inspect the chemical storage areas on a bi-weekly basis. Monthly safety inspections are performed by the Safety manager or other trained personnel. A formal daily walkthrough is also conducted by the maintenance staff.

The new permit was drafted on May 8, 2020 that authorized this facility to discharge NCCW and stormwater associated with industrial activity. The permittee sent a letter on July 1, 2020 requesting that the NCCW be removed from the permit as they send the NCCW, along with process wastewater and sewage to the municipal plant (PA American Coatesville). The permit was redrafted as stormwater only permit and finalized as such. At the request of the permittee, the permit was issued as an Individual Stormwater permit, not a PAG03 general permit. A major amendment application was submitted on December 2021 requesting approval of 4 additional outfalls (Outfalls 002 through 005) and to mark Outfall 001 and 004 as no-exposure outfalls. The requests were accepted and implemented through the amendment issued on September 20, 2022.

The following table summarizes the materials and activities for each drainage area:

| Outfall No. | Drainage Area (ft2) | % Impervious | Description of Materials/Activities in Drainage Area Exposed to Precipitation | No Exposure? |
|---|---|---|---|---|
| 001 | 61,696 | 37 | Drainage from the employee/overflow parking lot is collected via storm grates and discharged south via a culvert. | ☒ |
| 002 | 105,777 | 30 | Drainage from the rooftops, southwest parking lots, universal waste area, loading docks discharges southwest of the facility via sheet flow. | ☐ |

| | | | | |
|---|---|---|---|---|
| 003 | 38,947 | 91 | Drainage from the west parking lot, residual waste area, loading docks Drains into a seepage pit with overflow discharging into a field to the west of the facility via a culvert. | ☐ |
| 004 | 155,291 | 100 | Drainage from the rooftops and concrete storage pad in the north discharge further north to a retention basin that eventually discharges to the northwest via a headwall. | ☒ |
| 005 | 97,943 | 100 | Drainage from the rooftop, storage tank area, and loading/unloading docks. Drains into a seepage pit with overflow discharging to a grass swale along the east/southeast of the facility. This swale eventually discharges to another swale running along the front of the facility in the south. | ☐ |

The following table summarizes the BMPs applied for each drainage area:

| Outfall / IMP No. | Sampling Completed? | Representative Outfall No. | Treatment? | Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater | PCSM? |
|---|---|---|---|---|---|
| 001 | ☐ | | ☐ | Minimize usage, maximize recycling and investigate use of least hazardous materials. Formal daily inspections are made of both raw material and waste storage facilities to ensure their integrity. Raw materials and products are stored in enclosed or covered areas. Good housekeeping including sweeping/cleaning in raw material storage and production areas on a periodic basis. | ☐ |
| 002 | ☒ | | ☐ | Minimize usage, maximize recycling and investigate use of least hazardous materials. Formal daily inspections are made of both raw material and waste storage facilities to ensure their integrity. Raw materials and products are stored in enclosed or covered areas. Good housekeeping including sweeping/cleaning in raw material storage and production areas on a periodic basis. | ☐ |
| 003 | ☒ | | ☐ | Minimize usage, maximize recycling and investigate use of least hazardous materials. Formal daily inspections are made of both raw material and waste storage facilities to ensure their integrity. Raw materials and products are stored in enclosed or covered areas. Good housekeeping including sweeping/cleaning in raw material storage and production areas on a periodic basis. Stormwater drains into a seepage pit with overflow discharging into a field to the west of the facility via a culvert. | ☐ |
| 004 | ☐ | | ☐ | Minimize usage, maximize recycling and investigate use of least hazardous materials. Formal daily inspections are made of both raw material and waste storage facilities to ensure their integrity. Raw materials and products are stored in enclosed or covered areas. Good housekeeping including sweeping/cleaning in raw material storage and production areas on a periodic basis. | ☐ |

| | | | | | |
|---|---|---|---|---|---|
| 005 | ☒ | | ☐ | Minimize usage, maximize recycling and investigate use of least hazardous materials. Formal daily inspections are made of both raw material and waste storage facilities to ensure their integrity. Raw materials and products are stored in enclosed or covered areas. Good housekeeping including sweeping/cleaning in raw material storage and production areas on a periodic basis. Stormwater drains into a seepage pit with overflow discharging discharges to a grass swale along the east/southeast of the facility. | ☐ |

