

Application Type Renewal  
Facility Type Storm Water  
Major / Minor Minor

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

Application No. PAS503501  
APS ID 775405  
Authorization ID 1490513

**Applicant and Facility Information**

Applicant Name	<u>Reworld Harrisburg</u>	Facility Name	<u>Susquehanna Resource Management Complex</u>
Applicant Address	<u>1670 S 19th Street</u> <u>Harrisburg, PA 17104-3201</u>	Facility Address	<u>1670 South 19th Street</u> <u>Harrisburg, PA 17104-3201</u>
Applicant Contact	<u>Kevin Connor</u>	Facility Contact	<u>John Mccurdy</u>
Applicant Phone	<u>(717) 236-0958</u>	Facility Phone	<u>(717) 891-3618</u>
Client ID	<u>294020</u>	Site ID	<u>450856</u>
SIC Code	<u>4953</u>	Municipality	<u>Harrisburg City</u>
SIC Description	<u>Trans. &amp; Utilities - Refuse Systems</u>	County	<u>Dauphin</u>
Date Application Received	<u>June 28, 2024</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>July 11, 2024</u>	If No, Reason	<u></u>
Purpose of Application	<u>NPDES discharge of stormwater associated with industrial activity.</u>		

**Summary of Review**

This is a renewal application for a NPDES individual permit for discharges of stormwater associated with industrial activity located in Harrisburg City, Dauphin County. See Figures 1, 2, and 3 for a Site Location Map, Site Plan, and Stormwater Drainage Map.

The applicant was previously identified as Covanta Harrisburg. Covanta has rebranded with a new name, "Reworld". The applicant is now called Reworld Harrisburg. The site is still the Susquehanna Resource Management Complex and is still owned by the Lancaster County Solid Waste Authority.

The facility's SIC code is 4953 (Refuse Systems) which requires a NPDES permit for discharges of stormwater associated with industrial activity. The facility was once covered under a PAG-03 general permit, PAR503508, but was changed to an individual permit for discharges of stormwater associated with industrial activity in 2012 to address compliance issues associated with stormwater sampling. Since then, the facility was covered under individual permit PAS503501. If the facility qualified for a PAG-03, they would fall under Appendix A based on their SIC code.

Facility Description: Resource recovery facility combusting municipal solid waste to generate steam and electricity.

A renewal application was received via Public Uploads Ref ID 242787 on 6/28/2024. The application was deemed complete on 7/11/2024. A technical deficiency notice was issued on 7/11/2024. The deficiencies were addressed on 8/16/2024.

The facility has 5 outfalls that discharge to Spring Creek (CWF, MF): Outfalls 001, 002, 003, 004, and 006. Most storm and roof drains located throughout the facility discharge without treatment into stormwater catch basins, which then discharge through the five outfalls to Spring Creek. Storm and roof drains from the original boiler building and the exterior lime silo area discharge to a holding basin in the basement of the Boiler Building.

Approve	Deny	Signatures	Date
X		<i>Jacob S. Rakowsky</i> Jacob S. Rakowsky, E.I.T. / Project Manager	9/6/2024
X		<i>Scott M. Arwood</i> Scott M. Arwood, P.E. / Environmental Engineer Manager	9/6/2024

**Summary of Review**

Per the application, the PPC Plan was last updated in December 2022.

Part C permit conditions require semi-annual site inspections as well as implementation of BMPs and implementation of the facility PPC Plan. Given the BMPs in place, the discharge is not expected to have any measurable effect on the water quality of the receiving stream.

EPA waiver is in effect.

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.	001	Design Flow (MGD)	N/A (stormwater)
Latitude	40° 14' 41"	Longitude	-76° 51' 11"
Wastewater Description: Stormwater associated with industrial activity.			
Receiving Waters	Spring Creek (CWF)	Stream Code	10124
NHD Com ID	56403673	RMI	0.67
Drainage Area	11.3 sq. mi.	Yield (cfs/mi <sup>2</sup> )	
Q <sub>7-10</sub> Flow (cfs)	0.599	Q <sub>7-10</sub> Basis	StreamStats
Watershed No.	7-C	Chapter 93 Class.	CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN		
Source(s) of Impairment	URBAN RUNOFF/STORM SEWERS		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Steelton Borough Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Borough, Dauphin County
PWS RMI	53.0	Distance from Outfall (mi)	1.4

