

Application Type Renewal
 Facility Type Non-Municipal
 Major / Minor Minor

**NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE**

Application No. PA0254266
 APS ID 1044980
 Authorization ID 1364412

Applicant and Facility Information

Applicant Name	<u>Family Guidance Inc.</u>	Facility Name	<u>Promise Camp STP</u>
Applicant Address	<u>227 Lance Road</u> <u>Clinton, PA 15026-1567</u>	Facility Address	<u>227 Lance Road</u> <u>Clinton, PA 15026-1567</u>
Applicant Contact	<u>Stephen Cratsa</u>	Facility Contact	<u>Same as Applicant</u>
Applicant Phone	<u>(412) 862-1998</u>	Facility Phone	<u>Same as Applicant</u>
Client ID	<u>246038</u>	Site ID	<u>728049</u>
Ch 94 Load Status	<u>Not Overloaded</u>	Municipality	<u>Hanover Township</u>
Connection Status	<u>No Limitations</u>	County	<u>Beaver</u>
Date Application Received	<u>July 21, 2021</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>August 11, 2021</u>	If No, Reason	<u></u>
Purpose of Application	<u>Application for renewal of an NPDES Permit for treated sewage effluent.</u>		

Summary of Review

The permittee has applied for a renewal of NPDES Permit No. PA0254266. NPDES Permit No. PA0245266 was previously issued by the PA Department of Environmental Protection (DEP) on January 24, 2017 and expired on January 31, 2022. The renewal application was submitted in a timely manner; therefore, the permit was granted an administrative extension.

Sewage from this facility is treated by septic tanks, sand filtration, chlorination, and dichlorination prior to discharge to Trib 33690 of Little Traverse Creek through Outfall 001. Trib 33690 of Little Traverse Creek is classified as a Warm Water Fishery (WWF) per Chapter 93 Designated Use.

The applicant is currently enrolled in and will continue to use eDMR.

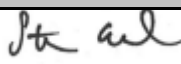

Sludge produced at this facility is pumped and disposed of by Dalton's Service Company LLC.

The Act-14 PL 834 Municipal Notification was provided by the July 17, 2021 letters from Stephen Cratsa at Family Guidance Inc to Hanover Township and Beaver County. No comments were received.

Since the last permit:

- Ammonia-nitrogen summer and winter limits have become more restrictive.
- Total Residual Chlorine (TRC) limit has become more restrictive.
- Annual *E. coli* monitoring has been added to the permit.
- Monitoring frequency for DO, pH, and TRC was changed from 5/week to daily when discharging.

Anti-Backsliding

Approve	Deny	Signatures	Date
X		 Stephanie Conrad / Environmental Engineering Specialist	September 7, 2022
x		 Mahbuba Iasmin, Ph.D., P.E. / Environmental Engineer Manager	April 17, 2023

Summary of Review

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

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

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

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	<u>001</u>	Design Flow (MGD)	<u>0.0075</u>
Latitude	<u>40° 31' 36.54"</u>	Longitude	<u>-80° 24' 7.25"</u>
Quad Name	<u>Hookstown</u>	Quad Code	<u>1402</u>
Wastewater Description: <u>Sewage Effluent</u>			
Receiving Waters	<u>Trib 33690 of Little Traverse Creek (WWF)</u>	Stream Code	<u>33690</u>
NHD Com ID	<u>99684856</u>	RMI	<u>0.27</u>
Drainage Area	<u>0.0995</u>	Yield (cfs/mi ²)	<u>0.0047</u>
Q ₇₋₁₀ Flow (cfs)	<u>0.00047</u>	Q ₇₋₁₀ Basis	<u>0.00047</u>
Elevation (ft)	<u>1020</u>	Slope (ft/ft)	<u></u>
Watershed No.	<u>20-D</u>	Chapter 93 Class.	<u>WWF</u>
Existing Use	<u></u>	Existing Use Qualifier	<u></u>
Exceptions to Use	<u></u>	Exceptions to Criteria	<u></u>
Assessment Status	<u>Attaining Use(s)</u>		
Cause(s) of Impairment	<u></u>		
Source(s) of Impairment	<u></u>		
TMDL Status	<u>Final</u>	Name	<u>Raccoon Creek Watershed</u>
Background/Ambient Data		Data Source	
pH (SU)	<u></u>		<u></u>
Temperature (°F)	<u></u>		<u></u>
Hardness (mg/L)	<u></u>		<u></u>
Other:	<u></u>		<u></u>
Nearest Downstream Public Water Supply Intake	<u>Raccoon Creek State Park</u>		
PWS Waters	<u>Raccoon Lake</u>	Flow at Intake (MGD)	<u>0.353</u>
PWS RMI	<u>1.54</u>	Distance from Outfall (mi)	<u>4.95</u>

Changes Since Last Permit Issuance: None

Other Comments:

Treatment Facility Summary				
Treatment Facility Name: Promise Camp STP				
WQM Permit No.	Issuance Date	Purpose		
0410404	June 7, 2011	Permit issued to Family Guidance Inc. from DEP, approving construction of a new treatment facility including three septic tanks, two sand filters, chlorine disinfection, and dechlorination.		
041040	Pending	Permit pending issuance to Family Guidance Inc. from DEP, approving: <ul style="list-style-type: none"> • modifications to convert the 5,000- gallon dosing tank into an aerated equalization tank • Installation of an Evertreat 7.5 K IFAS plug flow Integrated Film Activated Sludge Moving Bed Biofilm Reactor • Installation of a tablet chlorine feeder and a 297-gallon chlorine contact tank <ul style="list-style-type: none"> • Installation of a tablet dechlorination feeder • Installation of internet service and a telemetry system <ul style="list-style-type: none"> • Installation of a refrigerated compositor 		
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary with Ammonia Reduction	Septic Tank Sand Filter	Chlorine with Dechlorination	0.0075
Hydraulic Capacity (MGD)	Organic Capacity (lbs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposal
0.0075	21.89	Not Overloaded	Pumped and Hauled	Landfill

Changes Since Last Permit Issuance: None

Other Comments: The facility is proposing construction of a new treatment plant which should be completed during the upcoming permit cycle.

Compliance History

Operations Compliance Check Summary Report

Facility: Promise Camp STP

NPDES Permit No.: PA0254266

Compliance Review Period: 7/31/2017-7/31/2022

Inspection Summary:

IN SP ID	INSPECTED DATE	IN SP TYPE	AGENCY	INSPECTION RESULT DESC	INSPECTION COMMENT
2797257	11/01/2018	Administrative/File Review	PA Dept of Environmental Protection	Violation(s) Noted	
2978842	01/06/2020	Administrative/File Review	PA Dept of Environmental Protection	Violation(s) Noted	
3209071	08/22/2021	Administrative/File Review	PA Dept of Environmental Protection	Administratively Closed	Review of eDMR Non-Compliance data for routine monitoring
3217028	07/09/2021	Compliance Evaluation	PA Dept of Environmental Protection	Violation(s) Noted	
3286329	10/14/2021	Administrative/File Review	PA Dept of Environmental Protection	Administratively Closed	Call with facility regarding status of anticipated construction for new facility

Violation Summary:

VIOL ID	VIOLATION DATE	VIOLATION TYPE	VIOLATION TYPE DESC	RESOLVED DATE
832283	11/01/2018	302.202	Operator Certification - Failure to submit annual system fee	12/12/2018
872694	01/06/2020	92A.44	NPDES - Violation of effluent limits in Part A of permit	02/04/2020
922711	07/09/2021	92A.44	NPDES - Violation of effluent limits in Part A of permit	07/27/2021
922712	07/09/2021	92A.41(A)5	NPDES - Failure to properly operate and maintain all facilities which are installed or used by the permittee to achieve compliance	07/27/2021

Open Violations by Client ID: No open violations

Enforcement Summary:

ENF ID	ENF TYPE	EXECUTED DATE	PENALTY AMOUNT	ENF FINAL STATUS	ENF CLOSED DATE
368959	NOV	11/01/2018		Comply/Closed	12/12/2018
383557	CACP	02/04/2020	\$7,800.00	Comply/Closed	02/04/2020
398130	NOV	07/27/2021		Superseded	05/03/2022
403434	COA	05/03/2022	\$7,750.00		

DMR Violation Summary:

