AUTHORIZATION TO DISCHARGE UNDER
THE NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

In compliance with the provisions of the Federal Clean Water Act as amended, 33 U.S.C. §§ 1251 et seq. (the "CWA"),

General Electric Company

is authorized to discharge from a facility located at

General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

to receiving water named

Housatonic River
Unkamet Brook
Housatonic River Watershed

in accordance with effluent limitations, monitoring requirements and other conditions set forth herein.

This Permit shall become effective on [DATE].[1]

This Permit expires at midnight on [DATE].

This Permit supersedes the Permit issued on September 30, 2008 and modified August 10, 2009.

This Permit consists of this **cover page**, **Part I**, **Attachment A** (Whole Effluent Toxicity Testing Protocol), **Attachment B** (PFAS Analytes), **Attachment C** (Site-Specific BMPs), and **Part II** (NPDES Part II Standard Conditions, April 2018).

Signed this day of

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Ken Moraff, Director
Water Division
Environmental Protection Agency
Region 1
Boston, MA

[1] Pursuant to 40 Code of Federal Regulations (CFR) § 124.15(b)(3), if no comments requesting a change to the Draft Permit are received, the Permit will become effective upon the date of signature. Procedures for appealing EPA's Final Permit decision may be found at 40 CFR § 124.19.

PART I

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

1. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge the wastewaters from internal Outfall 64G and Outfall 64T through **Outfall Serial Number 005** to the **Housatonic River**. The discharge shall be limited and monitored **when discharging** as specified below; the receiving water shall be monitored as specified below.

Effluent Characteristic	**Effluent Limitations**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Flow[6] Flow Rate Total Flow Rainfall[7]	Report MGD Report MGD Report Inches	Report MGD Report MGD Report Inches	Continuous	Meter
Total Suspended Solids (TSS)	96.2 lbs/day	132.9 lbs/day 30 mg/L	2/Month	Grab
pH[8]	6.5 - 8.3 S.U.		2/Month	Grab
Oil & Grease	Report mg/L	15 mg/L	2/Month	Grab
Total Polychlorinated Biphenyls (PCBs)[9]	0.000064 µg/L	Report µg/L	2/Month	Grab
Total Volatile Organic Compounds (VOCs)[10]	---	Report µg/L	1/Quarter	Grab
Total Semi-volatile Organic Compounds (SVOCs)[11]	---	Report µg/L	1/Quarter	Grab
Per- and polyfluoroalkyl substances (PFAS)[12]	---	Report ng/L	1/Quarter	Grab
Ambient Characteristic[13]	**Reporting Requirements**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Total Polychlorinated Biphenyls (PCBs)	---	Report µg/L	1/Quarter	Grab
Total Polychlorinated Biphenyls (PCBs), downstream	---	Report µg/L	1/Quarter	Grab

2. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge groundwater, potable water, wash waters generated as a result of activities required in Part I.C.2., and water generated from remedial activities at the GE-Pittsfield/Housatonic River Site consisting of treated groundwater, landfill leachate, investigation and/or remediation derived wastewater (e.g., monitoring well purging, decontamination wastewater), and drain back waters (i.e., waters decanted from impacted soils) through internal **Outfall Serial Number 64G** following treatment through the Building 64G treatment system to the **Housatonic River** via Outfall 005. The discharge shall be limited and monitored **when discharging** as specified below; the receiving water shall be monitored as specified below.

Effluent Characteristic	**Effluent Limitations**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Flow[6] Flow Rate Total Flow	 Report MGD Report MGD	 Report MGD Report MGD	Continuous	Meter
Total Suspended Solids (TSS)	Report mg/L	30 mg/L	2/Month	Grab
pH[8]	6.5 - 8.3 S.U.		2/Month	Grab
Total Petroleum Hydrocarbons (TPH)	Report mg/L	5 mg/L	2/Month	Grab
Total Polychlorinated Biphenyls (PCBs)[9]	Report µg/L	0.01 µg/L	2/Month	Grab
Total Volatile Organic Compounds (VOCs)[10]	---	Report µg/L	1/Quarter	Grab
Total Semi-volatile Organic Compounds (SVOCs)[11]	---	Report µg/L	1/Quarter	Grab
Per- and polyfluoroalkyl substances (PFAS)[12]	---	Report ng/L	1/Quarter	Grab
Whole Effluent Toxicity (WET) Testing[14,15]				
IC_{25}	---	Report %	1/Quarter	Composite
C-NOEC	---	Report NOEC	1/Quarter	Composite
Hardness	---	Report mg/L	1/Quarter	Composite
Ammonia Nitrogen	---	Report mg/L	1/Quarter	Composite
Total Aluminum	---	Report mg/L	1/Quarter	Composite
Total Cadmium	---	Report mg/L	1/Quarter	Composite
Total Copper	---	Report mg/L	1/Quarter	Composite
Total Nickel	---	Report mg/L	1/Quarter	Composite
Total Lead	---	Report mg/L	1/Quarter	Composite
Total Zinc	---	Report mg/L	1/Quarter	Composite

Ambient Characteristic[16]	Reporting Requirements		Monitoring Requirements[1,2,3]	
	Average Monthly	Maximum Daily	Average Monthly	Maximum Daily
Hardness	---	Report mg/L	1/Quarter	Grab
Ammonia Nitrogen	---	Report mg/L	1/Quarter	Grab
Total Aluminum	---	Report mg/L	1/Quarter	Grab
Total Cadmium	---	Report mg/L	1/Quarter	Grab
Total Copper	---	Report mg/L	1/Quarter	Grab
Total Nickel	---	Report mg/L	1/Quarter	Grab
Total Lead	---	Report mg/L	1/Quarter	Grab
Total Zinc	---	Report mg/L	1/Quarter	Grab
pH[17]	---	Report S.U.	1/Quarter	Grab
Temperature[17]	---	Report °C	1/Quarter	Grab

3. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge the stormwater, groundwater infiltration and potable water from fire system testing through internal **Outfall Serial Number 64T** following treatment through the Building 64T treatment system to the **Housatonic River** via Outfall 005. The discharge shall be limited and monitored **when discharging** as specified below; the receiving water shall be monitored as specified below.

Effluent Characteristic	**Effluent Limitations**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Flow[6] Flow Rate Total Flow	 Report MGD Report MGD	 Report MGD Report MGD	Continuous	Meter
Total Suspended Solids (TSS)	Report mg/L	30 mg/L	2/Month	Grab
pH[8]	6.5 - 8.3 S.U.		2/Month	Grab
Total Petroleum Hydrocarbons (TPH)	Report mg/L	5 mg/L	2/Month	Grab
Total Polychlorinated Biphenyls (PCBs)[9]	---	Report µg/L	2/Month	Grab
Total Volatile Organic Compounds (VOCs)[10]	---	Report µg/L	1/Quarter	Grab
Total Semi-volatile Organic Compounds (SVOCs)[11]	---	Report µg/L	1/Quarter	Grab
Per- and polyfluoroalkyl substances (PFAS)[12]	---	Report ng/L	1/Quarter	Grab
Whole Effluent Toxicity (WET) Testing[14,15]				
IC_{25}	---	Report %	1/Quarter	Composite
C-NOEC	---	Report NOEC	1/Quarter	Composite
Hardness	---	Report mg/L	1/Quarter	Composite
Ammonia Nitrogen	---	Report mg/L	1/Quarter	Composite
Total Aluminum	---	Report mg/L	1/Quarter	Composite
Total Cadmium	---	Report mg/L	1/Quarter	Composite
Total Copper	---	Report mg/L	1/Quarter	Composite
Total Nickel	---	Report mg/L	1/Quarter	Composite
Total Lead	---	Report mg/L	1/Quarter	Composite
Total Zinc	---	Report mg/L	1/Quarter	Composite
Ambient Characteristic[16]	**Reporting Requirements**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Average Monthly**	**Maximum Daily**
Hardness	---	Report mg/L	1/Quarter	Grab
Ammonia Nitrogen	---	Report mg/L	1/Quarter	Grab

Total Aluminum	---	Report mg/L	1/Quarter	Grab
Total Cadmium	---	Report mg/L	1/Quarter	Grab
Total Copper	---	Report mg/L	1/Quarter	Grab
Total Nickel	---	Report mg/L	1/Quarter	Grab
Total Lead	---	Report mg/L	1/Quarter	Grab
Total Zinc	---	Report mg/L	1/Quarter	Grab
pH[17]	---	Report S.U.	1/Quarter	Grab
Temperature[17]	---	Report °C	1/Quarter	Grab

4. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge stormwater and potable water from fire system testing through **Outfall Serial Number 05A** following treatment through OWS 64-W to the **Housatonic River**. The discharge shall be limited and monitored **during wet weather** as specified below; the receiving water shall be monitored as specified below. Discharges **during dry weather**, except those that consist of potable water from fire testing activities, are prohibited (i.e., discharges that contain groundwater infiltration).

Effluent Characteristic	**Effluent Limitations**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Flow[6] Flow Rate Total Flow Rainfall[7]	Report MGD Report MGD Report Inches	Report MGD Report MGD Report Inches	Continuous	Meter
Total Suspended Solids (TSS)	Report mg/L	30 mg/L	2/Month	Grab
pH[8]	6.5 - 8.3 S.U.		2/Month	Grab
Oil & Grease	Report mg/L	15 mg/L	2/Month	Grab
Total Polychlorinated Biphenyls (PCBs)[9]	---	Report µg/L	2/Month	Grab
Total Volatile Organic Compounds (VOCs)[10]	---	Report µg/L	1/Quarter	Grab
Total Semi-volatile Organic Compounds (SVOCs)[11]	---	Report µg/L	1/Quarter	Grab
Per- and polyfluoroalkyl substances (PFAS)[12]	---	Report ng/L	1/Quarter	Grab
Ambient Characteristic[13]	**Reporting Requirements**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Total Polychlorinated Biphenyls (PCBs)	---	Report µg/L	1/Quarter	Grab
Total Polychlorinated Biphenyls (PCBs), downstream	---	Report µg/L	1/Quarter	Grab

5. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge City of Pittsfield stormwater and potable water from fire system testing through **Outfall Serial Number 05B** to the **Housatonic River**. The discharge shall be limited and monitored **during wet weather** as specified below; the receiving water shall be monitored as specified below. Discharges **during dry weather**, except those that consist of potable water from fire testing activities, are prohibited (i.e., discharges that contain groundwater infiltration).

Effluent Characteristic	**Effluent Limitations**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Flow[6] Flow Rate Total Flow Rainfall[7]	 Report MGD Report MGD Report Inches	 Report MGD Report MGD Report Inches	Continuous	Meter
Total Suspended Solids (TSS)	Report mg/L	30 mg/L	2/Month	Grab
pH[8]	6.5 - 8.3 S.U.		2/Month	Grab
Oil & Grease	Report mg/L	15 mg/L	2/Month	Grab
Total Polychlorinated Biphenyls (PCBs)[9]	---	Report µg/L	2/Month	Grab
Total Volatile Organic Compounds (VOCs)[10]	---	Report µg/L	1/Quarter	Grab
Total Semi-volatile Organic Compounds (SVOCs)[11]	---	Report µg/L	1/Quarter	Grab
Per- and polyfluoroalkyl substances (PFAS)[12]	---	Report ng/L	1/Quarter	Grab
Ambient Characteristic[13]	**Reporting Requirements**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Total Polychlorinated Biphenyls (PCBs)	---	Report µg/L	1/Quarter	Grab
Total Polychlorinated Biphenyls (PCBs), downstream	---	Report µg/L	1/Quarter	Grab

6. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge stormwater and potable water from fire system testing through **Outfall Serial Number 006** following treatment through OWS 64-X to the **Housatonic River**. The discharge shall be limited and monitored **during wet weather** as specified below; the receiving water shall be monitored as specified below. Discharges **during dry weather**, except those that consist of potable water from fire testing activities, are prohibited (i.e., discharges that contain groundwater infiltration).

Effluent Characteristic	**Effluent Limitations**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Flow[6] Flow Rate Total Flow Rainfall[7]	Report MGD Report MGD Report Inches	Report MGD Report MGD Report Inches	Continuous	Meter
Total Suspended Solids (TSS)	Report mg/L	30 mg/L	2/Month	Grab
pH[8]	6.5 - 8.3 S.U.		2/Month	Grab
Oil & Grease	Report mg/L	15 mg/L	2/Month	Grab
Total Polychlorinated Biphenyls (PCBs)[9]	---	Report µg/L	2/Month	Grab
Total Volatile Organic Compounds (VOCs)[10]	---	Report µg/L	1/Quarter	Grab
Total Semi-volatile Organic Compounds (SVOCs)[11]	---	Report µg/L	1/Quarter	Grab
Per- and polyfluoroalkyl substances (PFAS)[12]	---	Report ng/L	1/Quarter	Grab
Ambient Characteristic[13]	**Reporting Requirements**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Total Polychlorinated Biphenyls (PCBs)	---	Report µg/L	1/Quarter	Grab
Total Polychlorinated Biphenyls (PCBs), downstream	---	Report µg/L	1/Quarter	Grab

7. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge stormwater and potable water from fire system testing through **Outfall Serial Number 06A and Outfall Serial Number SRO5** to the **Housatonic River**. The discharge shall be limited and monitored **during wet weather** as specified below; the receiving water shall be monitored as specified below. Discharges **during dry weather**, except those that consist of potable water from fire testing activities, are prohibited (i.e., discharges that contain groundwater infiltration).

Effluent Characteristic	**Effluent Limitations**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Flow[6] Flow Rate Total Flow Rainfall[7]	 Report MGD Report MGD Report Inches	 Report MGD Report MGD Report Inches	Continuous	Meter
Total Suspended Solids (TSS)	Report mg/L	30 mg/L	2/Month	Grab
pH[8]	6.5 - 8.3 S.U.		2/Month	Grab
Oil & Grease	Report mg/L	15 mg/L	2/Month	Grab
Total Polychlorinated Biphenyls (PCBs)[9]	---	Report µg/L	2/Month	Grab
Total Volatile Organic Compounds (VOCs)[10]	---	Report µg/L	1/Quarter	Grab
Total Semi-volatile Organic Compounds (SVOCs)[11]	---	Report µg/L	1/Quarter	Grab
Per- and polyfluoroalkyl substances (PFAS)[11,12]	---	Report ng/L	1/Quarter	Grab
Ambient Characteristic[13]	**Reporting Requirements**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Total Polychlorinated Biphenyls (PCBs)	---	Report µg/L	1/Quarter	Grab
Total Polychlorinated Biphenyls (PCBs), downstream	---	Report µg/L	1/Quarter	Grab

8. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge stormwater and potable water from fire system testing through **Outfall Serial Number 009** following treatment through OWS 119-W to the **Unkamet Brook**. The discharge shall be limited and monitored **during wet weather** as specified below; the receiving water shall be monitored as specified below. Discharges **during dry weather**, except those that consist of potable water from fire testing activities, are prohibited (i.e., discharges that contain groundwater infiltration).

Effluent Characteristic	**Effluent Limitations**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Flow[6] Flow Rate Total Flow Rainfall[7]	Report MGD Report MGD Report Inches	Report MGD Report MGD Report Inches	Continuous	Meter
Total Suspended Solids (TSS)	95.2 lbs/day	493.9 lbs/day 30 mg/L	2/Month	Grab
pH[8]	6.5 - 8.3 S.U.		2/Month	Grab
Oil & Grease	Report mg/L	15 mg/L	2/Month	Grab
Total Polychlorinated Biphenyls (PCBs)[9]	---	Report µg/L	2/Month	Grab
Total Volatile Organic Compounds (VOCs)[10]	---	Report µg/L	1/Quarter	Grab
Total Semi-volatile Organic Compounds (SVOCs)[11]	---	Report µg/L	1/Quarter	Grab
Per- and polyfluoroalkyl substances (PFAS)[11,12]	---	Report ng/L	1/Quarter	Grab
Ambient Characteristic[13]	**Reporting Requirements**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Total Polychlorinated Biphenyls (PCBs)	---	Report µg/L	1/Quarter	Grab
Total Polychlorinated Biphenyls (PCBs), downstream	---	Report µg/L	1/Quarter	Grab

9. During the period beginning on the effective date and lasting through the expiration date, the Permittee is authorized to discharge stormwater through **Outfall Serial Number YD10, YD12, YD13, and YD16** to the **Unkamet Brook**. The discharge shall be limited and monitored as specified below.

Effluent Characteristic	**Effluent Limitations**		**Monitoring Requirements[1,2,3]**	
	Average Monthly	**Maximum Daily**	**Measurement Frequency[4]**	**Sample Type[5]**
Flow[6] Flow Rate Total Flow Rainfall[7]	 Report MGD Report MGD Report Inches	 Report MGD Report MGD Report Inches	1/Year	Estimate
Total Suspended Solids (TSS)	---	Report mg/L	1/Year	Grab
pH[8]	6.5 - 8.3 S.U.		1/Year	Grab
Oil & Grease	---	Report mg/L	1/Year	Grab
Total Polychlorinated Biphenyls (PCBs)[9]	---	Report µg/L	1/Year	Grab

Footnotes:

1. Effluent samples shall yield data representative of the discharge. A routine sampling program shall be developed in which samples are taken as follows:

Outfall 005	At the discharge point to the Housatonic River following mixing of the effluent from Building 64G with the effluent from Building 64T.
Outfall 64G	At the discharge point of the Building 64G treatment system, prior to comingling with the effluent from Building 64T.
Outfall 64T	At the discharge point of the Building 64T treatment system, prior to comingling with the effluent from Building 64G.
Outfall 05A	At the discharge point to the Housatonic River following treatment through OWS 64-W.
Outfall 05B	At the discharge point to the Housatonic River.
Outfall 006	At the discharge point to the Housatonic River following treatment through OWS 64-X.
Outfall 06A	At the discharge point to the Housatonic River.
Outfall SRO5	At the discharge point to the Housatonic River.
Outfall 009	At the discharge point of OWS 119-W following treatment through OWS 119-W.
YD 10	At the discharge point to the Unkamet Brook.
YD 12	At the discharge point to the Unkamet Brook.
YD 13	At the discharge point to the Housatonic River.
YD 16	At the discharge point to the Housatonic River.

Changes in sampling location must be approved in writing by the Environmental Protection Agency Region 1 (EPA). The Permittee must report the results to EPA and the Massachusetts Department of Environmental Protection (the "State") of any additional testing above that required herein, if testing is done in accordance with 40 CFR Part 136.

2. In accordance with 40 CFR § 122.44(i)(1)(iv), The Permittee must monitor according to sufficiently sensitive test procedures (i.e., methods) approved under 40 CFR Part 136 or required under 40 CFR chapter I, subchapter N or O, for the analysis of pollutants or pollutant parameters (except WET). A method is "sufficiently sensitive" when: 1) The method minimum level (ML) is at or below the level of the effluent limitation established in the permit for the measured pollutant or pollutant parameter; or 2) The method has the lowest ML of the analytical methods approved under 40 CFR Part 136 or required under 40 CFR chapter I, subchapter N or O for the measured pollutant or pollutant parameter. The term "minimum level" refers to either the sample concentration equivalent to the lowest calibration point in a method or a multiple of the method detection limit (MDL), whichever is higher. Minimum levels may be obtained in several ways: They may be published in a method; they may be based on the lowest acceptable calibration point used by a laboratory; or they may be calculated by multiplying the MDL in a method, or the MDL determined by a laboratory, by a factor.

3. When a parameter is not detected above the ML, the Permittee must report the data qualifier signifying less than the ML for that parameter (e.g., < 0.01 µg/L, if the ML for a parameter is 0.01 µg/L). For calculating and reporting the average monthly concentration when one or more values are not detected, assign a value of zero to all non-detects and report the average of all the results. The number of exceedances shall be enumerated for each parameter in the field provided on every Discharge Monitoring Report (DMR).

4. Measurement frequency of 2/month is defined as the sampling of two discharge events in each calendar month. Measurement frequency of 1/quarter is defined as the sampling of one discharge event during each calendar quarter. Calendar quarters are defined as January through March, inclusive, April through June, inclusive, July through September, inclusive and October through December, inclusive. Measurement frequency of 1/year is defined as the sampling of one discharge event during one calendar year. If no sample is collected during the measurement frequencies defined above, the Permittee must report an appropriate No Data Indicator Code.

5. Each wet weather grab sample shall be taken during the first flush of one consecutive discharge event consistent with the sampling methodology developed pursuant to the requirements in Part I.C.2.d.

   Wet weather composite sampling shall be done on a wet weather day. Wet weather is defined as any day on which more than 0.1 inches of total precipitation falls or on which snow melt occurs, and the interval from the preceding measurable storm is at least 24 hours. The 24-hour storm interval is waived when the preceding measurable storm did not yield a measurable discharge, or if the permittee is able to document that less than a 24-hour interval

is representative for local storm events during the sampling period. Dry weather is defined as any day on which less than 0.1 inches of total precipitation occurs and no snow melt occurs.

6. Effluent flow rate and total (volume) shall be reported in million gallons per day (MGD). Flow must be recorded using a flow meter, unless otherwise noted, that is capable of collecting continuous measurements. Dry weather flow will be obtained through visual inspection and measurement, where dry weather flows are less than can be measured by a flow meter.

7. The daily total precipitation shall be reported on the discharge monitoring report in inches. The Permittee will maintain a rainfall rain gauge on-site when the air temperature is above freezing and will report the National Weather Service data for Pittsfield, MA when the air temperature is below freezing. Report on the DMR the average and daily maximum precipitation that fell on the days PCB samples were taken.

8. The pH shall be within the specified range at all times. The minimum and maximum pH sample measurement values for the month shall be reported in standard units (S.U.).

9. For the purposes of this permit, total polychlorinated biphenyls (PCBs) analysis must achieve a minimum level of detection no greater than 0.01 µg/L. The compliance level for total PCBs is non-detect. Total PCB analysis must be completed using a test method in 40 CFR Part 136 so long as that test method achieves ≤0.01 (e.g., 608.3 with additional sample volume, if necessary) or EPA Method 1628.

10. The Permittee must report the sum of all volatile organic compounds (VOCs) detected using EPA Method 624.1, attach the results to the discharge monthly reports and submit a summary table to EPA by March 15th of each calendar year that summarizes the monitoring results for all compounds. See Part I.D.4.

11. The Permittee must report the sum of all semi- volatile organic compounds (SVOCs) detected using EPA Method 625.1, attach the results to the discharge monthly reports and submit a summary table to EPA by March 15th of each calendar year that summarizes the monitoring results for all compounds. See Part I.D.4.

12. PFAS analytes include those listed in Attachment C (40 parameters) and are listed separately in NetDMR. Report in nanograms per liter (ng/L). In the absence of an applicable 40 CFR Part 136 method, PFAS monitoring shall be conducted using EPA Method 1633. The reporting requirement for the listed PFAS parameters takes effect the first full calendar quarter following 6 months after the effective date of the permit. After one year of monitoring, if all samples are non-detect for all forty PFAS compounds, using EPA's multi-lab validated method for wastewater, the Permittee may request to remove the requirement for PFAS monitoring. See Special Condition in Part I.C.7.

13. A sample shall be taken of the receiving water both upstream and downstream of each outfall for total PCBs when discharges are occurring from that outfall and the results reported on the appropriate DMR. This PCB sampling is independent of any other PCB monitoring required

by this permit. Total PCB analysis must achieve a minimum level of detection no greater than 0.01 µg/L. Total PCB analysis must be completed using a test method in 40 CFR Part 136 so long as that test method achieves ≤0.01 (e.g., 608.3 with additional sample volume, if necessary) or EPA Method 1628.

14. The Permittee must conduct chronic toxicity tests (IC_{25} and C-NOEC) 1/quarter in accordance with test procedures and protocol specified in **Attachment A** of this permit in the calendar months of March, June, September, and December. IC_{50} and C-NOEC are defined in Part II.E. of this permit. The Permittee must test the daphnid, *Ceriodaphnia dubia*. The complete report for each toxicity test shall be submitted as an attachment to the DMR submittal that includes the results for that toxicity test.

15. For Part I.A.1., Whole Effluent Toxicity Testing, the Permittee must conduct the analyses specified in **Attachment A**, Part VI. CHEMICAL ANALYSIS for the effluent sample. If toxicity test(s) using the receiving water as diluent show the receiving water to be toxic or unreliable, the Permittee must follow procedures outlined in **Attachment A**, Section IV., DILUTION WATER. Even where alternate dilution water has been used, the results of the receiving water control (0% effluent) analyses must be reported. Minimum levels and test methods are specified in **Attachment A**, Part VI. CHEMICAL ANALYSIS.

16. For Part I.A.1., Ambient Characteristic, the Permittee must conduct the analyses specified in **Attachment A**, Part VI. CHEMICAL ANALYSIS for the receiving water sample collected as part of the WET testing requirements. Such samples shall be taken from the receiving water at a point immediately upstream of the permitted discharge's zone of influence at a reasonably accessible location, as specified in **Attachment A**. Minimum levels and test methods are specified in **Attachment A**, Part VI. CHEMICAL ANALYSIS.

17. A pH and temperature measurement shall be taken of each receiving water sample at the time of collection and the results reported on the appropriate DMR. These pH and temperature measurements are independent of any pH and temperature measurements required by the WET testing protocol.

Part I.A. continued.

10. Authorized Non-Stormwater Discharges

    a. Discharges from emergency/unplanned fire-fighting activities.

    b. Fire hydrant flushings.

    c. Potable water, including uncontaminated water line flushings.

    d. Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outside storage of refrigerated gases or liquids.

    e. Irrigation/landscape drainage, provided all pesticides, herbicides, and fertilizers have been applied in accordance with the approved labeling.

    f. Foundation or footing drains where flows are not contaminated with oil or hazardous materials.

    g. Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the Facility, but not intentional discharges from the cooling tower (e.g., "piped" cooling tower blowdown; drains).

    h. Any authorized non-stormwater discharge listed above, or any discharge authorized by this NPDES permit mixed with a discharge authorized by a different NPDES permit.[2]

11. All existing manufacturing, commercial, mining, and silvicultural dischargers must notify EPA as soon as they know or have reason to believe (40 CFR § 122.42):

    a. That any activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

        (1) 100 micrograms per liter (µg/L);
        (2) 200 µg/L for acrolein and acrylonitrile; 500 µg/L for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (mg/L) for antimony;
        (3) Five times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR § 122.21(g)(7); or
        (4) Any other notification level established by EPA in accordance with 40 CFR § 122.44(f) and State regulations.

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2 At this Facility, a "discharge authorized by a different NPDES permit" refers to the stormwater inflow from the City of Pittsfield Municipal Separate Storm Sewer System that is authorized by the Massachusetts Small MS4 General Permit. Discharges authorized by this permit must meet all effluent limitations prior to mixing with this stormwater inflow.

b. That any activity has occurred or will occur which would result in the discharge, on a non-routine or infrequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":

(1) 500 μg/L;
(2) One mg/L for antimony;
(3) 10 times the maximum concentration value reported for that pollutant in the permit application in accordance with 40 CFR § 122.21(g)(7); or
(4) Any other notification level established by EPA in accordance with 40 CFR § 122.44(f) and State regulations.

c. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the permit application.

B. UNAUTHORIZED DISCHARGES

1. This permit authorizes the discharges listed in Part I.A. and only from the outfall(s) listed in Part I.A. in accordance with the terms and conditions of this permit. Discharges from any other point sources are not authorized by this permit and shall be reported in accordance with Part D.1.e.(1) of the Standard Conditions of this permit (24-hour reporting).

2. The following discharges are expressly prohibited:

a. Discharge of any solid hazardous waste in combination with stormwater discharges or other allowable non-stormwater discharges including, but not limited to: sludge and/or bottom deposits from any tank(s), basin(s), and/or collection structure(s), tank bottom water. Examples of tanks and/or basins include, but are not limited to: primary catch basins, oil/water separators, water treatment tanks, baffled storage tanks collecting spills;

b. Discharge of liquid hazardous waste alone or in combination with stormwater or other allowable non-stormwater discharge;

c. Discharges of groundwater[3] alone or in combination with stormwater or other authorized non-stormwater discharge, except as specifically authorized in Part I.A.1, 2, and 3. Discharges of groundwater include, but are not limited to: wastewater generated during remediation or dewatering activities; and groundwater that infiltrates into the stormwater collection system.

3 For the purposes of this permit, "groundwater" shall mean: the waters below the ground surface that contain (i.e., soluble) or transports (i.e., insoluble) pollutants from releases of oil and hazardous materials to soil or groundwater at the Facility that infiltrates into the stormwater collection system and discharges to the receiving waters either during dry weather flows or that is flushed out during wet weather flows.

d. Discharges of aqueous film-forming foam and alcohol resistant foam either in concentrate form or as foam diluted with water during testing or maintenance of the fire suppression system at the Facility.

