

Application Type Renewal  
Wastewater Type Sewage  
Facility Type SFTF

**NPDES PERMIT FACT SHEET  
INDIVIDUAL SFTF/SRSTP**

Application No. PA0262153  
APS ID 823076  
Authorization ID 1255111

**Applicant, Facility and Project Information**

Applicant Name	<u>Point View Cottage Association</u>	Facility Name	<u>Point View Cottage Association #1 STP</u>
Applicant Address	<u>Point View Drive</u> <u>Williamsburg, PA 16693</u>	Facility Address	<u>Point View Drive</u> <u>Williamsburg, PA 16693</u>
Applicant Contact	<u>Jon Mcclintock</u>	Facility Contact	<u>Jon Mcclintock</u>
Applicant Phone	<u>(814) 407-2004</u>	Facility Phone	<u>(814) 407-2004</u>
Client ID	<u>307394</u>	Site ID	<u>765921</u>
SIC Code	<u>4952</u>	Municipality	<u>Catharine Township</u>
SIC Description	<u>Trans. &amp; Utilities - Sewerage Systems</u>	County	<u>Blair</u>
Date Application Received	<u>December 3, 2018</u>	WQM Required	<u></u>
Date Application Accepted	<u>December 27, 2018</u>	WQM App. No.	<u></u>
Project Description	<u>This is an application for NPDES renewal.</u>		

Approve	Deny	Signatures	Date
X		Nicholas Hong, P.E. / Environmental Engineering Specialist	January 9, 2020
		Daniel W. Martin, P.E. / Environmental Engineer Manager	
		Maria Bebenek, P.E. / Environmental Program Manager	

### Summary of Review

The application submitted by the applicant requests a NPDES renewal permit for the Point View Cottage Association- Permit #1 located at 172 Point View Drive, Williamsburg, PA 16693 in Blair County, municipality of Catherine. The existing permit became effective on February 1, 2014 and expired on January 31, 2019. The application for renewal was received by DEP Southcentral Regional Office (SCRO) on December 3, 2018.

The purpose of this Fact Sheet is to present the basis of information used for establishing the proposed NPDES permit effluent limitations. The Fact Sheet includes a description of the facility, a description of the facility's receiving waters, a description of the facility's receiving waters attainment/non-attainment assessment status, and a description of any changes to the proposed monitoring/sampling frequency. Section 6 provides the justification for the proposed NPDES effluent limits derived from technology based effluent limits (TBEL), water quality based effluent limits (WQBEL), total maximum daily loading (TMDL), antidegradation, anti-backsliding, and/or whole effluent toxicity (WET). A brief summary of the outlined descriptions has been included in the Summary of Review section.

The subject facility is a 0.002 MGD (2000 GPD) treatment facility. The applicant does not anticipate any proposed upgrades to the treatment facility in the next five years. The NPDES application has been processed as a Small Flow Treatment Facility due to the type of sewage and the design flow rate for the facility. The applicant disclosed the Act 14 requirement to Blair County Commissioners and Catherine Township Supervisors and the notice was received by the parties on approximately on November 27, 2018. A planning approval letter was not necessary as the facility is neither new or expanding.

Utilizing the DEP's web-based Emap-PA information system, the receiving waters has been determined to be Township Run. The sequence of receiving streams that Township Run discharges into are the Frankstown Juniata River, the Juniata River, and the Susquehanna River which eventually drains into the Chesapeake Bay. The subject site is not subject to the Chesapeake Bay implementation requirements. The receiving water has protected water usage for warm water fishes (WWF) and migratory fishes (MF). No Class A Wild Trout fisheries are impacted by this discharge. The absence of high quality and/or exceptional value surface waters removes the need for an additional evaluation of anti-degradation requirements.

Township Run is a Category 2 stream listed in the 2016 Integrated List of All Waters (formerly 303d Listed Streams). This stream is an attaining stream that supports aquatic life. The receiving waters is not subject to a total maximum daily load (TMDL) plan to improve water quality in the subject facility's watershed.

The existing permit and proposed permit differ as follows:

- Monitoring for pH has been eliminated.

The proposed permit will expire five (5) years from the effective date.

Based on the review in this report, it is recommended that the permit be drafted. 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.

Any additional information or public review of documents associated with the discharge or facility may be available at PA DEP Southcentral Regional Office (SCRO), 909 Elmerton Avenue, Harrisburg, PA 17110. To make an appointment for file review, contact the SCRO File Review Coordinator at 717.705.4700.