END	Outfall	PARAMETER	SAMPLE	PERMIT	UNITS	STAT_BASE_CODE
9/30/2017	1	Ammonia-Nitrogen	13.3	2.6	mg/L	Average Monthly
11/30/2017	1	Ammonia-Nitrogen	39.55	8.5	mg/L	Average Monthly
12/31/2017	1	Ammonia-Nitrogen	13.6	8.5	mg/L	Average Monthly
1/31/2018	1	Ammonia-Nitrogen	25	8.5	mg/L	Average Monthly
2/28/2018	1	Ammonia-Nitrogen	18.1	8.5	mg/L	Average Monthly
3/31/2018	1	Ammonia-Nitrogen	56.4	8.5	mg/L	Average Monthly
5/31/2018	1	Total Residual Chlorine (TRC)	4.5	1	mg/L	Average Monthly
7/31/2018	1	Ammonia-Nitrogen	47.7	2.6	mg/L	Average Monthly
7/31/2018	1	Carbonaceous Biochemical Oxygen Demand (CBOD5)	114	50	mg/L	Instantaneous Maximum
7/31/2018	1	Carbonaceous Biochemical Oxygen Demand (CBOD5)	69.8	25	mg/L	Average Monthly
7/31/2018	1	Dissolved Oxygen	0.3	4	mg/L	Minimum
7/31/2018	1	Flow	0.074	0.0075	MGD	Average Monthly
7/31/2018	1	Total Residual Chlorine (TRC)	1.17	1	mg/L	Average Monthly
8/31/2018	1	Ammonia-Nitrogen	22.5	2.6	mg/L	Average Monthly
8/31/2018	1	Dissolved Oxygen	2.3	4	mg/L	Minimum
8/31/2018	1	Fecal Coliform	6000	1000	CFU/100 ml	Instantaneous Maximum
9/30/2018	1	Ammonia-Nitrogen	12.7	2.6	mg/L	Average Monthly
9/30/2018	1	Flow	0.0364	0.0075	MGD	Average Monthly
10/31/2018	1	Ammonia-Nitrogen	4.1	2.6	mg/L	Average Monthly
2/28/2019	1	Ammonia-Nitrogen	8.7	8.5	mg/L	Average Monthly
3/31/2019	1	Ammonia-Nitrogen	15.3	8.5	mg/L	Average Monthly
5/31/2019	1	Flow	0.0131	0.0075	MGD	Average Monthly
5/31/2019	1	Total Residual Chlorine (TRC)	1	0.2	mg/L	Average Monthly
6/30/2019	1	Ammonia-Nitrogen	7.3	2.6	mg/L	Average Monthly
6/30/2019	1	Total Residual Chlorine (TRC)	1	0.2	mg/L	Average Monthly
7/31/2019	1	Ammonia-Nitrogen	44.4	2.6	mg/L	Average Monthly
7/31/2019	1	Carbonaceous Biochemical Oxygen Demand (CBOD5)	26	25	mg/L	Average Monthly
7/31/2019	1	Dissolved Oxygen	3.9	4	mg/L	Minimum
7/31/2019	1	Flow	0.009	0.0075	MGD	Average Monthly
7/31/2019	1	Total Residual Chlorine (TRC)	1	0.2	mg/L	Average Monthly
8/31/2019	1	Ammonia-Nitrogen	10.5	2.6	mg/L	Average Monthly
8/31/2019	1	Flow	0.0139	0.0075	MGD	Average Monthly
9/30/2019	1	Flow	0.0147	0.0075	MGD	Average Monthly
9/30/2019	1	Total Residual Chlorine (TRC)	1	0.2	mg/L	Average Monthly
12/31/2019	1	pH				
5/31/2020	1	Ammonia-Nitrogen	6.7	2.6	mg/L	Average Monthly
6/30/2020	1	Ammonia-Nitrogen	2.8	2.6	mg/L	Average Monthly
6/30/2021	1	Ammonia-Nitrogen	17	2.6	mg/L	Average Monthly
6/30/2021	1	Carbonaceous Biochemical Oxygen Demand (CBOD5)	28.5	25	mg/L	Average Monthly
7/31/2021	1	Ammonia-Nitrogen	31.2	2.6	mg/L	Average Monthly
8/31/2021	1	Ammonia-Nitrogen	6	2.6	mg/L	Average Monthly
2/28/2022	1	Ammonia-Nitrogen	28.9	8.5	mg/L	Average Monthly
6/30/2022	1	Ammonia-Nitrogen	4.565	2.6	mg/L	Average Monthly

Compliance Status: Facility was issued a COA for violations of effluent exceedances and construction of new STP to prevent future effluent violations

Completed by: Amanda Schmidt

Completed date: 9/6/22

Compliance History

DMR Data for Outfall 001 (from August 1, 2021 to July 31, 2022)

Parameter	JUL-22	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21
Flow (MGD) Average Monthly	0.0021	0.0012	0.00028	0.00058 7	0.00064	0.00033	0.00019 4	0.00007 1	0.00009 6	0.00146	0.00025	0.00039
pH (S.U.) Minimum	7.0	7.0	7.0	7.0	7.0	7.0	7.0	7.0	7.0	7.1	7.0	7.0
pH (S.U.) Maximum	7.2	7.2	7.2	7.2	7.1	7.2	7.2	7.2	7.2	7.2	7.2	7.2
DO (mg/L) Minimum	5.2	7.2	8.2	8.2	8.0	6.0	5.4	7.3	7.2	7.3	6.9	6.0
TRC (mg/L) Average Monthly	0.022	0.017	0.019	0.017	0.016	0.016	0.026	0.022	0.019	0.017	0.018	0.02
CBOD5 (mg/L) Average Monthly	24.45	6.55	6.35	7.1	4.1	8.55	4.45	3.25	3.3	9.25	8.1	6.5
CBOD5 (mg/L) Instantaneous Maximum	29.8	7.0	9.3	8.3	4.1	13	5.6	4.1	4.6	10.4	11.1	9.6
TSS (mg/L) Average Monthly	18	1	3	< 1	3	1	1	1	1	4.5	10	1.5
TSS (mg/L) Instantaneous Maximum	26	1	5	< 1	6	1	1	1	1	8	16	3.0
Fecal Coliform (CFU/100 ml) Geometric Mean	9800	< 1	< 1	< 1	< 1	5	1	1	1	3	40.5	7.5
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	10000	< 1	< 1	< 1	< 1	10	1	1	1	6	58	13
Total Nitrogen (mg/L) Daily Maximum								E				
Ammonia (mg/L) Average Monthly	16.78	4.565	< 0.3	< 0.3	< 0.30	28.9	0.3	0.3	0.3	0.3	0.57	6.0
Ammonia (mg/L) Instantaneous Maximum	29.5	8.83	< 0.3							0.3	0.84	12
Total Phosphorus (mg/L) Daily Maximum								E				

Compliance History

Effluent Violations for Outfall 001, from: September 1, 2021 To: July 31, 2022

Parameter	Date	SBC	DMR Value	Units	Limit Value	Units
Fecal Coliform	07/31/22	Geo Mean	9800	CFU/100 ml	200	CFU/100 ml
Fecal Coliform	07/31/22	IMAX	10000	CFU/100 ml	1000	CFU/100 ml
Ammonia	06/30/22	Avg Mo	4.565	mg/L	2.6	mg/L
Ammonia	02/28/22	Avg Mo	28.9	mg/L	8.5	mg/L
Ammonia	07/31/22	Avg Mo	16.78	mg/L	2.6	mg/L

Summary of Inspections:

Other Comments: This facility serves a camp, which has intermittent sewage use. There was no flow reported between July of 2020 and May of 2021.