C. SPECIAL CONDITIONS

1. Stormwater Pollution Prevention Plan

The Permittee must develop and implement a Stormwater Pollution Prevention Plan (SWPPP) that documents the selection, design, installation/operation, and maintenance of control measures, including BMPs to meet the effluent limits required in this permit to minimize the discharge of pollutants from the Facility's authorized outfalls to the receiving water. The SWPPP shall be a written document consistent with the terms of this Permit. The SWPPP must document the implementation of all requirements in Part I.C.2 through 6 and be kept up to date throughout the permit term, such as making revisions when changes are made to the stormwater collection system or based on corrective actions.

a. The SWPPP shall be developed, implemented, signed consistent with the signatory requirements in Part II.D.2 of this Permit, and submitted to EPA within 90 days after the effective date of this Permit. EPA will provide any comments on the SWPPP within 90 days of receipt confirmation and comments must be reasonably considered by the Permittee for inclusion in the SWPPP. The SWPPP must be updated at least once per calendar year and a copy submitted to EPA by January 31.

b. The SWPPP shall be prepared by a qualified person in accordance with good engineering practices and manufacturer's specifications and must take future conditions into consideration. The SWPPP shall contain the elements listed in EPA's 2021 MSGP[4] as described below:

(1) Stormwater pollution prevention team

The Permittee must identify the personnel that comprise the Facility's stormwater pollution prevention team as well as their individual responsibilities. The stormwater pollution prevention team is responsible for overseeing development of the SWPPP, any modifications to it, and for implementing/operating and maintaining control measures and taking corrective actions, when required in Part I.C.5. Each member of the stormwater pollution prevention team must have ready access to either an electronic or paper copy of this permit, the most updated copy of the SWPPP, and other relevant documents or information that must be kept with the SWPPP.

i. Description of the control measures implemented in the drainage area of each outfall with treatment system schematics that describe each major treatment system component/process;

4 The SWPPP requirements are consistent with those found in EPA's 2021 MSGP Part 2.1.2.

ii. Description of the exposed materials located in the drainage area of each outfall that are likely to contribute pollutants via stormwater discharges;
iii. An estimate of the runoff coefficient of the drainage areas (low = under 40%; medium = 40 to 65%; high = above 65%);

(2) Facility description

The Permittee must provide the following in the SWPPP, at a minimum:

i. A description of the nature of the activities at the Facility.
ii. A general location map (e.g., U.S. Geological Survey (USGS) quadrangle map) with enough detail to identify the location of the Facility and all receiving waters for the authorized discharges.
iii. A site map showing:

1) Boundaries of the property and the size of the property in acres;
2) Location and extent of significant structures and impervious surfaces;
3) Boundary of each drainage area at the Facility contributing to each outfall including directions of stormwater flow (use arrows);
4) Locations of all stormwater control measures;
5) Locations of all receiving waters, in the immediate vicinity of the Facility. Indicate listed impairments;
6) Locations of all stormwater conveyances including manholes, catch basins, and pipes;
7) Locations of potential pollutant sources, including, at a minimum, the soil or groundwater management areas at the Facility;
8) Locations where significant spills or leaks have occurred;
9) Locations of all authorized outfalls and showing the precise monitoring locations;
10) Locations of City of Pittsfield stormwater inflow and discharge pathway and outfalls;
11) The location of municipal separate storm sewer systems (MS4s) and where MS4 stormwater mixes with site wastewaters;
12) Areas of Endangered Species Act-designated critical habitat for endangered or threatened species, if any;
13) Locations of any of the following: fueling stations; vehicle and equipment maintenance and/or cleaning areas; loading/unloading areas; locations used for the treatment, storage, or disposal of wastes; liquid or solid hazardous waste storage; remedial activity areas; immediate access roads; transfer areas for substances in bulk; equipment; and locations and sources of run-on to the Facility from adjacent property that contains significant quantities of pollutants.

(3) Summary of potential pollutant sources;

The Permittee must describe in the SWPPP areas at the Facility where materials or activities are exposed to stormwater, or from which authorized non-stormwater discharges originate. Materials include but are not limited to: soil and groundwater management areas, soil, sediment or

groundwater from remedial activities, including landfill leachate; remedial equipment; raw materials or products (e.g., treatment chemicals); treatment byproducts, and waste products. Activities include, but are not limited to: the storage, loading and unloading, transportation, disposal, or conveyance of any material, or waste product. For structures located in areas of activity, the structures themselves are potential sources of pollutants. For each area identified, the description must include:

i. A list of the activities exposed to stormwater.
ii. A list of the pollutant(s) or pollutant constituents (e.g., oil recovery, sulfuric acid, cleaning solvents) associated with each identified activity, which could be exposed to rainfall or snowmelt and could be discharged from the Facility. The pollutant list must include all significant materials that have been handled, treated, stored, released, or disposed at the Facility since this NPDES permit was last issued (September 30, 2008).
iii. Documenting where potential spills and leaks could occur that could contribute pollutants to stormwater discharges, and the corresponding outfall(s) that would be affected by such spills and leaks. The Permittee must document all significant spills and leaks of oil or toxic or hazardous substances that actually occurred at exposed areas, or that drained to a stormwater conveyance, since this NPDES permit was last issued (September 30, 2008).
iv. Evaluation of unauthorized discharges. The Permittee must inspect and document all discharge points at the Facility as part of the SWPPP. Documentation of this evaluation must include:

1) The date of the evaluation;
2) A description of the evaluation criteria used;
3) A list of the discharge points that were directly observed during the evaluation;
4) If there any unauthorized discharges identified, The Permittee must immediately take action(s), such as implementing control measures, to eliminate those discharges, obtain permission to discharge to the sanitary sewer, or modify this permit.
5) An explanation of all actions taken to immediately eliminate the unauthorized discharge per Part I.C.5.
6) A summary of all discharge sampling data collected at the Facility since this NPDES permit was last issued (September 30, 2008). The summary shall include data tables/figures (and may include a narrative description) that adequately summarizes the collected sampling data to yield data representative of the discharges from the Facility.

(4) Description of all stormwater control measures;

The Permittee must document the location and type of control measures in use to comply with the effluent limitations and conditions of this permit. The Permittee must also document the following, as appropriate:

i. How the control measure meets the selection and design considerations in in Part I.C.2;

ii. How the control measures address the pollutant sources identified.
iii. The flow schematic of each control measure, or combination of control measures that depict each major treatment system component.
iv. Any additional information necessary to describe how the Permittee has met effluent limit requirements in this permit that do not involve the site-specific selection of a control measure or are specific activity requirement.

(5) Schedules and procedures pertaining to implementation of control measures

The Permittee must document the following with regards to control measure in the SWPPP:

i. Good Housekeeping: A schedule or the convention used for determining when pickup and disposal of waste materials occurs. Also provide a schedule for routine inspections for leaks and conditions of drums, tanks and containers.
ii. Maintenance: Preventative maintenance procedures, including regular inspections, testing, maintenance and repair of all control measures used to meet the effluent limits in this permit, and any back-up practices in place should a discharge occur while a control measure is off-line. The SWPPP shall include the schedule or frequency for maintaining all control measures used to comply with the effluent limits in this permit.
iii. Spill Prevention and Response Procedures: Procedures for preventing and responding to spills and leaks, including notification procedures. For preventing spills, include in the SWPPP the control measures for material handling and storage, and the procedures for preventing spills that can contaminate stormwater. Also specify cleanup equipment, procedures and spill logs, as appropriate, in the event of spills.
iv. Erosion and Sediment Controls: If polymers and/or other chemicals are used as erosion and sediment controls, the polymers and/or chemicals used, and the purpose must be documented and disclosed in accordance with Part I.C.6;
v. Employee Training: The elements of employee training plan shall include but are not limited to: the content of the training; the frequency/schedule of training for employees who work in areas where materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to meet the conditions of this permit; a log of the dates on which specific employees received training.

(6) Schedules and procedures pertaining to implementation of inspections and assessments

The Permittee must document the procedures for performing, as appropriate, the types of inspections specified by this permit, including routine facility inspections quarterly visual assessments. For each type of inspection performed, the SWPPP must identify: person(s) or positions of person(s) responsible for the inspection; schedules for conducting inspections; specific items to be covered by the inspection, including schedules for specific outfalls.

(7) Schedules and procedures pertaining to implementation of monitoring

The Permittee must document the procedures for collecting the samples required for discharge and receiving water monitoring specified by this permit and must include documentation of each of the following for each type of monitoring:

i. Locations where samples are collected, including geographic coordinates.
ii. Parameters for sampling and the frequency of sampling for each parameter.
iii. Schedules for monitoring at the Facility.
iv. The procedures for collecting field samples.
v. The procedure for reporting exceedances of numeric limits applicable to discharges from each authorized outfall when results are obtained at the time of collection (i.e., pH).

(8) Documentation Requirements

The Permittee is required to keep the following inspection, monitoring, and certification records with the SWPPP that together demonstrate compliance with the conditions of this permit:

i. A copy of this permit as issued final, including any subsequent permit modifications, if any in either a hard copy or an electronic copy easily available to SWPPP personnel.
ii. Documentation of any maintenance and repairs of control measures, including the date(s) of regular maintenance, date(s) of discovery of areas in need of repair/replacement, and for repairs, date(s) that the control measure(s) returned to full function, and the justification for any extended maintenance/repair schedules.
iii. All inspection reports, including the routine facility inspection and visual assessment documentation (see Part I.C.4).
iv. Description of any deviations from the schedule for visual assessments and/or monitoring, and the reason for the deviations (e.g., adverse weather or it was impracticable to collect samples within the first flush of a measurable storm event).
v. Documentation of any effluent limit exceedances, the corrective action taken, and the corrective action documentation required per Part I.C.5, including any rationale where SWPPP changes were not made, or any documentation required to meet any corrective action extension.

c. The Permittee must amend and update the SWPPP within 14 days of any changes at the Facility affecting the SWPPP or if the revision is due to corrective action, in accordance with the applicable corrective action schedule in Part I.C.5. Changes that may affect the SWPPP include, but are not limited to:

(1) A change in design, operation, or maintenance of the Facility or control measure which has a significant effect on the potential for the discharge of pollutants to the waters of the United States;
(2) A release of a reportable quantity of pollutants as described in 40 CFR § 302;
(3) A determination by the Permittee or EPA that the SWPPP appears to be ineffective in achieving the general objective of controlling pollutants in stormwater discharges; or

(4) Any revisions or improvements made to the Facility's stormwater management program based on new information and experiences with wet weather events, including major storm events and flooding conditions. Any amended or updated versions of the SWPPP shall be re-certified by the Permittee. Such re-certifications also shall be signed in accordance with the requirements identified in Part II.D.2 of this Permit.

d. The Permittee must certify at least annually that the previous year's inspections, corrective actions, and training activities were conducted, results were recorded, and records were maintained, as described in the SWPPP. Certifications must be submitted by March 1 of the following calendar year. If the Facility is not in compliance with any limitations and/or control measure, including BMPs described in the SWPPP, the annual certification shall state the non-compliance and the remedies which are being undertaken. Such annual certifications also shall be signed in accordance with the requirements identified in Part II.D.2 of this Permit. The Permittee must submit a copy of the current SWPPP and all SWPPP certifications (i.e., the initial certification, recertifications, and annual certifications) signed during the effective period of this Permit to EPA. All documentation of SWPPP activities shall be kept at the Facility for at least five years.

2. Best Management Practices (BMPs)

The Permittee must select, design, install, implement/operate, and maintain stormwater control measures, including best management practices (BMPs) to minimize[5] pollutant discharges to the receiving waters from stormwater and stormwater comingled with any other authorized wastewater that meet the numeric limits contained in Part I.A.1-10, address the selection and design considerations in Part I.C.2.a, meet the non-numeric technology-based effluent limits in Part I.C.2.b, meet the requirements for control measures, including BMPs in Part I.C.2.c and d, and meet the water quality-based effluent limitations in Part I.C.3. The selection, design, installation, and implementation/operation and maintenance of control measures to comply with this permit must be in accordance with good engineering practices and manufacturer's specifications. Note that control measures may deviate from such manufacturer's specifications with justification for such deviation and documentation of the rationale is included in the Facility's SWPPP. The Permittee must perform routine inspections of control measures per Part I.C.4 and modify control measures per Part I.C.5 if control measures are not achieving their intended effect of minimizing pollutant discharges (i.e., discharges will be controlled as necessary such that the receiving water of the United States will meet applicable water quality standards or meet any of the other numeric or non-numeric effluent limits in this permit).

a. The Permittee must consider the following when selecting and designing control measures:[6]

5 "Minimize" (unless otherwise stated) means to reduce and/or eliminate to the extent achievable using control measures that are technologically available and economically practicable and achievable in light of best industry practices.

6 These selection and design considerations are consistent with those found in EPA's 2021 MSGP Part 2.1.1.

(1) Preventing stormwater from coming into contact with polluting materials is generally more effective, and less costly, than trying to remove pollutants from stormwater;
(2) Using stormwater control measures in combination may be more effective than using control measures in isolation for minimizing pollutants in stormwater discharges;
(3) Assessing the type and quantity of pollutants, including their potential to impact receiving water quality, is critical to designing effective stormwater control measures that will achieve the limits in this permit;
(4) Minimizing impervious areas at the Facility and infiltrating stormwater onsite can reduce the frequency and volume of discharges, so long as any re-infiltration avoids ground water contamination/recontamination; and
(5) Attenuating flow using can reduce wet weather flows that exceed the design flow capacity of treatment systems.

b. The Permittee must comply with the following non-numeric effluent limits:[7]

(1) Minimize Exposure.

The Permittee must minimize the exposure of material areas including loading and unloading, storage, disposal, cleaning, maintenance, and soil and groundwater management areas to rain, snow, snowmelt, and stormwater in order to minimize pollutant discharges by either locating these materials and activities inside or protecting them with storm resistant coverings. Unless infeasible, the Permittee must also:

i. Use grading, berming or curbing to prevent discharges of contaminated runoff and divert run-on away from these areas;
ii. Locate materials, equipment, and activities so that potential leaks and spills are contained or able to be contained or diverted before discharge;
iii. Store leaky vehicles and equipment indoors;
iv. Perform all vehicle and/or equipment cleaning operations indoors, under cover, or in bermed areas that prevent discharges and run-on and also that capture any overspray; and
v. Drain fluids from equipment and vehicles that will be decommissioned, and, for any equipment and vehicles that will remain unused for extended periods of time, inspect at least quarterly for leaks.

(2) Good Housekeeping

The Permittee must keep clean all exposed areas that are potential sources of pollutants. The Permittee must perform good housekeeping measures in order to minimize pollutant discharges, including but not limited to, the following:

7 These non-numeric technology-based effluent limits are consistent with those found in EPA's 2021 MSGP Part 2.1.2.

i. Sweep or vacuum at regular intervals or, alternatively, wash down material areas and/or equipment and collect and/or treat, and properly dispose of the washdown water;
ii. Store materials in appropriate containers;
iii. Keep all dumpster lids closed when not in use. For dumpsters and roll off boxes that do not have lids and could leak, ensure that discharges have a control (e.g., secondary containment, treatment).
iv. Minimize the potential for waste, garbage and floatable debris to be discharged by keeping exposed areas free of such materials, or by intercepting them before they are discharged.

(3) Maintenance

The Permittee must maintain all control measures that are used to achieve the effluent limits in this permit in effective operating condition, as well as all industrial equipment and systems, in order to minimize pollutant discharges. This includes:

i. Performing inspections and preventive maintenance of stormwater drainage, source controls, treatment systems, and treatment materials and systems that could fail and result in discharges of pollutants via stormwater.
ii. Maintaining non-structural control measures.
iv. Cleaning catch basins in line with manufacturer specifications, or as directed in Part I.C.2.d, whichever is lower, and keeping the debris surface at least six inches below the lowest outlet pipe.
v. If the Permittee finds that a control measure needs routine maintenance, the Permittee must conduct the necessary maintenance immediately[8] in order to minimize pollutant discharges.
vi. If the Permittee finds that a control measure needs to be repaired or replaced, the Permittee must immediately take all reasonable steps[9] to prevent or minimize the discharge of pollutants until the final repair or replacement is implemented, including cleaning up any contaminated surfaces so that the material will not be discharged during subsequent storm events. Final repairs/replacement of stormwater controls should be completed as soon as feasible but must be no later than the timeframe established in Part I.C.5 for corrective actions. If a control measure was never installed, was installed incorrectly or not otherwise in accordance with this permit, or is not being properly operated or maintained, the Permittee must conduct corrective action as specified in I.C.5.

8 For the purposes of corrective action, "immediately" means the day the Permittee identifies that a control measure needs to be maintained, repaired, or replaced, the Permittee must take all reasonable steps to minimize or prevent the discharge of pollutants until the Permittee can implement a permanent solution. However, if the Permittee identifies a problem too late in the workday to initiate action, the Permittee must perform the action the following workday morning.
9 For the purposes of corrective action, "all reasonable steps" means the Permittee must respond to the conditions triggering the action, such as, cleaning up any exposed materials that may be discharged in a storm event (e.g., through sweeping, vacuuming) or making arrangements (i.e., scheduling) for a new control measure to be installed.

(4) Spill Prevention and Response

The Permittee must minimize the potential for leaks, spills and other releases that may be exposed to stormwater and develop plans for effective response to such spills if or when they occur in order to minimize pollutant discharges. The Permittee must conduct spill prevention and response measures, including but not limited to, the following:

i. Clean up spills and leaks promptly using dry methods (e.g., absorbents) to prevent the discharge of pollutants.
ii. Use drip pans and absorbents if leaky vehicles and/or equipment are stored outdoors.
iii. Use spill/overflow protection equipment.
iv. Plainly label containers (e.g., "Used Oil," "Treatment Chemical," "Solid Hazardous Waste," "Liquid Hazardous Waste") that could be susceptible to spillage or leakage to ensure proper handling and facilitate rapid response if spills or leaks occur.
v. Implement procedures for material storage and handling, including the use of secondary containment and barriers between material storage and traffic areas, or a similarly effective means designed to prevent the discharge of pollutants from these areas.
vi. Develop training on the procedures for expeditiously stopping, containing, and cleaning up leaks, spills, and other releases. As appropriate, execute such procedures as soon as possible.
vii. Keep spill kits onsite, located near areas where spills may occur or where a rapid response can be made.
viii. Notify appropriate Facility personnel when a leak, spill, or other release occurs.[10]

(5) Erosion and Sediment Controls

To minimize pollutant discharges in stormwater, the Permittee must minimize erosion by stabilizing exposed soils at Facility wherever feasible (i.e., not in conflict with remedial activities at the Facility), including placing flow velocity dissipation devices at outfall locations, if necessary to minimize streambank erosion and scour in the immediate vicinity of outfalls. The Permittee must also use structural and non-structural control measures to minimize the discharge of sediment, including backflow prevention devices to minimize re-entrainment of sediment in the discharge and/or mobilization of sediment from the receiving water.

10 Where a leak, spill or other release containing a hazardous substance or oil in an amount equal to or in excess of a reportable quantity established under either 40 CFR Part 110, 40 CFR Part 117, or 40 CFR Part 302, occurs during a 24-hour period, the Permittee must notify the National Response Center (NRC) at (800) 424-8802 in accordance with the requirements of 40 CFR Part 110, 40 CFR Part 117, and 40 CFR Part 302 as soon as the Permittee has knowledge of the discharge. State or local requirements may necessitate reporting spills or discharges to local emergency response, public health, or drinking water supply agencies. Contact information must be in locations that are readily accessible and available.

(6) Management of Stormwater

The Permittee must divert, infiltrate, reuse, contain, or otherwise reduce stormwater to minimize pollutants in the discharges. In any instance of infiltration, the discharge shall not interfere with the remedial activities that are being conducted or have been completed at the Facility.

(7) Salt Storage Piles or Piles Containing Salt

The Permittee must enclose or cover storage piles of salt, or piles containing salt, used for deicing or other commercial or industrial purposes, including maintenance of paved surfaces, in order to minimize pollutant discharges. The Permittee must implement appropriate measures (e.g., good housekeeping, diversions, containment) to minimize exposure resulting from adding to or removing materials from the pile. Piles do not need to be enclosed or covered pursuant to this permit if stormwater from the piles is not discharged.

(8) Employee Training

The Permittee must train all employees who work in areas where industrial materials or activities are exposed to stormwater, or who are responsible for implementing activities necessary to comply with this permit (e.g., inspectors, maintenance personnel), including all members of the stormwater pollution prevention team. The Permittee must ensure personnel understand the requirements of this permit and their specific responsibilities with respect to those requirements.[11] Personnel must be trained in at least the following if related to the scope of their job duties (e.g., only personnel responsible for conducting inspections need to understand how to conduct inspections):

i. An overview of what is in the SWPPP.
ii. Spill response procedures, good housekeeping, maintenance requirements, and material management practices.
iii. The location of all the control measures required by this permit, and how they are to be operated and maintained.
iv. The proper procedures to follow with respect to the permit's pollution prevention requirements.
v. When and how to conduct inspections, record applicable findings, and take corrective actions.
vi. The Facility's emergency procedures, and when these procedures are applicable.

(9) Non-Stormwater Discharges

11 "Personnel" means: 1) Those responsible for the design, installation, maintenance, and/or repair of controls (including pollution prevention measures); 2) Those responsible for the storage and handling of chemicals and materials that could become pollutants discharged via stormwater; 3) Those who are responsible for conducting and documenting inspections and monitoring; and 4) Those who are responsible for taking and documenting corrective actions.

The Permittee must evaluate for the presence of non-stormwater discharges. The Permittee must eliminate any non-stormwater discharges not explicitly authorized in this permit. If not covered under this permit, wastewater, wash water and any other unauthorized non-stormwater must be discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements, or otherwise disposed of appropriately. See also Part I.C.2.d.

(10) Dust Generation and Tracking of Waste Materials

The Permittee must minimize generation of dust and off-site tracking of waste materials in order to minimize pollutants discharged via stormwater.

c. In addition, the Permittee must select, design, install, implement/operate, and maintain the following control measure, including BMPs, consistent with those described in EPA's Dewatering and Remediation General Permit.[12]

(1) Effluent Flow

The Permittee must document the measures and methods used to control flow through each stormwater treatment system to ensure that the design flow of the treatment system is not exceeded.

(2) Pollutant Minimization

The Permittee must document the control measures that meet the following requirements:

i. Control measures must ensure dilution is not used as a form of treatment, or as a means to achieve the limitations and requirements in this permit; and
ii. The Permittee must select, design, install and properly operate and maintain the pollution control technologies necessary to meet the limitations and requirements in this permit.

(3) Quality Assurance/Quality Control (QA/QC)

The Permittee must document QA/QC practices including, at a minimum:

i. A record of each sample collection, indicating the location of each sampling location with a geographic identifier (i.e., latitude and longitude coordinates), and the collection date, time and personnel (or automated sampler) that conducted the sampling.
ii. Specifications for the number of samples, type of samples, type and number of containers, type of preservation, type and number of quality assurance samples, if

[12] The current DRGP was effective August 2, 2022 and is available at: https://www.epa.gov/npdes-permits/dewatering-and-remediation-general-permit-drgp.

applicable, type and number of field samples, if applicable, and sample storage, holding times, and shipping methods, including chain-of-custody procedures.
iii. Specifications for test methods, including any test methods authorized specifically for use in this permit, and the sufficiently sensitive minimum levels for each required parameter.
iv. A schedule for review of sample results and reporting of any exceedance of the effluent limits in this permit.
v. A description of data validation and data reporting processes.

(4) Major Storm and Flood Events[13]

The Permittee must implement adaptive measures[14] and/or, if appropriate, combinations of adaptative measures that minimize[15] discharges that result from impacts[16] of major storm and flood events.[17] The Permittee must document in the SWPPP its assessment of the major storm and flood risks at the Facility under baseline conditions[18] and under future conditions,[19] and all control measures considered to address discharges resulting from these risks.[20] For all control measures considered, the Permittee must document in the SWPPP the rationale for either implementing or not implementing the measure. The assessment must be presented in sufficient

13 The Major Storm and Flood Events BMP is found in Part 2.2.2.7 of EPA's 2022 DRGP and the Stormwater Control Measure Selection and Design Considerations pertaining to major storm events is found in Part 2.1.1.8 of EPA's 2021 MSGP.
14 "Adaptive Measures" refers to structural improvements, enhanced/resilient pollution prevention measures, and/or other control measures, actions, or strategies that mitigate the effects of impacts. They may include but are not limited to: building or modifying infrastructure, utilization of models (including but not limited to: flood, increased precipitation, system performance), monitoring and inspecting (including but not limited to: flood control, infrastructure, treatment) and repair/retrofit.
15 "Minimize" means to reduce and/or eliminate to the extent achievable using control measures that are technologically available and economically practicable and achievable in light of best industry practice.
16 "Impacts" refers to an effect on a component of the stormwater collection system and/or related operation that may include destruction, damage, or ineffective operation such as bypass, upset or failure, overflow, increased inflow and infiltration or discharges of pollutants, and effluent limit exceedance. Impacts may be economic, environmental, or public health related.
17 "Major storm and flood events" refer to instances resulting from major storms such as hurricanes, extreme/heavy precipitation events, and pluvial, fluvial, and flash flood events. "Extreme/heavy precipitation" refers to instances during which the amount of rain or snow experienced in a location substantially exceeds what is normal. What constitutes a period of heavy precipitation varies according to location and season.
18 "Baseline conditions" refers to the 100-year flood based on historical records.
19 "Future conditions" refers to projected flood elevations using a Climate Informed Science Approach (CISA), which is the elevation and flood hazard area that results from using the best-available, actionable hydrologic and hydraulic data and methods that integrate current and future changes in flooding based on climate science. These shall include both short-term (10-25 years forward-looking) and long-term (25-70 forward-looking) conditions relative to the baseline and must include projections of flooding due to major storm and flood events using federal, state, and local data, where available.
20 The risk assessment must evaluate future conditions considering, at a minimum, changes in precipitation, extreme weather events, and inland flooding, and incorporate the results of the evaluation in a manner that demonstrates that the control measures taken are precautionary and sufficiently protective. Evaluation must be completed by a qualified person on a rolling annual basis considering: 1) historical observations from all years the Permittee has operated the facility prior to this permit's term; 2) all observations of events that occurred in the calendar year; and 3) the 10 to 70 years forward-looking from the review year to assess impacts.

detail to allow EPA, the public, or an independent qualified person to evaluate the reasonableness of the decision. For control measures already in place, including requirements from state, local or federal agencies, a description of the controls and how they meet the requirement(s) of this permit must be documented in the SWPPP. The Permittee must consider, at a minimum, the following control measures to minimize discharges:[21]

i. Construct flood barriers to protect infrastructure or reinforce infrastructure to withstand flooding and additional exertion of force.
ii. Prevent floating of structures by elevating above flood level[22] or securing with non-corrosive device.
iii. Store materials and waste above flood level.
iv. Reduce or eliminate outdoor storage.
v. Relocate any mobile or unsecured equipment to higher ground.
vi. Develop emergency procedures for major storm or flood event that apply when a storm is anticipated within 48 hours until after the storm or any residual impact recedes.
vii. Identify and maintain up-to-date emergency contacts for staff and contractors; and
viii. Conduct staff training for implementing emergency procedures for major storm and flood events at regular intervals and in conjunction with Part I.C.4.

d. The Permittee must select, design, install, implement/operate, and maintain the site-specific control measures, including the site-specific BMPs, in Attachment C of this Permit. The Permittee must document the components of Attachment C in the SWPPP.

3. Water Quality-Based Limitations

a. The discharge shall not cause a violation of the water quality standards of the receiving water.
b. The discharge shall be free from pollutants in concentrations or combinations that, in the receiving water, settle to form objectionable deposits; float as debris, scum or other matter to form nuisances; produce objectionable odor, color, taste or turbidity; or produce undesirable or nuisance species of aquatic life.
c. The discharge shall be free from pollutants in concentrations or combinations that adversely affect the physical, chemical, or biological nature of the bottom.
d. The discharge shall not result in pollutants in concentrations or combinations in the receiving water that are toxic to humans, aquatic life or wildlife.

21 EPA Region 1 currently maintains a resource of additional data sources for evaluation and incorporation pursuant to this BMP at https://www.epa.gov/npdes-permits/dewatering-and-remediation-general-permit-drgp.
22 "Flood level" is the computed elevation to which floodwater is anticipated to rise during the reference flood. The reference flood shall be either the flood elevation that results from adding an additional 2 feet to the 100-year flood elevation for non-critical actions and by adding an additional 3 feet to the 100-year flood (the 1% -annual-chance flood) elevation for critical actions or the flood elevation that result from 500-year flood (the 0.2% -annual-chance flood) and selecting the higher of the two flood elevations.

e. The discharge shall be free from floating, suspended and settleable solids in concentrations or combinations that would impair any use assigned to the receiving water.
f. The discharge shall be free from oil, grease and petrochemicals that produce a visible film on the surface of the water, impart an oily taste to the water or an oily or other undesirable taste to the edible portions of aquatic life, coat the banks or bottom of the water course, or are deleterious or become toxic to aquatic life.

4. Inspections

The Permittee must plan and conduct routine inspections that meet the following requirements:[23]

a. Inspection Personnel. Qualified personnel[24] must perform the inspections.

b. Inspection Areas. Qualified personnel must conduct inspections of areas of the Facility covered by the requirements in this permit, including, but not limited to, the following:

(1) Areas where materials or activities are exposed to stormwater;
(2) Areas identified in the SWPPP that are potential pollutant sources;
(3) Areas where spills and leaks have occurred in the past three years;
(4) Outfalls; and
(5) Control measures used to comply with the effluent limits contained in this permit.

c. Inspection Activities. During the inspection, the qualified personnel must examine the following:
(1) Materials, residue or wastes that may have or could come into contact with stormwater;
(2) Leaks or spills from equipment, drums, tanks and other containers;
(3) Offsite tracking of waste materials, or sediment where vehicles enter or exit the site;
(4) Tracking or blowing of raw, or waste materials from areas of no exposure to exposed areas;
(5) Erosion of soils at the Facility that could be transported by stormwater runoff into the stormwater collection system;
(6) Non-authorized non-stormwater discharges;
(7) Control measures needing replacement, maintenance or repair;
(8) During an inspection occurring during a stormwater discharge event, the Permittee must observe the control measures implemented to comply with effluent limits to ensure they are functioning correctly; and
(9) During an inspection occurring during a stormwater discharge event, the Permittee must observe discharges from the authorized outfalls.

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23 These inspection requirements are consistent with those found in EPA's 2021 MSGP Parts 3.1 and 3.2.
24 "Qualified personnel" means: those who are knowledgeable in the principles and practices of control measures and pollution prevention, and who possess the education and ability to assess conditions at the Facility that could impact discharge quality, and the education and ability to assess the effectiveness of control measures selected and installed to meet the requirements of the permit.

d. Inspection Frequency. The qualified personnel must conduct inspections at least quarterly (i.e., once each calendar quarter). At least once each calendar year, the routine inspection must be conducted during a period when a stormwater discharge is occurring.

e. Documentation. The Permittee must document the findings of the Facility inspections and maintain this report with the SWPPP. Document all findings, including but not limited to, the following information:

(1) The inspection date and time;
(2) The name(s) and signature(s) of the qualified personnel that conducted the inspection;
(3) Weather information;
(4) All observations relating to the implementation of stormwater control measures at the Facility, including:

i. A description of any stormwater discharges occurring at the time of the inspection;
ii. Any previously unidentified discharges from and/or pollutants at the Facility;
iii. Any evidence of, or the potential for, pollutants entering the stormwater collection system;
iv. Observations regarding the physical condition of and around all authorized outfalls, including any flow dissipation devices, and evidence of pollutants in discharges and/or the receiving water;
v. Any stormwater control measures needing maintenance, repairs, or replacement;
vi. Any additional stormwater control measures needed to comply with the permit requirements;
vii. Any incidents of noncompliance; and
viii. Any corrective action(s) taken as a result of inspections.

f. Visual Assessment

(1) Visual Assessment Frequency. Once each quarter for the duration of permit coverage, the Permittee must collect a stormwater sample from each outfall and conduct a visual assessment of each of these samples. These samples are not required to be collected consistent with 40 CFR Part 136 procedures but must be collected in such a manner that the samples are representative of the authorized discharge from each outfall.