**1.0 Applicant**

**1.1 General Information**

This fact sheet summarizes PA Department of Environmental Protection's review for the NPDES renewal for the following subject facility.

Facility Name: Point View Cottage Association- Permit #1

NPDES Permit # PA0262153

Physical Address: 172 Point View Drive  
Williamsburg, PA 16693

Mailing Address: 172 Point View Drive  
Williamsburg, PA 16693

Contact: Donald B. Smith  
Vice President  
prview@atlanticbb.net

Consultant: There was not a consultant utilized for the NPDES renewal.

**1.2 Permit History**

Via note to DEP, the facility installed the treatment system in September 2016.

**2.0 Treatment Facility Summary**

**2.1.1 Site location**

The physical address for the facility is 172 Point View Drive, Williamsburg, PA 16693. A topographical and an aerial photograph of the facility are depicted as Figure 1 and Figure 2.

Figure 1: Topographical map of the subject facility

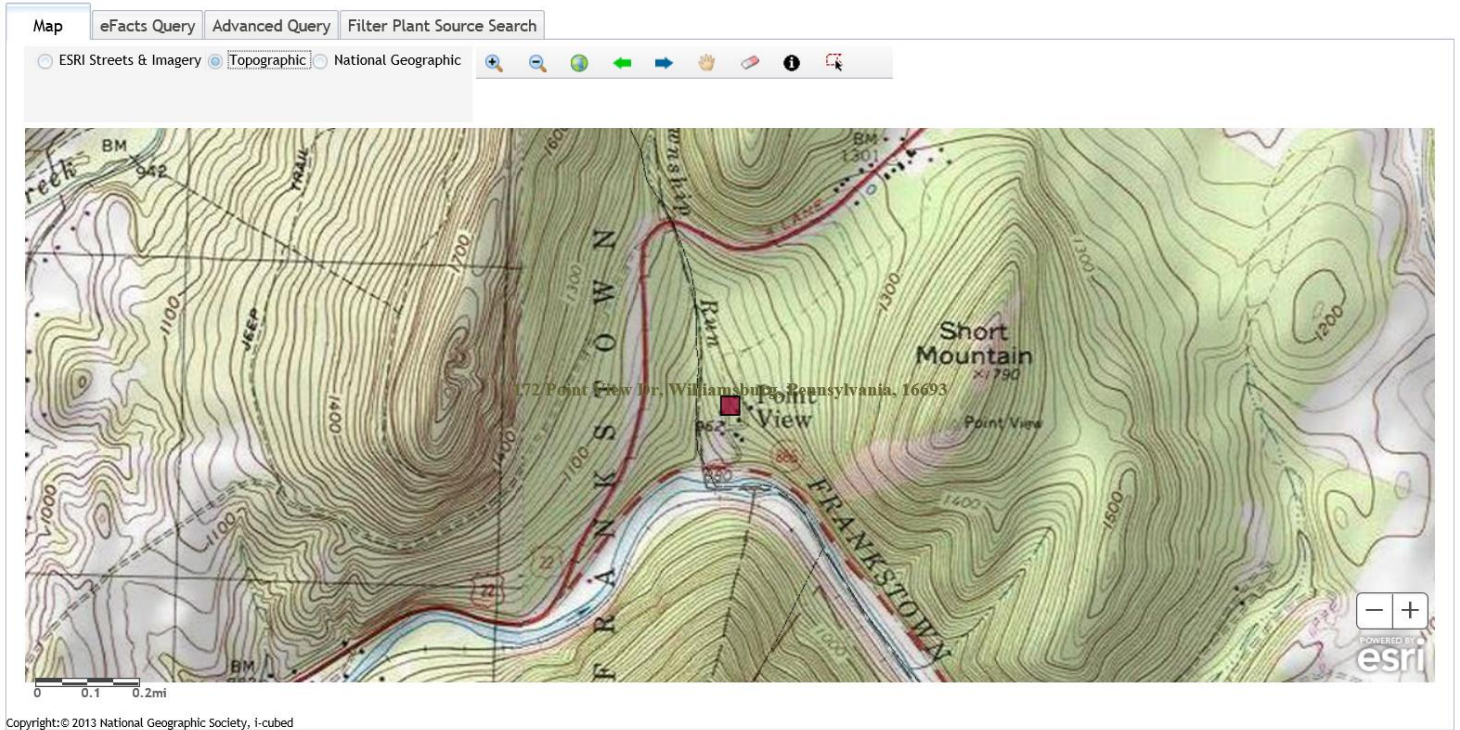
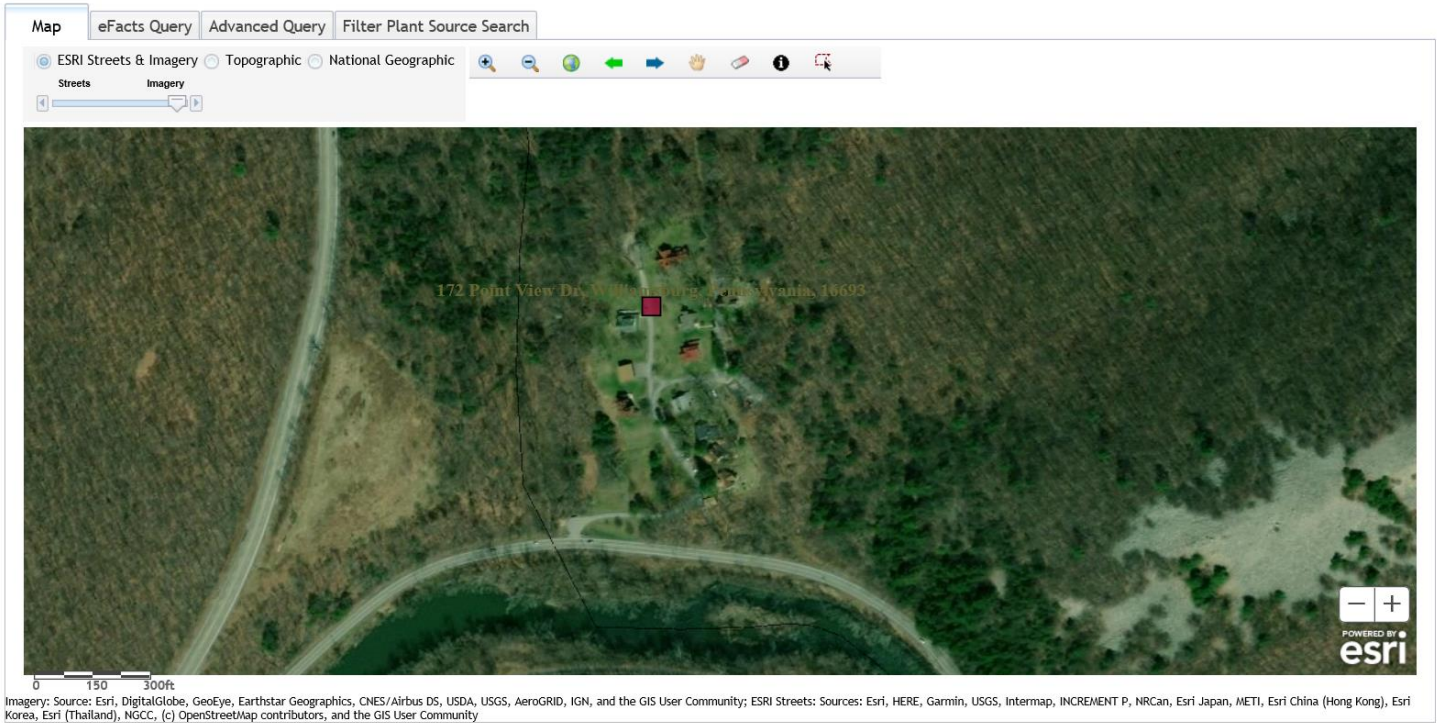