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Development of Effluent Limitations

Outfall No. <u>001</u>	Design Flow (MGD) <u>0.0075</u>
Latitude <u>40° 31' 36.54"</u>	Longitude <u>-80° 24' 7.25"</u>
Wastewater Description: <u>Sewage Effluent</u>	

Technology-Based Limitations (TBELs)

The following technology-based limitations apply, subject to water quality analysis and BPJ where applicable:

Pollutant	Limit (mg/l)	SBC	Federal Regulation	State Regulation
Flow (MGD)	Report	Average Monthly	-	92a.27, 92a.61
CBOD5	25	Average Monthly	133.102(a)(4)(i)	92a.47(a)(1)
	40	Average Weekly	133.102(a)(4)(ii)	92a.47(a)(2)
Total Suspended Solids	30	Average Monthly	133.102(b)(1)	92a.47(a)(1)
	45	Average Weekly	133.102(b)(2)	92a.47(a)(2)
Total Residual Chlorine	0.5	Average Monthly	-	92a.48(b)(2)
Ammonia-Nitrogen	25	Average Monthly	-	BPJ
Dissolved Oxygen	4.0	Min	-	BPJ
pH	6.0 – 9.0 S.U.	Min – Max	133.102(c)	95.2(1)
Total Nitrogen	Report	Average Monthly	-	92a.61
Total Phosphorus	Report	Average Monthly	-	92a.61
Fecal Coliform (5/1 – 9/30)	200 / 100 ml	Geo Mean	-	92a.47(a)(4)
Fecal Coliform (5/1 – 9/30)	1,000 / 100 ml	IMAX	-	92a.47(a)(4)
Fecal Coliform (10/1 – 4/30)	2,000 / 100 ml	Geo Mean	-	92a.47(a)(5)
Fecal Coliform (10/1 – 4/30)	10,000 / 100 ml	IMAX	-	92a.47(a)(5)

Water Quality-Based Limitations (WQBELs)

Pursuant to EPA’s approval of Pennsylvania’s 2017 Triennial Review of Water Quality Standards and corresponding regulatory changes published in the *Pennsylvania Bulletin* on July 11, 2020, new water quality criteria for ammonia-nitrogen apply to waters of the commonwealth. Therefore, WQBELs for Outfall 002 are being re-evaluated even though there have been no changes to the facility.

WQM 7.0 Water Quality Modeling

The Department’s WQM 7.0 version 1.1 model is a Microsoft Access ® Program used for sewage dischargers to determine whether TBELs are sufficient to meet in-stream water quality criteria for ammonia-nitrogen, carbonaceous biochemical oxygen demand (CBOD₅), and dissolved oxygen (DO). To accomplish this, the model simultaneously simulates mixing and degradation of ammonia-nitrogen and mixing and consumption of DO through CBOD₅ and ammonia-nitrogen degradation. WQM 7.0 determines the highest pollutant loadings that the stream can assimilate while still meeting water quality criteria under design conditions.

The model is a two-step process. The discharge is first modeled for the summer period (May through October) because warm temperatures are more likely to result in critical loading conditions. Reduced DO levels likely also play a role in ammonia toxicity and solubility of DO decreases at increased water temperature. If summer modeling determines WQBELs are appropriate for the summer period, then modeling is completed for the winter period (November through

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April). This is in accordance with the Department's *Implementation Guidance of Section 9.7 Ammonia Criteria* [Doc. No. 391-2000-013] (Ammonia Guidance).

River Mile Index (RMI) was measured in eMAP PA as the distance from the facility's outfall to the mouth of the Ohio River. Elevation was read by applying a topomap in eMAP PA. Discharge point and downstream drainage areas as well as Q₇₋₁₀ flow were generated by USGS Stream Stats. USGS Stream Stats output files are included in Attachment A. In the absence of site-specific data, discharge temperature, stream temperature, and stream pH were assumed to be 20, 25, and 7 in accordance with the Ammonia Guidance. Stream width to depth was assumed to be 10 in accordance with the Department's *Technical Reference Guide (TRG) WQM 7.0 for Windows Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen Version 1.0* [Doc No. 391-2000-007].

WQM 7.0 modeling inputs are documented in the table below:

Discharge Characteristics		Basin/Stream Characteristics	
Parameter	Value	Parameter	Value
River Mile Index (RMI)	0.270	Drainage Area (mile)	0.10
Discharge Flow (MGD)	0.0075	Q ₇₋₁₀ (cfs)	0.0005
Discharge Temp (°C)	20.0	Low-flow yield (cfs/mi ²)	0.005
Ammonia-Nitrogen (mg/L)	2.60	Elevation (ft)	1020
CBOD ₅ (mg/L)	25.0	Stream Width/Depth	10
DO (mg/L)	4.0	Stream Temp (°C)	25.0
pH (s.u.)	7.0	Stream pH (s.u.)	7.0

The discharge was modeled using WQM 7.0 to evaluate the CBOD₅, ammonia Nitrogen and Dissolved Oxygen parameters. The modeling confirmed that technology based effluent limitations for CBOD₅ are appropriate. The modeling also determined that new, more restrictive ammonia-nitrogen water quality-based effluent limits are necessary to meet in-stream water quality criterion. In accordance with the Department's SOP for Establishing *Effluent Limitations for Individual Sewage Permits* [SOP No. BCW-PMT-033 Version 1.9] a seasonal multiplier of three times the summertime average monthly limit should be established for the winter period. Winter ammonia-nitrogen limits were also modeled using WQM 7.0. By comparing the winter WQM 7.0 output value with the one calculated from the summer limit using a seasonal multiplier of three, the more restrictive of the two values is imposed. For this facility, the winter ammonia-nitrogen limit to be imposed was generated through WQM 7.0 modeling. WQM 7.0 output files are provided in Attachment B.

Parameter	Limit (mg/l)	SBC	Model
Ammonia-Nitrogen (winter)	3.3	Average Monthly	WQM 7.0
Ammonia-Nitrogen (summer)	2.3	Average Monthly	WQM 7.0

A review of eDMR data suggests that the facility will not be able to comply with the new ammonia-nitrogen limits. Therefore, a compliance period ending March 31, 2024 will be implemented. The compliance date reflects that the new limits will go into effect three months following the construction completion date specified in the May 2022 Consent Order and Agreement (COA).

Total Residual Chlorine Modeling

The Department's Total Residual Chlorine (TRC) Spreadsheet is a Microsoft Excel® Program used to evaluate WQBELs for TRC using a mass balance. In accordance with the Department's SOP for *Establishing Effluent Limitations for Individual Sewage Permits* [SOP No. BCW-PMT-033 Version 1.9], default values of 0.3 mg/L and 0 mg/L for in-stream and discharge chlorine demand were used to model inputs. Additionally, a discharge flow of 0.02 MGD and Q₇₋₁₀ flow of 0.0005 were used as model inputs.

TRC was re-modeled with the TRC Spreadsheet, and it was determined that a new, more restrictive WQBEL is necessary to meet in-stream water quality criteria. TRC modeling output files are provided in Attachment C. review of eDMR data suggests that the facility will not be able to comply with the new TRC or Ammonia-Nitrogen limits. Therefore, a compliance

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period ending March 31, 2024 will be implemented. The compliance date reflects that the new limits will go into effect three months following the construction completion date specified in the May 2022 Consent Order and Agreement (COA).

TRC Modeling was conducted using default stream parameter values. Because of this, the permittee has the option to conduct a site-specific study in accordance with the Department's guidance document, *Implementation Guidance Total Residual Chlorine (TRC) Regulation*. If the permittee elects to conduct a site-specific study, then they shall notify DEP of this within 60 days of permit issuance and submit the study results within 15 months of permit issuance. If the Department agrees that the study results in modification of the WBEL, then the Department will initiate an amendment to the permit. Part C. IV has been added to the permit to reflect this.

WQBELs

The table below summarizes the WQBELs which will be imposed in this permit.

Parameter	Limit (mg/l)	SBC	Model
Ammonia-Nitrogen (winter)	3.3	Average Monthly	WQM 7.0
Ammonia-Nitrogen (summer)	2.3	Average Monthly	WQM 7.0
Total Residual Chlorine	0.015	Average Monthly	TRC Spreadsheet

Best Professional Judgment (BPJ) Limitations

A Dissolved Oxygen minimum limitation of 4.0 mg/L will be implemented based on the standard in 25 PA Code Chapter 93 and best professional judgment.

Additional Considerations

In accordance with Section 1.A. of the Department's SOP for *Establishing Effluent Limitations for Individual Sewage Permits* [SOP No. SOP BCW-PMT-033 Version 1.9], pursuant to EPA approval of Pennsylvania's 2017 Triennial Review of Water Quality Standards and corresponding regulatory changes published in the *Pennsylvania Bulletin* on July 11, 2020 and under the authority of 25 Pa. Code § 93.7(a) and § 92.a.61, sewage dischargers will include monitoring, at a minimum for *E. coli*. For new and reissued permits, a monitoring frequency of 1/year will be imposed for facilities with a design flow between 0.002 and 0.05 MGD.