(2) Visual Assessment Procedures. The visual assessment must include the following:
i. Make the assessment of a stormwater discharge sample in a clean, colorless glass or plastic container, and examined in a well-lit area;
ii. Make the assessment of the sample collected within the first 30 minutes of an actual discharge from a storm event. If it is not possible to collect the sample within the first 30 minutes of discharge, the sample must be collected as soon as practicable after the first 30 minutes, and document why it was not possible to take the sample

within the first 30 minutes. In the case of snowmelt, samples must be taken during a period with a measurable discharge; and
iii. For storm events, make the assessment on discharges that occur at least 72 hours (three days) from the previous discharge. The 72-hour (three-day) storm interval does not apply if less than a 72-hour (three-day) interval is representative for local storm events during the sampling period.
iv. Visually inspect or observe for the following water quality characteristics, which may be evidence of stormwater pollution: color; odor; clarity (turbidity); floating solids; settleable solids; suspended solids; film; and any other indications of pollutants (e.g., foam, oil sheen).
v. Whenever the visual assessment shows evidence of stormwater pollution in the discharge, initiate the corrective action procedures in Part I.C.5.

(3) Visual Assessment Documentation. The Permittee must document the results of visual assessments and maintain this documentation onsite with the SWPPP. Any corrective action required as a result of a quarterly visual assessment must be conducted consistent with Part I.C.5 of this permit. Documentation of each visual assessment must include:

i. Sample location(s);
ii. Sample collection date and time, for each sample;
iii. Qualified personnel collecting the sample and conducting visual assessment;
iv. Nature of the discharge (e.g., stormwater runoff from rainfall, snowmelt);
v. Observations of the stormwater discharge;
vi. Possible sources of any observed indications of pollution;
vii. If applicable, why it was not possible to take samples within the first 30 minutes.

5. Corrective Action[25]

a. Conditions Requiring SWPPP Review and Revision

When any of the following conditions occur or are detected during an inspection, monitoring or other means, or EPA informs the Permittee that any of the following conditions have occurred, the Permittee must review and revise, as appropriate, the SWPPP (e.g., sources of pollution, spill and leak procedures, non-stormwater discharges, selection, design, installation and implementation of control measures) so that this permit's effluent limits are met and pollutant discharges are minimized:

(1) An unauthorized release or discharge (e.g., spill, leak, or discharge of non-stormwater not authorized by this permit, or discharge of a prohibited discharge listed in Part I.B.2 of this permit to a water of the United States) occurs at the Facility.
(2) A discharge violates a numeric effluent limit listed in Part I.A.1-9 and/or in Part I.E. State 401 Certification Conditions.

25 These corrective action requirements are consistent with those found in EPA's 2021 MSGP Part 5.1.

(3) The stormwater control measures are not stringent enough for stormwater discharges to be controlled as necessary to meet State water quality standards or to meet the non-numeric effluent limits in this permit.
(4) A required control measure was never installed, was installed incorrectly or not otherwise in accordance with Part I.C.2 of this permit, or is not being properly operated or maintained.
(5) Whenever a visual assessment shows evidence of stormwater pollution (e.g., color, odor, turbidity, floating solids, suspended solids, settleable solids, visible film). Also see Part I.C.4.

b. Conditions Requiring SWPPP Review

The Permittee must review the SWPPP (e.g., sources of pollution, spill and leak procedures, non-stormwater discharges, selection, design, installation and implementation of control measures) to determine if modifications are necessary to meet the effluent limits in this permit if construction or a change in design, operation, or maintenance at the Facility occurs that:

(1) Significantly changes the nature of pollutants discharged via stormwater from the Facility: or
(2) Significantly increases the quantity of pollutants discharged.

c. Deadlines for Corrective Actions

(1) Immediate Actions.

The Permittee must immediately take all reasonable steps to minimize or prevent the discharge of pollutants until a permanent solution can be implemented, including cleaning any contaminated surfaces so that the pollutants will not be discharged in subsequent storm events.

(2) Subsequent Actions

If additional actions are necessary beyond those implemented as an immediate action, the Permittee must complete the corrective actions (e.g., install a new or modified control and make it operational, complete the repair) before the next storm event if possible, and within 14 calendar days from the time of discovery of the permit limit or condition is not met. If it is infeasible to complete the corrective action within 14 calendar days, the Permittee must document why it is infeasible to complete the corrective action within the 14-day timeframe. The Permittee must also identify the schedule for completing the work, which must be done as soon as practicable after the 14-day timeframe but no longer than 45 days after discovery. If the completion of corrective action will exceed the 45-day timeframe, the Permittee may take the minimum additional time necessary to complete the corrective action, provided that a request to implement an alternative schedule is provided to EPA in writing for concurrence. Any such request must include rationale for the extension, and a completion date. Where corrective actions result in changes to any of the control measures or BMPs documented in the SWPPP, the Permittee must modify the SWPPP accordingly within 14 calendar days of completing corrective action. These time intervals are schedules for documenting findings and for making repairs and

improvements. They are included in this permit to ensure that the conditions prompting the need for these repairs and improvements do not persist indefinitely.

(3) Effect of Corrective Action

If the event triggering the review is a permit violation (e.g., non-compliance with an effluent limit), correcting it does not remove the original violation. Additionally, failing to take corrective action in accordance with this section is an additional permit violation. EPA may consider the appropriateness and promptness of corrective action in determining enforcement responses to permit violations.

6. Discharges of Chemicals or Additives

The discharge of any chemical[26] that was not reported in the application submitted to EPA or provided through a subsequent written notification submitted to EPA is prohibited. Upon the effective date of this permit, any chemical that has been disclosed to EPA may be discharged up to the frequency and level disclosed, provided that such discharge does not violate §§ 307 or 311 of the CWA or applicable State water quality standards. Discharges of a new chemical are authorized under this Permit 30 days following written notification to EPA unless otherwise notified by EPA. To request authorization to discharge a new chemical, the Permittee must submit a written notification to EPA in accordance with Part I.D.3.a of this permit. The written notification must include the following information, at a minimum:

a. The following information for each chemical that will be discharged:

   (1) Product name, chemical formula, general description, and manufacturer of the chemical;
   (2) Purpose or use of the chemical;
   (3) Safety Data Sheet (SDS) and Chemical Abstracts Service (CAS) Registry number for each chemical;
   (4) The frequency (e.g., hourly, daily), magnitude (i.e., maximum application concentration), duration (e.g., hours, days), and method of application for the chemical;
   (5) The vendor's reported aquatic toxicity, if available (i.e., NOAEL and/or LC_{50} in percent for aquatic organism(s)).

b. Written rationale that demonstrates that the discharge of such chemicals as proposed will not: 1) add any pollutants in concentrations that exceed any permit effluent limitation; and 2) add any pollutants that would justify the application of permit conditions different from, or in addition to those currently in this permit.

7. Monitoring Frequency Reduction

26 "Chemical" includes, but is not limited to: algaecides/biocides, antifoams, coagulants, corrosion/scale inhibitors/coatings, disinfectants, flocculants, neutralizing agents, oxidants, oxygen scavengers, pH conditioners, surfactants and bioremedial agents, including microbes.

After one year of monitoring, if all samples are non-detect for all forty PFAS compounds, using either a method in 40 CFR Part 136 or EPA Draft Method 1633, the Permittee may request to remove the requirement for PFAS monitoring. Until written notice is received from EPA indicating that the monitoring requirements have been changed, the Permittee is required to continue the monitoring specified in this Permit. See Reporting Requirements in Part I.D.3.a.

D. REPORTING REQUIREMENTS

Unless otherwise specified in this Permit, the Permittee must submit reports, requests, and information and provide notices in the manner described in this section.

1. Submittal of DMRs Using NetDMR

   The Permittee must continue to submit its monthly monitoring data in discharge monitoring reports (DMRs) to EPA and the State electronically using NetDMR no later than the 15th day of the month following the monitoring period. When the Permittee submits DMRs using NetDMR, it is not required to submit hard copies of DMRs to EPA or the State. NetDMR is accessible through EPA's Central Data Exchange at https://cdx.epa.gov/.

2. Submittal of Reports as NetDMR Attachments

   Unless otherwise specified in this Permit, The Permittee must electronically submit all reports to EPA as NetDMR attachments rather than as hard copies. Because the due dates for reports described in this Permit may not coincide with the due date for submitting DMRs (which is no later than the 15th day of the month following the monitoring period), a report submitted electronically as a NetDMR attachment shall be considered timely if it is electronically submitted to EPA using NetDMR with the next DMR due following the particular report due date specified in this Permit.

3. Submittal of Requests and Reports to EPA Water Division (WD)

   a. The following requests, reports, and information described in this Permit shall be submitted to the NPDES Applications Coordinator in EPA WD:

      (1) Transfer of Permit notice;
      (2) Request for changes in sampling location;
      (3) SWPPP reports and certifications;
      (4) Request to discharge new chemicals or additives;
      (5) Request for discontinuation of per- and polyfluoroalkyl substances (PFAS) sampling (*see* Part I.A.1, footnote 12) requirements; and
      (6) Report on unacceptable dilution water/request for alternative dilution water for WET testing.

   b. These reports, information, and requests shall be submitted to EPA WD electronically at R1NPDESReporting@epa.gov or by hard copy mail to the following address:

U.S. Environmental Protection Agency
Water Division
NPDES Applications Coordinator
5 Post Office Square - Suite 100 (06-03)
Boston, MA 02109-3912

4. Submittal of Reports in Hard Copy Form

   a. The following notifications and reports shall be signed and dated originals, submitted in hard copy, with a cover letter describing the submission:

      (1) Written notifications required under Part II, Standard Conditions. Beginning December 21, 2025, such notifications must be done electronically using EPA's NPDES Electronic Reporting Tool ("NeT"), or another approved EPA system that will be accessible through EPA's Central Data Exchange at https://cdx.epa.gov/.

   b. This information shall be submitted to EPA's Enforcement and Compliance Assurance Division (ECAD) at the following address:

U.S. Environmental Protection Agency
Enforcement and Compliance Assurance Division
Water Compliance Section
5 Post Office Square, Suite 100 (04-SMR)
Boston, MA 02109-3912

5. State Reporting

Duplicate signed copies of all WET test reports shall be submitted to the Massachusetts Department of Environmental Protection, Division of Watershed Management, at the following address:

Massachusetts Department of Environmental Protection
Bureau of Water Resources
Division of Watershed Management
8 New Bond Street
Worcester, Massachusetts 01606

6. Verbal Reports and Verbal Notifications

   a. Any verbal reports or verbal notifications, if required in Parts I and/or II of this Permit, shall be made to both EPA and to the State. This includes verbal reports and notifications that require reporting within 24 hours (e.g., Part II.B.4.c. (2), Part II.B.5.c. (3), and Part II.D.1.e.).

   b. Verbal reports and verbal notifications shall be made to EPA's ECAD at:

617-918-1510

c. Verbal reports and verbal notifications shall be made to the State's Emergency Response at:

888-304-1133

E. STATE 401 CERTIFICATION CONDITIONS

1. This Permit is in the process of receiving state water quality certification issued by the State under § 401(a) of the CWA and 40 CFR § 124.53. EPA will incorporate all State water quality certification requirements (if any) into the Final Permit.

FRESHWATER CHRONIC
TOXICITY TEST PROCEDURE AND PROTOCOL
USEPA Region 1

I. GENERAL REQUIREMENTS

The permittee shall be responsible for the conduct of acceptable chronic toxicity tests using three fresh samples collected during each test period. The following tests shall be performed as prescribed in Part 1 of the NPDES discharge permit in accordance with the appropriate test protocols described below. (Note: the permittee and testing laboratory should review the applicable permit to determine whether testing of one or both species is required).

- **Daphnid (Ceriodaphnia dubia) Survival and Reproduction Test.**
- **Fathead Minnow (Pimephales promelas) Larval Growth and Survival Test.**

Chronic toxicity data shall be reported as outlined in Section VIII.

II. METHODS

Methods to follow are those recommended by EPA in: Short Term Methods For Estimating The Chronic Toxicity of Effluents and Receiving Water to Freshwater Organisms, Fourth Edition. October 2002. United States Environmental Protection Agency. Office of Water, Washington, D.C., EPA 821-R-02-013. The methods are available on-line at https://www.epa.gov/cwa-methods/whole-effluent-toxicity-methods. Exceptions and clarification are stated herein.

III. SAMPLE COLLECTION AND USE

A total of three fresh samples of effluent and receiving water are required for initiation and subsequent renewals of a freshwater, chronic, toxicity test. The receiving water control sample must be collected immediately upstream of the permitted discharge's zone of influence. Fresh samples are recommended for use on test days 1, 3, and 5. However, provided a total of three samples are used for testing over the test period, an alternate sampling schedule is acceptable. The acceptable holding times until initial use of a sample are 24 and 36 hours for on-site and off-site testing, respectively. A written waiver is required from the regulating authority for any hold time extension. All test samples collected may be used for 24, 48 and 72 hour renewals after initial use. All samples held for use beyond the day of sampling shall be refrigerated and maintained at a temperature range of 0-6^{o} C.

All samples submitted for chemical and physical analyses will be analyzed according to Section VI of this protocol.

Sampling guidance dictates that, where appropriate, aliquots for the analysis required in this protocol shall be split from the samples, containerized and immediately preserved, or analyzed as per 40 CFR Part 136. EPA approved test methods require that samples collected for metals analyses be preserved immediately after collection. Testing for the presence of total residual chlorine (TRC) must be analyzed immediately or as soon as possible, for all effluent samples, prior to WET testing. TRC analysis may be performed on-site or by the toxicity testing laboratory and the samples must be dechlorinated, as necessary, using sodium thiosulfate prior to sample use for toxicity testing.

If any of the renewal samples are of sufficient potency to cause lethality to 50 percent or more of the test organisms in any of the test treatments for either species or, if the test fails to meet its permit limits, then chemical analysis for total metals (originally required for the initial sample only in Section VI) will be required on the renewal sample(s) as well.

IV. DILUTION WATER

Samples of receiving water must be collected from a location in the receiving water body immediately upstream of the permitted discharge's zone of influence at a reasonably accessible location. Avoid collection near areas of obvious road or agricultural runoff, storm sewers or other point source discharges and areas where stagnant conditions exist. EPA strongly urges that screening for toxicity be performed prior to the set up of a full, definitive toxicity test any time there is a question about the test dilution water's ability to achieve test acceptability criteria (TAC) as indicated in Section V of this protocol. The test dilution water control response will be used in the statistical analysis of the toxicity test data. All other control(s) required to be run in the test will be reported as specified in the Discharge Monitoring Report (DMR) Instructions, Attachment F, page 2,Test Results & Permit Limits.

The test dilution water must be used to determine whether the test met the applicable TAC. When receiving water is used for test dilution, an additional control made up of standard laboratory water (0% effluent) is required. This control will be used to verify the health of the test organisms and evaluate to what extent, if any, the receiving water itself is responsible for any toxic response observed.

If dechlorination of a sample by the toxicity testing laboratory is necessary a "sodium thiosulfate" control, representing the concentration of sodium thiosulfate used to adequately dechlorinate the sample prior to toxicity testing, must be included in the test.

If the use of an alternate dilution water (ADW) is authorized, in addition to the ADW test control, the testing laboratory must, for the purpose of monitoring the receiving water, also run a receiving water control.

If the receiving water diluent is found to be, or suspected to be toxic or unreliable an ADW of known quality with hardness similar to that of the receiving water may be substituted. Substitution is species specific meaning that the decision to use ADW is made for each species and is based on the toxic response of that particular species. Substitution to an ADW is authorized in two cases. The first is the case where repeating a test due to toxicity in the site dilution water requires an **immediate decision** for ADW use be made by the permittee and toxicity testing laboratory. The second is in the case where two of the most recent documented incidents of unacceptable site dilution water toxicity requires ADW use in future WET testing.

For the second case, written notification from the permittee requesting ADW use **and** written authorization from the permit issuing agency(s) is required **prior to** switching to a long-term use of ADW for the duration of the permit.

Written requests for use of ADW with supporting documentation must be sent electronically to the NPDES Applications Coordinator in EPA Water Division (WD) at the following email address:

R1NPDESReporting@epa.gov

Note: USEPA Region 1 retains the right to modify any part of the alternate dilution water policy stated in this protocol at any time. Any changes to this policy will be documented in the annual DMR posting.

See the most current annual DMR instructions which can be found on the EPA Region 1 website at https://www.epa.gov/aboutepa/epa-region-1-new-england (click on NPDES, EPA Permit Attachments, Self-Implementing Alternate Dilution Water Guidance) for further important details on alternate dilution water substitution requests.

V. TEST CONDITIONS AND TEST ACCEPTABILITY CRITERIA

Method specific test conditions and TAC are to be followed and adhered to as specified in the method guidance document, EPA 821-R-02-013. If a test does not meet TAC the test must be repeated with fresh samples within 30 days of the initial test completion date.

V.1. Use of Reference Toxicity Testing

Reference toxicity test results and applicable control charts must be included in the toxicity testing report.

If reference toxicity test results fall outside the control limits established by the laboratory for a specific test endpoint, a reason or reasons for this excursion must be evaluated, correction made and reference toxicity tests rerun as necessary.

If a test endpoint value exceeds the control limits at a frequency of more than one out of twenty then causes for the reference toxicity test failure must be examined and if problems are identified corrective action taken. The reference toxicity test must be repeated during the same month in which the exceedance occurred.

If two consecutive reference toxicity tests fall outside control limits, the possible cause(s) for the exceedance must be examined, corrective actions taken and a repeat of the reference toxicity test must take place immediately. Actions taken to resolve the problem must be reported.

V.1.a. Use of Concurrent Reference Toxicity Testing

In the case where concurrent reference toxicity testing is required due to a low frequency of testing with a particular method, if the reference toxicity test results fall slightly outside of laboratory established control limits, but the primary test met the TAC, the results of the primary test will be considered acceptable. However, if the results of the concurrent test fall well outside the established **upper** control limits i.e. ≥3 standard deviations for IC25 values and ≥ two concentration intervals for NOECs, and even though the primary test meets TAC, the primary test will be considered unacceptable and must be repeated.

V.2. For the *C. dubia* test, the determination of TAC and formal statistical analyses must be performed using only the first three broods produced.

V.3. Test treatments must include 5 effluent concentrations and a dilution water control. An additional test treatment, at the permitted effluent concentration (% effluent), is required if it is not included in the dilution series.

VI. CHEMICAL ANALYSIS

As part of each toxicity test's daily renewal procedure, pH, specific conductance, dissolved oxygen (DO) and temperature must be measured at the beginning and end of each 24-hour period in each test treatment and the control(s).

The additional analysis that must be performed under this protocol is as specified and noted in the table below.

Parameter	Effluent	Receiving Water	ML (mg/l)
Hardness[1, 4]	x	x	0.5
Total Residual Chlorine (TRC)[2, 3, 4]	x		0.02
Alkalinity[4]	x	x	2.0
pH[4]	x	x	--
Specific Conductance[4]	x	x	--
Total Solids[6]	x		--
Total Dissolved Solids[6]	x		--
Ammonia[4]	x	x	0.1
Total Organic Carbon[6]	x	x	0.5
Total Metals[5]			
Cd	x	x	0.0005
Pb	x	x	0.0005
Cu	x	x	0.003
Zn	x	x	0.005
Ni	x	x	0.005
Al	x	x	0.02
Other as permit requires			

Notes:

1. Hardness may be determined by:

- APHA Standard Methods for the Examination of Water and Wastewater , 21st Edition
  -Method 2340B (hardness by calculation)
  -Method 2340C (titration)

2. Total Residual Chlorine may be performed using any of the following methods provided the required minimum limit (ML) is met.
   - APHA Standard Methods for the Examination of Water and Wastewater , 21st Edition
     -Method 4500-CL E Low Level Amperometric Titration
     -Method 4500-CL G DPD Colorimetric Method
   - USEPA 1983. Manual of Methods Analysis of Water and Wastes
     -Method 330.5
3. Required to be performed on the sample used for WET testing prior to its use for toxicity testing
4. Analysis is to be performed on samples and/or receiving water, as designated in the table above, from all three sampling events.
5. Analysis is to be performed on the initial sample(s) only unless the situation arises as stated in Section III, paragraph 4
6. Analysis to be performed on initial samples only

VII. TOXICITY TEST DATA ANALYSIS AND REVIEW

A. Test Review

1. Concentration / Response Relationship

A concentration/response relationship evaluation is required for test endpoint determinations from both Hypothesis Testing and Point Estimate techniques. The test report is to include documentation of this evaluation in support of the endpoint values reported. The dose-response review must be performed as required in Section 10.2.6 of EPA-821-R-02-013. Guidance for this review can be found at www.epa.gov/cwa-methods/whole-effluent-toxicity-methods

In most cases, the review will result in one of the following three conclusions: (1) Results are reliable and reportable; (2) Results are anomalous and require explanation; or (3) Results are inconclusive and a retest with fresh samples is required.

2. Test Variability (Test Sensitivity)

This review step is separate from the determination of whether a test meets or does not meet TAC. Within test variability is to be examined for the purpose of evaluating test sensitivity. This evaluation is to be performed for the sub-lethal hypothesis testing endpoints reproduction and growth as required by the permit. The test report is to include documentation of this evaluation to support that the endpoint values reported resulted from a toxicity test of adequate sensitivity. This evaluation must be performed as required in Section 10.2.8 of EPA-821-R-02-013.

To determine the adequacy of test sensitivity, USEPA requires the calculation of test percent minimum significant difference (PMSD) values. In cases where NOEC determinations are made based on a non-parametric technique, calculation of a test PMSD value**,** for the sole purpose of assessing test sensitivity, shall be calculated using a comparable parametric statistical analysis technique. The calculated test PMSD is then compared to the upper and lower PMSD bounds shown for freshwater tests in Section 10.2.8.3, p. 52, Table 6 of EPA-821-R-02-013. The comparison will yield one of the following determinations.

- The test PMSD exceeds the PMSD upper bound test variability criterion in Table 6, the test results are considered highly variable and the test may not be sensitive enough to determine the presence of toxicity at the permit limit concentration (PLC). If the test results indicate that the discharge is not toxic at the PLC, then the test is considered insufficiently sensitive and must be repeated within 30 days of the initial test completion using fresh samples. If the test results indicate that the discharge is toxic at the PLC, the test is considered acceptable and does not have to be repeated.

- The test PMSD falls below the PMSD lower bound test variability criterion in Table 6, the test is determined to be very sensitive. In order to determine which treatment(s) are statistically significant and which are not, for the purpose of reporting a NOEC, the relative percent difference (RPD) between the control and each treatment must be calculated and compared to the lower PMSD boundary. See *Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications Under the NPDES Program*, EPA 833-R-1-003, June 2002, Section 6.4.2. This document can be located under Guidance Documents at the following USEPA website location: https://www.epa.gov/aboutepa/epa-region-1-new-england (click on NPDES, EPA Permit Attachments).

  If the RPD for a treatment falls below the PMSD lower bound, the difference is considered statistically insignificant. If the RPD for a treatment is greater that the PMSD lower bound, then the treatment is considered statistically significant.

- The test PMSD falls within the PMSD upper and lower bounds in Table 6, the sub-lethal test endpoint values shall be reported as is.

B. Statistical Analysis

1. General - Recommended Statistical Analysis Method

Refer to general data analysis flowchart, EPA 821-R-02-013, page 43

For discussion on Hypothesis Testing, refer to EPA 821-R-02-013, Section 9.6

For discussion on Point Estimation Techniques, refer to EPA 821-R-02-013, Section 9.7

2. *Pimephales promelas*

Refer to survival hypothesis testing analysis flowchart, EPA 821-R-02-013, page

79 Refer to survival point estimate techniques flowchart, EPA 821-R-02-013, page

80 Refer to growth data statistical analysis flowchart, EPA 821-R-02-013, page 92

3. *Ceriodaphnia dubia*

Refer to survival data testing flowchart, EPA 821-R-02-013, page 168

Refer to reproduction data testing flowchart, EPA 821-R-02-013, page 173

VIII. TOXICITY TEST REPORTING

A report of results must include the following:

- Test summary sheets (2007 DMR Attachment F) which includes:
  - Facility name
  - NPDES permit number
  - Outfall number
  - Sample type
  - Sampling method
  - Effluent TRC concentration
  - Dilution water used
  - Receiving water name and sampling location
  - Test type and species
  - Test start date
  - Effluent concentrations tested (%) and permit limit concentration
  - Applicable reference toxicity test date and whether acceptable or not
  - Age, age range and source of test organisms used for testing
  - Results of TAC review for all applicable controls
  - Test sensitivity evaluation results (test PMSD for growth and reproduction)
  - Permit limit and toxicity test results
  - Summary of test sensitivity and concentration response evaluation

In addition to the summary sheets the report must include:

- A brief description of sample collection procedures
- Chain of custody documentation including names of individuals collecting samples, times and dates of sample collection, sample locations, requested analysis and lab receipt with time and date received, lab receipt personnel and condition of samples upon receipt at the lab(s)
- Reference toxicity test control charts
- All sample chemical/physical data generated, including minimum limits (MLs) and analytical methods used
- All toxicity test raw data including daily ambient test conditions, toxicity test chemistry, sample dechlorination details as necessary, bench sheets and statistical analysis
- A discussion of any deviations from test conditions
- Any further discussion of reported test results, statistical analysis and concentration-response relationship and test sensitivity review per species per endpoint

Attachment B: PFAS Analyte List

Target Analyte Name	Abbreviation	CAS Number
c acids		
Perfluorobutanoic acid	PFBA	375-22-4
Perfluoropentanoic acid	PFPeA	2706-90-3
Perfluorohexanoic acid	PFHxA	307-24-4
Perfluoroheptanoic acid	PFHpA	375-85-9
Perfluorooctanoic acid	PFOA	335-67-1
Perfluorononanoic acid	PFNA	375-95-1
Perfluorodecanoic acid	PFDA	335-76-2
Perfluoroundecanoic acid	PFUnA	2058-94-8
Perfluorododecanoic acid	PFDoA	307-55-1
Perfluorotridecanoic acid	PFTrDA	72629-94-8
Perfluorotetradecanoic acid	PFTeDA	376-06-7
Perfluoroalkyl sulfonic acids		
Acid Form		
Perfluorobutanesulfonic acid	PFBS	375-73-5
Perfluoropentansulfonic acid	PFPeS	2706-91-4
Perfluorohexanesulfonic acid	PFHxS	355-46-4
Perfluoroheptanesulfonic acid	PFHpS	375-92-8
Perfluorooctanesulfonic acid	PFOS	1763-23-1
Perfluorononanesulfonic acid	PFNS	68259-12-1
Perfluorodecanesulfonic acid	PFDS	335-77-3
Perfluorododecanesulfonic acid	PFDoS	79780-39-5
Fluorotelomer sulfonic acids		
1*H*,1*H*, 2*H*, 2*H*-Perfluorohexane sulfonic acid	4:2FTS	757124-72-4
1*H*,1*H*, 2*H*, 2*H*-Perfluorooctane sulfonic acid	6:2FTS	27619-97-2
1*H*,1*H*, 2*H*, 2*H*-Perfluorodecane sulfonic acid	8:2FTS	39108-34-4
Perfluorooctane sulfonamides		
Perfluorooctanesulfonamide	PFOSA	754-91-6
N-methyl perfluorooctanesulfonamide	NMeFOSA	31506-32-8
N-ethyl perfluorooctanesulfonamide	NEtFOSA	4151-50-2
Perfluorooctane sulfonamidoacetic acids		
N-methyl perfluorooctanesulfonamidoacetic acid	NMeFOSAA	2355-31-9
N-ethyl perfluorooctanesulfonamidoacetic acid	NEtFOSAA	2991-50-6
Perfluorooctane sulfonamide ethanols		
N-methyl perfluorooctanesulfonamidoethanol	NMeFOSE	24448-09-7
N-ethyl perfluorooctanesulfonamidoethanol	NEtFOSE	1691-99-2
Per- and Polyfluoroether carboxylic acids		
Hexafluoropropylene oxide dimer acid	HFPO-DA	13252-13-6
4,8-Dioxa-3*H*-perfluorononanoic acid	ADONA	919005-14-4
Perfluoro-3-methoxypropanoic acid	PFMPA	377-73-1
Perfluoro-4-methoxybutanoic acid	PFMBA	863090-89-5
Nonafluoro-3,6-dioxaheptanoic acid	NFDHA	151772-58-6

Target Analyte Name	Abbreviation	CAS Number
Ether sulfonic acids		
9-Chlorohexadecafluoro-3-oxanonane-1-sulfonic acid	9Cl-PF3ONS	756426-58-1
11-Chloroeicosafluoro-3-oxaundecane-1-sulfonic acid	11Cl-PF3OUdS	763051-92-9
Perfluoro(2-ethoxyethane)sulfonic acid	PFEESA	113507-82-7
3-Perfluoropropyl propanoic acid	3:3FTCA	356-02-5
2H,*2H*,*3H*,*3H*-Perfluorooctanoic acid	5:3FTCA	914637-49-3
3-Perfluoroheptyl propanoic acid	7:3FTCA	812-70-4

Attachment C: Site-Specific Best Management Practices (BMPs)

Part I.C.2.d of Draft Permit No. MA00003891

A. Stormwater Collection System Management

The Permittee must complete the following activities beginning no later than 90 days following the effective date of this permit and ending no later than the expiration date of this permit.

1. Cleaning and inspection of existing stormwater collection system components.

a. Debris removal from manholes.