Drainage Area: 16,200 SF

% Impervious: 40%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:

Truck traffic which may drag out some solid waste from tipping floor.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:

Indoor storage of chemicals, daily sweeping, soil covered areas planted with grass, other areas paved with asphalt or concrete, catch basins cleaned twice a year, use of silt sacks in all drains, straw bales and pond filter media.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	002	Design Flow (MGD)	N/A (stormwater)
Latitude	40° 14' 41"	Longitude	-76° 51' 13"
Wastewater Description: Stormwater associated with industrial activity.			
Receiving Waters	Spring Creek (CWF, MF)	Stream Code	10124
NHD Com ID	56403673	RMI	0.67
Drainage Area	11.3 sq. mi.	Yield (cfs/mi <sup>2</sup> )	
Q <sub>7-10</sub> Flow (cfs)	0.599	Q <sub>7-10</sub> Basis	StreamStats
Elevation (ft)		Slope (ft/ft)	
Watershed No.	7-C	Chapter 93 Class.	CWF, MF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN		
Source(s) of Impairment	URBAN RUNOFF/STORM SEWERS		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Steelton Borough Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Borough, Dauphin County
PWS RMI	53.0	Distance from Outfall (mi)	1.4

Drainage Area: 16,200 SF

% Impervious: 80%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:

Truck traffic.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:

Indoor storage of chemicals, daily sweeping, soil covered areas planted with grass, other areas paved with asphalt or concrete, catch basins cleaned twice a year, use of silt sacks in all drains, Terra Kleen sediment trap installed and use of pond filter media.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	003	Design Flow (MGD)	N/A (stormwater)
Latitude	40° 14' 42"	Longitude	-76° 51' 13"
Wastewater Description: Stormwater associated with industrial activity.			
Receiving Waters	Spring Creek (CWF)	Stream Code	10124
NHD Com ID	56403673	RMI	0.67
Drainage Area	11.3 sq. mi.	Yield (cfs/mi <sup>2</sup> )	
Q <sub>7-10</sub> Flow (cfs)	0.599	Q <sub>7-10</sub> Basis	StreamStats
Watershed No.	7-C	Chapter 93 Class.	CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN		
Source(s) of Impairment	URBAN RUNOFF/STORM SEWERS		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Steelton Borough Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Borough, Dauphin County
PWS RMI	53.0	Distance from Outfall (mi)	1.4

Drainage Area: 18,000 SF

% Impervious: 100%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:  
Truck traffic with ash handling.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:  
Indoor storage of chemicals, daily sweeping, soil covered areas planted with grass, other areas paved with asphalt or concrete, catch basins cleaned twice a year, use of silt sacks in all drains, Terra Kleen sediment trap installed.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	004	Design Flow (MGD)	N/A (stormwater)
Latitude	40° 14' 38"	Longitude	-76° 51' 19"
Wastewater Description: Stormwater associated with industrial activity.			
Receiving Waters	Spring Creek (CWF)	Stream Code	10124
NHD Com ID	56403673	RMI	0.67
Drainage Area	11.3 sq. mi.	Yield (cfs/mi <sup>2</sup> )	
Q <sub>7-10</sub> Flow (cfs)	0.599	Q <sub>7-10</sub> Basis	StreamStats
Watershed No.	7-C	Chapter 93 Class.	CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN		
Source(s) of Impairment	URBAN RUNOFF/STORM SEWERS		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Steelton Borough Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Borough, Dauphin County
PWS RMI	53.0	Distance from Outfall (mi)	1.4