Figure 2: Aerial Photograph of the subject facility



**2.1.2 Sources of Wastewater/Stormwater**

Wastewater is generated from five dwellings.

**2.2 Description of Wastewater Treatment Process**

The subject facility is a 0.002 MGD (2000 GPD) design flow facility. The subject facility treats wastewater using five (5) 1,000-gal two compartment septic tanks, an Orenco AdvanTex AX-20 filter with uv disinfection prior to discharge through the outfall. The facility is being evaluated for flow, pH, CBOD5, TSS, and fecal coliform. The existing permits limits for the facility is summarized in Section 2.4.

The treatment process is summarized in the table.

Treatment Facility Summary				
<b>Treatment Facility Name:</b> Point View Cottage Association Permit#1 SFTF				
<b>WQM Permit No.</b>	<b>Issuance Date</b>			
0713403	01/15/2014			
<b>Waste Type</b>	<b>Degree of Treatment</b>	<b>Process Type</b>	<b>Disinfection</b>	<b>Avg Annual Flow (MGD)</b>
Sewage	Secondary	Septic Tank Sand Filter	Ultraviolet	0.002
<b>Hydraulic Capacity (MGD)</b>	<b>Organic Capacity (lbs/day)</b>	<b>Load Status</b>	<b>Biosolids Treatment</b>	<b>Biosolids Use/Disposal</b>
0.002		Not Overloaded		Other WWTP

**2.3 Facility Outfall Information**

The facility has the following outfall information for wastewater.

<b>Outfall No.</b>	001	<b>Design Flow (MGD)</b>	.002
<b>Latitude</b>	40° 29' 23.14"	<b>Longitude</b>	-78° 14' 36.05"
<b>Wastewater Description:</b>	Sewage Effluent		

**2.4 Existing NPDES Permits Limits**

The existing NPDES permit limits are summarized in the table.

**PART A - EFFLUENT LIMITATIONS, MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS**

I. A. For Outfall 001, Latitude 40° 29' 23.13", Longitude 78° 14' 36.05", River Mile Index 0.140, Stream Code 16249  
 Receiving Waters: Township Run  
 Type of Effluent: Treated Sewage

1. The permittee is authorized to discharge during the period from February 1, 2014 through January 31, 2019.
2. Based on the anticipated wastewater characteristics and flows described in the permit application and its supporting documents and/or amendments, the following effluent limitations and monitoring requirements apply (see also Additional Requirements and Footnotes).

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)			Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type	
	Average Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum			Instant. Maximum
Flow (MGD)	Report	XXX	XXX	XXX	XXX	XXX	1/month	Measured
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/month	Grab
CBOD5	XXX	XXX	XXX	10	XXX	20	1/month	Grab
Total Suspended Solids	XXX	XXX	XXX	10	XXX	20	1/month	Grab
Fecal Coliform (CFU/100 ml)	XXX	XXX	XXX	200 Geo Mean	XXX	XXX	1/month	Grab

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

at Outfall 001

**3.0 Facility NPDES Compliance History**

**3.1 Summary of Inspections**

A summary of the most recent inspections during the existing permit review cycle is as follows.

The DEP inspector noted the following during the inspection.

05/29/2014:

- There was nothing significant to report.

**3.2 Summary of DMR Data**

Sampling date 11/01/2019

pH 6.50  
 CBOD5 3.04 mg/l  
 TSS 1.6 mg/l  
 Fecal Coliform <1.0 CFU/100 mL

**3.3 Non-Compliance**

**3.3.1 Non-Compliance- NPDES Effluent**

A summary of the non-compliance to the permit limits for the existing permit cycle is as follows.

The laboratory sampling data from 11/1/2019 meets the permit limits.

### **3.3.2 Non-Compliance- Enforcement Actions**

A summary of the non-compliance enforcement actions for the current permit cycle is as follows:

As of December 2019, the facility does not have any open enforcement actions.

### **3.4 Open Violations**

No open violations existed as of December 2019.

## **4.0 Receiving Waters and Water Supply Information Detail Summary**

### **4.1 Receiving Waters**

The receiving waters has been determined to be Township Run. The sequence of receiving streams that Township Run discharges into are the Frankstown Juniata River, the Juniata River, and the Susquehanna River which eventually drains into the Chesapeake Bay.

### **4.2 Public Water Supply (PWS) Intake**

The closest PWS to the subject facility is Mifflintown Municipal Authority (PWS ID # 4340008) located approximately 37 miles downstream of the subject facility on the Juniata River. Based upon the distance and the flow rate of the facility, the PWS should not be impacted.

### **4.3 Class A Wild Trout Streams**

Class A Wild Trout Streams are waters that support a population of naturally produced trout of sufficient size and abundance to support long-term and rewarding sport fishery. DEP classifies these waters as high-quality coldwater fisheries.

The information obtained from EMAP suggests that no Class A Wild Trout Fishery will be impacted by this discharge.

### **4.4 2016 Integrated List of All Waters (303d Listed Streams):**

Section 303(d) of the Clean Water Act requires States to list all impaired surface waters not supporting uses even after appropriate and required water pollution control technologies have been applied. The 303(d) list includes the reason for impairment which may be one or more point sources (i.e. industrial or sewage discharges) or non-point sources (i.e. abandoned mine lands or agricultural runoff and the pollutant causing the impairment such as metals, pH, mercury or siltation).