(1) Conduct initial inspection and removal of accumulated debris from all outside stormwater manholes (MHs) and catch basins (CBs) on GE property in Drainage Basins 005, 006, and 009;
(2) Conduct quarterly inspections for a minimum of 10 MHs and CBs in Drainage Basins 005, 006 and 009. The 10 MHs and CBs must rotate each quarter until all MHs and BCs in a given drainage basin have been inspected. Removal of accumulated debris must be completed as needed (i.e., when observed debris thickness exceeds approximately six inches and prior to the catch basin exceeding 50% of the sediment storage capacity).
(3) Provide a summary of completed inspection/cleaning activities in the SWPPP.

b. Debris removal from oil/water separators.

(1) Conduct initial removal of accumulated debris from OWSs 64W, 64X, 64Z, and 119W.
(2) Conduct annual inspections (including debris thickness measurements) of each OWS.
(3) Remove accumulated debris from each OWS at least annually, or when the average thickness of debris observed during annual inspections exceeds six inches.
(4) Provide a summary of completed inspection/cleaning activities in the SWPPP.

c. Pipeline cleaning.

(1) Within Drainage Basins 005 and 006, perform hydraulic pressure washing of the interior surfaces of active storm sewer piping to remove accumulated debris. Pipeline sections in Drainage Basins 005 and 006 subject to cleaning include piping that: was historically cleaned and/or sliplined; is located in potential PCB source areas (e.g., subsurface areas that overlap GMAs, subsurface areas with elevated PCB concentrations in soil), or is located in close proximity to authorized outfalls. This also includes any additional piping identified during MH and CB cleaning and inspection activities, that requires cleaning.
(2) Within Drainage Basins 009, YD 10, and YD 12, perform hydraulic pressure washing of the interior surfaces of active storm sewer piping to remove accumulated debris. Pipeline sections in Drainage Basin 009, YD 10, and YD 12 subject to cleaning

include active piping that may be susceptible to I/I (i.e., where the elevation of the groundwater table is at or above the elevation of the piping at any time); and pipeline sections where debris have historically accumulated.

(3) Provide a summary of the results of the cleaning activities in the SWPPP.

2. Enhancements to treatment systems.

a. Determine design flow as follows:

(1) Calculate the design storm based on current conditions for the drainage area contributing to each OWS for the 10-year, 24-hour storm.

(2) Calculate the total influent volume from the design storm for each OWS for: site stormwater; and City of Pittsfield stormwater inflow.

(3) Calculate the design storm based on future conditions determined in the assessment completed for Part I.C.2.c.4, Major Storm and Flood Events.

b. Modify each OWS design flow capacity to meet the current site wastewater influent volume for the updated design storm and consider further enhancements based on the design storm under future conditions. The Permittee shall include City of Pittsfield stormwater inflow in the required treatment capacity if this stormwater cannot be segregated from site wastewaters in a given drainage area. Also see "eliminate site stormwater bypasses," below.

c. Make reasonable best efforts to increase the water storage volume and solids settling capabilities within each drainage area through changes to the physical configuration (e.g., OWS modifications, stormwater pipeline modifications, retention or storage above-ground or within the stormwater collection system).

d. Following completion of the enhancements described above, determine the first flush magnitude and duration for each outfall using up-to-date collection system engineering specifications, runoff coefficients for each drainage area, updated design storm calculations, and control measure design flow capacity, then design a sample collection methodology that ensures the wet weather samples required in Part I.A.1-9 are representative of the first flush characteristics.

e. Following completion of the enhancements described above, conduct quarterly sampling and analysis for one year in conjunction with routine wet weather monitoring to calculate the removal efficiency of each OWS. Sampling must include one influent and one effluent sample from each OWS for each quarterly sampling. Analyze samples for total PCBs, total suspended solids (TSS), and oil and grease. Samples taken for this sampling and analysis shall be first flush flow-weighted composites (see Part I.A.1-9 for footnotes pertaining to composite and event sampling). Record OWS flow rate and total flow and other pertinent discharge conditions, such as rainfall/precipitation.

3. Previously identified optimization

Implement any control measures selected during the previous permit term that optimize stormwater management within Drainage Basins 005 and 006 through physical modifications related to the East Street Diversion Structure and existing OWS 64Z discharge/bypass piping network that have not yet been implemented.

4. Eliminate site stormwater bypasses[1]

   a. Eliminate **site** stormwater bypasses of the OWSs by implementing measures that ensure such wastewaters receive treatment. Such measures may include, where practicable and appropriate, designing new or reconfiguring existing infrastructure in a manner that facilitates segregation of the site stormwater, including flow control measures that temporarily reroute or retain flows; or installing water storage structures.

   b. Make reasonable best efforts to modify, abandon, or replace existing storm sewer piping (including existing Sewer Relief Overflows) to segregate City of Pittsfield stormwater inflow from the stormwater collection and treatment systems. Potential measures shall be discussed with the City of Pittsfield, EPA and MassDEP, as appropriate. Reasonable best efforts, in consultation with the City, shall be applied to minimize, that is, reduce or eliminate, the mixing of site stormwater with stormwater inflow from the City of Pittsfield and exposure to site pollutant sources.

B. Dry Weather Flow Elimination

1. Upon the effective date of this permit, the Permittee shall implement monitoring to identify any occurrences of dry weather flow from outfalls 05A, 05B, 006, 06A, SRO5, 009, YD10, YD12, YD13 and YD16. If a dry weather discharge occurs at any of the outfalls 05A, 05B, 006, 06A, SRO5, 009, YD10, YD12, YD13 or YD16, take corrective action in accordance with the corrective action requirements of the permit to identify and eliminate the source(s) of such flow prior to the expiration of this permit. If this permit expires and is administratively continued, the timelines for corrective action in Part I.C.5 apply.

2. Within 12 months of the effective date of this permit, the Permittee shall implement the following collection system modification requirements for the stormwater collection system within Drainage Basins 005, 006, and 009 identified during previous inspections as contributing groundwater infiltration/inflow (I/I) to the stormwater collection system:

   a. Disconnect, reline, recondition, replace or abandon in place the infrastructure, at a minimum, that is located within areas of contaminated soil and/or groundwater subject to current or former remedial activities that contributes to any authorized outfall except Outfall 64G or Outfall 64T. Infrastructure includes: pipelines, manholes, catch basins, sediment traps, and sumps; or

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1 For the purposes of this requirement, "bypass" means: the intentional diversion of waste streams from any portion of a treatment facility. Under the Standard Conditions and in accordance with 40 CFR § 122.41(m), "bypasses" that meet this regulatory definition are prohibited and must be eliminated except under the specific circumstances stated in this regulation.

b. If other modification is determined equivalent to elimination of I/I contributions (e.g., installation of active or passive treatment, diverting significant sources to Outfall 64G, Outfall 64T, or to the sanitary sewer), a request to implement this alternative must be provided to EPA in writing for concurrence.
c. Any future stormwater collection system infrastructure shall consist solely of new or slip lined stormwater piping.

3. Following the collection system modification requirements in 2., the Permittee shall conduct visual (e.g., direct observation or video) inspection of existing stormwater collection system piping in Drainage Basins 005, 006, and 009 to assess pipeline integrity during dry weather and representative of a given location at a time when water table elevations have intersected the stormwater collection system piping elevation and groundwater infiltration is reasonably possible. Inspection of areas during a time when the water table elevation is below the elevation of the stormwater collection system piping being inspected is not representative for the purposes of this requirement. As part of this inspection, the Permittee must update mapping of the storm water collection system integrity, showing all storm water collection systems pipelines, pipe type (e.g. concrete, clay, perforated), pipes sizes, connections, manhole locations, and treatment units, and clearly highlight locations where pipe integrity is degraded, and locations where groundwater infiltration is observed.

4. Following the visual inspection requirements in 3., the Permittee shall disconnect, reline, recondition, replace or abandon in place the infrastructure, at a minimum, that is located within areas of contaminated soil and/or groundwater subject to current or former remedial activities where groundwater infiltration has been observed and that contributes to any authorized outfall except Outfall 64G or Outfall 64T. Infrastructure includes: pipelines, manholes, catch basins, sediment traps, and sumps.

5. Following the collection system modification requirements in 4., the Permittee shall implement monitoring to identify any of the occurrences of groundwater infiltration into the stormwater collection system that contributes pollutants. The Permittee must collect representative (i.e., at a time when the water table elevation is high enough to produce a groundwater flow sufficient for sample collection) samples for volatile organic compound (VOC) analysis, semi-volatile organic compound (SVOC) analysis, and total polychlorinated biphenyls (PCBs).

6. Following the monitoring required in 5., where VOCs, SVOCs or PCBs are detected in groundwater infiltration that contributes to any authorized outfall except Outfall 64G or Outfall 64T, the Permittee shall disconnect, reline, recondition, replace or abandon in place the infrastructure, unless the groundwater is rerouted to Outfall 64G or Outfall 64T. If other modification is determined equivalent to elimination of I/I contributions (e.g., installation of active or passive treatment, diverting significant sources to Outfall 64G, Outfall 64T, or to the sanitary sewer), a request to implement this alternative must be provided to EPA in writing for concurrence.

7. The Permittee shall substantially complete the above activities within 36 months of the effective date of this permit. Following completion, the Permittee must develop and

implement a procedure to inspect the stormwater collection system infrastructure in conjunction with the routine inspection requirements in Part I.C.4. The routine inspections must include any infrastructure abandoned in place (e.g., plugged) to ensure the integrity of the seals, and sufficient inspection points to ensure that there is no breakout of groundwater in the vicinity of the outfalls, and no new contributions of pollutants from groundwater infiltration. If any inspection identifies evidence of dry weather flow, the Permittee shall assess and eliminate the dry weather flow consistent with this part within the timeframes specified in Part I.C.5.

8. All future stormwater collection system infrastructure shall consist solely of new or slip lined stormwater piping.

C. Non-Numeric Effluent Limitations for PCBs

1. The Permittee shall select, design, implement, and maintain control measures to eliminate[2] discharges of PCBs from the site to the receiving waters via Outfalls 005, 05A, 05B, 006, 06A, SRO5, and 009 through an iterative process over the permit term, which must include the following, at a minimum:

a. Source Identification

The Permittee shall identify the components of the stormwater collection system and trace the components that contribute PCBs to the discharges. Specifically, the collection system must be accurately mapped and the sources of PCBs contributing to the authorized outfalls must be specifically identified. The following potential sources must be evaluated, at a minimum:

(1) Presence of PCBs on surfaces exposed to stormwater.
(2) Presence of PCBs in soils/sediment that accumulates in the stormwater collection system structures.
(3) Presence of PCBs in groundwater that infiltrates into the stormwater collection system structures.
(4) PCBs in sediment in the OWSs that could be resuspended.
(5) PCBs in City of Pittsfield stormwater inflow from connections to GE's conveyance system.

The Permittee shall use the results of this evaluation to prioritize the implementation of control measures, including BMPs, as required below.

b. Optimization

The Permittee shall evaluate, select, design, implement, and maintain control measures, including BMPs, that optimize existing infrastructure as follows:

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2 For the purposes of this provision, to "eliminate" discharges of PCBs means: in any sample required by this provision and at the specified outfalls, the PCB sample result for each individual compound is non-detect using EPA Method 608.3 or 1628 and the minimum level of the analysis is at or below 0.01 µg/L.

(1) Reduce stormwater flows that contribute PCBs to the OWSs; and/or
(2) Enhance storage capacity of the existing OWSs; or increase storage capacity of the treatment system OWSs through upstream engineering controls, including, but not limited to: remotely controlled discharge valves, in-pipe and/or aboveground water storage, reuse systems, and passive remediation measures (e.g., infiltration through engineered media, targeted infiltration).
(3) Inspect and evaluate the effectiveness of the optimization measures taken through routine site inspections in Part I.C.4 and during evaluation, described below.

c. Minimization

The Permittee shall evaluate, select, design, implement, and maintain control measures, including BMPs, that eliminate the discharge of PCBs to the receiving water. Minimization must address source control and elimination of PCBs from contaminated soils, sediments, stormwater and groundwater that have entered the collection system structures via inflow and infiltration, as follows:

(1) Disconnect or abandon in place the existing collection system structures identified as contributing PCBs to the discharge; or
(2) Reline, recondition, or replace existing collection system structures identified as contributing PCBs to the discharge.
(3) If other modification is determined equivalent to elimination of PCB contributions (e.g., installation of active or passive treatment, diverting contributing sources to a sanitary sewer), a request to implement this alternative must be provided to EPA in writing for concurrence.
(4) Any future stormwater collection system structures shall consist solely of new or slip lined components.

d. Design Standards

The Permittee shall evaluate, select, design, and implement design standards (e.g., procedures and protocols) that eliminate the discharge of PCBs during the site maintenance or development activities as follows:

(1) If any development results in new pavement, new catch basins, or new treatment systems, incorporate the optimization and minimization measures specified above for the new infrastructure.
(2) Utilize green infrastructure measures where practicable, such as streetscapes, vacant lots, riparian corridors, green roof systems, cisterns, bioswales and biobasins, and porous paving.
(3) Reuse runoff, where practicable, for irrigation, and other site needs that may exist, including beneficial reuse of stored volumes.
(4) Minimize the hydraulic gradient that draws groundwater into the stormwater collection system, where practicable, including elevation of collection system structures if necessary.

e. Evaluation

The Permittee shall implement ongoing evaluation of the effectiveness of control measures, including BMPs, implemented to meet the requirement to eliminate discharges of PCBs. Specifically, the Permittee must conduct routine sampling for PCBs no less than annually to assess areas to prioritize control measures, to evaluate the performance of control measures, and incorporate design standards, and procedures and protocols. In addition, the Permittee must conduct representative sampling during both wet weather and dry weather conditions to determine:

(1) Influent concentration of total PCBs into each OWS.
(2) Effluent concentration of total PCBs from each OWS concurrent with OWS influent concentrations in (1).
(3) Effluent concentration of total PCBs from the outfalls concurrent with the OWS influent and effluent concentrations in (2).
(4) Concentration of total PCBs in the receiving waters, immediately upstream and downstream of the outfalls concurrent with the effluent concentration in (3).

NPDES PART II STANDARD CONDITIONS
(April 26, 2018)[1]

TABLE OF CONTENTS

[1] Updated July 17, 2018 to fix typographical errors.

A. GENERAL REQUIREMENTS

1. Duty to Comply

The Permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Clean Water Act (CWA or Act) and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.

a. The Permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under Section 405(d) of the CWA within the time provided in the regulations that establish these standards or prohibitions, or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.

b. Penalties for Violations of Permit Conditions: The Director will adjust the civil and administrative penalties listed below in accordance with the Civil Monetary Penalty Inflation Adjustment Rule (83 Fed. Reg. 1190-1194 (January 10, 2018) and the 2015 amendments to the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461 note. See Pub. L.114-74, Section 701 (Nov. 2, 2015)). These requirements help ensure that EPA penalties keep pace with inflation. Under the above-cited 2015 amendments to inflationary adjustment law, EPA must review its statutory civil penalties each year and adjust them as necessary.

(1) Criminal Penalties

(a) *Negligent Violations.* The CWA provides that any person who negligently violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to criminal penalties of not less than $2,500 nor more than $25,000 per day of violation, or imprisonment of not more than 1 year, or both. In the case of a second or subsequent conviction for a negligent violation, a person shall be subject to criminal penalties of not more than $50,000 per day of violation or by imprisonment of not more than 2 years, or both.

(b) *Knowing Violations.* The CWA provides that any person who knowingly violates permit conditions implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to a fine of not less than $5,000 nor more than $50,000 per day of violation, or by imprisonment for not more than 3 years, or both. In the case of a second or subsequent conviction for a knowing violation, a person shall be subject to criminal penalties of not more than $100,000 per day of violation, or imprisonment of not more than 6 years, or both.

(c) *Knowing Endangerment.* The CWA provides that any person who knowingly violates permit conditions implementing Sections 301, 302, 303, 306, 307, 308, 318, or 405 of the Act and who knows at that time that he or she is placing another person in imminent danger of death or serious bodily injury shall upon conviction be subject to a fine of not more than $250,000 or by imprisonment of not more than 15 years, or both. In the case of a second or subsequent conviction for a knowing

endangerment violation, a person shall be subject to a fine of not more than $500,000 or by imprisonment of not more than 30 years, or both. An organization, as defined in Section 309(c)(3)(B)(iii) of the Act, shall, upon conviction of violating the imminent danger provision, be subject to a fine of not more than $1,000,000 and can be fined up to $2,000,000 for second or subsequent convictions.

(d) *False Statement.* The CWA provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or both. The Act further provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

(2) *Civil Penalties*. The CWA provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to a civil penalty not to exceed the maximum amounts authorized by Section 309(d) of the Act, the 2015 amendments to the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461 note, and 40 C.F.R. Part 19. *See* Pub. L.114-74, Section 701 (Nov. 2, 2015); 83 Fed. Reg. 1190 (January 10, 2018).

(3) *Administrative Penalties*. The CWA provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Act is subject to an administrative penalty as follows:

(a) *Class I Penalty.* Not to exceed the maximum amounts authorized by Section 309(g)(2)(A) of the Act, the 2015 amendments to the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461 note, and 40 C.F.R. Part 19. *See* Pub. L.114-74, Section 701 (Nov. 2, 2015); 83 Fed. Reg. 1190 (January 10, 2018).

(b) *Class II Penalty.* Not to exceed the maximum amounts authorized by Section 309(g)(2)(B) of the Act the 2015 amendments to the Federal Civil Penalties Inflation Adjustment Act of 1990, 28 U.S.C. § 2461 note, and 40 C.F.R. Part 19. *See* Pub. L.114-74, Section 701 (Nov. 2, 2015); 83 Fed. Reg. 1190 (January 10, 2018).

2. Permit Actions

This permit may be modified, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit

condition.

3. Duty to Provide Information

The Permittee shall furnish to the Director, within a reasonable time, any information which the Director may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The Permittee shall also furnish to the Director, upon request, copies of records required to be kept by this permit.

4. Oil and Hazardous Substance Liability

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the Permittee from responsibilities, liabilities or penalties to which the Permittee is or may be subject under Section 311 of the CWA, or Section 106 of the Comprehensive Environmental Response, Compensation and Liability Act of 1980 (CERCLA).

5. Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege.

6. Confidentiality of Information

a. In accordance with 40 C.F.R. Part 2, any information submitted to EPA pursuant to these regulations may be claimed as confidential by the submitter. Any such claim must be asserted at the time of submission in the manner prescribed on the application form or instructions or, in the case of other submissions, by stamping the words "confidential business information" on each page containing such information. If no claim is made at the time of submission, EPA may make the information available to the public without further notice. If a claim is asserted, the information will be treated in accordance with the procedures in 40 C.F.R. Part 2 (Public Information).

b. Claims of confidentiality for the following information will be denied:

(1) The name and address of any permit applicant or Permittee;
(2) Permit applications, permits, and effluent data.

c. Information required by NPDES application forms provided by the Director under 40 C.F.R. § 122.21 may not be claimed confidential. This includes information submitted on the forms themselves and any attachments used to supply information required by the forms.

7. Duty to Reapply

If the Permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the Permittee must apply for and obtain a new permit. The Permittee shall submit a new application at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Director. (The Director shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)

8. State Authorities

Nothing in Parts 122, 123, or 124 precludes more stringent State regulation of any activity

covered by the regulations in 40 C.F.R. Parts 122, 123, and 124, whether or not under an approved State program.

9. Other Laws

The issuance of a permit does not authorize any injury to persons or property or invasion of other private rights, or any infringement of State or local law or regulations.

B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

The Permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the Permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a Permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

2. Need to Halt or Reduce Not a Defense

It shall not be a defense for a Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

3. Duty to Mitigate

The Permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

4. Bypass

a. Definitions

(1) *Bypass* means the intentional diversion of waste streams from any portion of a treatment facility.

(2) *Severe property damage* means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.

b. *Bypass not exceeding limitations.* The Permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs (c) and (d) of this Section.

c. Notice

(1) *Anticipated bypass*. If the Permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least ten days before the date of the bypass. As of December 21, 2020 all notices submitted in compliance with this Section must be submitted electronically by the Permittee to the Director or initial recipient, as defined in 40 C.F.R. § 127.2(b), in compliance with this Section and 40 C.F.R. Part 3 (including, in all cases, Subpart D to Part 3), § 122.22, and 40 C.F.R. Part 127. Part 127 is not intended to undo existing requirements for electronic reporting. Prior to this date, and independent of Part 127, Permittees may be required to report electronically if specified by a particular permit or if required to do so by state law.

(2) *Unanticipated bypass*. The Permittee shall submit notice of an unanticipated bypass as required in paragraph D.1.e. of this part (24-hour notice). As of December 21, 2020 all notices submitted in compliance with this Section must be submitted electronically by the Permittee to the Director or initial recipient, as defined in 40 C.F.R. § 127.2(b), in compliance with this Section and 40 C.F.R. Part 3 (including, in all cases, Subpart D to Part 3), § 122.22, and 40 C.F.R. Part 127. Part 127 is not intended to undo existing requirements for electronic reporting. Prior to this date, and independent of Part 127, Permittees may be required to report electronically if specified by a particular permit or required to do so by law.

d. *Prohibition of bypass.*

(1) Bypass is prohibited, and the Director may take enforcement action against a Permittee for bypass, unless:

(a) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;

(b) There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance; and

(c) The Permittee submitted notices as required under paragraph 4.c of this Section.

(2) The Director may approve an anticipated bypass, after considering its adverse effects, if the Director determines that it will meet the three conditions listed above in paragraph 4.d of this Section.

5. Upset

a. *Definition*. *Upset* means an exceptional incident in which there is an unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the Permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or

improper operation.

b. *Effect of an upset.* An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph B.5.c. of this Section are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.

c. *Conditions necessary for a demonstration of upset.* A Permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:

(1) An upset occurred and that the Permittee can identify the cause(s) of the upset;
(2) The permitted facility was at the time being properly operated; and
(3) The Permittee submitted notice of the upset as required in paragraph D.1.e.2.b. (24-hour notice).
(4) The Permittee complied with any remedial measures required under B.3. above.

d. *Burden of proof.* In any enforcement proceeding the Permittee seeking to establish the occurrence of an upset has the burden of proof.

C. MONITORING REQUIREMENTS

1. Monitoring and Records

a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.

b. Except for records of monitoring information required by this permit related to the Permittee's sewage sludge use and disposal activities, which shall be retained for a period of at least 5 years (or longer as required by 40 C.F.R. § 503), the Permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of the sample, measurement, report or application. This period may be extended by request of the Director at any time.

c. Records of monitoring information shall include:

(1) The date, exact place, and time of sampling or measurements;
(2) The individual(s) who performed the sampling or measurements;
(3) The date(s) analyses were performed;
(4) The individual(s) who performed the analyses;
(5) The analytical techniques or methods used; and
(6) The results of such analyses.

d. Monitoring must be conducted according to test procedures approved under 40 C.F.R. § 136 unless another method is required under 40 C.F.R. Subchapters N or O.

e. The Clean Water Act provides that any person who falsifies, tampers with, or

knowingly renders inaccurate any monitoring device or method required to be maintained under this permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than 2 years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than $20,000 per day of violation, or by imprisonment of not more than 4 years, or both.

2. Inspection and Entry

The Permittee shall allow the Director, or an authorized representative (including an authorized contractor acting as a representative of the Administrator), upon presentation of credentials and other documents as may be required by law, to:

a. Enter upon the Permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;

b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and

d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Clean Water Act, any substances or parameters at any location.

D. REPORTING REQUIREMENTS

1. Reporting Requirements

a. *Planned Changes*. The Permittee shall give notice to the Director as soon as possible of any planned physical alterations or additions to the permitted facility. Notice is required only when:

(1) The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 C.F.R. § 122.29(b); or

(2) The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements at 40 C.F.R. § 122.42(a)(1).

(3) The alteration or addition results in a significant change in the Permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan.

b. *Anticipated noncompliance*. The Permittee shall give advance notice to the Director of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.

c. *Transfers.* This permit is not transferable to any person except after notice to the Director. The Director may require modification or revocation and reissuance of the permit to change the name of the Permittee and incorporate such other requirements as may be necessary under the Clean Water Act. *See* 40 C.F.R. § 122.61; in some cases, modification or revocation and reissuance is mandatory.

d. *Monitoring reports*. Monitoring results shall be reported at the intervals specified elsewhere in this permit.

(1) Monitoring results must be reported on a Discharge Monitoring Report (DMR) or forms provided or specified by the Director for reporting results of monitoring of sludge use or disposal practices. As of December 21, 2016 all reports and forms submitted in compliance with this Section must be submitted electronically by the Permittee to the Director or initial recipient, as defined in 40 C.F.R. § 127.2(b), in compliance with this Section and 40 C.F.R. Part 3 (including, in all cases, Subpart D to Part 3), § 122.22, and 40 C.F.R. Part 127. Part 127 is not intended to undo existing requirements for electronic reporting. Prior to this date, and independent of Part 127, Permittees may be required to report electronically if specified by a particular permit or if required to do so by State law.

(2) If the Permittee monitors any pollutant more frequently than required by the permit using test procedures approved under 40 C.F.R. § 136, or another method required for an industry-specific waste stream under 40 C.F.R. Subchapters N or O, the results of such monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Director.

(3) Calculations for all limitations which require averaging or measurements shall utilize an arithmetic mean unless otherwise specified by the Director in the permit.

e. *Twenty-four hour reporting.*

(1) The Permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the Permittee becomes aware of the circumstances. A written report shall also be provided within 5 days of the time the Permittee becomes aware of the circumstances. The written report shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance. For noncompliance events related to combined sewer overflows, sanitary sewer overflows, or bypass events, these reports must include the data described above (with the exception of time of discovery) as well as the type of event (combined sewer overflows, sanitary sewer overflows, or bypass events), type of sewer overflow structure (e.g., manhole, combined sewer overflow outfall), discharge volumes untreated by the treatment works treating domestic sewage, types of human health and environmental impacts of the sewer overflow event, and whether the noncompliance was related to wet weather. As of December 21, 2020 all

reports related to combined sewer overflows, sanitary sewer overflows, or bypass events submitted in compliance with this section must be submitted electronically by the Permittee to the Director or initial recipient, as defined in 40 C.F.R. § 127.2(b), in compliance with this Section and 40 C.F.R. Part 3 (including, in all cases Subpart D to Part 3), § 122.22, and 40 C.F.R. Part 127. Part 127 is not intended to undo existing requirements for electronic reporting. Prior to this date, and independent of Part 127, Permittees may be required to electronically submit reports related to combined sewer overflows, sanitary sewer overflows, or bypass events under this section by a particular permit or if required to do so by state law. The Director may also require Permittees to electronically submit reports not related to combined sewer overflows, sanitary sewer overflows, or bypass events under this section.

(2) The following shall be included as information which must be reported within 24 hours under this paragraph.

(a) Any unanticipated bypass which exceeds any effluent limitation in the permit. *See* 40 C.F.R. § 122.41(g).
(b) Any upset which exceeds any effluent limitation in the permit.
(c) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Director in the permit to be reported within 24 hours. *See* 40 C.F.R. § 122.44(g).

(3) The Director may waive the written report on a case-by-case basis for reports under paragraph D.1.e. of this Section if the oral report has been received within 24 hours.

f. *Compliance Schedules.* Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.

g. *Other noncompliance.* The Permittee shall report all instances of noncompliance not reported under paragraphs D.1.d., D.1.e., and D.1.f. of this Section, at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph D.1.e. of this Section. For noncompliance events related to combined sewer overflows, sanitary sewer overflows, or bypass events, these reports shall contain the information described in paragraph D.1.e. and the applicable required data in Appendix A to 40 C.F.R. Part 127. As of December 21, 2020 all reports related to combined sewer overflows, sanitary sewer overflows, or bypass events submitted in compliance with this section must be submitted electronically by the Permittee to the Director or initial recipient, as defined in 40 C.F.R. § 127.2(b), in compliance with this Section and 40 C.F.R. Part 3 (including, in all cases, Subpart D to Part 3), §122.22, and 40 C.F.R. Part 127. Part 127 is not intended to undo existing requirements for electronic reporting. Prior to this date, and independent of Part 127, Permittees may be required to electronically submit reports related to combined sewer overflows, sanitary sewer overflows, or bypass events under this section by a particular permit or if required to do so by state law. The Director may also require Permittees to electronically submit reports not related to combined sewer overflows, sanitary sewer overflows, or bypass events under this Section.

h. *Other information.* Where the Permittee becomes aware that it failed to submit any

relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Director, it shall promptly submit such facts or information.

i. *Identification of the initial recipient for NPDES electronic reporting data*. The owner, operator, or the duly authorized representative of an NPDES-regulated entity is required to electronically submit the required NPDES information (as specified in Appendix A to 40 C.F.R. Part 127) to the appropriate initial recipient, as determined by EPA, and as defined in 40 C.F.R. § 127.2(b). EPA will identify and publish the list of initial recipients on its Web site and in the FEDERAL REGISTER, by state and by NPDES data group (see 40 C.F.R. § 127.2(c) of this Chapter). EPA will update and maintain this listing.

2. Signatory Requirement

a. All applications, reports, or information submitted to the Director shall be signed and certified. *See* 40 C.F.R. §122.22.

b. The CWA provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.

3. Availability of Reports.

Except for data determined to be confidential under paragraph A.6. above, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the offices of the State water pollution control agency and the Director. As required by the CWA, effluent data shall not be considered confidential. Knowingly making any false statements on any such report may result in the imposition of criminal penalties as provided for in Section 309 of the CWA.

E. DEFINITIONS AND ABBREVIATIONS

1. General Definitions

For more definitions related to sludge use and disposal requirements, see EPA Region 1's NPDES Permit Sludge Compliance Guidance document (4 November 1999, modified to add regulatory definitions, April 2018).

Administrator means the Administrator of the United States Environmental Protection Agency, or an authorized representative.

Applicable standards and limitations means all, State, interstate, and federal standards and limitations to which a "discharge," a "sewage sludge use or disposal practice," or a related activity is subject under the CWA, including "effluent limitations," water quality standards, standards of performance, toxic effluent standards or prohibitions, "best management practices," pretreatment standards, and "standards for sewage sludge use or disposal" under Sections 301, 302, 303, 304, 306, 307, 308, 403 and 405 of the CWA.