The following table summarizes the sample results for all sampling outfalls:

**Outfall 002:**

| Pollutant | Average Concentration | | Maximum Concentration | | No. Storm Events Sampled | Quantitation Limit |
|---|---|---|---|---|---|---|
| | Grab Sample | Flow-Weighted Composite Sample | Grab Sample | Flow-Weighted Composite Sample | | |
| Oil and Grease (mg/L) | 2.4 | | 2.4 | | 1 | 1.5 |
| BOD5 (mg/L) | 20 | | 20 | | 1 | 20 |
| COD (mg/L) | 81 | | 81 | | 1 | 10 |
| TSS (mg/L) | 58 | | 58 | | 1 | 1.3 |
| Total Nitrogen (mg/L) | 3.7 | | 3.7 | | 1 | 0.79 |
| Total Phosphorus (mg/L) | 0.21 | | 0.21 | | 1 | 0.050 |
| pH (S.U.) | Min: 7.27 | Max: | Min: 7.27 | Max: | 1 | XXX |

**Outfall 003:**

| Pollutant | Average Concentration | | Maximum Concentration | | No. Storm Events Sampled | Quantitation Limit |
|---|---|---|---|---|---|---|
| | Grab Sample | Flow-Weighted Composite Sample | Grab Sample | Flow-Weighted Composite Sample | | |
| Oil and Grease (mg/L) | 2.0 | | 2.0 | | 1 | 1.5 |
| BOD5 (mg/L) | 32 | | 32 | | 1 | 20 |
| COD (mg/L) | 110 | | 110 | | 1 | 13 |
| TSS (mg/L) | 20 | | 20 | | 1 | 2.0 |
| Total Nitrogen (mg/L) | 4.6 | | 4.6 | | 1 | 0.79 |
| Total Phosphorus (mg/L) | 0.32 | | 0.32 | | 1 | 0.050 |
| pH (S.U.) | Min: 7.30 | Max: | Min: 7.30 | Max: | 1 | XXX |

**Outfall 005:**

| Pollutant | Average Concentration | | Maximum Concentration | | No. Storm Events Sampled | Quantitation Limit |
|---|---|---|---|---|---|---|
| | Grab Sample | Flow-Weighted Composite Sample | Grab Sample | Flow-Weighted Composite Sample | | |
| Oil and Grease (mg/L) | 1.7 | | 1.7 | | 1 | 1.5 |
| BOD5 (mg/L) | 100 | | 100 | | 1 | 20 |
| COD (mg/L) | 380 | | 380 | | 1 | 50 |
| TSS (mg/L) | 52 | | 52 | | 1 | 5.0 |

| | | | | | | |
|---|---|---|---|---|---|---|
| Total Nitrogen (mg/L) | 9.9 | | 9.9 | | 1 | 3.8 |
| Total Phosphorus (mg/L) | 1.5 | | 1.5 | | 1 | 0.050 |
| pH (S.U.) | Min: 7.27 | Max: | Min: 7.27 | Max: | 1 | XXX |

The COD concentration from all outfalls seems higher. The Operations Section is notified to conduct an inspection to the facility to identify the cause of high COD before the final permit can be issued.

The facility created a PPC plan on December 22, 2022.

No change is proposed for this renewal.

## Compliance History

**DMR Data for Outfall 002 (from February 1, 2024 to January 31, 2025)**

| Parameter | JAN-25 | DEC-24 | NOV-24 | OCT-24 | SEP-24 | AUG-24 | JUL-24 | JUN-24 | MAY-24 | APR-24 | MAR-24 | FEB-24 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| pH (S.U.) Daily Maximum | | 7.27 | | | | | | 8.12 | | | | |
| BOD5 (mg/L) Daily Maximum | | < 20 | | | | | | 13 | | | | |
| COD (mg/L) Daily Maximum | | 81 | | | | | | 92 | | | | |
| TSS (mg/L) Daily Maximum | | 58 | | | | | | 6.7 | | | | |
| Oil and Grease (mg/L) Daily Maximum | | 2.4 | | | | | | 1.6 | | | | |
| Nitrate-Nitrite (mg/L) Daily Maximum | | 0.48 | | | | | | 0.93 | | | | |
| Total Nitrogen (mg/L) Daily Maximum | | 3.7 | | | | | | 2.8 | | | | |
| Total Phosphorus (mg/L) Daily Maximum | | 0.21 | | | | | | 0.10 | | | | |