States or the U.S. Environmental Protection Agency (EPA) must determine the conditions that would return the water to a condition that meets water quality standards. As a follow-up to listing, the state or EPA must develop a Total Maximum Daily Load (TMDL) for each waterbody on the list. A TMDL identifies allowable pollutant loads to a waterbody from both point and non-point sources that will prevent a violation of water quality standards. A TMDL also includes a margin of safety to ensure protection of the water.

The water quality status of Pennsylvania's waters uses a five-part categorization (lists) of waters per their attainment use status. The categories represent varying levels of attainment, ranging from Category 1, where all designated water uses are met to Category 5 where impairment by pollutants requires a TMDL for water quality protection.

**The receiving waters is listed in the 2016 Pennsylvania Integrated Water Quality Monitoring and Assessment Report as a Category 2 waterbody. The surface waters is an attaining stream that supports aquatic life. The designated use has been classified as protected waters for warm water fishes and migratory fishes.**

### **4.5 Low Flow Stream Conditions**

Water quality modeling estimates are based upon conservative data inputs. The data are typically estimated using either a stream gauge or through USGS web based StreamStats program. The NPDES effluent limits are based upon the combined flows from both the stream and the facility discharge.

A conservative approach to estimate the impact of the facility discharge using values which minimize the total combined volume of the stream and the facility discharge. The volumetric flow rate for the stream is based upon the seven-day, 10-year low flow

(Q710) which is the lowest estimated flow rate of the stream during a 7 consecutive day period that occurs once in 10 year time period. The facility discharge is based upon a known design capacity of the subject facility.

The low flow yield and the Q710 for the subject facility was estimated using StreamStats. The low flow yield is 0.039 ft<sup>3</sup>/s/mi and the Q710 is 0.0269 ft<sup>3</sup>/s.



**4.6 Summary of Discharge, Receiving Waters and Water Supply Information**

Outfall No.	<u>001</u>	Design Flow (MGD)	<u>.002</u>
Latitude	<u>40° 29' 23.14"</u>	Longitude	<u>-78° 14' 35.66"</u>
Quad Name	<u></u>	Quad Code	<u></u>
Wastewater Description: <u>Sewage Effluent</u>			
Receiving Waters	<u>Township Run (WWF, MF)</u>	Stream Code	<u>16249</u>
NHD Com ID	<u>65607620</u>	RMI	<u>0.12</u>
Drainage Area	<u>0.68</u>	Yield (cfs/mi <sup>2</sup> )	<u>0.039</u>
Q <sub>7-10</sub> Flow (cfs)	<u>0.0269</u>	Q <sub>7-10</sub> Basis	<u>StreamStats</u>
Elevation (ft)	<u></u>	Slope (ft/ft)	<u></u>
Watershed No.	<u>11A</u>	Chapter 93 Class.	<u>Warm Water Fishes, Migratory Fishes</u>
Existing Use	<u>Same as Chapter 93 Class</u>	Existing Use Qualifier	<u></u>
Exceptions to Use	<u></u>	Exceptions to Criteria	<u>None</u>
Assessment Status	<u>Attaining Use(s) supports aquatic life.</u>		
Cause(s) of Impairment	<u>Not applicable</u>		
Source(s) of Impairment	<u>Not applicable</u>		
TMDL Status	<u>Not applicable</u>	Name	<u></u>
Background/Ambient Data		Data Source	
pH (SU)	<u>Not appl.</u>	<u></u>	
Temperature (°F)	<u>Not appl.</u>	<u></u>	
Hardness (mg/L)	<u>Not appl.</u>	<u></u>	
Other:	<u></u>	<u></u>	
Nearest Downstream Public Water Supply Intake	<u>Mifflintown Municipal Authority</u>		
PWS Waters	<u>Juniata River</u>	Flow at Intake (cfs)	<u></u>
PWS RMI	<u>87</u>	Distance from Outfall (mi)	<u>37</u>

**5.0: Overview of Presiding Water Quality Standards**

**5.1 General**

There are at least six (6) different policies which determines the effluent performance limits for the NPDES permit. The policies are technology based effluent limits (TBEL), water quality based effluent limits (WQBEL), antidegradation, total maximum daily loading (TMDL), anti-backsliding, and whole effluent toxicity (WET) The effluent performance limitations enforced are the selected permit limits that is most protective to the designated use of the receiving waters. An overview of each of the policies that are applicable to the subject facility has been presented in Section 6.