In accordance with Section 1.A. of the Department's SOP for *Establishing Effluent Limits for Individual Sewage Permits* [SOP No. BCW-PMT-033 Version 1.9], and under the authority of 25 Pa. Code 92a.61(b), nutrient monitoring for total nitrogen and total phosphorus will be imposed for sewage facilities with a design flow > 2,000 gallons. The intent of this monitoring is to establish the nutrient load of the wastewater and evaluate the impact that load may have on the quality of the receiving stream. During the last permit cycle, total nitrogen monitoring resulted in six samples with results ranging from 12.3 to 64.75. Total phosphorus sampling resulted in six samples with results ranging from 1.36 to 5.2. The SOP states that if the receiving stream is not impaired for nutrients, then discretion may be used in setting the monitoring frequency. Trib 33690 of Little Traverse Creek is not impaired for nutrients; therefore, a monitoring frequency of 1/year will again be imposed.

Monitoring frequency for the proposed effluent limits are based upon Table 6-3, Self-Monitoring Requirements for Sewage Dischargers, from the Department's *Technical Guidance for the Development and Specification of Effluent Limitations* [Doc No. 362-0400-001]. Please note that Monitoring Requirements were changed for Flow to 1/week Metered to be consistent with the guidance. Sample frequency for DO, pH, and TRC was changed to 1/day in accordance with Table 6-3. The facility was informed that the frequency would change during this permit cycle in a certified mail letter dated January 24, 2017 (Certified Mail No. 7000 1670 0005 1017 8731).

Consent Order and Agreement (COA)

On May 3, 2022, the Department and Family Guidance Inc. entered into a Consent Order and Agreement in order to address chronic effluent limit violations. In accordance with the COA, Family Guidance Inc. agreed to build a new facility which

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should be capable of meeting the new NPDES Permit Limits. The WQM permit application was received January 10, 2022 and is pending technical review. Family Guidance Inc. must complete construction by December 31, 2023 and submit quarterly compliance reports. These same requirements were written into Part C.II.A. of the NPDES Permit. A copy of the COA is provided in Attachment D.

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: April 1, 2024 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		
TRC	XXX	XXX	XXX	0.015	XXX	0.048	1/day	Grab
Ammonia-Nitrogen Nov 1 - Apr 30	XXX	XXX	XXX	3.3	XXX	6.5	2/month	Grab
Ammonia-Nitrogen May 1 - Oct 31	XXX	XXX	XXX	2.3	XXX	4.5	2/month	Grab

Compliance Sampling Location: Outfall 001

Other Comments:

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 March 31, 2024.

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		
TRC	XXX	XXX	XXX	0.2	XXX	0.4	1/day	Grab
Ammonia-Nitrogen Nov 1 - Apr 30	XXX	XXX	XXX	8.5	XXX	17.0	2/month	Grab
Ammonia-Nitrogen May 1 - Oct 31	XXX	XXX	XXX	2.6	XXX	Report	2/month	Grab

Compliance Sampling Location: Outfall 001

Other Comments:

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	Maximum	Instant. Maximum		
Flow (MGD)	0.0075	XXX	XXX	XXX	XXX	XXX	Weekly	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	4.0 Inst Min	XXX	XXX	XXX	1/day	Grab
CBOD5	XXX	XXX	XXX	25.0	XXX	50.0	2/month	Grab
TSS	XXX	XXX	XXX	30.0	XXX	60.0	2/month	Grab
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
Total Nitrogen	XXX	XXX	XXX	XXX	Report Daily Max	XXX	1/year	Grab
Total Phosphorus	XXX	XXX	XXX	XXX	Report Daily Max	XXX	1/year	Grab

Compliance Sampling Location: Outfall 001

Other Comments:

ATTACHMENT A

USGS Stream Stats Output

Permit No. PA0254266

Point of Discharge

StreamStats Report

Region ID: PA

Workspace ID: PA20210831135433809000

Clicked Point (Latitude, Longitude): 40.52664, -80.40202

Time: 2021-08-31 09:54:54 -0400



Basin Characteristics

Parameter Code	Parameter Description	Value	Unit
DRNAREA	Area that drains to a point on a stream	0.0995	square miles
ELEV	Mean Basin Elevation	1170	feet

Low-Flow Statistics Parameters [Low Flow Region 4]

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
DRNAREA	Drainage Area	0.0995	square miles	2.26	1400

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Downstream of Discharge

Parameter Code	Parameter Name	Value	Units	Min Limit	Max Limit
ELEV	Mean Basin Elevation	1170	feet	1050	2580

Low-Flow Statistics Disclaimers [Low Flow Region 4]

One or more of the parameters is outside the suggested range. Estimates were extrapolated with unknown errors

Low-Flow Statistics Flow Report [Low Flow Region 4]

Statistic	Value	Unit
7 Day 2 Year Low Flow	0.00198	ft ³ /s
30 Day 2 Year Low Flow	0.00425	ft ³ /s
7 Day 10 Year Low Flow	0.00047	ft ³ /s
30 Day 10 Year Low Flow	0.0012	ft ³ /s
90 Day 10 Year Low Flow	0.00272	ft ³ /s

Low-Flow Statistics Citations

Stuckey, M.H., 2006, Low-flow, base-flow, and mean-flow regression equations for Pennsylvania streams: U.S. Geological Survey Scientific Investigations Report 2006-5130, 84 p. (<http://pubs.usgs.gov/sir/2006/5130/>)

ATTACHMENT B

WQM 7.0 Modeling Results

Permit No. PA0254266

Summer

Permit No. PA0254266

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
20D	33690	Trib 33690 to Little Traverse Creek	0.270	1020.00	0.10	0.00000	0.00	<input checked="" type="checkbox"/>

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		Stream	
									Temp (°C)	pH	Temp (°C)	pH
Q7-10	0.005	0.00	0.00	0.000	0.000	10.0	0.00	0.00	25.00	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
Promis Camp STP	PA0254266	0.0075	0.0000	0.0000	0.000	20.00	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	4.00	8.24	0.00	0.00
NH3-N	2.60	0.00	0.00	0.70

Permit No. PA0254266

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
20D	33690	Trib 33690 to Little Traverse Creek	0.010	940.00	0.26	0.00000	0.00	<input checked="" type="checkbox"/>

Stream Data

Design Cond.	LFY	Trib Flow	Stream Flow	Rch Trav Time	Rch Velocity	WD Ratio	Rch Width	Rch Depth	Tributary Temp	Tributary pH	Stream Temp	Stream pH
	(cfsm)	(cfs)	(cfs)	(days)	(fps)		(ft)	(ft)	(°C)		(°C)	
Q7-10	0.005	0.00	0.00	0.000	0.000	10.0	0.00	0.00	25.00	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			

Permit No. PA0254266

WQM 7.0 Hydrodynamic Outputs

<u>SWP Basin</u>		<u>Stream Code</u>			<u>Stream Name</u>							
20D		33690			Trib 33690 to Little Traverse 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												
0.270	0.00	0.00	0.00	.0116	0.05828	.268	1.25	4.67	0.04	0.440	20.19	7.00
Q1-10 Flow												
0.270	0.00	0.00	0.00	.0116	0.05828	NA	NA	NA	0.04	0.444	20.13	7.00
Q30-10 Flow												
0.270	0.00	0.00	0.00	.0116	0.05828	NA	NA	NA	0.04	0.437	20.26	7.00

Permit No. PA0254266

WQM 7.0 Modeling Specifications

Parameters	Both	Use Inputted Q1-10 and Q30-10 Flows	<input checked="" type="checkbox"/>
WLA Method	EMPR	Use Inputted W/D Ratio	<input type="checkbox"/>
Q1-10/Q7-10 Ratio	0.64	Use Inputted Reach Travel Times	<input type="checkbox"/>
Q30-10/Q7-10 Ratio	1.36	Temperature Adjust Kr	<input checked="" type="checkbox"/>
D.O. Saturation	90.00%	Use Balanced Technology	<input checked="" type="checkbox"/>
D.O. Goal	5		

Permit No. PA0254266

WQM 7.0 Wasteload Allocations

<u>SWP Basin</u>	<u>Stream Code</u>	<u>Stream Name</u>
20D	33690	Trib 33690 to Little Traverse 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
0.270	Promis Camp ST	9.50	5.2	9.50	5.2	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
0.270	Promis Camp ST	1.88	1.98	1.88	1.98	0	0