Application means the EPA standard national forms for applying for a permit, including any additions, revisions, or modifications to the forms; or forms approved by EPA for use in

"approved States," including any approved modifications or revisions.

Approved program or *approved State* means a State or interstate program which has been approved or authorized by EPA under Part 123.

Average monthly discharge limitation means the highest allowable average of "daily discharges" over a calendar month, calculated as the sum of all "daily discharges" measured during a calendar month divided by the number of "daily discharges" measured during that month.

Average weekly discharge limitation means the highest allowable average of "daily discharges" over a calendar week, calculated as the sum of all "daily discharges" measured during a calendar week divided by the number of "daily discharges" measured during that week.

Best Management Practices ("BMPs") means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of "waters of the United States." BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Bypass see B.4.a.1 above.

C-NOEC or *"Chronic (Long-term Exposure Test) – No Observed Effect Concentration" means* the highest tested concentration of an effluent or a toxicant at which no adverse effects are observed on the aquatic test organisms at a specified time of observation.

Class I sludge management facility is any publicly owned treatment works (POTW), as defined in 40 C.F.R. § 501.2, required to have an approved pretreatment program under 40 C.F.R. § 403.8 (a) (including any POTW located in a State that has elected to assume local program responsibilities pursuant to 40 C.F.R. § 403.10 (e)) and any treatment works treating domestic sewage, as defined in 40 C.F.R. § 122.2, classified as a Class I sludge management facility by the EPA Regional Administrator, or, in the case of approved State programs, the Regional Administrator in conjunction with the State Director, because of the potential for its sewage sludge use or disposal practice to affect public health and the environment adversely.

Contiguous zone means the entire zone established by the United States under Article 24 of the Convention on the Territorial Sea and the Contiguous Zone.

Continuous discharge means a "discharge" which occurs without interruption throughout the operating hours of the facility, except for infrequent shutdowns for maintenance, process changes, or similar activities.

CWA means the Clean Water Act (formerly referred to as the Federal Water Pollution Control Act or Federal Water Pollution Control Act Amendments of 1972) Public Law 92-500, as amended by Public Law 95-217, Public Law 95-576, Public Law 96-483and Public Law 97-117, 33 U.S.C. 1251 *et seq*.

CWA and regulations means the Clean Water Act (CWA) and applicable regulations promulgated thereunder. In the case of an approved State program, it includes State program requirements.

Daily Discharge means the "discharge of a pollutant" measured during a calendar day or any

other 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily discharge" is calculated as the average measurement of the pollutant over the day.

Direct Discharge means the "discharge of a pollutant."

Director means the Regional Administrator or an authorized representative. In the case of a permit also issued under Massachusetts' authority, it also refers to the Director of the Division of Watershed Management, Department of Environmental Protection, Commonwealth of Massachusetts.

Discharge

(a) When used without qualification, *discharge* means the "discharge of a pollutant."

(b) As used in the definitions for "interference" and "pass through," *discharge* means the introduction of pollutants into a POTW from any non-domestic source regulated under Section 307(b), (c) or (d) of the Act.

Discharge Monitoring Report ("DMR") means the EPA uniform national form, including any subsequent additions, revisions, or modifications for the reporting of self-monitoring results by Permittees. DMRs must be used by "approved States" as well as by EPA. EPA will supply DMRs to any approved State upon request. The EPA national forms may be modified to substitute the State Agency name, address, logo, and other similar information, as appropriate, in place of EPA's.

Discharge of a pollutant means:

(a) Any addition of any "pollutant" or combination of pollutants to "waters of the United States" from any "point source," or

(b) Any addition of any pollutant or combination of pollutants to the waters of the "contiguous zone" or the ocean from any point source other than a vessel or other floating craft which is being used as a means of transportation.

This definition includes additions of pollutants into waters of the United States from: surface runoff which is collected or channeled by man; discharges through pipes, sewers, or other conveyances owned by a State, municipality, or other person which do not lead to a treatment works; and discharges through pipes, sewers, or other conveyances, leading into privately owned treatment works. This term does not include an addition of pollutants by any "indirect discharger."

Effluent limitation means any restriction imposed by the Director on quantities, discharge rates, and concentrations of "pollutants" which are "discharged" from "point sources" into "waters of the United States," the waters of the "contiguous zone," or the ocean.

Effluent limitation guidelines means a regulation published by the Administrator under section 304(b) of CWA to adopt or revise "effluent limitations."

Environmental Protection Agency ("EPA") means the United States Environmental Protection

Agency.

Grab Sample means an individual sample collected in a period of less than 15 minutes.

Hazardous substance means any substance designated under 40 C.F.R. Part 116 pursuant to Section 311 of CWA.

Incineration is the combustion of organic matter and inorganic matter in sewage sludge by high temperatures in an enclosed device.

Indirect discharger means a nondomestic discharger introducing "pollutants" to a "publicly owned treatment works."

Interference means a discharge (see definition above) which, alone or in conjunction with a discharge or discharges from other sources, both:

(a) Inhibits or disrupts the POTW, its treatment processes or operations, or its sludge processes, use or disposal; and

(b) Therefore is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation) or of the prevention of sewage sludge use or disposal in compliance with the following statutory provisions and regulations or permits issued thereunder (or more stringent State or local regulations): Section 405 of the Clean Water Act, the Solid Waste Disposal Act (SWDA) (including title II, more commonly referred to as the Resources Conservation and Recovery Act (RCRA), and including State regulations contained in any State sludge management plan prepared pursuant to Subtitle D of the SDWA), the Clean Air Act, the Toxic Substances Control Act, and the Marine Protection, Research and Sanctuaries Act.

Landfill means an area of land or an excavation in which wastes are placed for permanent disposal, and that is not a land application unit, surface impoundment, injection well, or waste pile.

Land application is the spraying or spreading of sewage sludge onto the land surface; the injection of sewage sludge below the land surface; or the incorporation of sewage sludge into the soil so that the sewage sludge can either condition the soil or fertilize crops or vegetation grown in the soil.

Land application unit means an area where wastes are applied onto or incorporated into the soil surface (excluding manure spreading operations) for agricultural purposes or for treatment and disposal.

LC_{50} means the concentration of a sample that causes mortality of 50% of the test population at a specific time of observation. The LC_{50} = 100% is defined as a sample of undiluted effluent.

Maximum daily discharge limitation means the highest allowable "daily discharge."

Municipal solid waste landfill (MSWLF) unit means a discrete area of land or an excavation that receives household waste, and that is not a land application unit, surface impoundment, injection well, or waste pile, as those terms are defined under 40 C.F.R. § 257.2. A MSWLF unit also may receive other types of RCRA Subtitle D wastes, such as commercial solid waste, nonhazardous sludge, very small quantity generator waste and industrial solid waste. Such a landfill may be

publicly or privately owned. A MSWLF unit may be a new MSWLF unit, an existing MSWLF unit or a lateral expansion. A construction and demolition landfill that receives residential lead-based paint waste and does not receive any other household waste is not a MSWLF unit.

Municipality

(a) When used without qualification *municipality* means a city, town, borough, county, parish, district, association, or other public body created by or under State law and having jurisdiction over disposal of sewage, industrial wastes, or other wastes, or an Indian tribe or an authorized Indian tribal organization, or a designated and approved management agency under Section 208 of CWA.

(b) As related to sludge use and disposal, *municipality* means a city, town, borough, county, parish, district, association, or other public body (including an intermunicipal Agency of two or more of the foregoing entities) created by or under State law; an Indian tribe or an authorized Indian tribal organization having jurisdiction over sewage sludge management; or a designated and approved management Agency under Section 208 of the CWA, as amended. The definition includes a special district created under State law, such as a water district, sewer district, sanitary district, utility district, drainage district, or similar entity, or an integrated waste management facility as defined in Section 201 (e) of the CWA, as amended, that has as one of its principal responsibilities the treatment, transport, use or disposal of sewage sludge.

National Pollutant Discharge Elimination System means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 402, 318, and 405 of the CWA. The term includes an "approved program."

New Discharger means any building, structure, facility, or installation:

(a) From which there is or may be a "discharge of pollutants;"

(b) That did not commence the "discharge of pollutants" at a particular "site" prior to August 13, 1979;

(c) Which is not a "new source;" and

(d) Which has never received a finally effective NPDES permit for discharges at that "site."

This definition includes an "indirect discharger" which commences discharging into "waters of the United States" after August 13, 1979. It also includes any existing mobile point source (other than an offshore or coastal oil and gas exploratory drilling rig or a coastal oil and gas exploratory drilling rig or a coastal oil and gas exploratory drilling rig or a coastal oil and gas developmental drilling rig) such as a seafood processing rig, seafood processing vessel, or aggregate plant, that begins discharging at a "site" for which it does not have a permit; and any offshore or coastal mobile oil and gas exploratory drilling rig or coastal mobile oil and gas developmental drilling rig that commences the discharge of pollutants after August 13, 1979, at a "site" under EPA's permitting jurisdiction for which it is not covered by an individual or general permit and which is located in an area determined by the Director in the issuance of a final permit to be in an area of biological concern. In determining whether an area is an area of biological concern, the Director shall consider the factors specified in 40 C.F.R. §§ 125.122 (a) (1) through (10).

An offshore or coastal mobile exploratory drilling rig or coastal mobile developmental drilling rig will be considered a "new discharger" only for the duration of its discharge in an area of biological concern.

New source means any building, structure, facility, or installation from which there is or may be a "discharge of pollutants," the construction of which commenced:

(a) After promulgation of standards of performance under Section 306 of CWA which are applicable to such source, or

(b) After proposal of standards of performance in accordance with Section 306 of CWA which are applicable to such source, but only if the standards are promulgated in accordance with Section 306 within 120 days of their proposal.

NPDES means "National Pollutant Discharge Elimination System."

Owner or operator means the owner or operator of any "facility or activity" subject to regulation under the NPDES programs.

Pass through means a Discharge (see definition above) which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the POTW's NPDES permit (including an increase in the magnitude or duration of a violation).

Pathogenic organisms are disease-causing organisms. These include, but are not limited to, certain bacteria, protozoa, viruses, and viable helminth ova.

Permit means an authorization, license, or equivalent control document issued by EPA or an "approved State" to implement the requirements of Parts 122, 123, and 124. "Permit" includes an NPDES "general permit" (40 C.F.R § 122.28). "Permit" does not include any permit which has not yet been the subject of final agency action, such as a "draft permit" or "proposed permit."

Person means an individual, association, partnership, corporation, municipality, State or Federal agency, or an agent or employee thereof.

Person who prepares sewage sludge is either the person who generates sewage sludge during the treatment of domestic sewage in a treatment works or the person who derives a material from sewage sludge.

pH means the logarithm of the reciprocal of the hydrogen ion concentration measured at 25° Centigrade or measured at another temperature and then converted to an equivalent value at 25° Centigrade.

Point Source means any discernible, confined, and discrete conveyance, including but not limited to, any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, container, rolling stock, concentrated animal feeding operation, landfill leachate collection system, vessel or other floating craft from which pollutants are or may be discharged. This term does not include return flows from irrigated agriculture or agricultural storm water runoff (see 40 C.F.R. § 122.3).

Pollutant means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, chemical wastes, biological materials, radioactive materials

(except those regulated under the Atomic Energy Act of 1954, as amended (42 U.S.C. 2011 *et seq*.)), heat, wrecked or discarded equipment, rock, sand, cellar dirt and industrial, municipal, and agricultural waste discharged into water. It does not mean:

(a) Sewage from vessels; or

(b) Water, gas, or other material which is injected into a well to facilitate production of oil or gas, or water derived in association with oil and gas production and disposed of in a well, if the well is used either to facilitate production or for disposal purposes is approved by the authority of the State in which the well is located, and if the State determines that the injection or disposal will not result in the degradation of ground or surface water resources.

Primary industry category means any industry category listed in the NRDC settlement agreement (*Natural Resources Defense Council et al. v. Train*, 8 E.R.C. 2120 (D.D.C. 1976), *modified* 12 E.R.C. 1833 (D.D.C. 1979)); also listed in Appendix A of 40 C.F.R. Part 122.

Privately owned treatment works means any device or system which is (a) used to treat wastes from any facility whose operator is not the operator of the treatment works and (b) not a "POTW."

Process wastewater means any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.

Publicly owned treatment works (POTW) means a treatment works as defined by Section 212 of the Act, which is owned by a State or municipality (as defined by Section 504(4) of the Act). This definition includes any devices and systems used in the storage, treatment, recycling and reclamation of municipal sewage or industrial wastes of a liquid nature. It also includes sewers, pipes and other conveyances only if they convey wastewater to a POTW Treatment Plant. The term also means the municipality as defined in Section 502(4) of the Act, which has jurisdiction over the indirect discharges to and the discharges from such a treatment works.

Regional Administrator means the Regional Administrator, EPA, Region I, Boston, Massachusetts.

Secondary industry category means any industry which is not a "primary industry category."

Septage means the liquid and solid material pumped from a septic tank, cesspool, or similar domestic sewage treatment system, or a holding tank when the system is cleaned or maintained.

Sewage Sludge means any solid, semi-solid, or liquid residue removed during the treatment of municipal waste water or domestic sewage. Sewage sludge includes, but is not limited to, solids removed during primary, secondary, or advanced waste water treatment, scum, septage, portable toilet pumpings, type III marine sanitation device pumpings (33 C.F.R. Part 159), and sewage sludge products. Sewage sludge does not include grit or screenings, or ash generated during the incineration of sewage sludge.

Sewage sludge incinerator is an enclosed device in which only sewage sludge and auxiliary fuel are fired.

Sewage sludge unit is land on which only sewage sludge is placed for final disposal. This does

not include land on which sewage sludge is either stored or treated. Land does not include waters of the United States, as defined in 40 C.F.R. § 122.2.

Sewage sludge use or disposal practice means the collection, storage, treatment, transportation, processing, monitoring, use, or disposal of sewage sludge.

Significant materials includes, but is not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substance designated under Section 101(14) of CERCLA; any chemical the facility is required to report pursuant to Section 313 of title III of SARA; fertilizers; pesticides; and waste products such as ashes, slag and sludge that have the potential to be released with storm water discharges.

Significant spills includes, but is not limited to, releases of oil or hazardous substances in excess of reportable quantities under Section 311 of the CWA (see 40 C.F.R. §§ 110.10 and 117.21) or Section 102 of CERCLA (*see* 40 C.F.R. § 302.4).

Sludge-only facility means any "treatment works treating domestic sewage" whose methods of sewage sludge use or disposal are subject to regulations promulgated pursuant to section 405(d) of the CWA, and is required to obtain a permit under 40 C.F.R. § 122.1(b)(2).

State means any of the 50 States, the District of Columbia, Guam, the Commonwealth of Puerto Rico, the Virgin Islands, American Samoa, the Commonwealth of the Northern Mariana Islands, the Trust Territory of the Pacific Islands, or an Indian Tribe as defined in the regulations which meets the requirements of 40 C.F.R. § 123.31.

Store or storage of sewage sludge is the placement of sewage sludge on land on which the sewage sludge remains for two years or less. This does not include the placement of sewage sludge on land for treatment.

Storm water means storm water runoff, snow melt runoff, and surface runoff and drainage.

Storm water discharge associated with industrial activity means the discharge from any conveyance that is used for collecting and conveying storm water and that is directly related to manufacturing, processing, or raw materials storage areas at an industrial plant.

Surface disposal site is an area of land that contains one or more active sewage sludge units.

Toxic pollutant means any pollutant listed as toxic under Section 307(a)(1) or, in the case of "sludge use or disposal practices," any pollutant identified in regulations implementing Section 405(d) of the CWA.

Treatment works treating domestic sewage means a POTW or any other sewage sludge or waste water treatment devices or systems, regardless of ownership (including federal facilities), used in the storage, treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated for the disposal of sewage sludge. This definition does not include septic tanks or similar devices.

For purposes of this definition, "domestic sewage" includes waste and waste water from humans or household operations that are discharged to or otherwise enter a treatment works. In States where there is no approved State sludge management program under Section 405(f) of the CWA, the Director may designate any person subject to the standards for sewage sludge use and

disposal in 40 C.F.R. Part 503 as a "treatment works treating domestic sewage," where he or she finds that there is a potential for adverse effects on public health and the environment from poor sludge quality or poor sludge handling, use or disposal practices, or where he or she finds that such designation is necessary to ensure that such person is in compliance with 40 C.F.R. Part 503.

Upset see B.5.a. above.

Vector attraction is the characteristic of sewage sludge that attracts rodents, flies, mosquitoes, or other organisms capable of transporting infectious agents.

Waste pile or *pile* means any non-containerized accumulation of solid, non-flowing waste that is used for treatment or storage.

Waters of the United States or waters of the U.S. means:

(a) All waters which are currently used, were used in the past, or may be susceptible to use in interstate or foreign commerce, including all waters which are subject to the ebb and flow of the tide;

(b) All interstate waters, including interstate "wetlands;"

(c) All other waters such as intrastate lakes, rivers, streams (including intermittent streams), mudflats, sandflats, "wetlands", sloughs, prairie potholes, wet meadows, playa lakes, or natural ponds the use, degradation, or destruction of which would affect or could affect interstate or foreign commerce including any such waters:

    (1) Which are or could be used by interstate or foreign travelers for recreational or other purpose;

    (2) From which fish or shellfish are or could be taken and sold in interstate or foreign commerce; or

    (3) Which are used or could be used for industrial purposes by industries in interstate commerce;

(d) All impoundments of waters otherwise defined as waters of the United States under this definition;

(e) Tributaries of waters identified in paragraphs (a) through (d) of this definition;

(f) The territorial sea; and

(g) "Wetlands" adjacent to waters (other than waters that are themselves wetlands) identified in paragraphs (a) through (f) of this definition.

Waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA (other than cooling ponds as defined in 40 C.F.R. § 423.11(m) which also meet the criteria of this definition) are not waters of the United States. This exclusion applies only to manmade bodies of water which neither were originally created in waters of the United States (such as disposal area in wetlands) nor resulted from the impoundment of waters of the United States. Waters of the United States do not include prior converted cropland.

Notwithstanding the determination of an area's status as prior converted cropland by any other federal agency, for the purposes of the Clean Water Act, the final authority regarding Clean Water Act jurisdiction remains with EPA.

Wetlands means those areas that are inundated or saturated by surface or groundwater at a frequency and duration sufficient to support, and that under normal circumstances do support, a prevalence of vegetation typically adapted for life in saturated soil conditions. Wetlands generally include swamps, marshes, bogs, and similar areas.

Whole Effluent Toxicity (WET) means the aggregate toxic effect of an effluent measured directly by a toxicity test.

*Zone of Initial Dilution (*ZID) means the region of initial mixing surrounding or adjacent to the end of the outfall pipe or diffuser ports, provided that the ZID may not be larger than allowed by mixing zone restrictions in applicable water quality standards.

2. Commonly Used Abbreviations

BOD	Five-day biochemical oxygen demand unless otherwise specified
CBOD	Carbonaceous BOD
CFS	Cubic feet per second
COD	Chemical oxygen demand
Chlorine	
Cl_2	Total residual chlorine
TRC	Total residual chlorine which is a combination of free available chlorine (FAC, see below) and combined chlorine (chloramines, etc.)
TRO	Total residual chlorine in marine waters where halogen compounds are present
FAC	Free available chlorine (aqueous molecular chlorine, hypochlorous acid, and hypochlorite ion)
Coliform	
Coliform, Fecal	Total fecal coliform bacteria
Coliform, Total	Total coliform bacteria
Cont.	Continuous recording of the parameter being monitored, i.e. flow, temperature, pH, etc.
Cu. M/day or M^3/day	Cubic meters per day
DO	Dissolved oxygen

kg/day	Kilograms per day
lbs/day	Pounds per day
mg/L	Milligram(s) per liter
mL/L	Milliliters per liter
MGD	Million gallons per day
Nitrogen	
Total N	Total nitrogen
NH_3-N	Ammonia nitrogen as nitrogen
NO_3-N	Nitrate as nitrogen
NO_2-N	Nitrite as nitrogen
NO_3-NO_2	Combined nitrate and nitrite nitrogen as nitrogen
TKN	Total Kjeldahl nitrogen as nitrogen
Oil & Grease	Freon extractable material
PCB	Polychlorinated biphenyl
Surfactant	Surface-active agent
Temp. °C	Temperature in degrees Centigrade
Temp. °F	Temperature in degrees Fahrenheit
TOC	Total organic carbon
Total P	Total phosphorus
TSS or NFR	Total suspended solids or total nonfilterable residue
Turb. or Turbidity	Turbidity measured by the Nephelometric Method (NTU)
µg/L	Microgram(s) per liter
WET	"Whole effluent toxicity"
ZID	Zone of Initial Dilution

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
NEW ENGLAND - REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

FACT SHEET

DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES PURSUANT TO THE CLEAN WATER ACT (CWA)

NPDES PERMIT NUMBER: MA0003891

PUBLIC NOTICE START AND END DATES:

NAME AND MAILING ADDRESS OF APPLICANT:

General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

NAME AND ADDRESS OF FACILITY WHERE DISCHARGE OCCURS:

General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

RECEIVING WATER AND CLASSIFICATION:

Housatonic River
Unkamet Brook
(Housatonic River Watershed) (MA21-02)
Class B, Warm Water Fishery

Table of Contents

Tables

Figures

Appendices

Attachment

1.0 Proposed Action

The General Electric Company (the Permittee or GE) has applied to the U.S. Environmental Protection Agency (EPA) for reissuance of a National Pollutant Discharge Elimination System (NPDES) permit to discharge from the 159 Plastics Avenue facility (the Facility) into the designated Housatonic River, and Unkamet Brook. The Facility's location is shown on Figure 1 of this Fact Sheet.

Individual Permit

On September 30, 2008, EPA issued the most recent Final NPDES Permit for the Facility (2008 Permit). That permit was subsequently modified through a permit modification issued on August 10, 2009 (2009 Permit Modification), which became effective on October 1, 2009, and included both the modified and unmodified conditions from the permit issued in 2008. The current permit, including both the 2008 Permit and as modified by the 2009 Permit Modification will be referred to hereinafter as the "2009 Permit." The 2009 Permit expired on December 31, 2013. The Permittee filed an application for permit reissuance with EPA dated June 27, 2013, as required by 40 Code of Federal Regulations (CFR) § 122.6. Since the permit application was deemed timely and complete, the Facility's 2009 Permit has been administratively continued pursuant to 40 CFR sections 122.6 and 122.21(d). EPA and the Massachusetts Department of Environmental Protection (MassDEP) conducted a site visit on December 1, 2021. The Permittee submitted a supplement to the application on January 23, 2023 (See Attachment 1).

General Permit

Discharges from 26 stormwater outfalls previously obtained coverage under EPA's Multi-Sector General Permit (MSGP) for Stormwater Discharges Associated with Industrial Activity issued on October 30, 2000. Based on Standard Industrial Classification codes of 2821, 3612, and 3629, the Permittee was covered under Sector C (Chemical Allied Products) and Sector AC (Electronic and Electrical Equipment and Components). Seven of these storm water outfalls discharged to Unkamet Brook, two discharged into Silver Lake, and 17 discharged into the East Branch of the Housatonic River. The 2009 Permit for the Facility incorporated the discharges covered under the MSGP, except for 9 outfalls which were determined to be non-point source discharges (i.e., not conveyed via a pipe or other point source discharge as defined by the Clean Water Act). The MSGP coverage for these discharges was revoked upon final issuance. Any remaining outfalls still active at the Facility previously covered under EPA's MSGP continue to be covered under this individual permit.

Consent Decree

On October 27, 2000, a Consent Decree (CD) was executed between GE, EPA, the Massachusetts Department of Environmental Protection (MassDEP), and several other government agencies (U.S. District Court for Massachusetts: United States, et al. v. General Electric Co., No. 99-30225). Currently, the Facility is subject to environmental study and remedial/removal activities pursuant to the CD. Numerous response actions have been conducted, are currently underway, or are expected to occur to address polychlorinated biphenyls (PCBs) and other hazardous substances in soils, sediments, and groundwater at or near the Facility. These discharges are discussed in this Fact Sheet and Draft Permit to the extent that they are authorized by this NPDES permit (i.e., Outfalls 005 via internal Outfall 64G).

Definitive Economic Development Agreement

In 1999, the Permittee, the Pittsfield Economic Development Authority (PEDA) and the City of Pittsfield signed an agreement known as the Definitive Economic Development Agreement (DEDA) regarding the transfer of approximately 52 acres of land to PEDA. GE transferred approximately 26 acres to PEDA in 2005, and an additional 26 acres in 2011 and 2012. Prior to completing transfer of the land to PEDA, GE abandoned several sections of storm sewer to eliminate the potential for stormwater to flow/migrate between the two properties. Further, GE installed concrete plugs in remaining storm sewer section to eliminate flow from the PEDA designated segments of storm sewer to GE-owned segments of the system. The CD requires PEDA to maintain pavement in four areas of this land where building demolition debris were buried. The outfalls that discharged into Silver Lake (001, 01A, 004 and YD3) were transferred to PEDA and removed from GE's permit. PEDA is subject to a separate NPDES permit issued on August 18, 2021 (Permit No. MA0040231) for PEDA's discharges.[1]

2.0 Statutory and Regulatory Authority

Congress enacted the Federal Water Pollution Control Act, codified at 33 U.S.C. § 1251 – 1387 and commonly known as the Clean Water Act (CWA), "to restore and maintain the chemical, physical, and biological integrity of the Nation's waters." CWA § 101(a). To achieve this objective, the CWA makes it unlawful for any person to discharge any pollutant into the waters of the United States from any point source, except as authorized by specific permitting sections of the CWA, one of which is § 402. *See* CWA §§ 301(a), 402(a). Section 402(a) established one of the CWA's principal permitting programs, the NPDES Permit Program. Under this section, EPA may "issue a permit for the discharge of any pollutant or combination of pollutants" in accordance with certain conditions. CWA § 402(a). NPDES permits generally contain discharge limitations and establish related monitoring and reporting requirements. *See* CWA § 402(a)(1) and (2). The regulations governing EPA's NPDES permit program are generally found in 40 CFR §§ 122, 124, 125, and 136.

"Congress has vested in the Administrator [of EPA] broad discretion to establish conditions for NPDES permits" in order to achieve the statutory mandates of Section 301 and 402. *Arkansas v. Oklahoma,* 503 U.S. 91, 105 (1992). *See also* 40 CFR §§ 122.4(d), 122.44(d)(1), and 122.44(d)(5). CWA §§ 301 and 306 provide for two types of effluent limitations to be included in NPDES permits: "technology-based" effluent limitations (TBELs) and "water quality-based" effluent limitations (WQBELs). *See* CWA §§ 301 and 304(b); 40 CFR §§ 122, 125, and 131.

2.1 Technology-Based Requirements

Technology-based treatment requirements represent the minimum level of control that must be imposed under CWA §§ 301(b) and 402 to meet best practicable control technology currently available (BPT) for conventional pollutants and some metals, best conventional control technology (BCT) for conventional pollutants, and best available technology economically achievable (BAT) for toxic and non-conventional pollutants. 40 CFR §125*See* 40 CFR § 125 Subpart A.

Subpart A of 40 CFR Part 125 establishes criteria and standards for the imposition of technology-based treatment requirements in permits under § 301(b) of the CWA, including the application of EPA

[1] See https://www3.epa.gov/region1/npdes/permits/2021/finalma0040231permit.pdf.

promulgated Effluent Limitation Guidelines (ELGs) and case-by-case determinations of effluent limitations under CWA § 402(a)(1). EPA promulgates New Source Performance Standards (NSPS) under CWA § 306 and 40 CFR § 401.12. *See also* 40 CFR §§ 122.2 (definition of "new source") and 122.29.

Section 402(p) of the CWA, 33 U.S.C. § 1342(p) requires stormwater discharges associated with industrial activity to be authorized by a NPDES permit. See also 40 CFR § 122.26(a)(1)(ii).

In general, ELGs for non-POTW facilities must be complied with as expeditiously as practicable but in no case later than three years after the date such limitations are established and in no case later than March 31, 1989. *See* 40 CFR § 125.3(a)(2). Compliance schedules and deadlines not in accordance with the statutory provisions of the CWA cannot be authorized by a NPDES permit. In the absence of published technology-based effluent guidelines, the permit writer is authorized under CWA § 402(a)(1)(B) to establish effluent limitations on a case-by-case basis using best professional judgment (BPJ).

2.2 Water Quality-Based Requirements

The CWA and federal regulations require that effluent limitations based on water quality considerations be established for point source discharges when such limitations are necessary to meet state or federal water quality standards that are applicable to the designated receiving water. This is necessary when less stringent TBELs would interfere with the attainment or maintenance of water quality criteria in the receiving water. *See* CWA § 301(b)(1)(C) and 40 CFR §§ 122.44(d)(1),122.44(d)(5), 125.84(e) and 125.94(i).

2.2.1 Water Quality Standards

The CWA requires that each state develop water quality standards (WQSs) for all water bodies within the State. *See* CWA § 303 and 40 CFR §§ 131.10-12. Generally, WQSs consist of three parts: 1) beneficial designated use or uses for a water body or a segment of a water body; 2) numeric or narrative water quality criteria sufficient to protect the assigned designated use(s); and 3) antidegradation requirements to ensure that once a use is attained it will not be degraded and to protect high quality and National resource waters. *See* CWA § 303(c)(2)(A) and 40 CFR § 131.12. The applicable State WQSs can be found in Title 314 of the Code of Massachusetts Regulations, Chapter 4 (314 CMR 4.00).

As a matter of state law, state WQSs specify different water body classifications, each of which is associated with certain designated uses and numeric and narrative water quality criteria. When using chemical-specific numeric criteria to develop permit limitations, acute and chronic aquatic life criteria and human health criteria are used and expressed in terms of maximum allowable in-stream pollutant concentrations. In general, aquatic-life acute criteria are considered applicable to daily time periods (maximum daily limit) and aquatic-life chronic criteria are considered applicable to monthly time periods (average monthly limit). Chemical-specific human health criteria are typically based on lifetime chronic exposure and, therefore, are typically applicable to monthly average limits.