**5.2.1 Technology-Based Limitations**

TBEL treatment requirements under section 301(b) of the Act represent the minimum level of control that must be imposed in a permit issued under section 402 of the Act (40 CFR 125.3). Small flow treatment facilities are confined to permit limitations promulgated by the Small Flow Treatment Facilities Manual (Document # 36-0300-002) and the SOP- New and Reissuance Small Flow Treatment Facility Individual NPDES Permit Application (Revised January 13, 2015).

Parameter	Avg Mo	IMAX	Sample Type	Frequency: SFTFs
Flow (GPD)	Report	XXX	Measured	1/month
BOD5 (mg/l)	10	20	Grab	1/month
TSS (mg/l)	10	20	Grab	1/month
Fecal Coliform (No/100 ml)	200 Geometric Mean		Grab	1/month

**5.3 Water Quality-Based Limitations**

WQBEL are based on the need to attain or maintain the water quality criteria and to assure protection of designated and existing uses (PA Code 25, Chapter 92a.2). The subject facility that is typically enforced is the more stringent limit of either the TBEL or the WQBEL.

Determination of WQBEL is calculated by spreadsheet analysis or by a computer modeling program developed by DEP. DEP permit engineers utilize the following computing programs for WQBEL permit limitations: (1) MS Excel worksheet for Total Residual Chlorine (TRC); (2) WQM 7.0 for Windows Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen Version 1.0 (WQM Model) and (3) PENTOXSD for Windows 2.0 (PENTOXSD) for Toxics pollutants.

**5.3.1 Water Quality Modeling 7.0**

WQM is not applicable to the subject facility.

**5.3.2 PENTOXSD Modeling**

The facility is not subject to PENTOXSD.

**5.3.3 Whole Effluent Toxicity (WET)**

The facility is not subject to WET.

**5.4 Total Maximum Daily Loading (TMDL)**

**5.4.1 TMDL**

The goal of the Clean Water Act (CWA), which governs water pollution, is to ensure that all of the Nation's waters are clean and healthy enough to support aquatic life and recreation. To achieve this goal, the CWA created programs designed to regulate and reduce the amount of pollution entering United States waters. Section 303(d) of the CWA requires states to assess their waterbodies to identify those not meeting water quality standards. If a waterbody is not meeting standards, it is listed as impaired and reported to the U.S. Environmental Protection Agency. The state then develops a plan to clean up the impaired waterbody. This plan includes the development of a Total Maximum Daily Load (TMDL) for the pollutant(s) that were found to be the cause of the water quality violations. A Total Maximum Daily Load (tmdl) calculates the maximum amount of a specific pollutant that a waterbody can receive and still meet water quality standards.

Pennsylvania has committed to restoring all impaired waters by developing TMDLs and TMDL alternatives for all impaired waterbodies. The TMDL serves as the starting point or planning tool for restoring water quality.

#### **5.4.1.1 Local TMDL**

The subject facility does not discharge into a local TMDL.

#### **5.4.1.2 Chesapeake Bay TMDL Requirement**

The Chesapeake Bay Watershed is a large ecosystem that encompasses approximately 64,000 square miles in Maryland, Delaware, Virginia, West Virginia, Pennsylvania, New York and the District of Columbia. An ecosystem is composed of interrelated parts that interact with each other to form a whole. All of the plants and animals in an ecosystem depend on each other in some way. Every living thing needs a healthy ecosystem to survive. Human activities affect the Chesapeake Bay ecosystem by adding pollution, using resources and changing the character of the land.

Most of the Chesapeake Bay and many of its tidal tributaries have been listed as impaired under Section 303(d) of the federal Water Pollution Control Act ("Clean Water Act"), 33 U.S.C. § 1313(d). While the Chesapeake Bay is outside the boundaries of Pennsylvania, more than half of the State lies within the watershed. Two major rivers in Pennsylvania are part of the Chesapeake Bay Watershed. They are (a) the Susquehanna River and (b) the Potomac River. These two rivers total 40 percent of the entire Chesapeake Bay watershed.

The overall management approach needed for reducing nitrogen, phosphorus and sediment are provided in the Bay TMDL document and the Phase I and II WIPs which is described in the Bay TMDL document and Executive Order 13508.

The Bay TMDL is a comprehensive pollution reduction effort in the Chesapeake Bay watershed identifying the necessary pollution reductions of nitrogen, phosphorus and sediment across the seven Bay watershed jurisdictions of Delaware, Maryland, New York, Pennsylvania, Virginia, West Virginia and the District of Columbia to meet applicable water quality standards in the Bay and its tidal waters.