Dissolved Oxygen Allocations

RMI	Discharge Name	<u>CBOD5</u>		<u>NH3-N</u>		<u>Dissolved Oxygen</u>		Critical Reach	Percent Reduction
		Baseline (mg/L)	Multiple (mg/L)	Baseline (mg/L)	Multiple (mg/L)	Baseline (mg/L)	Multiple (mg/L)		
0.27	Promis Camp STP	25	25	1.98	1.98	5	5	0	0

Permit No. PA0254266

WQM 7.0 D.O. Simulation

<u>SWP Basin</u>	<u>Stream Code</u>	<u>Stream Name</u>		
20D	33690	Trib 33690 to Little Traverse Creek		
<u>RMI</u>	<u>Total Discharge Flow (mgd)</u>	<u>Analysis Temperature (°C)</u>	<u>Analysis pH</u>	
0.270	0.007	20.194	7.000	
<u>Reach Width (ft)</u>	<u>Reach Depth (ft)</u>	<u>Reach WDRatio</u>	<u>Reach Velocity (fps)</u>	
1.250	0.268	4.673	0.036	
<u>Reach CBOD5 (mg/L)</u>	<u>Reach Kc (1/days)</u>	<u>Reach NH3-N (mg/L)</u>	<u>Reach Kn (1/days)</u>	
24.11	1.493	1.91	0.711	
<u>Reach DO (mg/L)</u>	<u>Reach Kr (1/days)</u>	<u>Kr Equation</u>	<u>Reach DO Goal (mg/L)</u>	
5.126	26.975	Owens	5	
<u>Reach Travel Time (days)</u>	<u>Subreach Results</u>			
0.440	<u>TravTime (days)</u>	<u>CBOD5 (mg/L)</u>	<u>NH3-N (mg/L)</u>	<u>D.O. (mg/L)</u>
	0.044	22.56	1.85	6.40
	0.088	21.11	1.79	6.88
	0.132	19.76	1.74	7.11
	0.176	18.49	1.68	7.26
	0.220	17.30	1.63	7.38
	0.264	16.19	1.58	7.49
	0.308	15.15	1.53	7.59
	0.352	14.18	1.49	7.68
	0.396	13.27	1.44	7.77
	0.440	12.42	1.40	7.85

Permit No. PA0254266

WQM 7.0 Effluent Limits

<u>SWP Basin</u>		<u>Stream Code</u>	<u>Stream Name</u>				
20D		33690	Trib 33690 to Little Traverse Creek				
<u>RMI</u>	<u>Name</u>	<u>Permit Number</u>	<u>Disc Flow (mgd)</u>	<u>Parameter</u>	<u>Effl. Limit 30-day Ave. (mg/L)</u>	<u>Effl. Limit Maximum (mg/L)</u>	<u>Effl. Limit Minimum (mg/L)</u>
0.270	Promis Camp STP	PA0254266	0.007	CBOD5	25		
				NH3-N	1.98	3.96	
				Dissolved Oxygen			5

Winter

Permit No. PA0254266

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
20D	33690	Trib 33690 to Little Traverse Creek	0.270	1020.00	0.10	0.00000	0.00	<input checked="" type="checkbox"/>

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		Stream	
									Temp (°C)	pH	Temp (°C)	pH
Q7-10	0.009	0.00	0.00	0.000	0.000	10.0	0.00	0.00	5.00	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
Promis Camp STP	PA0254266	0.0075	0.0000	0.0000	0.000	15.00	7.00

Parameter Name	Parameter Data			
	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	12.51	0.00	0.00
NH3-N	8.50	0.00	0.00	0.70

Permit No. PA0254266

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
20D	33690	Trib 33690 to Little Traverse Creek	0.010	940.00	0.26	0.00000	0.00	<input checked="" type="checkbox"/>

Stream Data

Design Cond.	LFY (cfs)	Trib Flow (cfs)	Stream Flow (cfs)	Rch Trav Time (days)	Rch Velocity (fps)	WD Ratio	Rch Width (ft)	Rch Depth (ft)	Tributary		Stream	
									Temp (°C)	pH	Temp (°C)	pH
Q7-10	0.009	0.00	0.00	0.000	0.000	10.0	0.00	0.00	5.00	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			

Permit No. PA0254266

WQM 7.0 Hydrodynamic Outputs

<u>SWP Basin</u>		<u>Stream Code</u>			<u>Stream Name</u>							
20D		33690			Trib 33690 to Little Traverse 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												
0.270	0.00	0.00	0.00	.0116	0.05828	.27	1.26	4.68	0.04	0.431	14.25	7.00
Q1-10 Flow												
0.270	0.00	0.00	0.00	.0116	0.05828	NA	NA	NA	0.04	0.438	14.51	7.00
Q30-10 Flow												
0.270	0.00	0.00	0.00	.0116	0.05828	NA	NA	NA	0.04	0.425	14.01	7.00

Permit No. PA0254266

WQM 7.0 Modeling Specifications

Parameters	Both	Use Inputted Q1-10 and Q30-10 Flows	<input checked="" type="checkbox"/>
WLA Method	EMPR	Use Inputted W/D Ratio	<input type="checkbox"/>
Q1-10/Q7-10 Ratio	0.64	Use Inputted Reach Travel Times	<input type="checkbox"/>
Q30-10/Q7-10 Ratio	1.38	Temperature Adjust Kr	<input checked="" type="checkbox"/>
D.O. Saturation	90.00%	Use Balanced Technology	<input checked="" type="checkbox"/>
D.O. Goal	5		

Permit No. PA0254266

WQM 7.0 Wasteload Allocations

SWP Basin Stream Code Stream Name
20D 33690 Trib 33690 to Little Traverse 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
0.270	Promis Camp ST	14.54	15.29	14.54	15.29	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
0.270	Promis Camp ST	2.99	3.32	2.99	3.32	0	0

Dissolved Oxygen Allocations

RMI	Discharge Name	<u>COD5</u>		<u>NH3-N</u>		<u>Dissolved Oxygen</u>		Critical Reach	Percent Reduction
		Baseline (mg/L)	Multiple (mg/L)	Baseline (mg/L)	Multiple (mg/L)	Baseline (mg/L)	Multiple (mg/L)		
0.27	Promis Camp STP	25	25	3.32	3.32	5	5	0	0

Permit No. PA0254266

WQM 7.0 D.O. Simulation

<u>SWP Basin</u>	<u>Stream Code</u>	<u>Stream Name</u>		
20D	33690	Trib 33690 to Little Traverse Creek		
<u>RMJ</u>	<u>Total Discharge Flow (mgd)</u>	<u>Analysis Temperature (°C)</u>	<u>Analysis pH</u>	
0.270	0.007	14.254	7.000	
<u>Reach Width (ft)</u>	<u>Reach Depth (ft)</u>	<u>Reach WDRatio</u>	<u>Reach Velocity (fps)</u>	
1.263	0.270	4.685	0.037	
<u>Reach CBOD5 (mg/L)</u>	<u>Reach Kc (1/days)</u>	<u>Reach NH3-N (mg/L)</u>	<u>Reach Kn (1/days)</u>	
23.28	1.488	3.07	0.450	
<u>Reach DO (mg/L)</u>	<u>Reach Kr (1/days)</u>	<u>Kr Equation</u>	<u>Reach DO Goal (mg/L)</u>	
5.560	23.455	Owens	5	
<u>Reach Travel Time (days)</u>	<u>Subreach Results</u>			
0.431	<u>TravTime (days)</u>	<u>CBOD5 (mg/L)</u>	<u>NH3-N (mg/L)</u>	<u>D.O. (mg/L)</u>
	0.043	22.16	3.02	7.33
	0.086	21.10	2.98	8.03
	0.129	20.09	2.90	8.33
	0.172	19.12	2.84	8.49
	0.216	18.20	2.79	8.60
	0.259	17.33	2.74	8.68
	0.302	16.49	2.68	8.75
	0.345	15.70	2.63	8.82
	0.388	14.95	2.58	8.88
	0.431	14.23	2.53	8.94

Permit No. PA0254266

WQM 7.0 Effluent Limits

<u>SWP Basin</u>		<u>Stream Code</u>		<u>Stream Name</u>			
20D		33690		Trib 33690 to Little Traverse 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)
0.270	Promis Camp STP	PA0254266	0.007	CBOD5	25		
				NH3-N	3.32	6.64	
				Dissolved Oxygen			5