Drainage Area: 9,600 SF

% Impervious: 80%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:  
Truck traffic.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:  
Indoor storage of chemicals, daily sweeping, soil covered areas planted with grass, other areas paved with asphalt or concrete, catch basins cleaned twice a year, use of silt sacks in all drains.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	006	Design Flow (MGD)	N/A (stormwater)
Latitude	40° 14' 36"	Longitude	-76° 51' 14"
Wastewater Description: Stormwater associated with industrial activity.			
Receiving Waters	Spring Creek (CWF)	Stream Code	10123
NHD Com ID	56403673	RMI	0.67
Drainage Area	11.3 sq. mi.	Yield (cfs/mi <sup>2</sup> )	
Q <sub>7-10</sub> Flow (cfs)	0.599	Q <sub>7-10</sub> Basis	StreamStats
Watershed No.	7-C	Chapter 93 Class.	CWF
Existing Use		Existing Use Qualifier	
Exceptions to Use		Exceptions to Criteria	
Assessment Status	Impaired		
Cause(s) of Impairment	CAUSE UNKNOWN		
Source(s) of Impairment	URBAN RUNOFF/STORM SEWERS		
TMDL Status		Name	
Nearest Downstream Public Water Supply Intake	Steelton Borough Water Authority		
PWS Waters	Susquehanna River	Municipality	Steelton Borough, Dauphin County
PWS RMI	53.0	Distance from Outfall (mi)	1.4

Drainage Area: 14,400 SF

% Impervious: 80%

Description of Materials/Activities in Drainage Area Exposed to Precipitation:  
Truck traffic.

Description of Treatment or BMPs in Drainage Area to Control Pollutants in Stormwater:  
Indoor storage of chemicals, daily sweeping, soil covered areas planted with grass, other areas paved with asphalt or concrete, catch basins cleaned twice a year, use of silt sacks in all drains.

Compliance History	
<b>Summary of DMRs:</b>	<p>A summary of eDMR sampling results from the effective date of the previous permit, 1/1/2020, through 2024 can be found in Table 1 below. Sampling results from the renewal application can be found in Table 2 below.</p> <p>The facility was required to submit TSS and E. Coli impairment sampling results due to the siltation and E. Coli impairments in the receiving water. The discharge is not expected to cause or contribute to the impairments.</p>
<b>Summary of Inspections:</b>	<p>The facility was last inspected on 5/4/2021. No violations were noted.</p> <p>The client currently has no open violations that should affect issuance of the final permit.</p>



Table 1. Summary of 2020 to 2024 eDMR Sampling Results

Parameter		Outfall 001	Outfall 002	Outfall 003	Outfall 004	Outfall 006
Ammonia-Nitrogen (mg/L)	avg	0.868	1.068	0.288	0.296	0.268
	max	2.130	6.130	0.568	0.569	0.733
Total Arsenic (mg/L)	avg	0.006	0.005	0.005	0.005	0.005
	max	0.010	0.008	0.005	0.005	0.005
Total Barium (mg/L)	avg	0.048	0.064	0.024	0.016	0.026
	max	0.100	0.190	0.034	0.025	0.065
Total Cadmium (mg/L)	avg	0.0017	0.0032	0.0026	0.0014	0.0021
	max	0.0024	0.0074	0.0051	0.0041	0.0100
Chemical Oxygen Demand (COD) (mg/L)	avg	181	78	16	22	48
	max	425	213	21	57	155
Total Chromium (mg/L)	avg	0.0041	0.0037	0.0025	0.0025	0.0026
	max	0.0091	0.0062	0.0028	0.0029	0.0030
Total Cyanide (mg/L)	avg	0.0042	0.0041	0.0037	0.0038	0.0037
	max	0.0064	0.0050	0.0050	0.0050	0.0050
Total Iron (mg/L)	avg	0.8	1.0	0.5	0.7	0.4
	max	3.2	2.7	1.4	3.1	1.0
Total Lead (mg/L)	avg	0.024	0.037	0.030	0.018	0.010
	max	0.085	0.090	0.052	0.053	0.031
Dissolved Magnesium (mg/L)	avg	2.6	2.6	0.6	1.4	1.5
	max	4.5	4.9	1.0	3.2	3.0
Total Magnesium (mg/L)	avg	3.0	3.1	0.8	1.8	1.8
	max	4.8	5.4	1.4	3.8	3.3
Total Mercury (mg/L)	avg	0.00030	0.00021	0.00021	0.00020	0.00020
	max	0.00068	0.00030	0.00025	0.00020	0.00020
pH (S.U.)	avg	7.3	7.7	7.8	7.7	7.8
	max	8.1	8.8	9.0	8.5	8.2
Total Selenium (mg/L)	avg	0.01	0.01	0.01	0.01	0.01
	max	0.02	0.01	0.01	0.01	0.01
Total Silver (mg/L)	avg	0.0025	0.0028	0.0024	0.0026	0.0023
	max	0.0069	0.0094	0.0056	0.0075	0.0046
Total Dissolved Solids (mg/L)	avg	210	427	97	66	98
	max	422	2020	162	88	191
Total Organic Carbon (mg/L)	avg	55	23	5	6	12
	max	95	76	8	17	40
Total Suspended Solids (mg/L)	avg	43	36	13	18	26
	max	182	98	33	55	88