The Watershed Implementation Plans (WIPs) provides objectives for how the jurisdictions in partnership with federal and local governments will achieve the Bay TMDL's nutrient and sediment allocations. The jurisdictions have developed or will develop WIPs over three Phases.

Phase I and Phase II WIPs were developed and submitted to EPA in 2010 and 2012 for objectives to be implemented by 2017 and 2025 to achieve applicable water quality standards. The Phase II WIPs build on the initial Phase I WIPs platform by providing more specific local actions. In 2018, Phase III WIPs will be developed to include further actions for jurisdictions to implement between 2018 and 2025.

Section 7 of the Phase II WIP describes Pennsylvania's strategy for reducing nutrients to the Chesapeake Bay from wastewater facilities. The supplement to Section 7 of the Phase II WIP provides an update on Chesapeake Bay TMDL implementation activities for point sources and DEP's current implementation strategy for wastewater. The supplement is updated periodically to reflect changes due to PA DEP's permit actions as well as changes to strategies in managing the wastewater sector's allocated loads under the TMDL. The latest revision of the supplement was October 14, 2016.

The Chesapeake Bay TMDL (Appendix Q) categorizes point sources into four sectors

:

- Sector A- significant sewage dischargers;
- Sector B- significant industrial waste (IW) dischargers;
- Sector C- non-significant dischargers (both sewage and IW facilities); and
- Sector D- combined sewer overflows (CSOs).

All sectors contain a listing of individual facilities with NPDES permits that were believed to be discharging at the time the TMDL was published (2010). All sectors with the exception of the non-significant dischargers have individual wasteload allocations (WLAs) for TN and TP assigned to specific facilities. Non-significant dischargers have a bulk or aggregate allocation for TN and TP based on the facilities in that sector that were believed to be discharging at that time and their estimated nutrient loads.

Based upon the supplement the subject facility has been categorized as a Sector C discharger. The supplement defines Sector C as a sewage facility is considered non-significant dischargers if it is a Phase 4 facility or Phase 5 facility having a specified flow rate (i.e. Phase 4 facility  $\geq 0.2$  MGD and  $< 0.4$  MGD, Phase 5 facility  $> 0.002$  MGD and  $< 0.2$  MGD), a small flow/single residence sewage treatment facilities ( $\leq 0.002$  MGD), or a non-significant IW facilities. These facilities may be covered by statewide general permits or may have individual NPDES permits.

Currently, there are approximately 1,000 Phase 4 and 5 sewage facilities and approximately 740 small flow sewage treatment facilities covered by the general permit. There are also approximately 600 non-significant IW facilities.

A list of non-significant sewage and industrial waste dischargers with Cap Loads in NPDES permits is presented in Attachment B of the Phase 2 WIP.

**Due to the small amount of wastewater generated by the facility, the facility is not subject to Sector C monitoring requirements. The facility is not listed in the Phase 2 WIP.**

### **5.5 Anti-Degradation Requirement**

Chapter 93.4a of the PA regulations requires that surface water of the Commonwealth of Pennsylvania may not be degraded below levels that protect the existing uses. The regulations specifically state that *Existing instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected*. Antidegradation requirements are implemented through DEP's guidance manual entitled Water Quality Antidegradation Implementation Guidance (Document #391-0300-02).

The policy requires DEP to protect the existing uses of all surface waters and the existing quality of High Quality (HQ) and Exceptional Value (EV) Waters. Existing uses are protected when DEP makes a final decision on any permit or approval for an activity that may affect a protected use. Existing uses are protected based upon DEP's evaluation of the best available information (which satisfies DEP protocols and Quality Assurance/Quality Control (QA/QC) procedures) that indicates the protected use of the waterbody.

For a new, additional, or increased point source discharge to an HQ or EV water, the person proposing the discharge is required to utilize a nondischarge alternative that is cost-effective and environmentally sound when compared with the cost of the proposed discharge. If a nondischarge alternative is not cost-effective and environmentally sound, the person must use the best available combination of treatment, pollution prevention, and wastewater reuse technologies and assure that any discharge is nondegrading. In the case of HQ waters, DEP may find that after satisfaction of intergovernmental coordination and public participation requirements lower water quality is necessary to accommodate important economic or social development in the area in which the waters are located. In addition, DEP will assure that cost-effective and reasonable best management practices for nonpoint source control in HQ and EV waters are achieved.