ATTACHMENT C

TRC Modeling Results

Permit No. PA0254266

TRC EVALUATION					
Input appropriate values in A3:A9 and D3:D9					
0.00047	= Q stream (cfs)		0.5	= CV Daily	
0.0075	= Q discharge (MGD)		0.5	= CV Hourly	
30	= no. samples		1	= AFC_Partial Mix Factor	
0.3	= Chlorine Demand of Stream		1	= CFC_Partial Mix Factor	
0	= Chlorine Demand of Discharge		15	= AFC_Criteria Compliance Time (min)	
0.5	= BAT/BPJ Value		720	= CFC_Criteria Compliance Time (min)	
0	= % Factor of Safety (FOS)			= Decay Coefficient (K)	
Source	Reference	AFC Calculations		Reference	CFC Calculations
TRC	1.3.2.iii	WLA_afc = 0.032		1.3.2.iii	WLA_cfc = 0.024
PENTOXSD TRG	5.1a	LTAMULT_afc = 0.373		5.1c	LTAMULT_cfc = 0.581
PENTOXSD TRG	5.1b	LTA_afc = 0.012		5.1d	LTA_cfc = 0.014
Source	Effluent Limit Calculations				
PENTOXSD TRG	5.1f	AML MULT = 1.231			
PENTOXSD TRG	5.1g	AVG MON LIMIT (mg/l) = 0.015		AFC	
		INST MAX LIMIT (mg/l) = 0.048			
WLA_afc	$(.019/e^{-k \cdot AFC_tc}) + [(AFC_Yc \cdot Qs \cdot .019 / Qd \cdot e^{-k \cdot AFC_tc}) \dots + Xd + (AFC_Yc \cdot Qs \cdot Xs / Qd)]^{(1-FOS/100)}$				
LTAMULT_afc	$EXP((0.5 \cdot LN(cvh^2 + 1)) - 2.326 \cdot LN(cvh^2 + 1)^{0.5})$				
LTA_afc	wla_afc * LTAMULT_afc				
WLA_cfc	$(.011/e^{-k \cdot CFC_tc}) + [(CFC_Yc \cdot Qs \cdot .011 / Qd \cdot e^{-k \cdot CFC_tc}) \dots + Xd + (CFC_Yc \cdot Qs \cdot Xs / Qd)]^{(1-FOS/100)}$				
LTAMULT_cfc	$EXP((0.5 \cdot LN(cvd^2 / no_samples + 1)) - 2.326 \cdot LN(cvd^2 / no_samples + 1)^{0.5})$				
LTA_cfc	wla_cfc * LTAMULT_cfc				
AML MULT	$EXP(2.326 \cdot LN((cvd^2 / no_samples + 1)^{0.5}) - 0.5 \cdot LN(cvd^2 / no_samples + 1))$				
AVG MON LIMIT	MIN(BAT_BPJ, MIN(LTA_afc, LTA_cfc) * AML_MULT)				
INST MAX LIMIT	1.5 * ((av_mon_limit / AML_MULT) / LTAMULT_afc)				

ATTACHMENT D

Consent Order and Agreement

Permit No. PA0254266

COMMONWEALTH OF PENNSYLVANIA
DEPARTMENT OF ENVIRONMENTAL PROTECTION

In the Matter of:

Family Guidance, Inc. : Violations of the Clean Streams Law
Promise Camp Sewage Treatment Plant
Hanover Township
Beaver County

CONSENT ORDER AND AGREEMENT

This Consent Order and Agreement is entered into this 3rd day of May, 2022, by and between the Commonwealth of Pennsylvania, Department of Environmental Protection ("Department") and Family Guidance, Inc. (hereinafter "Family Guidance").

A. The Department is the agency of the Commonwealth with the duty and authority to administer and enforce the Clean Streams Law, the Act of June 22, 1937, P.L. 1987, *as amended* ("Clean Streams Law"), 35 P.S. §§ 691.1001; Section 1917-A of the Administrative Code, the Act of April 9, 1929, P.L. 177, *as amended* ("Administrative Code"), 71 P.S. § 510-17A; and the regulations promulgated thereunder ("Regulations"). Pursuant to a delegation from the United States Environmental Protection Agency, the Department also administers the National Pollutant Discharge Elimination System ("NPDES") program of the Federal Water Pollution Control Act, 33 U.S.C. § 1342.

B. Family Guidance is a "person" as that term is defined by Section 1 of The Clean Streams Law, 35 P.S. § 691.1. Family Guidance is a Pennsylvania non-profit, non-stock entity with a mailing address of 850 Cranberry Woods Drive, Suite 2236, Cranberry Township, PA 16066.

C. Family Guidance owns and operates a sewage treatment plant known as the Promise Camp Sewage Treatment Plant located at 227 Lance Road, Clinton, PA 15068, in Hanover Township, Beaver County, Pennsylvania ("Facility").

The NPDES Permit

D. All dischargers of sewage must first obtain a permit from the Department to discharge sewage in any manner, directly or indirectly, into waters of the Commonwealth pursuant to Sections 201 and 202 of The Clean Streams Law, 35 P.S. §§ 691.201 and 691.202.

E. Pursuant to Section 92a.1(b) of the Regulations, 25 Pa. Code § 92a.1(b), a person may not discharge pollutants from a point source into surface waters except as authorized under an NPDES permit.

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F. Pursuant to Section 92a.9 of the Regulations, 25 Pa. Code § 92a.9, an NPDES permit is the discharge permit for purposes of Section 202 of The Clean Streams Law, 35 P.S. § 691.202.

G. On January 24, 2017, the Department renewed NPDES permit PA0254266 ("NPDES Permit") authorizing Family Guidance to discharge treated sewage from the Facility to an Unnamed Tributary ("UNT") to Little Traverse Creek. The UNT to Little Traverse Creek is a "water of the Commonwealth" as that term is defined by Section 1 of The Clean Streams Law, 35 P.S. § 691.1. On August 9, 2021, the Department accepted Family Guidance's application to renew the NPDES Permit. The NPDES Permit has been administratively extended while the Department reviews the application.

The Facility

H. The construction of the Facility was authorized by Water Quality Management Part II Permit No. 0410404, issued on June 7, 2011.

I. The treatment process for the Facility consists of a septic tank, dosing tank, subsurface sand filter and chlorination.

J. The Facility treats raw sewage from a seasonal summer camp and receives little to no flow during the offseason. There is insufficient sewage flow to the Facility during the offseason to operate the existing intermittent sand filter system, so the septic tank is pumped out during the offseason and the treatment process is not utilized.

K. The lack of offseason sewage flows to the Facility and dosing of the sand filter prevents the existing treatment process from functioning properly.

L. On January 10, 2022, Family Guidance submitted a new Water Quality Management Part II Permit application ("WQM Permit Application") for the Facility to replace the existing treatment process with an extended aeration sewage treatment plant to ensure proper year-round treatment of sewage entering the Facility and prevent further effluent limitation exceedances ("Redesigned Facility").

Violations of Effluent Limitations

M. Part A, Condition I of the NPDES Permit establishes effluent limitations on the discharges from the Facility for, *inter alia*, ammonia-nitrogen, fecal coliform, total residual chlorine, flow, carbonaceous biochemical oxygen demand and dissolved oxygen.

N. Part A, Condition III of the NPDES Permit requires Family Guidance to sample its discharges for compliance with the effluent limitations in the NPDES Permit and to submit the results monthly to the Department in the form of Discharge Monitoring Reports ("DMRs").

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O. On February 4, 2020, the Department and Family Guidance entered into a Consent Assessment of Civil Penalty for violations of the effluent limitations in the NPDES Permit during the period of February 2017, through and including, February 2019.

P. As evidenced by its DMRs, Family Guidance has continued to fail to comply with effluent limitations in the NPDES Permit from March 2019, through and including, August 2021. The specific violations of the effluent limitations in the NPDES Permit, which are the subject of this Consent Order and Agreement, are listed in Exhibit A, which is attached hereto and fully incorporated by reference.

Q. Family Guidance's failures to comply with the effluent limitations, as described in Paragraph P, above, constitute violations of the NPDES Permit, Section 92a.1(b) of the Regulations, 25 Pa. Code § 92a.1(b), and Sections 201 and 202 of The Clean Streams Law, 35 P.S. §§ 691.201 and 691.202; statutory nuisances under Sections 3 and 202, of The Clean Streams Law, 35 P.S. §§ 691.3 and 691.202; unlawful conduct under Section 611 of The Clean Streams Law, 35 P.S. § 691.611; and subject Family Guidance to civil penalty liability under Section 605 of The Clean Streams Law, 35 P.S. § 691.605.