When permit effluent limitation(s) are necessary to ensure that the receiving water meets narrative water quality criteria, the permitting authority must establish effluent limits in one of the following three ways:

1) based on a "calculated numeric criterion for the pollutant which the permitting authority demonstrates will attain and maintain applicable narrative water quality criteria and fully protect the designated use," 2) based on a "case-by-case basis" using CWA § 304(a) recommended water quality criteria, supplemented as necessary by other relevant information; or, 3) in certain circumstances, based on use of an indicator parameter. *See* 40 CFR § 122.44(d)(1)(vi)(A – C).

2.2.2 Antidegradation

Federal regulations found at 40 CFR § 131.12 require states to develop and adopt a statewide antidegradation policy that maintains and protects existing in-stream water uses and the level of water quality necessary to protect these existing uses. In addition, the antidegradation policy ensures maintenance of high quality waters which exceed levels necessary to support propagation of fish, shellfish, and wildlife and to support recreation in and on the water, unless the State finds that allowing degradation is necessary to accommodate important economic or social development in the area in which the waters are located.

Massachusetts' statewide antidegradation policy, entitled "Antidegradation Provisions," is found in the State's WQSs at 314 CMR 4.04. Massachusetts guidance for the implementation of this policy is in an associated document entitled "Implementation Procedure for the Anti-Degradation Provisions of the State Water Quality Standards," dated October 21, 2009. According to the policy, no lowering of water quality is allowed, except in accordance with the antidegradation policy, and all existing in-stream uses, and the level of water quality necessary to protect the existing uses of a receiving water body must be maintained and protected.

This permit is being reissued with effluent limitations sufficiently stringent to satisfy the State's antidegradation requirements, including the protection of the existing uses of the receiving water.

2.2.3 Assessment and Listing of Waters and Total Maximum Daily Loads

The objective of the CWA is to restore and maintain the chemical, physical and biological integrity of the Nation's waters. To meet this goal, the CWA requires states to develop information on the quality of their water resources and report this information to EPA, the U.S. Congress, and the public. To this end, EPA released guidance on November 19, 2001, for the preparation of an integrated "List of Waters" that could combine reporting elements of both § 305(b) and § 303(d) of the CWA. The integrated list format allows states to provide the status of all their assessed waters in one list. States choosing this option must list each water body or segment in one of the following five categories: 1) unimpaired and not threatened for all designated uses; 2) unimpaired waters for some uses and not assessed for others; 3) insufficient information to make assessments for any uses; 4) impaired or threatened for one or more uses but not requiring the calculation of a Total Maximum Daily Load (TMDL); and 5) impaired or threatened for one or more uses and requiring a TMDL.

A TMDL is a planning tool and potential starting point for restoration activities with the ultimate goal of attaining water quality standards. A TMDL essentially provides a pollution budget designed to restore the health of an impaired water body. A TMDL typically identifies the source(s) of the pollutant from point sources and non-point sources, determines the maximum load of the pollutant that the water body can tolerate while still attaining WQSs for the designated uses, and allocates that load among the various

sources, including point source discharges, subject to NPDES permits. *See* 40 CFR § 130.7.

For impaired waters where a TMDL has been developed for a particular pollutant and the TMDL includes a waste load allocation (WLA) for a NPDES permitted discharge, the effluent limitation in the permit must be "consistent with the assumptions and requirements of any available WLA". 40 CFR § 122.44(d)(1)(vii)(B).

2.2.4 Reasonable Potential

Pursuant to CWA § 301(b)(1)(C) and 40 CFR § 122.44(d)(1), NPDES permits must contain any requirements in addition to TBELs that are necessary to achieve water quality standards established under § 303 of the CWA. *See also* 33 U.S.C. § 1311(b)(1)(C). In addition, limitations "must control any pollutant or pollutant parameter (conventional, non-conventional, or toxic) which the permitting authority determines are or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any water quality standard, including State narrative criteria for water quality." 40 CFR § 122.44(d)(1)(i). To determine if the discharge causes, or has the reasonable potential to cause, or contribute to an excursion above any WQS, EPA considers: 1) existing controls on point and non-point sources of pollution; 2) the variability of the pollutant or pollutant parameter in the effluent; 3) the sensitivity of the species to toxicity testing (when evaluating whole effluent toxicity); and 4) where appropriate, the dilution of the effluent by the receiving water. *See* 40 CFR § 122.44(d)(1)(ii).

If the permitting authority determines that the discharge of a pollutant will cause, has the reasonable potential to cause, or contribute to an excursion above WQSs, the permit must contain WQBELs for that pollutant. *See* 40 CFR § 122.44(d)(1)(i).

2.2.5 State Certification

EPA may not issue a permit unless the State Water Pollution Control Agency with jurisdiction over the receiving water(s) either certifies that the effluent limitations contained in the permit are stringent enough to assure that the discharge will not cause the receiving water to violate the State WQSs, the State waives, or is deemed to have waived, its right to certify. *See* 33 U.S.C. § 1341(a)(1). Regulations governing state certification are set forth in 40 CFR § 124.53 and § 124.55. EPA has requested permit certification by the State pursuant to 40 CFR § 124.53 and expects that the Draft Permit will be certified.

If the State believes that conditions more stringent than those contained in the Draft Permit are necessary to meet the requirements of either CWA §§ 208(e), 301, 302, 303, 306 and 307, or applicable requirements of State law, the State should include such conditions in its certification and, in each case, cite the CWA or State law provisions upon which that condition is based. Failure to provide such a citation waives the right to certify as to that condition. EPA includes properly supported State certification conditions in the NPDES permit. The only exception to this is that the permit conditions/requirements regulating sewage sludge management and implementing CWA § 405(d) are not subject to the State certification requirements. Reviews and appeals of limitations and conditions attributable to State certification shall be made through the applicable procedures of the State and may not be made through EPA's permit appeal procedures of 40 CFR Part 124.

In addition, the State should provide a statement of the extent to which any condition of the Draft Permit can be made less stringent without violating the requirements of State law. Since the State's certification is provided prior to final permit issuance, any failure by the State to provide this statement waives the State's right to certify or object to any less stringent condition.

It should be noted that under CWA § 401, EPA's duty to defer to considerations of State law is intended to prevent EPA from relaxing any requirements, limitations or conditions imposed by State law. Therefore, "[a] State may not condition or deny a certification on the grounds that State law allows a less stringent permit condition." 40 CFR § 124.55(c). In such an instance, the regulation provides that, "The Regional Administrator shall disregard any such certification conditions or denials as waivers of certification." *Id.* EPA regulations pertaining to permit limitations based upon WQSs and State requirements are contained in 40 CFR §§ 122.4(d) and 122.44(d).

2.3 Effluent Flow Requirements

Generally, EPA uses effluent flow both to determine whether an NPDES permit needs certain effluent limitations and to calculate the effluent limitations themselves. EPA practice is to use effluent flow as a reasonable and important worst-case condition in EPA's reasonable potential and WQBEL calculations to ensure compliance with WQSs under CWA § 301(b)(1)(C). Should the effluent flow differ from the flow assumed in these calculations, the in-stream dilution would be reduced and the calculated effluent limitations might not be sufficiently protective (i.e., might not meet WQSs). Further, pollutants that do not have the reasonable potential to exceed WQSs at a lower discharge flow may have reasonable potential at a higher flow due to the decreased dilution. In order to ensure that the assumptions underlying EPA's reasonable potential analyses and permit effluent limitation derivations remain sound for the duration of the permit, EPA may ensure the validity of its "worst-case" effluent flow assumptions through imposition of permit conditions for effluent flow.[2] In this regard, the effluent flow limitations are a component of WQBELs because the WQBELs are premised on a specific level of flow. The effluent flow limitations are also necessary to ensure that other pollutants remain at levels that do not have a reasonable potential to exceed WQSs.

The limitations on effluent flow are within EPA's authority to condition a permit to carry out the objectives and satisfy the requirements of the CWA. *See* CWA §§ 402(a)(2) and 301(b)(1)(C); 40 CFR §§ 122.4(a) and (d), 122.43 and 122.44(d). A condition on the discharge designed to ensure the validity of EPA's WQBELs and reasonable potential calculations that account for "worst case" conditions is encompassed by the references to "condition" and "limitations" in CWA §§402 and 301 and the implementing regulations, as WQBELs are designed to assure compliance with applicable water quality regulations, including antidegradation requirements. Regulating the quantity of pollutants in the discharge through a restriction on the quantity of effluent is also consistent with the CWA.

In addition, as provided in Part II.B.1 of this permit and 40 CFR § 122.41(e), the Permittee is required to properly operate and maintain all facilities and systems of treatment and control. Improper operation and

[2] EPA's regulations regarding "reasonable potential" require EPA to consider "where appropriate, the dilution of the effluent in the receiving water," *id.* 40 CFR §122.44(d)(1)(ii). *Both* the effluent flow and receiving water flow may be considered when assessing reasonable potential. *In re Upper Blackstone Water Pollution Abatement Dist.*, 14 E.A.D. 577, 599 (EAB 2010). EPA guidance directs that this "reasonable potential" analysis be based on "worst-case" conditions. *See In re Washington Aqueduct Water Supply Sys.,* 11 E.A.D. 565, 584 (EAB 2004).

maintenance may result in non-compliance with permit effluent limitations. Consequently, the effluent flow limitations are permit conditions that relate to the Permittee's duty to mitigate (*i.e.*, minimize any discharge in violation of the permit that has a reasonable likelihood of adversely affecting human health or the environment) and to properly operate and maintain the treatment works. *See* 40 CFR §§ 122.41(d) and 122.41(e).

2.4 Monitoring and Reporting Requirements

2.4.1 Monitoring Requirements

Sections 308(a) and 402(a)(2) of the CWA and the implementing regulations at 40 CFR Parts 122, 124, 125, and 136 authorize EPA to include monitoring and reporting requirements in NPDES permits.

The monitoring requirements included in this permit have been established to yield data representative of the Facility's discharges in accordance with CWA §§ 308(a) and 402(a)(2), and consistent with 40 CFR §§ 122.41(h), (j) and (1)(9), 122.43(a), 122.44(i) and 122.48. The Draft Permit specifies routine sampling and analysis requirements to provide ongoing, representative information on the levels of regulated constituents in the discharges. The monitoring program is needed to enable EPA and the State to assess the characteristics of the Facility's effluent, whether Facility discharges are complying with permit limits, and whether different permit conditions may be necessary in the future to ensure compliance with technology-based and water quality-based standards under the CWA. EPA and/or the State may use the results of the chemical analyses conducted pursuant to this permit, as well as national water quality criteria developed pursuant to CWA § 304(a)(1), State water quality criteria, and any other appropriate information or data, to develop numeric effluent limitations for any pollutants, including, but not limited to, those pollutants listed in Appendix D of 40 CFR Part 122.

NPDES permits require that the approved analytical procedures found in 40 CFR Part 136 be used for sampling and analysis unless other procedures are explicitly specified. *See* 40 CFR § 122.41(j)(4). Permits also include requirements necessary to comply with the *National Pollutant Discharge Elimination System (NPDES): Use of Sufficiently Sensitive Test Methods for Permit Applications and Reporting Rule*.[3] This Rule requires that where EPA-approved methods exist, NPDES applicants must use sufficiently sensitive EPA-approved analytical methods when quantifying the presence of pollutants in a discharge. Further, the permitting authority must prescribe that only sufficiently sensitive EPA-approved methods be used for analyses of pollutants or pollutant parameters under the permit. The NPDES regulations at 40 CFR § 122.21(e)(3) (completeness), 40 CFR § 122.44(i)(1)(iv) (monitoring requirements) and/or as cross referenced at 40 CFR § 136.1(c) (applicability) indicate that an EPA-approved method is sufficiently sensitive where:

- The method minimum level[4] (ML) is at or below the level of the effluent limitation established in the permit for the measured pollutant or pollutant parameter; or

[3] Fed. Reg. 49,001 (Aug. 19, 2014).

[4] The term "minimum level" refers to either the sample concentration equivalent to the lowest calibration point in a method or a multiple of the method detection limit (MDL), whichever is higher. Minimum levels may be obtained in several ways: They may be published in a method; they may be based on the lowest acceptable calibration point used by a laboratory; or they may be calculated by multiplying the MDL in a method, or the MDL determined by a laboratory, by a factor. EPA is considering the following terms related to analytical method sensitivity to be synonymous: "quantitation limit," "reporting limit," "level of quantitation," and "minimum level." *See* Fed. Reg. 49,001 (Aug. 19, 2014).

- In the case of permit applications, the ML is above the applicable water quality criterion, but the amount of the pollutant or pollutant parameter in a facility's discharge is high enough that the method detects and quantifies the level of the pollutant or parameter in the discharge; or
- The method has the lowest ML of the analytical methods approved under 40 CFR Part 136 or required under 40 CFR chapter I, subchapter N or O for the measured pollutant or pollutant parameter.

2.4.2 Reporting Requirements

The Draft Permit requires the Permittee to report monitoring results obtained during each calendar month to EPA and the State electronically using NetDMR. The Permittee must submit a Discharge Monitoring Report (DMR) for each calendar month no later than the 15th day of the month following the completed reporting period.

NetDMR is a national web-based tool enabling regulated CWA permittees to submit DMRs electronically via a secure internet application to EPA through the Environmental Information Exchange Network. NetDMR has eliminated the need for participants to mail in paper forms to EPA under 40 CFR §§ 122.41 and 403.12. NetDMR is accessible through EPA's Central Data Exchange at https://cdx.epa.gov/. Further information about NetDMR can be found on EPA's NetDMR support portal webpage.[5]

With the use of NetDMR, the Permittee is no longer required to submit hard copies of DMRs and reports to EPA and the State unless otherwise specified in the Final Permit. In most cases, reports required under the permit shall be submitted to EPA as an electronic attachment through NetDMR. Certain exceptions are provided in the permit such as for providing written notifications required under the Part II Standard Conditions.

2.5 Standard Conditions

The Standard Conditions, included as Part II of the Draft Permit, are based on applicable regulations found in the Code of Federal Regulations. *See* 40 CFR § 122.41. *See also, generally,* 40 CFR Part 122.

2.6 Anti-backsliding

The CWA's anti-backsliding requirements prohibit a permit from being renewed, reissued or modified to include less stringent limitations or conditions than those contained in a previous permit except in compliance with one of the specified exceptions to those requirements. *See* CWA §§ 402(o) and 303(d)(4) and 40 CFR § 122.44(l). Anti-backsliding provisions apply to effluent limits based on technology, water quality, and/or State certification requirements.

All proposed limitations in the Draft Permit are at least as stringent as limitations included in the 2009 Permit unless specific conditions exist to justify relaxation in accordance with CWA § 402(o) or § 303(d)(4). Discussion of any less stringent limitations and corresponding exceptions to anti-backsliding provisions is provided in the sections that follow.

[5] https://netdmr.zendesk.com/hc/en-us

3.0 Description of Facility and Discharge

3.1 Description of Facility

The GE Pittsfield, Massachusetts facility currently encompasses approximately 254 acres located along the East Branch of the Housatonic River and its tributaries. Given the size of the Facility, EPA will generally refer to areas of the Facility by the Removal Action Areas (RAAs) associated with the aforementioned Consent Decree. The 10 individual RAAs are:

- 40's Complex (Area #1) approximately 7 acres, transferred to PEDA on February 16, 2011;
- 30's Complex (Area #2) 15.75 acres, transferred to PEDA on May 2, 2005;
- 20's Complex (Area #3); 10.21 acres, 9.25-acre portion transferred to PEDA on May 2, 2005, and the remaining approximate one acre on December 16, 2011;
- East Street Area 2 – South (Area #4A) 45.4 acres;
- East Street Area 2 – North (Area #5) 53.4 acres, approximately 52 acres – Woodlawn Avenue and 19's Complex – transferred to PEDA on December 16, 2011 and February 7, 2012, respectively;
- East Street Area 1– North (Area #6) 5 acres;
- Hill 78 Consolidation Area (Area #7) approximately 6 acres;
- Building 71 Consolidation Area (Area #8) approximately 4.4 acres;
- Hill 78 Area – Remainder (Area #9) approximately 30 acres; and
- Unkamet Brook Area (Area #10) 135 acres.

Site plans are provided in Figure 2, including maps of the individual RAAs listed above. Plans follow the numbering format noted in parentheses.

Also, as noted, RAAs #1, #2, #3 and 52 acres of the East Street Area 2 - North RAA were transferred to PEDA through the aforementioned DEDA and are no longer part of the Facility. These transferred areas and the outfalls and discharges associated with these areas are not addressed or covered by this individual NPDES permit and, therefore, will not be discussed further in this Fact Sheet. The remaining individual RAAs associated with the Facility are described below.

3.1.1 Site History

GE began its operations at the Facility location in 1903. Three manufacturing divisions have operated at the GE facility (Transformer, Ordnance, and Plastics). The Facility was formerly used to manufacture and service large electrical transformer equipment and military hardware. These operations involved the use of transformer fluids containing polychlorinated biphenyls (PCBs). The Facility also manufactured additives and monomers for finished resins and produced zinc oxide powder for lighting arrestor disks. GE also conducted research and development of injection molded plastic products, and stored plastic products.

The GE Pittsfield/Housatonic River site has been subject to regulatory investigations dating back to the early 1980s. For several years, these investigations were consolidated under the following regulatory mechanisms: two Administrative Consent Orders (ACOs) with the Massachusetts Department of

Environmental Protection (MADEP) and a Corrective Action Permit with EPA under the Hazardous and Solid Waste Amendments to the Resource Conservation and Recovery Act (RCRA). A timeline of significant regulatory activities is summarized as follows:

- Two ACOs between GE and MADEP became effective in 1990;
- EPA issued a RCRA Corrective Action Permit (RCRA Permit) to the Facility in 1991;
- Following an appeal and subsequent modification, the RCRA Permit became effective in 1994;
- EPA proposed the Site to the Superfund National Priorities List in September of 1997.
- The Federal and State agencies and GE entered into negotiations late in 1997 in an attempt to reach a comprehensive settlement which included remediation, redevelopment, and restoration components.
- The parties reached a tentative agreement in principle relating to the Facility, contaminated areas in Pittsfield, and the Housatonic River in September 1998;
- The tentative agreement was translated into a Consent Decree (CD), lodged with the federal court on October 7, 1999, and approved by the court on October 27, 2000.

The CD provides for, among other things, the cleanup of the GE plant facility, cleanup and restoration of the former oxbows, cleanup and restoration of Silver Lake, environmental restoration of the Housatonic River and floodplains, compensation for natural resource damages, and government recovery of past and future response costs.[6] Cleanup of PCBs and other hazardous substances in Pittsfield and the Housatonic River has progressed under the CD for 20 contaminated areas outside the River, five groundwater management areas, and three River segments—the Upper ½-Mile Reach, the 1.5 Mile Reach, and Rest of River.[7] Cleanup is complete at all 20 contaminated areas outside the River, the Upper ½-Mile Reach, and the 1.5 Mile Reach.

At the five Groundwater Management Areas (GMAs), baseline monitoring is complete at all five areas, long-term monitoring is ongoing at three areas, and monitoring is substantially complete and terminated at two areas. Non-aqueous phase liquid (NAPL) containment and collection activities are ongoing at two areas and are anticipated to continue into the foreseeable future. Additional treatment of groundwater at some GMAs may also be conducted in the future.

Regarding the Rest of River, EPA issued a Draft RCRA Permit modification in June 2014, a RCRA Permit Modification that selected the Remedial Action for Rest of River in October 2016, a revised Draft RCRA Permit modification in July 2020, and a Revised Final Permit in December 2020. In January 2021, two parties initiated an appeal of the Revised Final Permit before the EPA Environmental Appeals Board (EAB). Then, in February 2022, the EAB rejected all challenges brought in the appeal and upheld EPA's Revised Final Permit. The two parties filed appeals with the U.S. Court of Appeals for the First Circuit, and on July 25, 2023, the First Circuit denied the petition and upheld the Final Permit. The final cleanup is estimated to take 13 years of active remediation.

[6] The Consent Decree, including a summary version, is available on EPA's website, currently found at: https://www/epa.gov/ge-housatonic.

[7] "Rest of River" is used in the Consent Decree to describe the third segment, or reach, of the River to be remediated in the Decree. The Rest of River covers nearly 125 miles from the confluence of the East and West Branches of the River in Pittsfield to the end of Reach 16 just before Long Island Sound in Connecticut. More information can be found at: https://www.epa.gov/ge-housatonic/rest-river-ge-pittsfieldhousatonic-river-site.

3.1.2 Removal Action Areas (RAAs)

The seven RAAs for the purposes of areas subject to this NPDES permit, are associated with the operation of GE's Transformer, Plastics and Ordnance Divisions at the Facility. GE is currently performing the required Post-Removal Site Control Activities, including inspection, monitoring and maintenance activities. Each RAA is described further, below.

East Street Area 2 - South (Area #4A on Figure 2)

This area comprises 45.4 acres of the western portion of the Facility. It is generally bounded by East Street to the north, Newell Street to the east, the Housatonic River to the south, and the Lyman Street Area to the west. The western portion of this area comprises primarily the 60s Complex, and is otherwise mostly paved. The eastern portion of this area contains a former Housatonic River oxbow that was formed when the river meandered through this area. This area is currently characterized as mostly open areas, with a relatively small, wooded area located south of the former oxbow. Soil-related remediation has been completed, and GE submitted a Final Completion Report for East Street Area 2-South on May 8, 2013, and EPA issued a Certificate of Completion to GE on June 20, 2013.

East Street Area 2 – North (Area #5 on Figure 2)

This area comprises 53.4 acres (52 of which were transferred to PEDA) and is also located within the western portion of the Facility. It is currently covered mostly with buildings and pavement. However, several relatively small grassy areas are present within the eastern portion of this area. This area is generally bounded by Tyler Street to the north, New York Avenue to the east, Woodlawn Avenue and the 40s Complex to the west, and Merrill Road, the 20s Complex, and East Street Area 1 to the south. Soil-related remediation has been completed, and GE submitted a Final Completion Report to EPA on January 6, 2012, and EPA issued a Certificate of Completion to GE on January 19, 2012. As listed above, GE subsequently transferred the Woodlawn Avenue portion of this area to PEDA on December 16, 2011, and the 19s Complex portion of this area to PEDA on February 7, 2012. GE and PEDA are performing separate post-removal site control activities on the PEDA-owned parcels.

East Street Area 1 – North (Area #6 on Figure 2)

This five-acre area is located immediately south of East Street Area 2 - North. This area is mostly unpaved and is generally bounded by Merrill Road to the north and west, East Street to the south, and a non-GE owned commercial area to the east. This area also includes the area currently occupied by a commercial use building and a relatively small unpaved portion south of East Street, which contains a NAPL containment/recovery system. No remedial action was required for this area. GE submitted a Final Completion Report on September 27, 2005, and EPA issued a Certificate of Completion to GE on September 29, 2005.

Hill 78 Consolidation Area (Area #7 on Figure 2)

This approximately 6-acre area currently rises above grade and is located near the center of the Facility. This area includes the former Hill 78 landfill, which was originally created in the early 1940s as an on-site disposal area for excavated soils generated within the Facility and was capped in 1991 with a geotextile

layer and either one foot of crushed stone, or soil. This area has been utilized as an on-plant consolidation area for certain materials excavated or otherwise removed as part of various Removal Actions at the Pittsfield/Housatonic River areas. The consolidation area was filled to capacity and final capping was completed in 2009. GE submitted a Final Completion Report on August 31, 2011 and EPA issued a Certificate of Completion to GE on September 6, 2011.

Building 71 Consolidation Area (Area #8 on Figure 2)

This approximately 5-acre area is also located within the central portion of the Facility. It is located immediately to the east of the Hill 78 Consolidation Area. With the exception of the Building 71, this area is unpaved and is generally bounded by paved parking areas to the north and east, by the Hill 78 Consolidation Area to the west, and U.S. Generating Company facilities to the south. This consolidation area was filled to capacity and final capping was completed in 2006. GE submitted a Final Completion Report for the Building 71 Consolidation Area on September 15, 2011 and EPA issued a Certificate of Completion to GE on September 26, 2011.

Hill 78 Area – Remainder (Area #9 on Figure 2)

The remaining portion of the Hill 78 Area comprises approximately 60 acres of the Facility. These areas are generally bounded by the Tyler Street Extension to the north, Merrill Road to the south, New York Avenue and other areas of the Facility to the west and east. With the exception of paved roadways associated with Building 78, the U.S. Generating Company's cogeneration facility, the remaining areas of the Hill 78 Area are generally open. Soil-related remediation has been completed, and GE submitted a Final Completion Report on August 31, 2011 and EPA issued a Certificate of Completion to GE on September 6, 2011.

Unkamet Brook Area (Area #10 on Figure 2)

This approximately135-acre area consists of the eastern portion of the GE facility and is bounded by Dalton Avenue to the north, Plastics Avenue and the Hill 78 Area - Remainder to the west, Merrill Road to the south and to the east by railroad tracks. This area also contains commercial/recreational property located between Merrill Road and the Housatonic River to the south. The GE-owned portion of this area located west of Unkamet Brook is mostly paved and covered with large buildings. The GE-owned portion of this area east of Unkamet Brook, as well as much of the land between Merrill Road and the Housatonic River, is undeveloped (except for the area associated with Building OP-3 and the commercial area along Merrill Road). Soil-related remediation has been completed, and on March 14, 2018, GE submitted a Final Completion Report (FCR) for the Unkamet Brook Area RAA and EPA issued a Certificate of Completion to GE on March 27, 2018.

As aforementioned, remediation and restoration has been completed for these RAAs and GE is currently performing required Post-Removal Site Control Activities, including inspection, monitoring and maintenance activities, at each RAA.

3.1.3 Groundwater Management Areas (GMAs)

For administrative purposes, the groundwater associated with much of the aforementioned RAAs is being actively monitored as five distinct Groundwater Management Areas (GMAs). The five GMAs are:

- GMA 1 – Facility areas including the 20s Complex, 30s Complex, 40s Complex, East Street Area 2-South, East Street Area 2 - North, East Street Area 1 - North, East Street Area 1 - South, Lyman Street Area, Newell Street Area II, Newell Street Area I, and Silver Lake Area – Currently in long-term groundwater and NAPL monitoring program, as well as NAPL recovery and assessment of elevated groundwater contamination above CD performance standards.
- GMA 2 – Former Oxbow Areas J and K – Completed long-term groundwater monitoring. Final Completion Report submitted and approved by EPA in 2012, with a requirement for post-certification sampling every five years.
- GMA 3 – Facility areas including the portion of the Unkamet Brook Area east of Plastics Avenue – Currently in long-term groundwater and NAPL monitoring program, as well as NAPL recovery and assessment of elevated groundwater contamination above CD performance standards.
- GMA 4 - Facility areas including the Hill 78 Consolidation Area, the Building 71 Consolidation Area, the Hill 78 Area - Remainder, and the portion of the Unkamet Brook Area west of Plastics Avenue – Currently in long-term groundwater monitoring program.
- GMA 5 - Former Oxbow Areas A and C – Completed long-term groundwater monitoring. Final Completion Report submitted and approved by EPA in 2013.

Maps showing the boundaries of the GMAs and the historic extent of groundwater contamination are included in Figure 3. GE has implemented groundwater monitoring, assessment, and response programs at all of the GMAs. GE has completed baseline monitoring at all five of the GMAs. GMAs 1 and 3 are currently being monitored under long-term monitoring programs and both GMAs have significant plumes of non-aqueous phased liquids being actively collected. GE conducts NAPL removal at the East Street Area 1, Newell 2, East Street Area 2 – South, Lyman Street Areas, and Unkamet Brook Areas. GMA 4 is currently in the long-term monitoring phase. The long-term monitoring program has been terminated at GMAs 2 and 5. However, GE is required to maintain certain wells and to conduct additional monitoring at GMA 2 at five-year intervals.

The objectives of the groundwater monitoring program at the Facility are to ensure that groundwater and NAPL do not adversely impact surface waters, sediments, and biota, including those in the Housatonic River, Silver Lake, and Unkamet Brook, and also to ensure that contaminants in groundwater do not pose an unacceptable risk to human health via inhalation of vapors migrating from groundwater into occupied buildings. These two objectives are consistent with the classifications of the Site groundwater under the Massachusetts Contingency Plan (MCP) (310 CMR 40.0932). The groundwater quality performance standards for the GMAs are based on the groundwater classification categories designated in the MCP. EPA notes that groundwater classification standards in 310 CMR 40.0932 are not equivalent to the numeric and narrative criteria found in the State Surface WQSs in 314 CMR 4.00 that apply to discharges of pollutants to surface waters of the Commonwealth via a point source.

Under normal hydrogeologic conditions, groundwater generally remains in situ (i.e., in place below the ground surface) and flows toward the East Branch of the Housatonic River, Silver Lake or Unkamet Brook depending on site hydrogeologic characteristics. Contaminants dissolved in the groundwater, or any oil or hazardous material that migrate along the surface of the groundwater, or mobilize along with solids in contact with the groundwater are, for the purposes of this NPDES Permit at this time, subject to the groundwater classification categories 310 CMR 40.0932.

However, groundwater also discharges directly to the surface waters via the NPDES permitted outfalls under the following conditions: 1) groundwater is pumped to the surface, treated, and discharged via an authorized NPDES outfall (i.e., Outfall 005 via internal Outfall 64G); and 2) groundwater infiltrates into the stormwater collection system in places where the condition of this infrastructure is degraded or otherwise compromised and either discharges during dry weather conditions or is flushed during wet weather conditions (i.e., discharged via an authorized NPDES outfall at Outfall 005 via internal Outfall 64T, otherwise, a Prohibited Discharge). As such, these discharges of groundwater to surface water through the NPDES permitted outfalls are subject to the effluent limitations, monitoring requirements and control measures, including Best Management Practices (BMPs), in this NPDES Permit and are required to meet the State Surface WQSs at 314 CMR 4.00. The groundwater discharges authorized by this NPDES Permit are described further in Section 3.2, below. The effluent limitations, monitoring requirements and control measures for the groundwater discharges are described further in Section 5, as follows:

- Treated groundwater – authorized wastewater at Outfall 005 via internal Outfall 64G and internal Outfall 64T, Section 5.3
- Groundwater – at any other outfall, a Prohibited Discharge, Section 5.4.5

3.2 Description of Discharge

3.2.1 Current Authorized Discharges

In general, the 2009 Permit authorizes the discharge of:

1) Stormwater, which consists of rainwater/snowmelt and/or flood waters throughout the Facility that accumulates in open paved areas and building roofs that flows by gravity into the stormwater collection system to the treatment systems (where present). Stormwater collected in the stormwater collection system typically discharges in conjunction with a storm event. However, stormwater may remain in the stormwater collection system and/or treatment system components following a storm event depending on the volume of stormwater generated. The 2009 Permit also authorizes discharges of offsite stormwater, that is, stormwater from portions of the Municipal Separate Storm Sewer System (MS4), which, in some areas of the Facility, flows onto the site and is discharged via GE's storm sewer system infrastructure (i.e., inflow).