**The subject facility's discharge will be to a non-special protection waters and the permit conditions are imposed to protect existing instream water quality and uses. Neither HQ waters or EV waters is impacted by this discharge.**

### **5.6 Anti-Backsliding**

Anti-backsliding is a federal regulation which prohibits a permit from being renewed, reissued, or modified containing effluent limitations which are less stringent than the comparable effluent limitations in the previous permit (40 CFR 122.1.1 and 40 CFR 122.1.2). A review of the existing permit limitations with the proposed permit limitations confirm that the facility is consistent with anti-backsliding requirements. The facility has proposed effluent limitations that are as stringent as the existing permit.

### **6.0 NPDES Parameter Details**

The basis for the proposed sampling and their monitoring frequency that will appear in the permit for each individual parameter are itemized in this Section. The final limits are the more stringent of technology based effluent treatment (TBEL) requirements, water quality based (WQBEL) limits, TMDL, antidegradation, anti-degradation, or WET.

The reader will find in this section:

- a) a justification of recommended permit monitoring requirements and limitations for each parameter in the proposed NPDES permit;
- b) a summary of changes from the existing NPDES permit to the proposed permit; and
- c) a summary of the proposed NPDES effluent limits.

**6.1 Recommended Monitoring Requirements and Effluent Limitations**

A summary of the recommended monitoring requirements and effluent limitations are itemized in the tables. The table is categorized by Conventional Pollutants and Disinfection.

**6.1.1 Conventional Pollutants and Disinfection**

Summary of Proposed NPDES Parameter Details for Conventional Pollutants and Disinfection			
Point View Cottage Association- Permit #1, PA0262153			
Parameter	Permit Limitation Required by <sup>1</sup> :	Recommendation	
CBOD	TBEL	Monitoring:	The monitoring frequency shall be 1x/mo as a grab sample (SOP)
		Effluent Limit:	Effluent limits shall not exceed 10 mg/l as an average monthly (SOP)
		Rationale:	The monitoring frequency and the effluent limits assigned by the SOP.
TSS	TBEL	Monitoring:	The monitoring frequency shall be 1x/mo as a grab sample (SOP).
		Effluent Limit:	Effluent limits shall not exceed 10 mg/l as an average monthly (SOP)
		Rationale:	The monitoring frequency and the effluent limits assigned by the SOP.
Fecal Coliform	TBEL	Monitoring:	The monitoring frequency shall be 1x/mo as a grab sample (SOP).
		Effluent Limit:	Effluent limits shall not exceed 200 MPN as a geometric mean (SOP).
		Rationale:	The monitoring frequency and the effluent limits assigned by the SOP.
<b>Notes:</b>			
1 The NPDES permit was limited by (a) anti-Backsliding, (b) Anti-Degradation, (c) SOP, (d) TBEL, (e) TMDL, (f) WQBEL, or (g) WET			
2 Monitoring frequency based on flow rate of 0.002 MGD.			
3 SOP, New and Reissuance Small Flow Treatment Facility Individual NPDES Permit Applications, Revised January 13, 2015			
4 Water Quality Antidegradation Implementaton Guidance (Document # 391-0300-002)			
5 Phase 2 Watershed Implementation Plan Wastewater Supplement, Revised September 6, 2017			

**6.2 Summary of Changes From Existing Permit to Proposed Permit**

A summary of how the proposed NPDES permit differs from the existing NPDES permit is summarized as follows.

- Monitoring for pH has been eliminated.

**6.3.1 Summary of Proposed NPDES Effluent Limits**

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. The proposed NPDES effluent limitations are summarized in the table below.

**PART A - EFFLUENT LIMITATIONS, MONITORING, RECORDKEEPING AND REPORTING REQUIREMENTS**

I. A. For Outfall 001, Latitude 40° 29' 23.14", Longitude 78° 14' 36.05", River Mile Index 0.12, Stream Code 16249

Receiving Waters: Township Run (WWF, MF)

Type of Effluent: Sewage Effluent

1. The permittee is authorized to discharge during the period from **Permit Effective Date** through **Permit Expiration Date**.
2. Based on the anticipated wastewater characteristics and flows described in the permit application and its supporting documents and/or amendments, the following effluent limitations and monitoring requirements apply (see also Additional Requirements and Footnotes).

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
Flow (MGD)	Report	XXX	XXX	XXX	XXX	XXX	1/month	Measured
CBOD5	XXX	XXX	XXX	10	XXX	20	1/month	Grab
TSS	XXX	XXX	XXX	10	XXX	20	1/month	Grab
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	200 Geo Mean	XXX	XXX	1/month	Grab

Samples taken in compliance with the monitoring requirements specified above shall be taken at the following location(s):

at Outfall 001