Table 2. Renewal Application Sampling Results

Parameter		Outfall 001	Outfall 002	Outfall 003	Outfall 004	Outfall 006	# of Storm Events Sampled
Ammonia-Nitrogen (mg/L)	avg	0.997	0.444	0.006	0.310	0.291	4
	max	2.130	1.280	0.010	0.569	0.733	
Total Arsenic (mg/L)	avg	0.005	0.005	0.005	0.005	0.005	4
	max	0.005	0.005	0.005	0.005	0.005	
Total Barium (mg/L)	avg	0.051	0.083	0.034	0.013	0.022	4
	max	0.072	0.190	0.034	0.022	0.053	
Total Cadmium (mg/L)	avg	0.0016	0.0029	0.0019	0.0010	0.0010	4
	max	0.0024	0.0074	0.0027	0.0011	0.0010	
Chemical Oxygen Demand (COD) (mg/L)	avg	185	95	16	20	40	4
	max	283	213	18	32	96	
Total Chromium (mg/L)	avg	0.0036	0.0032	0.0025	0.0025	0.0025	4
	max	0.0043	0.0053	0.0025	0.0025	0.0025	
Total Cyanide (mg/L)	avg	0.0057	0.0064	0.0055	0.0040	0.0046	4
	max	0.0077	0.0110	0.0100	0.0040	0.0046	
Total Iron (mg/L)	avg	0.540	0.573	0.165	0.275	0.285	4
	max	0.780	1.200	0.180	0.370	0.400	
Total Lead (mg/L)	avg	0.012	0.023	0.019	0.011	0.006	4
	max	0.015	0.050	0.023	0.014	0.012	
Dissolved Magnesium (mg/L)	avg	3.63	1.61	0.58	1.10	1.07	4
	max	4.50	3.60	0.85	1.50	3.00	
Total Magnesium (mg/L)	avg	3.98	3.63	0.70	1.27	1.85	4
	max	4.80	5.40	0.92	1.70	3.30	
Total Mercury (mg/L)	avg	0.00021	0.00020	0.00020	0.00020	0.00020	4
	max	0.00024	0.00020	0.00020	0.00020	0.00020	
pH (S.U.)	avg	7.7	7.9	7.9	7.6	7.7	4
	max	8.1	8.3	8.0	7.7	8.2	
Total Selenium (mg/L)	avg	0.01	0.01	0.01	0.01	0.01	4
	max	0.01	0.01	0.01	0.01	0.01	
Total Silver (mg/L)	avg	0.0020	0.0020	0.0020	0.0020	0.0020	4
	max	0.0020	0.0020	0.0020	0.0020	0.0020	
Total Dissolved Solids (mg/L)	avg	282	737	113	59	108	4
	max	370	2020	162	71	180	
Total Organic Carbon (mg/L)	avg	62.0	29.1	3.8	6.0	6.9	4
	max	95.0	75.6	6.0	11.2	9.4	
Total Suspended Solids (mg/L)	avg	23	14	6	8	19	4
	max	39	30	7	11	30	
Oil and Grease (mg/L)	avg	1.3	1.4	1.3	1.4	1.3	1
	max	1.3	1.4	1.3	1.4	1.3	
BOD5 (mg/L)	avg	70.3	223	5.6	10.5	86.3	1
	max	70.3	223	5.6	10.5	86.3	
Total Nitrogen (mg/L)	avg	7.22	8.48	0.69	1.51	2.86	1

	max	7.22	8.48	0.69	1.51	2.86	
Total Phosphorus (mg/L)	avg	0.5	1.01	0.137	0.151	0.76	1
	max	0.5	1.01	0.137	0.151	0.76	
Nitrate-Nitrite (mg/L)	avg	0.66	2.05	0.13	0.6	0.41	1
	max	0.66	2.05	0.13	0.6	0.41	
Total Kjeldahl Nitrogen (TKN) (mg/L)	avg	6.6	6.4	0.6	0.9	2.5	1
	max	6.6	6.4	0.6	0.9	2.5	
E. Coli (MPN/100ml)	avg	2419.6	2419.6	39	105	2419.6	1
	max	2419.6	2419.6	39	105	2419.6	