2) Groundwater, which infiltrates into the stormwater collection system from the hydrologic storage below the ground surface. For the purposes of the Draft Permit, groundwater refers to the waters below the ground surface that may contain (i.e., soluble) or transport (i.e., insoluble) pollutants from releases of oil and hazardous materials to soil or groundwater at the Facility that infiltrates into the stormwater

collection system and discharges to the receiving waters either during dry weather flows or that is flushed out during wet weather flows.

3) Potable water, which consists of the municipal water used to test the fire suppression systems throughout the Facility.

4) Allowable Non-Stormwater Discharges, which includes the dewatering and remediation effluent generated as a result of waste and wastewater treatment onsite. Refer to Section 5.4.3 below, for the full list of these discharges.

The 2009 NPDES Permit specifically authorizes these discharges to the East Branch of the Housatonic River via the following outfalls following the wastewater treatment described below:

Table 1: Housatonic River Outfalls

Outfall Number	Authorized Wastewaters in 2009 Permit
005	Discharges from internal outfall 64G include treated groundwater, landfill leachate, investigation and/or remediation derived wastewater (e.g., monitoring well purging, decontamination wastewater), and drain back waters (i.e., waters decanted from impacted solids), treated water from storm sewer cleaning (BMP requirement in the 2009 Permit), and treated potable water (used for fire protection testing). Dry weather discharges from internal outfall 64T include groundwater infiltration, and potable water (used for fire protection testing). Wet weather discharges include the dry weather flow components listed above, plus site storm water runoff and municipal storm water inflow.
05A (bypass outfall)	Dry weather flow reductions conducted at the site have eliminated dry weather flow from this outfall since 2015. Wet weather discharges consist of site storm water runoff and municipal storm water inflow treated through OWSs 64Z and 64W.
05B (bypass outfall)	Wet weather discharges consist of untreated site storm water runoff and municipal storm water inflow.
006	Dry weather discharges include discharges of groundwater infiltration, and potable water (used for fire protection testing) treated through OWS 64-X. Wet weather discharges consist of the dry weather flow components listed above plus site storm water runoff and municipal storm water inflow.
06A (bypass outfall)	Wet weather discharges consist of untreated site storm water runoff and municipal storm water inflow.
SRO5 (bypass outfall)	Wet weather discharges consist of untreated site storm water runoff and municipal storm water inflow.
YD13 (yard drain)	Wet weather discharges consist of untreated site storm water runoff.

YD16 (yard drain)	Wet weather discharges consist of untreated site storm water runoff.

Wastewater treatment for Outfall 005 occurs prior to comingling from two internal outfalls. The wastewater discharged via internal Outfall 64G is treated in the groundwater treatment system located within building 64G. This treatment system is designed to remove PCBs, volatile and semi-volatile organic compounds (including non-aqueous phase liquid), and suspended solids from groundwater at the Facility, which is pumped from recovery wells, periodic batch leachates, and other groundwater generated by remediation projects. The groundwater treatment is continuous, and the treated discharge from building 64G is ultimately discharged from Outfall 005. The treatment capacity of the 64G facility is 600 gallons per minute (867,000 gallons per day), and the estimated average flow through this facility is 300 gpm (435,000 gpd). The groundwater treatment at building 64G includes the following processes: sodium hydroxide addition to achieve a pH of 8 – 8.2, polymer addition to promote flocculation of solids, slow mix, plate clarifier, sand filters and activated carbon adsorption filters to remove organic compounds, treated clear water tank, V-notch weir with ultrasonic flow sensor, and is discharged from outfall 005. The solids are dewatered in two plate presses and accumulated in one cubic yard containers. The plate presses service both 64G and 64T treatment systems. The solids are disposed as PCB waste at either the Building 71 Consolidation Area on site, or off-site.

During wet weather, the wastewater discharged via internal Outfall 64T is treated in the stormwater treatment system located within building 64T and is also ultimately discharged through Outfall 005. Treatment at building 64T consists of pH adjustment, polymer addition to promote flocculation of solids, mixing, inclined plate clarification and multimedia filtration, and has a design flow capacity of 547,200 gpd. During small storms, wet weather flows are conveyed via the South Side Pumping Station, the East Street Diversion Structure and the 64Z Diversion Structure to O/W separator 64Z and then to treatment plant 64T. During larger storms, the capacity of the 64T treatment system is exceeded and wet weather flows discharge through Outfall 05A after treatment through oil/water separator (OWS) 64Z up to its design flow capacity of 3.3 MGD. The effluent is then discharged into the 64W diversion structure, treated through OWS 64W and discharged through Outfall 05A. When the design flow capacity of OWS 64W is also exceeded, the wastewater is discharged without treatment through Outfall 05B.

Under wet weather conditions, when the wastewater flow entering the East Street Diversion Structure exceeds the diversion capacity within that structure (approximately 100 gpm), this flow is routed toward OWS 64X, which is located in drainage basin 006. Under this scenario, this overflow from drainage basin 005 combines with flows from drainage basin 006, is treated through OWS 64X and discharged through Outfall 006. When the capacity of OWS 64X (3.0 MGD) is exceeded, the flows are discharged untreated through Outfall 06A. During larger storms, when the stormwater collection system in drainage area 006 is at capacity, excess flows are discharged untreated through the stormwater overflow Outfall SRO5.

In addition, the 2009 Permit specifically authorizes the following discharges to the Unkamet Brook via the following outfalls:

Table 2: Unkamet Brook Outfalls

Outfall Number	Authorized Wastewaters in 2009 Permit
009	Dry weather flows consist of discharge from OWS 119, including groundwater infiltration, and potable water (used for fire protection testing).

	Wet weather flows consist of dry weather flows listed above plus stormwater. Discharges include both flows treated in OWS 119-W and flows that bypass OWS 119-W.
09B (bypass outfall)	Wet weather discharges are flows that bypass OWS 119-W.
YD10 (yard drain)	Wet weather discharges consist of site storm water runoff and municipal stormwater inflow.
YD12 (yard drain)	Wet weather discharges consist of site storm water runoff.

During wet weather, stormwater and groundwater infiltration from the collection system is treated through OWS 119W with a capacity of 597,000 gallons per day and discharged at Outfall 09B, which then discharges to the Unkamet Brook at Outfall 009. The Permittee has indicated that no dry weather discharges occur at Outfall 009. GE also eliminated bypass flows to Outfall 009 in 2013. As a result, Outfall 09B and Outfall 009 consist of the same wet weather flows, with the sampling location for Outfall 09B located immediately prior to Outfall 009.

The 2009 Permit also authorizes potable water discharges from testing of the fire suppression systems at the Facility at all outfalls.

A schematic of water flow for each drainage basin, depicting each outfall and treatment system, is provided in Figure 4.

3.2.2 Proposed Changes to Outfalls & Authorized Discharges

The authorized outfalls and discharges discussed above were a result of historic permit proceedings that took place primarily after the CD was executed in 2000. Since then, GE has ceased its manufacturing operations at the Facility, completed activities that have altered the pollutant sources and source areas, and altered the nature of pervious and impervious surfaces at the Facility. During this same period, previously existing flow paths have been reconfigured, including changes in the flow volume within one or more drainage areas, and structural changes to the configuration of certain outfalls and portions of the stormwater collection system have been completed, including elimination of one or more outfalls. In addition, various investigations and alterations to the groundwater and stormwater treatment systems have been completed.

Since the 2009 Permit was issued, EPA has information specific to: 1) collection of monitoring data for separate internal outfalls, with separate effluent limitations and monitoring requirements for specific combinations of waste streams; 2) the effectiveness of different numeric and non-numeric limits and monitoring requirements for dry versus wet weather flows; 3) the presence of groundwater (both treated and untreated) in the discharges; 4) the frequency of bypasses for storm events that exceed the design flow capacity of one or more treatment system components; and 5) the effectiveness and effects of implementing the non-numeric effluent limits (i.e., BMPs); and 6) additional monitoring of the discharges and receiving waters to accurately characterize the chemical characteristics of the wastewaters and receiving waters, the effectiveness of treatment, and the magnitude, frequency and duration of discharges from each of the outfalls.

The permit record indicates that the primary motivation for the internal outfall configuration (i.e., internal Outfalls 64G and 64T) was to improve the treatment system and minimize discharges of groundwater, and stormwater that contains PCBs or pollutants from contact with groundwater. The two primary mechanisms for achieving these goals were to 1) segregate groundwater, the largest source of pollutants, from stormwater discharges; and 2) utilize the 64G and 64T treatment systems to the maximum extent possible so as not to discharge pollutants to the receiving waters or impact the sediment cleanup sites in the receiving waters. As a result, the two internal outfalls and external outfall have different effluent limitations and monitoring conditions depending on the weather conditions and the extent to which the wastewaters are treated through the treatment system components. A varied combination of water-quality based limits and technology-based limits have been imposed at the different outfalls. Further, certain stormwater outfalls have been subject to mostly monitoring requirements rather than limits, to better characterize the wastewaters, the conditions during which discharges occur, and the pollutants present in these discharges. This contrasts with the typical approach to the permitted stormwater discharges in both individual and general permits in Region 1. Stormwater permits typically require a single set of conditions for a given wastewater type, given site-specific characteristics. Where there is an internal outfall, such as a groundwater remediation treatment system, this internal wastestream is segregated prior to comingling to ensure that significantly different waste streams can be appropriately monitored to meet the sampling representativeness requirements of the CWA, and so that compliance with permit limits can be accurately determined.

Finally, as explained throughout this Fact Sheet, the 2009 Permit required significant information gathering to ensure EPA has an appropriate understanding of the technical facts at this Facility to impose the necessary and appropriate permit requirements. Therefore, for this Draft Permit, EPA finds that greater uniformity in permit conditions is warranted across the Facility's three primary external outfalls, as are efforts to improve consistency with stormwater permits in Region 1, to ensure that the discharges comply with the CWA and the NPDES regulations. Changes reflect the information collected during the prior permit term and are being made to ensure the proper operation and maintenance of the stormwater collection system, treatment systems, and the use of bypass. Technology- and water-quality requirements must be achieved at the end of pipe for each outfall, regardless of the treatment currently employed, or the current system configuration at the Facility. For these and other reasons outlined in further detail throughout this Fact Sheet, EPA has proposed the following changes to the authorized outfalls and discharges in the Draft Permit:

Table 3: Outfall / Authorized Wastewater Changes

Outfall Number	Location (Latitude/ Longitude)	Authorized Wastewaters
005	42 26' 59" 73 13' 53"	Discharges from internal outfalls 64G and 64T are unchanged except that municipal storm water inflow must be eliminated through BMPs (see Section 5.4.1).
05A (OWS outfall)	42 26' 59" 73 13' 53"	Untreated groundwater discharges are not authorized (see Prohibited Discharges in Section 5.4.5, below).

		Wet weather discharges may consist of site storm water runoff but municipal storm water inflow must be eliminated through BMPs (see Section 5.4.1).
05B (bypass outfall)	42 26' 59" 73 13' 53"	Wet weather discharges may consist of municipal storm water inflow. Untreated bypass flows of site stormwater exceeding the capacity of OWS 64-X are no longer authorized (see Prohibited Discharges in Section 5.4.5, below).
006	42 27' 04" 73 13' 44"	Dry weather discharges may consist of potable water (used for fire protection testing) treated through OWS 64-X. Untreated groundwater discharges are no longer authorized (see Prohibited Discharges in Section 5.4.5, below). Wet weather discharges may consist of site storm water runoff but municipal storm water inflow must be minimized through BMPs (see Section 5.4.1).
06A (bypass outfall)	42 27' 04" 73 13 44"	Wet weather discharges may consist of municipal storm water inflow. Untreated bypass flows of site stormwater exceeding the capacity of OWS 64-X are no longer authorized (see Prohibited Discharges in Section 5.4.5, below).
SRO5 (bypass outfall)	42 27' 04" 73 13 44"	Wet weather discharges may consist of municipal storm water inflow. Untreated bypass flows of site stormwater exceeding the capacity of OWS 64-X are no longer authorized (see Prohibited Discharges in Section 5.4.5, below).
YD13 (yard drain)		Wet weather discharges consist of site storm water runoff.
YD16 (yard drain)		Wet weather discharges consist of site storm water runoff.

Table 4: Unkamet Brook Outfalls

Outfall Number	Location (Latitude/ Longitude)	Authorized Wastewaters
09B (referred to a Outfall 009 in the Draft Permit)	42 27' 42" 73 12' 30"	Dry weather discharge may consist of potable water (used for fire protection testing). Groundwater discharges are no longer authorized (see Prohibited Discharges in Section 5.4.5, below). Wet weather flows consist of dry weather flows listed above plus stormwater. Discharges may include flows treated in OWS 119-W.

		Untreated bypass flows of site stormwater exceeding the capacity of OWS 119-W are no longer authorized (see Prohibited Discharges in Section 5.4.5, below).
009		GE eliminated bypass flows to Outfall 009 in 2013. Therefore, requirements have been consolidated with Outfall 09B. The Draft Permit refers to only Outfall 009. The sampling location is the same as former Outfall 09B (i.e., following treatment).
YD10 (yard drain)		Wet weather discharges consist of site storm water runoff and municipal stormwater inflow.
YD11 (yard drain)		Outfall YD11 was abandoned in 2015. Stormwater associated with the YD11 Drainage Area was re-directed to the YD12 Drainage Area stormwater collection system. Therefore, this outfall has been removed from the Draft Permit.
YD12 (yard drain)		Wet weather discharges consist of site storm water runoff.

A quantitative description of the discharge in terms of effluent parameters based on monitoring data submitted by the Permittee, including Discharge Monitoring Reports (DMRs) from approximately the previous five years (i.e., January 2018 through June 2023), is provided in Appendix A of this Fact Sheet.

4.0 Description of Receiving Water and Dilution

4.1 Receiving Water

The Facility discharges through Outfalls 005 and 006 directly to the East Branch of the Housatonic River (Segment ID MA21-02). The Facility also discharges through Outfall 009 to this segment via Unkament Brook. Segment MA21-02 consists of eight miles from the outlet of Center Pond, Dalton to the mouth at the confluence with the Housatonic River, in Pittsfield Massachusetts. The watershed basin for the East Branch of the Housatonic River is an estimated 70.85 square miles.[8]

These receiving waters are classified as Class B, warm water fishery in the Massachusetts WQSs, 314 Code of Massachusetts Regulations (CMR) 4.06. Class B waters are described in the Commonwealth of Massachusetts Water Quality Standards at 314 CMR 4.05(3)(b) as follows: *"designated as a habitat for fish, other aquatic life, and wildlife, including for their reproduction, migration, growth and other critical functions, and for primary and secondary contact recreation. Where designated in 314 CMR 4.06, they shall be suitable as a source of public water supply with appropriate treatment (Treated Water Supply). Class B waters shall be suitable for irrigation and other agricultural uses and for compatible industrial cooling and process uses. These waters shall have consistently good aesthetic value."*

Primary contact recreation is defined as any recreation or other water use in which there is prolonged and intimate contact with the water with a significant risk of ingestion of water. These include, but are not limited to, wading, swimming, kayaking, diving, surfing and water skiing. Secondary contact recreation is defined as recreation or other water use in which contact with the water is either incidental or accidental. These include but are not limited to fishing, human consumption of fish, boating, and

[8] *Appendix 16 Housatonic River Watershed Assessment and Listing Decision Summary*. Final Massachusetts Integrated List of Waters for the Clean Water Act 2018/2020 Reporting Cycle; CN: 505.1, November 2021.

limited contact incident to shoreline activities. The MASWQS also describe Class B warm water fisheries as having an instream temperature that shall not exceed 83°F (28.3°C), and the receiving waters shall be free from oil, grease and petrochemicals that produce a visible film on the surface of the water, impart an oily taste to the water or an oily or other undesirable taste to the edible portions of aquatic life, coat the banks or bottom of the water course, or are deleterious or become toxic to aquatic life.

Segment MA21-02 of the East Branch of the Housatonic River is listed in the *Massachusetts Integrated List of Waters for the Clean Water Act 2022 Reporting Cycle* ("303(d) List") as a Category 5 "Waters Requiring a TMDL.[9] The pollutants and conditions requiring a TMDL are Escherichia coli (*E. coli*), fecal coliform, and PCBs in fish tissue. To date no TMDL has been developed for this segment for any of the listed impairments. The status of each designated use is presented in Table 4.

Table 5: Summary of Designated Uses and Listing Status

Designated Use	**Status**
Aquatic Life	Not Assessed[1]
Aesthetics	Support[2]
Primary Contact Recreation	Impaired Cause: elevated fecal coliform bacteria Source: unknown Suspected sources: stormwater runoff
Secondary Contact Recreation	Support[2]
Fish Consumption	Impaired Cause: PCBs Source: inappropriate waste disposal from General Electric Site

1 The Housatonic River *Water Quality Assessment Report* (WQAR)[10] indicates that the Aquatic Life Use for the lower 2 miles "will not be…assessed for the lower two-mile reach (downstream from GE site) until water quality monitoring is conducted post remediation of the PCB contaminated sediments."
2 The WQAR indicates that these designated uses are on "alert status."

According to the most recent WQAR, segment MA21-02, the Secondary Contact and Aesthetics uses are assessed as support based upon the acceptable bacteria counts and the generally acceptable aesthetic conditions. However, these uses are identified with an Alert Status due to occasional septic/sewage odors and issues with turbidity. The Primary Contact Recreational Use is assessed as impaired because of elevated fecal coliform bacteria counts, noted particularly during wet weather. The Fish Consumption Use is assessed as impaired due to PCBs based on the Massachusetts Department of Public Health (MA DPH) site-specific fish consumption advisory. In the 1982 advisory, MA DPH specifically noted PCB contamination associated with the General Electric site. The current MA DPH fish consumption

[9] Final *Massachusetts Integrated List of Waters for the Clean Water Act 2022 Reporting Cycle*. MassDEP Division of Watershed Management. Watershed Planning Program, Worcester, Massachusetts; November 2021; CN: 568.1. Available at: https://www.mass.gov/doc/final-massachusetts-integrated-list-of-waters-for-the-clean-water-act-2022-reporting-cycle/download.
[10] *Housatonic River Watershed 2002 Water Quality Assessment Report*. MassDEP Division of Watershed Management, Worcester, Massachusetts; September 2007, Report Number: 21-AC-4; CN141.5.

advisory continues to identify PCBs as the hazard for all fish (also includes frogs and turtles).[11] The designated use for aquatic life not been assessed, as noted above.

4.2 Available Dilution

To ensure that discharges do not cause or contribute to violations of WQSs under all expected conditions, WQBELs are derived assuming critical conditions for the receiving water.[12] The critical flow is some measure of the low flow of the receiving water and may stipulate the magnitude, duration, and frequency of allowable excursions from the magnitude component of criteria in order to prevent adverse impacts of discharges on existing and designated uses. State WQSs specify the hydrologic condition at which water quality criteria must be applied. For rivers and streams, the lowest flow condition at and above which aquatic life criteria must be applied is typically the lowest mean flow for seven consecutive days, recorded once in 10 years, or 7-day 10-year low flow (7Q10). *See* 314 CMR 4.03(3)(a). Further, for rivers and streams, human health criteria may be applied at the harmonic mean flow. *See* 314 CMR 4.03(3)(d). The harmonic mean flow estimates the concentration of toxic pollutants in liters of water per day when daily variation is high. The harmonic mean flow is appropriate for modeling human health effects of toxic pollutants because it models exposure to low concentrations of a substance over a longer term.

EPA typically uses the above calculated dilution in its reasonable potential analysis and quantitative derivation of WQBELs for receiving water outfalls and for pollutants that are not a cause of impairment in the receiving waters. However, where an outfall discharges indirectly to a receiving water (i.e., an internal outfall), effluent limitations must be met at the end-of-pipe and no dilution applies (e.g., Outfall 64G). Further, where a pollutant is a listed cause of impairment in the receiving waters, no dilution applies, since the receiving waters do not have remaining assimilative capacity for those pollutants (e.g., PCBs). State WQSs require discharges be "limited or prohibited to protect existing uses and not interfere with the attainment of designated uses in downstream and adjacent segments. The Department will provide a reasonable margin of safety to account for any lack of knowledge concerning the relationship between the pollutants being discharged and their impact on water quality." See 314 CMR 4.03(1)(a). Further, 314 CMR 4.03(3) provides that criteria should be applied at flows lower than those specified in order to prevent adverse impacts of discharges on existing and designated uses. Given the impaired or unassessed status of multiple designated uses for which pollutants limited in this permit is the cause, and ongoing remedial activities in downstream segments for these pollutants, no dilution applies to the derivation of limits proposed in the Draft Permit.

However, should EPA reconsider any effluent limits in the Final Permit based on dilution, the below values will be used in the analysis:

EPA calculated the 7Q10 and harmonic mean flow for the site based on data from the United States Geological Survey (USGS) low-flow frequency statistics, for the nearest USGS gauging station (station

[11] Freshwater Fish Consumption Advisory List. Massachusetts Department of Public Health Bureau of Environmental Health; February 2023. https://www.mass.gov/lists/fish-consumption-advisories
[12] EPA Permit Writer's Manual, Section 6.2.4

number 01197000, East Branch Housatonic River at Coltsville, MA).[13,14] The gage is located approximately 1.2 miles upstream from the confluence of the East Branch of the Housatonic River with Unkamet Brook. The confluence of the East Branch of the Housatonic River with Unkamet Brook was used as the location for the Facility within the drainage basin. The 7Q10 and harmonic mean flow in the receiving water upstream of the discharge was then calculated as follows:

$Flow_{@Facility} = Flow_{@Gauge} / Drainage\ Area_{@Gauge} * Drainage\ Area_{@Facility}$

Where:

Drainage $Area_{@Gauge}$ = 57.1 square miles (mi^2)
7Q10 $Flow_{@Gauge}$= 12.1 cubic feet per second (cfs)
Harmonic Mean $Flow_{@Gauge}$ = 49 cfs
Drainage $Area_{@Facility}$ = 62.9 mi^2

Therefore:

7Q10 = 12.1 cfs / 57.1 mi^2 * 62.9 mi^2
7Q10 = 13.3 cfs (8.6 MGD)

Harmonic mean = 49 cfs / 57.1 mi^2 * 62.9 mi^2
Harmonic mean = 54 cfs (34.9 MGD)

Using the above-calculated 7Q10 and harmonic mean (Q_s), the dilution factor (DF) for a particular outfall is calculated as follows:

$$DF = (Q_s + Q_d)/Q_d$$

Where:

Q_S = 7Q10 or harmonic mean in million gallons per day (MGD)
Q_d = Discharge flow in MGD

4.3 Ambient Data

A summary of available ambient data collected in the receiving water in the vicinity of the Facility that is referenced in this Fact Sheet can be found in Appendix B of this Fact Sheet. These data include the results of sampling and analysis of PCBs at sampling locations upstream and downstream of each outfall during dry weather and wet weather conditions (i.e., Ambient Monitoring Program), as well as sampling and analysis of the receiving water in the vicinity of Outfall 005 for Whole Effluent Toxicity testing (i.e., Chemical Analysis and Dilution Water).

[13] USGS StreamStats National Data Collection Station Report for Station 01197000: http://streamstatsags.cr.usgs.gov/gagepages/html/01197000.htm.
[14] USGS StreamStats Interactive Map: https://streamstats.usgs.gov/ss/

5.0 Description of Effluent Limitations and Conditions

The proposed effluent limitations and conditions derived pursuant to the CWA, State and federal regulations, and State WQSs are described below. These proposed effluent limitations and conditions, the bases of which are discussed throughout this Fact Sheet, may be found in Part I of the Draft Permit.

The State and Federal regulations, data regarding discharge characteristics, and data regarding ambient characteristics described above, were relied upon and applied during the effluent limitation development process. Discharge and ambient data are included in Appendix A and B. EPA's Reasonable Potential Analysis for chemical-specific parameters is included in Appendix C and results are discussed in the sections below.

In accordance with 40 CFR § 122.45(b)(2), EPA determined that the measure of production appropriate for this Facility is the design flow of the treatment system at each outfall. For the purposes of this permit, design flow is defined as the maximum flow rate through the treatment component with the lowest capacity based on the specifications as reported by the Permittee. The design flow reflects the magnitude, frequency and duration of discharges treated within the specifications of the treatment system in use. EPA based this design flow on the treatment system specifications reported by the Permittee.

5.1 Effluent Limitation Guidelines

EPA has not promulgated technology-based effluent limitation guidelines in 40 CFR Subchapter N Parts 405 through 471 for a manufacturing facility that has ceased operations and is engaged in site remedial activities. Therefore, in accordance with CWA § 402(a)(1)(B) and 40 CFR § 125.3(c)(2), EPA may establish effluent limitations on a case-by-case basis using BPJ. The NPDES regulations in 40 CFR §125.3(c)(2) state that permits developed on a case-by-case basis under Section 402 (a)(1) of the CWA shall apply the appropriate factors listed in 40 CFR § 125.3(d) and must consider 1) the appropriate technology for the category class of point sources of which the applicant is a member, based on available information, and 2) any unique factors relating to the applicant.

To the extent applicable to the Facility, EPA considered the following information from other ELGs and/or NPDES permits for stormwater, groundwater, and potable water.

- EPA promulgated the regulations for industrial stormwater in 1990 and issued the first *Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity* (MSGP) in 1995. The stormwater outfalls at the Facility were previously covered under this General Permit under Sector C (Chemical Allied Products) and Sector AC (Electronic and Electrical Equipment and Components) through Standard Industrial Classification codes 2821, 3612, and 3629. Discharges of stormwater from the Facility were covered under this general permit until MSGP coverage was revoked with the issuance of the 2009 Permit. This general permit was last reissued January 15, 2021 ("2021 MSGP").[15]

[15] *Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity* (MSGP), is currently available at: https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp. The 2021 MSGP became effective on March 1, 2021.

- EPA's *General Permit for Dewatering and Remediation Activity Discharges* (DRGP)[16] was issued on August 2, 2022. The wastewater types covered under this General Permit, which is applicable to discharges that are a result of dewatering and remediation activities, include the wastewater types discharged from the Facility, specifically groundwater, stormwater, and potable water. Further, the pollutants considered in this General Permit include the pollutants present in discharges from the Facility. Finally, the treatment technologies considered in the case-by-case evaluation of technology-based effluent limitations in this General Permit include those in use at the Facility. Specifically, the Facility collects and treats stormwater, groundwater, and potable water (i.e., all wastewater types in the DRGP), collected and discharged via stormwater infrastructure (i.e., the infrastructure dewatering activity category of the DRGP) or collected via remediation infrastructure (i.e., the site remediation and material dewatering activity categories of the DRGP) and wastewaters are treated using one or more of the treatment technologies specified in Part 2.2.2 of the DRGP (i.e., Adsorption/Absorption, Advanced Oxidation Processes, Air Stripping, Granulated Activated Carbon (GAC)/Liquid Phase Carbon Adsorption, Ion Exchange, Precipitation/Coagulation/Flocculation, Separation/Filtration).

- EPA promulgated the regulations at 40 CFR § 129.105 for polychlorinated biphenyls (PCBs). Specifically, PCBs are designated toxic pollutants in 40 CFR § 401.15 pursuant to section 307(a)(1) of the Clean Water Act, [17] and are prohibited in any discharge under 40 CFR § 129.105(1)(i).[18] These standards were promulgated Feb. 2, 1977 and in accordance with Section 301 of the CWA, compliance was required with effluent limitations as expeditiously as practicable but in no case later than three years after the date such limitations are promulgated under section 304(b), and in no case later than March 31, 1989.[19]

5.2 Indicator Parameters

During the development of this Draft Permit, EPA identified one or more common groups of pollutants present in discharges. Further, these pollutants are present in soil and/or groundwater at this Facility that may be exposed to stormwater. In particular, groundwater continues to undergo remedial actions, including monitoring, pursuant to other regulatory programs. EPA is not authorizing the discharge of this groundwater under this permit, except when treated and discharged via Outfall 64G and Outfall 64T. *See* Part I.B.2.c. EPA determined that it would be both impractical and unnecessary to attempt to evaluate and limit every possible individual pollutant among the pollutants present at the Facility where industrial activity has taken place in the past and significant materials remain and are exposed to stormwater. As a result, EPA determined that use of "indicator parameters" in accordance with 40 CFR § 122.44(d)(1)(vi)(C) is reasonable and sufficiently stringent to carry out the provisions of the CWA and ensure compliance with applicable WQSs as required by CWA § 401(a)(2) and 40 CFR § 122.4(d).

For this Draft Permit, EPA has determined that:

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[16] The *National Pollutant Discharge Elimination System (NPDES) General Permit for Dewatering and Remediation Activity Discharges* – the Dewatering and Remediation General Permit (DRGP) is currently available at: https://www.epa.gov/npdes-permits/dewatering-and-remediation-general-permit-drgp. The 2022 DRGP became effective on August 2, 2022.
[17] Codified from Committee Print 95-30 (November 1977) is titled "Data Relating to H.R. 3199 (Clean Water Act of 1977)." Table 1 is titled "Section 307—Toxic Pollutants."
[18] 42 FR 6555, Feb. 2, 1977.
[19] *See* Federal Water Pollution Control Act (33 U.S.C. 1251 et seq.), as amended.

- The Draft Permit identifies indicator parameters and which pollutants are intended to be controlled using the numeric and/or non-numeric effluent limitations for these indicator parameters;
- This Fact Sheet sets forth the basis for the limitations, and finds that compliance with the effluent limitations on the indicator parameters will result in controls on the pollutants of concern which are sufficient to attain and maintain applicable WQSs;
- The Draft Permit requires effluent and ambient monitoring necessary for EPA to evaluate whether the limitations on the indicator parameters meet applicable WQSs; and
- The Draft Permit contains a reopener clause allowing EPA to modify or revoke and reissue the permit if the limitations on the indicator parameters no longer attain and maintain applicable WQSs.