After full and complete negotiation of all matters set forth in this Consent Order and Agreement and upon mutual exchange of covenants contained herein, the parties desiring to avoid litigation and intending to be legally bound, it is hereby ORDERED by the Department and AGREED to by Family Guidance as follows:

1. **Authority.** This Consent Order and Agreement is an Order of the Department authorized and issued pursuant Sections 5, 203, 316, 402, and 610 of the Clean Streams Law, 35 P.S. §§ 691.5, 691.203, 691.316, 691.402, and 691.610, and Section 1917-A of the Administrative Code, 71 P.S. § 510-17.

2. **Findings.**

a. Family Guidance agrees that the findings in Paragraphs A through Q are true and correct and, in any matter or proceeding involving Family Guidance and the Department, Family Guidance shall not challenge the accuracy or validity of these findings.

b. The parties do not authorize any other persons to use the findings in this Consent Order and Agreement in any matter or proceeding.

CORRECTIVE ACTIONS

3. Within thirty (30) days of the Department sending any technical deficiency letter ("Letter") regarding the WQM Permit Application to Family Guidance, Family Guidance shall provide to the Department complete and accurate information to resolve any deficiency cited in the Letter. The information provided by Family Guidance will allow the Department to determine that the engineer's report as well as all plans and specifications that accompanied the application, clearly show (i) the proposed treatment units of the Redesigned Facility, (ii) the

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bases of the design of the Redesigned Facility and its treatment units and (iii) compliance with all applicable statutory and regulatory requirements. Failure to do so will constitute noncompliance with this Consent Order and Agreement.

4. Upon the Department's approval of the WQM Permit Application, Family Guidance shall:

a. Fully implement the changes to the treatment process at the Facility in accordance with the approved Water Quality Management Part II Permit to ensure proper operation of the new treatment system and prevent effluent limitation exceedances; and,

b. Demolish the components of the existing treatment process at the Facility that are not utilized for the new treatment process at the Redesigned Facility, constructed in accordance with the approved Water Quality Management Part II Permit.

5. Family Guidance shall complete construction of the Redesigned Facility in accordance with the approved Water Quality Management Part II Permit by no later than December 31, 2023.

6. **Civil Penalty Settlement.** Upon signing this Consent Order and Agreement, Family Guidance shall pay a civil penalty settlement of SEVEN THOUSAND SEVEN HUNDRED FIFTY DOLLARS (\$7,750.00) in settlement of the Department's claim for civil penalties for the violations described in Paragraphs P and Q, above, which occurred prior to the execution of this Consent Order and Agreement. The payment shall be by corporate check or the like, made payable to the "Commonwealth of Pennsylvania, Clean Water Fund," and sent to the attention of Compliance Specialist, Clean Water Program, Department of Environmental Protection, 400 Waterfront Drive, Pittsburgh, PA 15222-4745.

7. **Additional Information.** If the Department requires additional information for any submittal pursuant to this Consent Order and Agreement, Family Guidance, shall provide such additional information to the Department within thirty (30) days unless a longer time is specified in the Department's notice.

8. **Progress Reports.** Beginning on April 15, 2022, Family Guidance shall submit quarterly written progress reports to the Department, documenting its efforts to comply with its obligations under this Consent Order and Agreement ("Progress Reports"). Progress Reports shall be submitted to the Department on or before January 15, April 15, July 15 and October 15 of each year for the duration of this Consent Order and Agreement, covering the time periods between January 1 to March 31, April 1 to June 30, July 1 to September 30, and October 31 to December 31 of each year, respectively. The Progress Reports shall be submitted electronically through the Department's OnBase Electronic Forms Upload tool at <https://www.dep.pa.gov/DataandTools/Pages/Application-Form-Upload.aspx>. The Progress Reports shall be addressed in accordance with Paragraph 14, below, and include, but not be limited to:

a. A description of the actions that have been taken toward achieving compliance with this Consent Order and Agreement;

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b. A description of all activities scheduled for the remainder of the Consent Order and Agreement; and,

c. A description of any problems or delays encountered or anticipated regarding the performance of the activities required by this Consent Order and Agreement.

9. **Stipulated Penalties.**

a. In the event Family Guidance fails to comply in a timely manner with any term or provision of this Consent Order and Agreement, Family Guidance shall be in violation of this Consent Order and Agreement and, in addition to other applicable remedies, shall pay a civil penalty of FIVE HUNDRED DOLLARS (\$500) per day per violation.

b. From the date of execution of this Consent Order and Agreement until the termination of this Consent Order and Agreement, for each violation of a monthly average effluent limitation in the NPDES Permit, or any amendment or renewal of the NPDES Permit, reported on the monthly Discharge Monitoring Reports, Family Guidance shall pay a stipulated civil penalty of TWO HUNDRED FIFTY DOLLARS (\$250) per violation per parameter.

c. From the date of execution of this Consent Order and Agreement until the termination of this Consent Order and Agreement, for each violation of an instantaneous maximum or minimum effluent limitation in the NPDES Permit, or any amendment or renewal of the NPDES Permit, reported on the monthly Discharge Monitoring Reports, Family Guidance shall pay a stipulated civil penalty of ONE HUNDRED DOLLARS (\$100) per violation per parameter.

d. Stipulated civil penalties shall be payable on or before the fifteenth day of the succeeding month. Payment shall be made by municipal check or the like, made payable to the "Commonwealth of Pennsylvania, Clean Water Fund" and shall be sent to Compliance Specialist, Clean Water Program, DEP, 400 Waterfront Drive, Pittsburgh 15222.

e. Any payment under this Paragraph shall neither waive Family Guidance's duty to meet its obligations under this Consent Order and Agreement nor preclude the Department from commencing an action to compel Family Guidance's compliance with the terms and conditions of this Consent Order and Agreement. The payment only resolves Family Guidance's liability for civil penalties arising from the violation of this Consent Order and Agreement for which payment is made.

f. Stipulated civil penalties shall be due automatically and without notice.

10. **Additional Remedies.**

a. In the event Family Guidance fails to comply with any provision of this Consent Order and Agreement, the Department may, in addition to the remedies prescribed herein, pursue any remedy available for a violation of an order of the Department, including an action to enforce this Consent Order and Agreement.

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b. The remedies provided by this paragraph and Paragraph 9 (Stipulated Penalties) are cumulative and the exercise of one does not preclude the exercise of any other. The failure of the Department to pursue any remedy shall not be deemed to be a waiver of that remedy. The payment of a stipulated penalty, however, shall preclude any further assessment of civil penalties for the violation for which the stipulated penalty is paid.

11. **Reservation of Rights.** The Department reserves the right to require additional measures to achieve compliance with applicable law. Family Guidance reserves the right to challenge any action which the Department may take to require those measures.

12. **Liability of Operator.** Family Guidance shall be liable for any violations of the Consent Order and Agreement, including those caused by, contributed to, or allowed by its officers, agents, employees, or contractors. Except as provided in Paragraph 13(c), Family Guidance also shall be liable for any violation of this Consent Order and Agreement caused by, contributed to, or allowed by its successors and assigns.

13. **Transfer.**

a. The duties and obligations under this Consent Order and Agreement shall not be modified, diminished, terminated or otherwise altered by the transfer of any legal or equitable interest in the Facility or any part thereof unless agreed to by the Department as set forth in Paragraph 13.c. below.

b. If Family Guidance intends to transfer any legal or equitable interest in the Facility affected by this Consent Order and Agreement, Family Guidance shall serve a copy of this Consent Order and Agreement upon the prospective transferee of the legal or equitable interest at least thirty (30) days prior to the contemplated transfer and shall simultaneously inform the Department of such intent.

c. The Department, in its sole discretion, may agree to modify or terminate Family Guidance's duties and obligations under this Consent Order and Agreement upon transfer of the Facility. Family Guidance waives its rights that it may have to challenge the Department's decision in this regard.