#### Summary of Sampling Results:

Values highlighted in red in Table 1 and Table 2 exceeded PAG-03 benchmarks. The applicable PAG-03 benchmarks include: 120 mg/L for COD, 9.0 S.U. for pH, 100 mg/L for TSS, 30 mg/L for Oil and Grease, 30 mg/L for BOD5, and 3.0 mg/L for Nitrate-Nitrite as N. Benchmarks were exceeded for COD, TSS, and BOD5.

Based on the facility's **SIC code of 4953**, the applicable PAG-03 NPDES Permit for Discharges of Stormwater Associated with Industrial Activity (effective 3/24/2023) appendix is **Appendix A**, which would include the following monitoring requirements:

**Table 3.** PAG-03, Appendix A Requirements

Parameter	Monitoring Requirements <sup>(1),(2)</sup>		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L) <sup>(3)</sup>	1 / 6 months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 months	Grab	XXX
pH (S.U.)	1 / 6 months	Grab	9.0
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100
Chemical Oxygen Demand (COD) (mg/L)	1 / 6 months	Grab	120
Ammonia-Nitrogen (mg/L)	1 / 6 months	Grab	XXX
Total Arsenic (mg/L)	1 / 6 months	Grab	XXX
Total Cadmium (mg/L)	1 / 6 months	Grab	XXX
Total Cyanide (mg/L)	1 / 6 months	Grab	XXX
Total Lead (mg/L)	1 / 6 months	Grab	XXX
Total Mercury (mg/L)	1 / 6 months	Grab	XXX
Total Selenium (mg/L)	1 / 6 months	Grab	XXX
Total Silver (mg/L)	1 / 6 months	Grab	XXX

**Proposed Effluent Limitations and Monitoring Requirements**

Consistent with PAG-03 Appendix A, all parameters from Table 3 are included in this permit. In addition to the Appendix A parameters, the facility will also be required to sample for the parameters included in the previous permit, which include: Total Barium, Total Chromium, Total Iron, Dissolved Magnesium, Total Magnesium, Total Dissolved Solids, and Total Organic Carbon. Due to the high concentrations of BOD5 in the renewal application, BOD5 will be added to the permit.

**Table 4.** Proposed Monitoring Requirements for Outfall 001, 002, 003, 004, and 006:

Parameter	Effluent Limitations				Monitoring Requirements <sup>(1),(2)</sup>	
	Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Nitrogen (mg/L) <sup>(3)</sup>	XXX	XXX	Report	XXX	1/6 months	Calculation
Total Phosphorus (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
pH (S.U.)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Suspended Solids (TSS) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Chemical Oxygen Demand (COD) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Ammonia-Nitrogen (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Arsenic (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Cadmium (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Cyanide (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Lead (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Mercury (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Selenium (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Silver (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Barium (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Chromium (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Iron (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Dissolved Magnesium (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Magnesium (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Dissolved Solids (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
Total Organic Carbon (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab
5-Day Biochemical Oxygen Demand (BOD5) (mg/L)	XXX	XXX	Report	XXX	1/6 months	Grab

**Footnotes**

- (1) In accordance with Part C V.C., the permittee shall conduct additional monitoring if specified by DEP in the letter authorizing permit coverage or other correspondence.
- (2) This is the minimum number of sampling events required. Permittees may optionally perform additional sampling.
- (3) Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO<sub>2</sub>+NO<sub>3</sub>-N), where TKN and NO<sub>2</sub>+NO<sub>3</sub>-N are measured in the same sample.

All required parameters from PAG-03 Appendix A are included in this permit.  
Benchmarks for TSS of 100 mg/L, COD of 120 mg/L, pH of 9.0 S.U., and BOD5 of 30 mg/L are included, which is typical of the monitoring requirements for PAG-03 Appendices (effective 3/24/2023).  
The BMPs from Appendix A are included.  
The requirement to submit an Annual Report is included.  
The requirement for routine inspections on a semiannual basis is included.