**DMR Data for Outfall 003 (from February 1, 2024 to January 31, 2025)**

| Parameter | JAN-25 | DEC-24 | NOV-24 | OCT-24 | SEP-24 | AUG-24 | JUL-24 | JUN-24 | MAY-24 | APR-24 | MAR-24 | FEB-24 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| pH (S.U.) Daily Maximum | | 7.30 | | | | | | 7.94 | | | | |
| BOD5 (mg/L) Daily Maximum | | 32 | | | | | | 10 | | | | |
| COD (mg/L) Daily Maximum | | 110 | | | | | | 74 | | | | |
| TSS (mg/L) Daily Maximum | | 20 | | | | | | 6.9 | | | | |
| Oil and Grease (mg/L) Daily Maximum | | 2.0 | | | | | | 1.9 | | | | |
| Nitrate-Nitrite (mg/L) Daily Maximum | | 0.53 | | | | | | 0.65 | | | | |
| Total Nitrogen (mg/L) Daily Maximum | | 4.6 | | | | | | 3.0 | | | | |
| Total Phosphorus (mg/L) Daily Maximum | | 0.32 | | | | | | 0.093 | | | | |

**DMR Data for Outfall 005 (from February 1, 2024 to January 31, 2025)**

| Parameter | JAN-25 | DEC-24 | NOV-24 | OCT-24 | SEP-24 | AUG-24 | JUL-24 | JUN-24 | MAY-24 | APR-24 | MAR-24 | FEB-24 |
|---|---|---|---|---|---|---|---|---|---|---|---|---|
| pH (S.U.) Daily Maximum | | 7.27 | | | | | | 7.90 | | | | |
| BOD5 (mg/L) Daily Maximum | | 100 | | | | | | 5.6 | | | | |
| COD (mg/L) Daily Maximum | | 380 | | | | | | 68 | | | | |
| TSS (mg/L) Daily Maximum | | 52 | | | | | | 16 | | | | |
| Oil and Grease (mg/L) Daily Maximum | | 1.7 | | | | | | 2.3 | | | | |
| Nitrate-Nitrite (mg/L) Daily Maximum | | 0.47 | | | | | | 0.28 | | | | |
| Total Nitrogen (mg/L) Daily Maximum | | 9.9 | | | | | | 3.0 | | | | |
| Total Phosphorus (mg/L) Daily Maximum | | 1.5 | | | | | | 0.18 | | | | |

## Site Inspection Summary

June 25, 2020: CEI conducted to verify that the permittee was no longer treating NCCW. No violation noted.

December 14, 2022: SW Inspection conducted to verify the three active and discharging outfalls (Outfall 002, 003, and 005). The property appeared clean with no trash observed.

**Current Effluent Limits**

Outfall 002, 003, and 005

| Parameter | Effluent Limitations | | | | | | Monitoring Requirements | |
|---|---|---|---|---|---|---|---|---|
| | Mass Units (lbs/day) | | Concentrations (mg/L) | | | | Minimum [(1)] 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 |
| Biochemical Oxygen Demand (BOD5) | XXX | XXX | XXX | XXX | Report | XXX | 1/6 months | Grab |
| Chemical Oxygen Demand (COD) | XXX | XXX | XXX | XXX | Report | XXX | 1/6 months | Grab |
| Total Suspended Solids | XXX | XXX | XXX | XXX | Report | XXX | 1/6 months | Grab |
| Oil and Grease | XXX | XXX | XXX | XXX | Report | XXX | 1/6 months | Grab |
| Nitrate-Nitrite as N | 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 |

Outfalls 001 and 004 are not monitored.