14. **Correspondence with Department.** All correspondence with the Department concerning this Consent Order and Agreement shall be addressed to:

Compliance Specialist
Clean Water Program
Department of Environmental Protection
400 Waterfront Drive
Pittsburgh, PA 15222-4745
Phone: 412-442-4000

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15. **Correspondence with Family Guidance.** All correspondence with Family Guidance concerning this Consent Order and Agreement shall be addressed to:

Matthew Chamberlain
Family Guidance, Inc.
850 Cranberry Woods Drive, Suite 2236
Cranberry Township, PA 16066
Phone: 412-741-8550
mchamberlain@familyguidance.net

Family Guidance shall notify the Department whenever there is a change in the contact person's name, title, or address. Service of any notice or any legal process for any purpose under this Consent Order and Agreement, including its enforcement, may be made by mailing a copy by first-class mail to the above address.

16. **Force Majeure.**

a. In the event that Family Guidance is prevented from complying in a timely manner with any time limit imposed in this Consent Order and Agreement solely because of a strike, fire, flood, act of God, or other circumstances beyond Family Guidance's control and which Family Guidance, by the exercise of all reasonable diligence, is unable to prevent, then Family Guidance may petition the Department for an extension of time. An increase in the cost of performing the obligations set forth in this Consent Order and Agreement shall not constitute circumstances beyond Family Guidance's control. Family Guidance's economic inability to comply with any of the obligations of this Consent Order and Agreement shall not be grounds for any extension of time.

b. Family Guidance shall only be entitled to the benefits of this paragraph if it notifies the Department within five (5) working days by telephone and within ten (10) working days in writing of the date it becomes aware or reasonably should have become aware of the event impeding performance. The written submission shall include all necessary documentation, as well as a notarized affidavit from an authorized individual specifying the reasons for the delay, the expected duration of the delay, and the efforts which have been made and are being made by Family Guidance to mitigate the effects of the event and to minimize the length of the delay. The initial written submission may be supplemented within ten (10) working days of its submission. Family Guidance's failure to comply with the requirements of this paragraph specifically and in a timely fashion shall render this paragraph null and of no effect as to the particular incident involved.

c. The Department will decide whether to grant all or part of the extension requested on the basis of all documentation submitted by Family Guidance and other information available to the Department. In any subsequent litigation, Family Guidance shall have the burden of proving that the Department's refusal to grant the requested extension was an abuse of discretion based upon the information then available to it.

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17. **Severability.** The paragraphs of this Consent Order and Agreement shall be severable and should any part hereof be declared invalid or unenforceable, the remainder shall continue in full force and effect between the parties.

18. **Entire Agreement.** This Consent Order and Agreement shall constitute the entire integrated agreement of the parties. No prior or contemporaneous communications or prior drafts shall be relevant or admissible for purposes of determining the meaning or extent of any provisions herein in any litigation or any other proceeding.

19. **Attorney Fees.** The parties shall bear their respective attorney fees, expenses and other costs in the prosecution or defense of this matter or any related matters, arising prior to execution of this Consent Order and Agreement.

20. **Modifications.** No changes, additions, modifications, or amendments of this Consent Order and Agreement shall be effective unless they are set out in writing and signed by the parties hereto.

21. **Titles.** A title used at the beginning of any paragraph of this Consent Order and Agreement may be used to aid in the construction of that paragraph, but shall not be treated as controlling.

22. **Decisions under Consent Order.** Any decision which the Department makes under the provisions of this Consent Order and Agreement, including a notice that civil penalties or stipulated penalties are due under this Consent Order and Agreement, is intended to be neither a final action under 25 Pa. Code §1021.2, nor an Adjudication under 2 Pa. C.S. §101. Any objection which Family Guidance may have to the decision will be preserved until the Department enforces this Consent Order and Agreement.

23. **Termination of Obligations.** The obligations of this Consent Order and Agreement, except the payment of any outstanding stipulated civil penalties due under Paragraph 9 (Stipulated Civil Penalties), shall terminate on December 31, 2025.

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IN WITNESS WHEREOF, the parties hereto have caused this Consent Order and Agreement to be executed by their duly authorized representatives. The undersigned representatives of Family Guidance certify under penalty of law, as provided by 18 Pa. C.S. § 4904, that they are authorized to execute this Consent Order and Agreement on behalf of Family Guidance; that Family Guidance consents to the entry of this Consent Order and Agreement as a final ORDER of the Department; and that Family Guidance hereby knowingly waives its rights to appeal this Consent Order and Agreement and to challenge its content or validity, which rights may be available under Section 4 of the Environmental Hearing Board Act, the Act of July 13, 1988, P.L. 530, No. 1988-94, 35 P.S. § 7514; the Administrative Agency Law, 2 Pa. C.S. § 103(a) and Chapters 5A and 7A; or any other provision of law. Signature by Family Guidance's attorney certifies only that the agreement has been signed after consulting with counsel.

FOR FAMILY GUIDANCE, INC.:

FOR THE COMMONWEALTH OF
PENNSYLVANIA DEPARTMENT OF
ENVIRONMENTAL PROTECTION:



Name:
~~President or Vice President~~
Executive Director



Christopher J. Kriley, P.E.
Program Manager
Clean Water Program
Southwest Region



Name:
Secretary or Treasurer Board Chairman



Attorney for Family Guidance, Inc.
KEVIN GABBER



Tyra Oliver
Assistant Counsel

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EXHIBIT A

Family Guidance, Inc.
Promise Camp Sewage Treatment Plant
Effluent Limitation Violations
Outfall 001

MONITORING END DATE	PARAMETER	STATISTICAL BASE CODE	PERMIT VALUE	SAMPLE VALUE	UNIT OF MEASURE
03/31/2019	Ammonia-Nitrogen	Average Monthly	8.5	15.3	mg/L
05/31/2019	Total Residual Chlorine (TRC)	Average Monthly	0.2	1.0	mg/L
05/31/2019	Flow	Average Monthly	0.0075	0.0131	MGD
06/30/2019	Ammonia-Nitrogen	Average Monthly	2.6	7.3	mg/L
06/30/2019	Total Residual Chlorine (TRC)	Average Monthly	0.2	1.0	mg/L
07/31/2019	Dissolved Oxygen	Minimum	4.0	3.9	mg/L
07/31/2019	Ammonia-Nitrogen	Average Monthly	2.6	44.4	mg/L
07/31/2019	Carbonaceous Biochemical Oxygen Demand (CBOD5)	Average Monthly	25	26	mg/L
07/31/2019	Total Residual Chlorine (TRC)	Average Monthly	0.2	1.0	mg/L
07/31/2019	Flow	Average Monthly	0.0075	0.0090	MGD
08/31/2019	Ammonia-Nitrogen	Average Monthly	2.6	10.5	mg/L
08/31/2019	Flow	Average Monthly	0.0075	0.0139	MGD
09/30/2019	Total Residual Chlorine (TRC)	Average Monthly	0.2	1.0	mg/L
09/30/2019	Flow	Average Monthly	0.0075	0.0147	MGD
05/31/2020	Ammonia-Nitrogen	Average Monthly	2.6	6.7	mg/L
06/30/2020	Ammonia-Nitrogen	Average Monthly	2.6	2.8	mg/L
06/30/2021	Ammonia-Nitrogen	Average Monthly	2.6	17.0	mg/L
06/30/2021	Carbonaceous Biochemical Oxygen Demand (CBOD5)	Average Monthly	25	28.5	mg/L
07/31/2021	Ammonia-Nitrogen	Average Monthly	2.6	31.2	mg/L
8/31/2021	Ammonia-Nitrogen	Average Monthly	2.6	6.0	mg/L

Permit No. PA0254266

Family Guidance

RESOLUTION FAITH. HOPE. LOVE.

Family Guidance, Inc.

Cranberry Township, Pennsylvania

RESOLUTION NO. 1 of 2022

The undersigned and authorized representatives of Family Guidance, Inc. hereby certify that a quorum of the Board of Directors properly met after due notice, as provided in the organization's by laws, on the 26th day of April, 2022, and adopted the following Resolution:

NOW, THEREFORE, BE AND IT HEREBY IS RESOLVED, as follows:

Allyson Sveda, Executive Director and
(Name) (Title)
Scott Brown *Moore / s/MT*, President of the Board
(Name) (Title)

Of Family Guidance, Inc. are hereby authorized to execute the signing of the Consent Order and Agreement from the Department of Environmental Protection and to forward the signed Consent Order and Agreement to the Department of Environmental Protection in a timely manner.

It is certified that the above Resolution is in full force in effect as of this 26th day of April, 2022.

Family Guidance, Inc.

(SEAL)

Scott D. Moore
(Signature)

SCOTT D. MOORE
Board Chairman

K. Mack Hall
(Signature)

K. Mack Hall
Board Secretary