**Antidegradation (93.4):**

The applicant is not proposing a new or increased discharge to a High Quality (HQ) or Exceptional Value (EV) water, so Module 1 (Anti Degradation Module) was not attached to the application.

The effluent limits for this discharge have been developed to ensure that existing instream water uses and the level of water quality necessary to protect the existing uses are maintained and protected. Best Management Practices will ensure that the existing instream uses are protected. No Exceptional Value Waters are impacted by this discharge.

The designated use of the receiving waters are as follows:  
Spring Creek (CWF, MF)



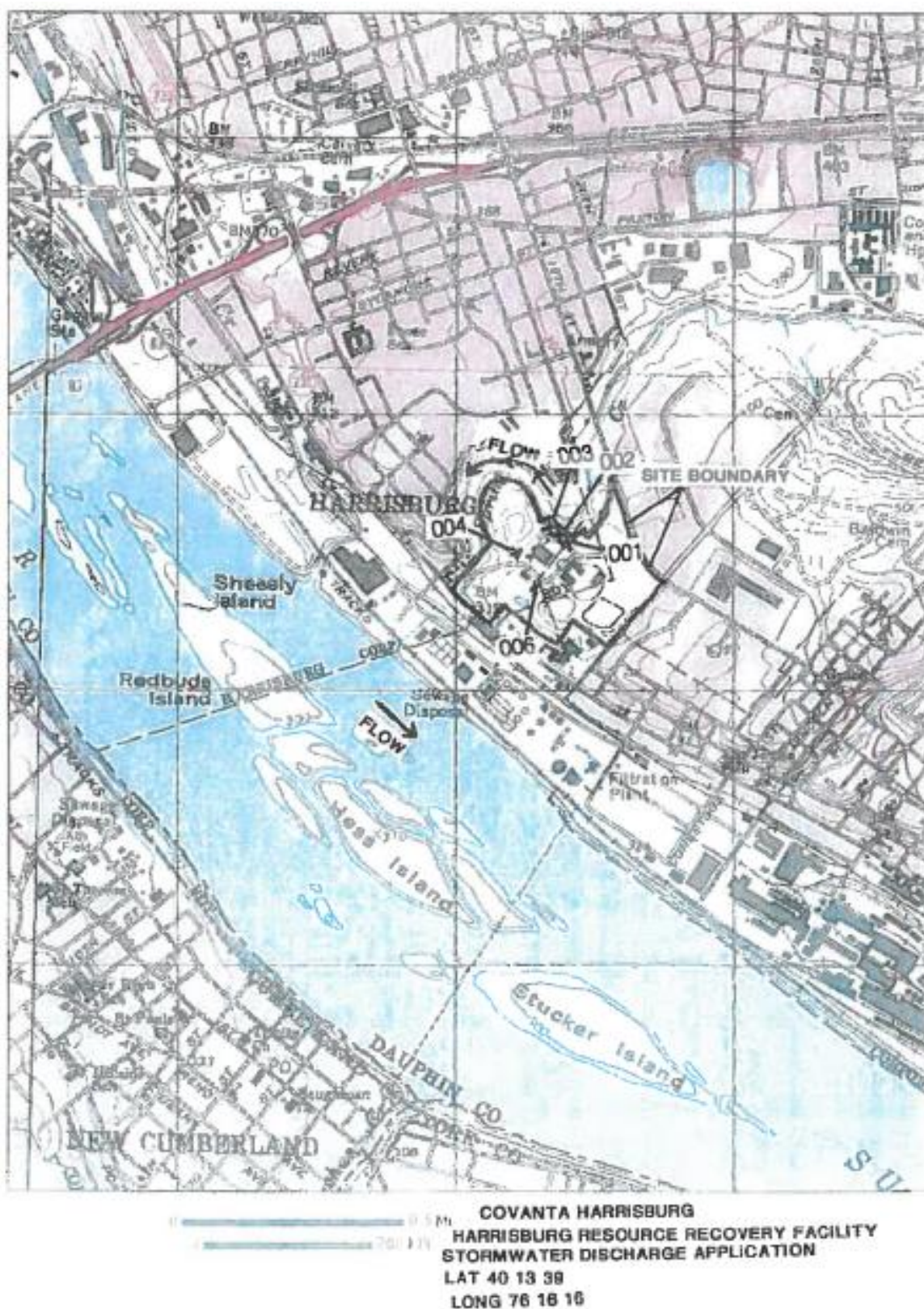


Figure 1. Site Location Map

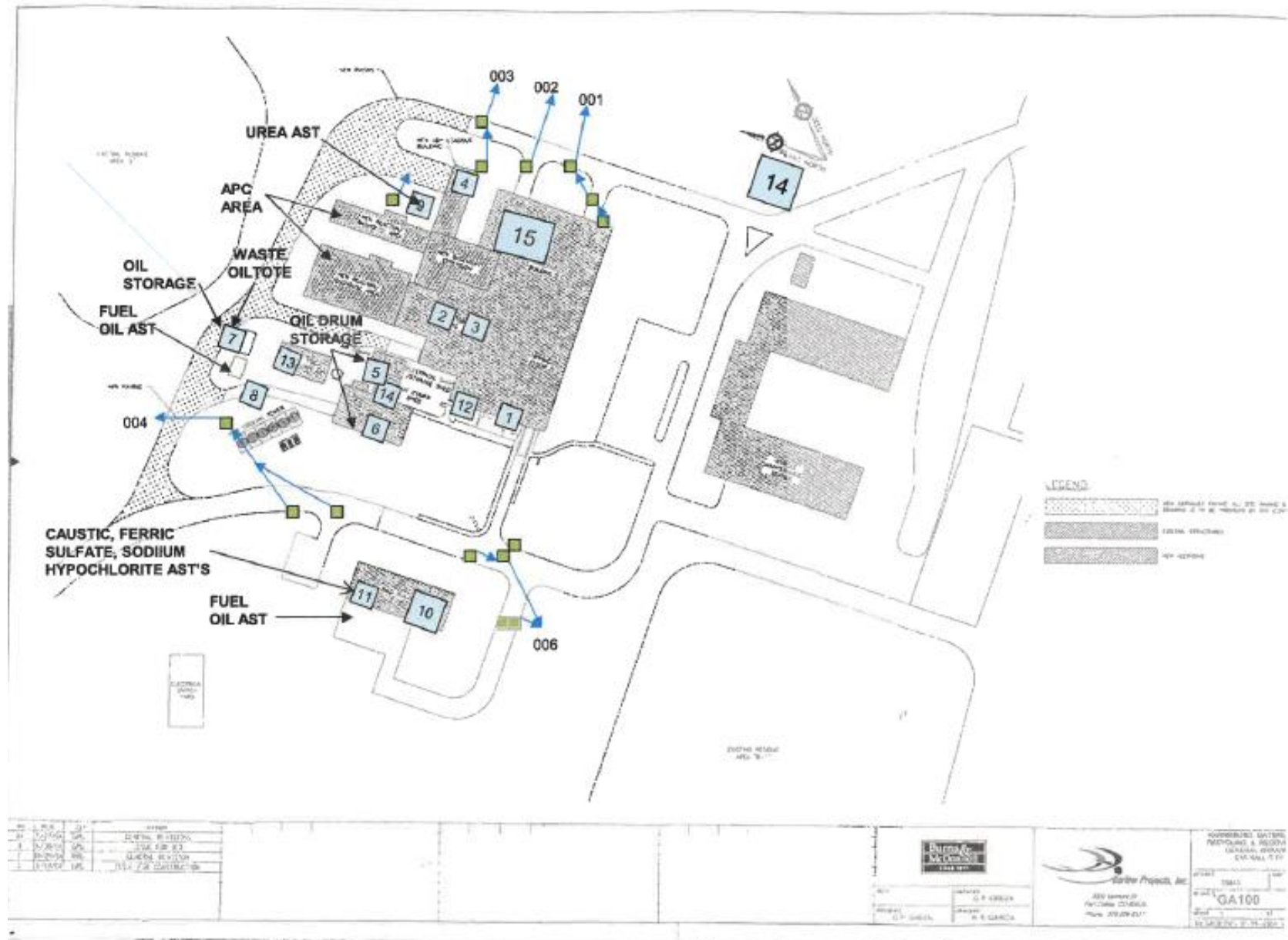


Figure 2. Site Plan

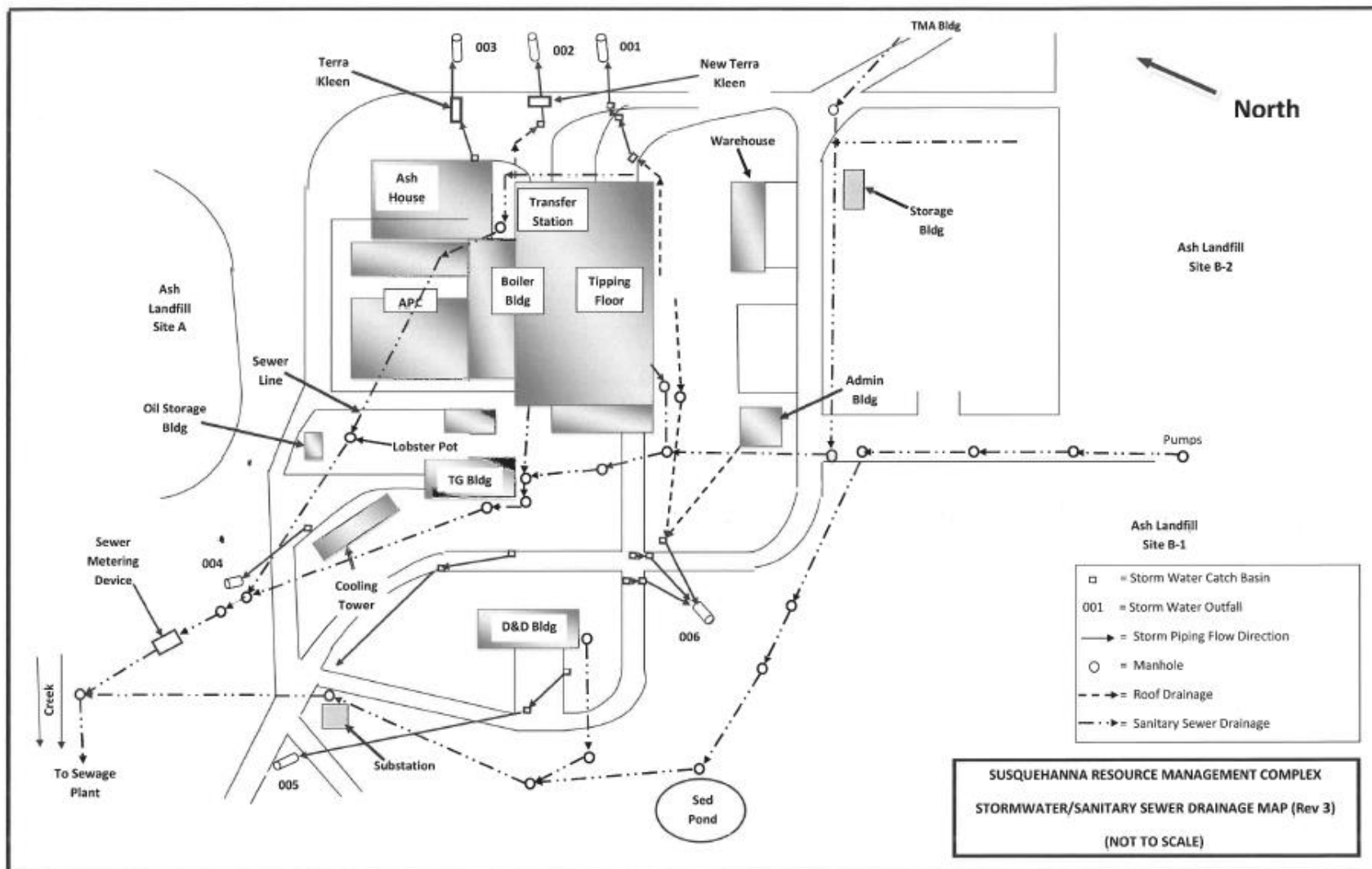


Figure 3. Stormwater Drainage Map