## Development of Effluent Limitations

**Outfall No.** 002 **Design Flow (MGD)** 0
**Latitude** 39º 57' 7.6" **Longitude** -75º 56' 10.5"
**Wastewater Description:** Stormwater (SW)

**Outfall No.** 003 **Design Flow (MGD)** 0
**Latitude** 39º 57' 13.6" **Longitude** -75º 56' 16.5"
**Wastewater Description:** Stormwater (SW)

**Outfall No.** 005 **Design Flow (MGD)** 0
**Latitude** 39º 57' 12.5" **Longitude** -75º 56' 3.9"
**Wastewater Description:** Stormwater (SW)

**Stormwater Technology Limits**

Outfalls 002, 003, and 005 will be subject to PAG-03 General Stormwater permit conditions as a minimum requirement because the outfalls discharge stormwater associated with industrial activity. The primary SIC code for the site is 2082-Malt Beverages and the corresponding appendix of the PAG-03 that would apply to the facility is Appendix I- Food and Kindred Products. The reporting requirements applicable to stormwater discharges are shown in Table 1 below. Along with the monitoring requirements, sector specific BMPs included in Appendix I of the PAG-03 will also be included in Part C of the Draft Permit.

Table 1:

| Pollutant | Monitoring Requirements [1],[2] | | Benchmark Values |
|---|---|---|---|
| | Minimum Measurement Frequency | Sample Type | |
| Total Nitrogen (mg/L) [3] | 1 / 6 months | Calculation | XXX |
| Total Phosphorus (mg/L) | 1 / 6 months | Grab | XXX |
| pH (S.U.) | 1 / 6 months | Grab | 9.0 |
| 5-Day Biochemical Oxygen Demand (BOD5) (mg/L) | 1 / 6 months | Grab | 30 |
| Total Suspended Solids (TSS) (mg/L) | 1 / 6 months | Grab | 100 |
| Chemical Oxygen Demand (COD) (mg/L) | 1 / 6 months | Grab | 120 |
| Nitrate + Nitrite-Nitrogen (mg/L) | 1 / 6 months | Grab | XXX |
| Oil and Grease (mg/L) | 1 / 6 months | Grab | 30 |

Footnotes
(1) In accordance with Part C V.C, the permittee shall conduct additional monitoring if specified by DEP in the letter authorizing permit coverage or other correspondence.

(2) This is the minimum number of sampling events required. Permittees may optionally perform additional sampling.

(3) Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO2+NO3-N), where TKN and NO2+NO3-N are measured in the same sample.

These are existing limits and will be carried over.

**Water Quality-Based Limitations**

Stormwater WQBELs
Water quality analyses are typically performed under low-flow (Q7-10) stream conditions. Stormwater discharges occur at variable rates and frequencies but not however during Q7-10 conditions. Since the discharge from Outfalls 002, 003, and 005 are entirely composed of stormwater, a formal water quality analysis cannot be accurately conducted. Accordingly, water quality-based effluent limitations are not proposed.

Anti-Degradation
The receiving stream, Valley Creek, is a TSF/MF waterbody in Ch. 93. Since the discharge in not into a High Quality (HQ) or Exceptional Value (EV) watershed, Anti-degradation provision isn't applicable.

Total Maximum Daily Loads:
Octoraro Creek Watershed TMDL isn't final yet.

Anti-backsliding:
Proposed limits are at least as stringent as were in the existing permit, unless noted otherwise. Therefore, anti-backsliding provision isn't applicable.

**Outfall 001 and 004:** These outfalls were designated as no-exposure outfalls during 2022 amendment. Follow-up inspection confirmed that the NOEX conditions were maintained. These outfalls will remain NOEX outfalls unless the conditions change.

## 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 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 |
| Nitrate-Nitrite | 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 |

Compliance Sampling Location: At Outfall 002

Other Comments: None

## 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 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 |
| Nitrate-Nitrite | 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 |

Compliance Sampling Location: At Outfall 003

Other Comments: None

## 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 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 |
| Nitrate-Nitrite | 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 |

Compliance Sampling Location: At Outfall 005

Other Comments: None