EPA selected indicator parameters that: 1) are more common (i.e., more frequently detected in wastewaters or pollutant sources at this Facility); 2) are more toxic (e.g., priority pollutants in Appendix A to 40 CFR §423, or a pollutant deemed a "Constituent of Concern" under EPA's CERCLA authority in portions of the site); 3) exhibit limiting physical and/or chemical characteristics with respect to susceptibility to treatment by pollution control technologies; and/or 4) exhibit physical and/or chemical characteristics strongly representative of other pollutants, which ensures that other pollutants with similar characteristics would also be removed by pollution control technologies. Therefore, effluent limitations established to control indicator parameters, also control the pollutants the indicator parameters represent. Further, monitoring requirements established for indicator parameters ensure that the numeric and non-numeric limitations in the permit are being met. EPA has grouped most indicator parameters, as shown below and described in the sections that follow. Stand-alone parameters included in the Draft Permit are noted as such (e.g., effluent flow, pH). Indicator parameters included in the Draft Permit are:

- Solids (TSS)
- Volatile organic compounds (total VOCs)
- Polychlorinated biphenyls (total PCBs)

The indicator parameters included in the Draft Permit are unchanged from the indicator parameters included in the 2009 Permit. The following sections describe the indicator parameters and the basis for the effluent limitations or monitor-only requirements for the selected indicator parameters.

5.3 Effluent Limitations and Monitoring Requirements

The State and Federal regulations, data regarding discharge characteristics, and data regarding ambient characteristics described above, were used during the effluent limitations development process. Discharge and ambient data are included in Appendix A and B. EPA's Reasonable Potential Analysis is included in Appendix C and D and results are discussed in the applicable sections below.

5.3.1 Effluent Flow

The Facility's 2009 Permit did not include effluent flow limits. Since January 1, 2018, the maximum effluent flow, in MGD, recorded at each authorized outfall was as follows:

Table 6: Summary of Flow at the Facility

Outfall Number	Total Flow Daily Max	Discharge Condition Authorized by 2009 Permit	Discharge Condition Authorized by Draft Permit
64G	0.26293 MGD	When discharging	When discharging Dry weather sampling required
64T	0.0432 MGD	Wet weather	When discharging Dry and wet weather sampling required
005	0.60041 MGD 0.71951 MGD	When discharging Wet weather	When discharging Dry and wet weather sampling required
05A	No discharges 0.58015 MGD	Dry weather Wet weather	Wet weather Dry weather discharges prohibited
05B	0.7697 MGD	Wet weather	Wet weather Dry weather discharges prohibited
006	0.00193 MGD 0.34388 MGD	Dry weather Wet weather	When discharging Dry and wet weather sampling required
06A	0.3883 MGD	Wet weather	Wet weather Dry weather discharges prohibited
SRO5	0.5866 MGD	Wet weather	Wet weather Dry weather discharges prohibited
009	No discharges 1.10134 MGD	Dry weather Wet weather	Outfall 009 and 09B combined as Outfall 009
09B (Outfall 009 in the Draft Permit)	4.32062 MGD	When discharging	Wet weather Dry weather discharges prohibited
Yard drains 10,12,13,16	---	Wet weather	Wet weather Dry weather discharges prohibited

The Draft Permit maintains the monitoring requirements for maximum daily and average monthly flow at all outfalls. This includes reinstating the quarterly monitoring requirements of the MSGP that applied to the Yard Drain outfalls prior to incorporating them into this individual permit. This is not a new requirement; rather, correction of a prior omission. The Draft Permit also requires continuous monitoring using a totalizer or similar device for all outfalls. Flow rate and total flow must be reported for all outfalls representative of dry weather and wet weather conditions, separately. The number of dry weather discharges must be reported.

In addition, several requirements included in the Best Management Practices (BMP) requirements of the Draft Permit pertain to flow. See Section 5.4, below.

5.3.2 pH

The hydrogen-ion concentration in an aqueous solution is represented by the pH using a logarithmic scale of 0 to 14 standard units (S.U.). Solutions with pH 7.0 S.U. are neutral, while those with pH less than 7.0 S.U. are acidic and those with pH greater than 7.0 S.U. are basic. Discharges with pH values markedly different from the receiving water pH can have a detrimental effect on the environment. Sudden pH changes can kill aquatic life. pH can also have an indirect effect on the toxicity of other pollutants in the water. pH, in S.U., is as follows for each of the authorized outfalls:

Table 7: Summary of pH at the Facility

Outfall Number	2009 Permit Limitation S.U.	Draft Permit Limitation S.U.	DMRs - pH Min-Max S.U.	Authorized Discharge Condition
64G	6.5-9.0	6.5-8.3	6.85-8.5	When discharging
64T	6.5-9.0	6.5-8.3	6.88-8.11	When discharging
005	6.5-9.0	6.5-8.3	7.02-8.19	When discharging
05A	6.5-9.0	6.5-8.3	6.88-8.39	When discharging
05B	6.5-9.0	6.5-8.3	6.6-8.1	When discharging
006	6.5-9.0	6.5-8.3	6.73-8.36	When discharging
06A	6.5-9.0	6.5-8.3	6.58-8.36	When discharging
SRO5	---	6.5-8.3	---	When discharging
009	6.5-9.0	6.5-8.3	6.54-7.96	Not authorized (Outfall 009 and 09B combined as Outfall 009)
09B (Outfall 009 in the Draft Permit)	6.5-9.0	6.5-8.3		When discharging
Yard drains 10,12,13,16	---	6.5-8.3	---	When discharging

The Draft Permit requires a pH range of 6.5 to 8.3 S.U. at all outfalls as noted above by grab samples. The pH minimum limitations are unchanged from the 2009 Permit. The pH maximum limitations have been revised from the technology-based pH limitation of 9.0 found in the National Effluent Limitation Guidelines that formerly applied to the Facility when engaged in the applicable industrial activities and discharges contained process wastewaters, to the water quality-based pH limitation of 8.3 found in the State WQSs for Inland Water, Class B at 314 CMR 4.05(3)(b)3. This revision is necessary to comply with CWA § 301(b)(1)(C) and 40 CFR § 122.44(d).

5.3.3 Oil and Grease

Oil and Grease is not a single chemical constituent but includes a large range of organic compounds that can be both petroleum-related (e.g., hydrocarbons) and non-petroleum (e.g., vegetable and animal oils and greases, fats, and waxes). These compounds have varying physical, chemical, and toxicological properties. Generally, oils and greases in surface waters either float on the surface, are solubilized or

emulsified in the water column, adsorb onto floating or suspended solids and debris, or settle on the bottom or banks. Oil and grease, or certain compounds within an oil and grease mixture, can be lethal to fish, benthic organisms and water-dwelling wildlife. Oil and Grease, in mg/L, is as follows for each of the authorized outfalls:

Table 8: Summary of Oil and Grease at the Facility

Outfall Number	2009 Permit Daily Max Limit	2009 Permit Discharge Condition	Draft Permit Daily Max Limit	Reported Oil & Grease Daily Max
64G	Monitor	When discharging	5 mg/L for TPH	6.4 mg/L
64T	15 mg/L	Wet weather	5 mg/L for TPH	0.04567 mg/L
005	15 mg/L 135 lbs/day 15 mg/L	When discharging Wet weather	15 mg/L 90 lbs/day 15 mg/L	4.9 mg/L 2.45 lbs/day Not detected
05A	15 mg/L	Dry weather Wet weather	15 mg/L	No discharges 4.4 mg/L
05B	15 mg/L	Wet weather	15 mg/L	8.8 mg/L
006	15 mg/L	Dry weather Wet weather	15 mg/L	4.9 mg/L 15.2 mg/L
06A	15 mg/L	Wet weather	15 mg/L	7.6 mg/L
SRO5	---	Wet weather	15 mg/L	---
009	15 mg/L	Dry weather Wet weather	Not authorized (Outfall 009 and 09B combined as Outfall 009)	No discharges Not detected
09B (Outfall 009 in the Draft Permit)	15 mg/L 438 lbs/day	When discharging	15 mg/L 438 lbs/day	Not detected Not detected
Yard drains 10,12,13,16	---	---	Monitor	---

For the existing Oil and Grease limits, as indicated above, EPA has retained the existing concentration-based limits and revised the existing mass loading limits. Loading is a function of concentration and flow. At Outfall 005 and 09B, the actual effluent flow being reported has changed since the last permit. In general, while an increase in effluent flow results in an increased mass loading limit, and a decrease in flow results in a more stringent mass loading limit.

The loading limit is calculated using the following formula: L = F x C x D, where L is the loading limit, F is the conversion factor for MGD, C is the effluent concentration, and D is the effluent flow. Therefore, at the current daily maximum flows for Outfall 005 and Outfall 09B in MGD and the daily maximum concentration limit of 15 mg/L, the mass loading limits equal:

Table 9: Revised Mass-Based Oil & Grease Limits

Outfall 005
Daily Max 0.71951 MGD * 15 mg/L * 8.34 = **90 pounds/day (lbs/day)**
Outfall 09B (Outfall 009 in the Draft Permit)
Daily Max 4.32062 MGD * 15 mg/L * 8.34 = **540 lbs/day, less stringent than 438 lbs/day, therefore, 438 lbs/day applies**

As indicated above, EPA has retained the existing daily max mass loading limit of 438 lbs/day at Outfall 09B. Where current conditions result in an increased calculated TSS mass loading limit, EPA finds no specific conditions exist to justify relaxation in accordance with CWA § 402(o) or § 303(d)(4). Therefore, this limit is necessary to comply with anti-backsliding requirements at CWA §§ 402(o) and 303(d)(4) and 40 CFR § 122.44(*l*) and are retained in the Draft Permit. However, where current conditions result in a decreased TSS mass loading limit, such as where the effluent flow at the outfall has decreased, a revised TSS mass loading limit is included in the Draft Permit.

Total Petroleum Hydrocarbons (TPH)

TPH analysis measures the hydrocarbon fraction of oil and grease, consisting of compounds that range from six carbon atoms (C6) to compounds with 25 carbon atoms (C25). The physical characteristics of the various petroleum fractions determine their fate and transport in the environment. The more soluble and volatile fractions are more likely to leach to groundwater, enter the air, or biodegrade. The relatively low density of smaller petroleum fractions tend to float in water and form thin surface films that affect aquatic organisms or other animals on the water's surface. The higher molecular weight compounds tend to sorb to sediment and persist at the site of release. These petroleum fractions tend to accumulate in substrates, causing stresses for benthic organisms, shellfish, or bottom-feeding fish.

TPH as oil is regulated by the Clean Water Act as stated in Title 40, Sections 109-114 and 40 CFR Section 112. Sections 109-114 address oil pollution prevention and spill response. Section 112 pertains to stormwater discharge permitting under NPDES. See also 40 CFR § 122.26. Because petroleum products are complex mixtures of hundreds of hydrocarbon compounds, as gross measures of petroleum contamination, TPH results simply show that petroleum hydrocarbons are present in the sampled media. Measured TPH values suggest the relative potential for human exposure and, therefore, the relative potential for human health effects sampling a range of hydrocarbon compounds (e.g., TPH) serves as a gross measure of petroleum contamination. The use of TPH as an indicator parameter is a common approach implemented by regulatory agencies in the United States to establish target cleanup levels for contaminated soil or water. This Facility recovers and treats groundwater and other wastewaters that contain oils and greases. Since 2018, Oil and Grease has been detected in the discharge from Outfall 64G as high as 6.4 mg/L.

Regarding the new proposed concentration-based TPH limit for Outfall 64G and 64T, because no national technology-based effluent limitation guidelines (ELGs) are applicable for the type of activities or discharges from the site, in accordance with CWA § 402(a)(1)(B) and 40 CFR § 125.3(c)(2), EPA is authorized to establish technology-based effluent limitations on a case-by-case basis using its BPJ by

applying the appropriate factors listed in 40 CFR § 125.3(d). As a result, determining BCT, BPT, and/or BAT and then developing a TBEL for TPH based on BPJ is appropriate at this Facility. As part of its analysis of the factors set forth in section 125.3(d), EPA considered the following information and conditions from the general permits described in Section 5.1, above, that address similar wastestreams, as set forth in more detail below.

Assessment of BAT Based on EPA's BPJ

To determine site-specific BAT limitations for TPH, as an indicator pollutant for a component of hydrocarbon oils and greases, EPA must use its BPJ and consider the following factors: 1) age of the equipment and facilities involved; 2) process employed; 3) engineering aspects of the application of various types of control techniques; 4) process changes; 5) the cost of achieving such effluent reductions; and 6) non-water quality environmental impacts (including energy requirements). *See* CWA § 304(b)(2) and 40 CFR § 125.3(d)(3). In establishing a BAT TBEL for TPH, EPA must determine limits based on use of the most effective pollution control technologies that are technologically and economically achievable, and that will result in reasonable progress toward eliminating discharges of the toxic pollutant(s). When setting BAT limits, EPA's consideration of the required factors and determination of BAT is governed by a reasonableness standard.

According to 40 CFR § 125.3(c)(2), in determining BAT requirements, EPA should consider the "appropriate technology for the category of point sources of which the applicant is a member, based on all available information," and also "any unique factors relating to the applicant." EPA reviewed use of the site's existing treatment technology for groundwater and other wastewaters treated through internal Outfalls 64G and 64T in conjunction with taking into account site-specific information in its consideration of the six BAT factors below. To review technologies that best address TPH (e.g., Adsorption/Absorption, Advanced Oxidation, and Separation), descriptions of these treatment technologies can be found in the Federal Remediation Technology Roundtable Remediation Technologies Screening Matrix and Reference Guide, Version 4.0 (2007). Additionally, many of these off-the-shelf technologies, which are specifically identified in EPA's DRGP as well as the cited Screening Matrix, are comparable in terms of effectiveness and costs to the technology that the Permittee has already installed and operates.

1) Age of the equipment and facilities involved

There is nothing about the age of the equipment and facilities involved that would prevent the ongoing use of the same or similar treatment to treat the wastestreams at the site. The Permittee has used an oil/water separator and the treatment system components at building 64G for Outfall 64G and building 64T for Outfall 64T since before the 2009 Permit was issued. Further, advanced treatment consisting of separation (i.e., coagulation and flocculation) and filtration at building 64G (i.e., carbon adsorption) was installed prior to the issuance of the 2009 permit. The treatment components continue to be subject to routine operation and maintenance, as required in the 2009 Permit.

2) Process(es) employed

The current processes employed at the site include implementation of separation (i.e., oil/water separation), and, at building 64T, advanced treatment consisting of consisting of removal (i.e.,

coagulation and flocculation) and at building 64G, advanced treatment consisting of consisting of removal (i.e., coagulation and flocculation) and filtration (i.e., carbon adsorption). Again, this technology was installed prior to this issuance process, and GE has operated this treatment technology since installation.

3) Engineering aspects of the application of various types of control techniques

Treatment for TPH and similar toxic pollutants adsorbed to TPH typically include separation (i.e., oil/water separation), removal (i.e., coagulation and flocculation) and/or filtration (i.e., carbon adsorption). These processes are a straightforward, standard and effective technology applied to treat many types of wastewaters containing hydrocarbons. The wastewaters at Outfalls 64G and 64T are treated using a combination of these well-established treatment techniques. In addition, the current treatment processes at the site have been in place at least since before the 2009 Permit was issued, and were installed specifically to treat wastewater containing oils and greases. From an engineering standpoint, the Permittee is expected to achieve significant reductions in TPH by maintaining the design performance of the treatment technology. Finally, implementation of the TPH limit is not expected to entail engineered actions or installation of new infrastructure, since the discharges from Outfalls 64G and 64T already meet the proposed limit nearly 100% of the time.

Requiring the Permittee to install different treatment technology other than the existing groundwater treatment system at building 64G or the existing stormwater treatment system at building 64T would likely involve engineering changes and may interfere with use of the site. However, EPA does not currently find that the installation of different treatment technology is necessary.

4) Process changes

As discussed above, the Facility's wastewater is treated using existing treatment systems and continued implementation of the systems will not require process changes at the Facility. Because no active industrial processes exist on the Facility property, implementation of the TPH limit will not result in any process changes.

As stated above, new technologies not currently in use may require process changes and interfere with current or future use of the property.

5) Cost of achieving effluent reductions

The Facility installed the existing treatment systems prior to the 2009 Permit and continues to operate and maintain them. As such, applying BAT limits based on use of the site's current technology will not result in any new installation costs to the Permittee. EPA expects that there are no additional capital costs and minimal non-routine operating costs associated with continuing to operate and maintain the treatment technology. To the extent the Facility incurs additional costs due to the operation of the treatment technology, EPA notes that that the Permittee installed these treatment technologies and has been operating it for several permit terms. As such, implementation of the OWSs and advanced treatment are, without question, "economically achievable."

On the other hand, requiring any additional or different treatment technology beyond the current treatment systems as BAT for TPH would result in additional and potentially significant installation fees and capital costs.

6) Non-water quality environmental impacts (including energy requirements)

Finally, EPA considers the non-water quality environmental impacts associated with the treatment of wastewater, including energy consumption, air emissions, noise, and visual impacts. The Permittee has operated the treatment systems for the current wastestreams since before the 2009 Permit and has not indicated or provided any information to suggest that operation of the treatment systems result in an increase in energy usage, air emissions and noise as compared to the existing system prior to 2009. EPA does not expect any non-water quality environmental impacts associated with continuing to operate and maintain the new treatment system. Furthermore, any impacts of treatment equipment would be dwarfed by current and future active site remediation, and site re-development and usage throughout the rest of the site and will be negligible in considering the activities across the site.

Based on consideration of the appropriate factors above and its best professional judgment, EPA has determined that performance of the current treatment (i.e., separation with coagulation, flocculation and/or filtration) is BAT for treatment of TPH at this Facility. As previously noted, EPA reviewed current performance as part of this analysis for the maximum daily Oil and Grease TBEL based on BAT. Since Oil and Grease contains non-hydrocarbon fats and greases, and given the limited number of occasions where discharges from Outfalls 64G and 64T do not already meet the limit for TPH being proposed, EPA concludes that the performance of the current treatment systems for the discharge of TPH from this site is consistent with performance of technology addressing groundwater and other wastestreams discharges from groundwater remediation sites and is consistent with discharges of groundwater under EPA's 2022 DRGP. While the Facility's discharges are not covered by this general permit, the presence of TPH contamination in the Facility's discharges as well as the Facility's existing treatment systems is similar to the technology and type of discharges evaluated in this permit.

Therefore, the Draft Permit has proposed a maximum daily limit of 5 mg/L at Outfall 64G and Outfall 64T for TPH.

5.3.4 Total Suspended Solids

Solids could include inorganic (e.g., silt, sand, clay, and insoluble hydrated metal oxides) and organic matter (e.g., flocculated colloids and compounds that contribute to color). Solids can clog fish gills, resulting in an increase in susceptibility to infection or asphyxiation. Suspended solids can increase turbidity in receiving waters and reduce light penetration through the water column or settle to form bottom deposits in the receiving water. Suspended solids also provide a medium for the transport of other adsorbed pollutants, such as PCBs, which may accumulate in settled deposits that can have a long-term impact on the water column through cycles of re-suspension.

Sorption to soils and sediments is probably the most influential factor on the transport and fate of organic contaminants in the environment (Chiou and Kile, 2000). Sediment-associated contaminants are one of the most common sources of tissue contamination in aquatic life (bioaccumulation). Such contamination is linked to impacts to other biota higher in the food chain via

biomagnification, an effect especially quantifiable with organochlorines such as PCBs (Burton and Pitt, 2002). Non-benthic organisms can also ingest contaminated sediment directly when the sediment at rest at the bottom of a waterbody is mobilized. Because TSS serves as a transport media for PCBs, TSS also functions as an indicator parameter for PCBs in this Permit (see Section 5.2, above). TSS, in mg/L, is as follows for each of the authorized outfalls:

Table 10: Summary of TSS at the Facility

Outfall Number	2009 Permit Limitation	2009 Permit Discharge Condition	Draft Permit Limitation Daily Max Monthly Avg	Reported TSS Daily Max Monthly Avg
64G	Monitor mg/L	When discharging	30 mg/L	4.4 mg/L 3.9 mg/L
64T	Monitor mg/L Monitor lbs/day	Wet weather	30 mg/L When discharging	16.9 mg/L 8.45 mg/L
005	Report mg/L 188 lbs/day monthly average 270 lbs/day daily maximum	When discharging Wet weather	30 mg/L When discharging 132.9 lbs/day 96.2 lbs/day	46 mg/L 23 mg/L 156 lbs/day 78 lbs/day 5.62 lbs/day 13.24 lbs/day
05A	Report mg/L Report lbs/day ---	Dry weather Wet weather	Prohibited 30 mg/L	No discharge ---
05B	Report mg/L	Wet weather	30 mg/L	300 mg/L
006	Report mg/L Report lbs/day Report mg/L Report lbs/day	Dry weather Wet weather	Prohibited 30 mg/L	59.1 mg/L 54.55 mg/L 722978 lbs/day* 0.9497 lbs/day 275 mg/L 185.67 mg/L 438.47 lbs/day 157.68 lbs/day
06A	Report mg/L Report lbs/day	Wet weather	30 mg/L	1150 mg/L 134.558 lbs/day
SRO5	---	Wet weather	30 mg/L	---

009	Report mg/L Report lbs/day Report mg/L Report lbs/day	Dry weather Wet weather	Not authorized (Outfall 009 and 09B combined as Outfall 009)	No discharge 16.4 mg/L 8.87 mg/L 80.7 lbs/day 27.63 lbs/day
09B (Outfall 009 in the Draft Permit)	Report mg/L 876 lbs/day 213 lbs/day	When discharging	30 mg/L 75 lbs/day 493.9 lbs/day 95.2 lbs/day	11.10955 mg/L 6.69628 mg/L 14.208 lbs/day 4.736 lbs/day
Yard drains 10,12,13,16	---	---	30 mg/L	---

*This value is as it appears in ECHO. The placement of a decimal point may be a typographical error in the entry.

For the existing TSS limits at Outfall 005 and Outfall 09B, as indicated above, EPA has either retained or revised the existing TSS mass loading limits. Loading is a function of concentration and flow. At Outfall 005 and 09B, the actual effluent flow being reported has changed since the last permit. EPA has also proposed new concentration-based effluent limits at these outfalls. In general, while an increase in effluent flow results in an increased mass loading limit, a decrease in flow results in a more stringent mass loading limit. However, where the new proposed concentration-based effluent limits are more stringent than the concentrations used to calculate the existing TSS mass loading limits, a more stringent mass loading limit can also result, even if the effluent flow has increased.

Since 2018, the effluent flow from Outfall 09B has been reported at a daily maximum total flow of 4.32062 MGD and a monthly average flow of 0.29999 MGD. The loading limit is calculated using the following formula: L = F x C x D, where L is the loading limit, F is the conversion factor for MGD, C is the effluent concentration, and D is the effluent flow. To represent the discharge flow for a non-continuous discharge, such as the discharges of stormwater from the Facility, EPA has calculated the 99th percentile of the daily maximum and monthly average total flow measurements to represent the daily maximum and monthly average discharge flows, respectively. The 99th percentile was calculated following the same methodology as is described in Appendix C. Therefore, at the 99th percentile flows shown in MGD, below, and the proposed daily maximum TSS concentration limit of 30 mg/L, the mass loading limits equal:

Table 11: Revised Mass-Based TSS Limits

Outfall 005
Daily Max 99th percentile = 0.5313 0.5313 MGD * 30 mg/L * 8.34 = **132.9 pounds/day (lbs/day)** Monthly Avg 99th percentile = 0.3843 0.3795 MGD * 30 mg/L * 8.34 = **96.2 lbs/day**
Outfall 09B (Outfall 009 in the Draft Permit)

Daily Max 99th percentile = 1.9740
1.9740 MGD * 30 mg/L * 8.34 = **493.9 pounds/day** (lbs/day)

Monthly Avg 99th percentile = 0.3805
0.29999 MGD * 30 mg/L * 8.34 = **95.2 lbs/day**

Where current conditions result in an increased calculated TSS mass loading limit, EPA finds no specific conditions exist to justify relaxation in accordance with CWA § 402(o) or § 303(d)(4). Therefore, these limits are necessary to comply with anti-backsliding requirements at CWA §§ 402(o) and 303(d)(4) and 40 CFR § 122.44(*l*) and are retained in the Draft Permit. However, where current conditions result in a decreased TSS mass loading limit, such as where the effluent flow at the outfall has decreased, and/or the proposed concentration limits are lower than the concentration used to complete the calculation previously, a revised TSS mass loading limit is included in the Draft Permit.

Regarding the new proposed concentration-based TSS limits, because no national technology-based effluent limitation guidelines (ELGs) are applicable for the type of activities or discharges from the site, in accordance with CWA § 402(a)(1)(B) and 40 CFR § 125.3(c)(2), EPA is authorized to establish technology-based effluent limitations on a case-by-case basis using its BPJ by applying the appropriate factors listed in 40 CFR § 125.3(d). As a result, determining BCT, BPT, and/or BAT and then developing a TBEL for TSS based on BPJ is appropriate at this Facility. As part of its analysis of the factors set forth in section 125.3(d), EPA considered the following TSS values and conditions from the ELGs and/or general permits described in Section 5.2, above, that address similar wastestreams, as set forth in more detail in Appendix E.

Finally, the Draft Permit also includes a revised sample type from composite to grab. The term "grab sample" refers to an individual sample collected within a short period of time at a particular location. Analysis of a grab sample provides an instantaneous view of stormwater quality at a single point in time and is appropriate for monitoring stormwater discharges from the Facility for several reasons. First, the intent of the sampling requirements proposed in the Draft Permit is to characterize the worst-case concentrations, not to characterize the average mass load or average concentration of any particular storm event, especially for pollutants for which TSS is an indicator parameter (i.e., PCBs). Grab sampling collected during the "first flush" of a discharge following a storm event will generally contain the highest pollutant concentrations in a storm runoff event, since groundwater infiltration or accumulated stormwater and/or pollutants that accumulated in the collection system and paved surfaces during the dry period before the storm are flushed out of the stormwater collection system during the initial stages of the wet weather event. Flow-weighted composite sampling to assess mean concentrations are generally used to estimate mass loadings in process wastewater and stormwater that is not subject to numeric limits under worst-case conditions, which is not the case for the authorized discharges from this Facility. The Draft Permit requires the Permittee to calculate the first-flush for each outfall and design a sampling program to ensure sample representativeness. Further, collecting multiple grab samples and compositing them significantly increases analytical costs and EPA sees no clear objective for the usefulness of this information in determining compliance with effluent limits. On the other hand, a grab sample collected during the first flush of a discharge event provides a reasonable measure of the highest concentrations in the discharge and allow EPA to determine which pollutants, if any, are present above permitted levels.

5.3.5 Polychlorinated Biphenyls (PCBs)

PCBs encompass a class of compounds with a dual ring chemical structure that is formed by the addition of chlorine (C_{12}) to biphenyl ($C_{12}H_{10}$). PCBs include up to 209 variations, or congeners, with different physical and chemical characteristics. PCBs were commonly used as mixtures called aroclors, typically found in oils associated with electrical transformers or gas pipelines. PCBs alone are not usually very mobile in subsurface soils or water. PCBs are only slightly soluble in water, bind strongly to soil and sediments, and are resistant to degradation. As a result, PCBs persist in the environment[20] and can be transported by solids.[21] Total PCBs is the sum of the full list for Chemical Abstracts Service (CAS) Registry number 1336-36-3A. There are seven PCB aroclors listed as priority pollutants in Appendix A to 40 CFR Part 423. They are:

- Aroclor 1242
- Aroclor 1254
- Aroclor 1221
- Aroclor 1232
- Aroclor 1248
- Aroclor 1260
- Aroclor 1016

At the GE Facility, the most commonly detected aroclors are generally 1254 and 1260.

PCBs exhibit a wide range of bioavailability and toxicity. The human health and ecological risks associated with PCBs are a function of exposure and the toxicity of PCBs. PCBs are known to cause cancer in animals and are classified as a probable human carcinogen by national and international health-protective organizations, such as the EPA, the Agency for Toxic Substances and Disease Registry (ATSDR, an arm of the U.S. Public Health Service) and the World Health Organization. According to ATSDR,[22]

PCBs do not readily break down in the environment and thus may remain there for very long periods of time. PCBs can travel long distances in the air and be deposited in areas far away from where they were released. In water, a small amount of PCBs may remain dissolved, but most stick to organic particles and bottom sediments. PCBs also bind strongly to soil.

PCBs are taken up by small organisms and fish in water. They are also taken up by other animals that eat these aquatic animals as food. PCBs accumulate in fish and marine mammals, reaching levels that may be many thousands of times higher than in water.

Total PCBs, in µg/L, is as follows for each of the authorized outfalls:

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[20] *Toxicological Profile for Polychlorinated Biphenyls (PCBs)*. Agency for Toxic Substances and Disease Registry: November, 2000.
[21] *Remediation Technologies Screening Matrix and Reference Guide, Version 4.0, Section 2.6.1: Properties and Behavior of Halogenated SVOCs* (2007).
[22] http://www.atsdr.cdc.gov/tfacts17.pdf

Table 12: Summary of PCBs at the Facility

Outfall Number	2009 Permit Limitation Monthly Avg	2009 Permit Discharge Condition	Draft Permit Limitation	Reported PCBs Monthly Avg Daily Max
64G	0.014 µg/L	When discharging	0.01 µg/L daily max	Not detected
64T	Monitor µg/L Monitor lbs/day	Wet weather	0.01 µg/L daily max When discharging	0.1183 lbs/day 0.3535 µg/L
005	Monitor µg/L 0.01 lbs/day monthly average 0.03 lbs/day daily maximum Monitor µg/L Monitor lbs/day	When discharging Wet weather	0.000064 µg/L monthly avg 0.01 µg/L monthly avg compliance level ---	0.0684 µg/L 0.0002105 lbs/day 0.2516 µg/L 0.0006 lbs/day
05A	Monitor µg/L Monitor lbs/day monthly avg daily max	Dry weather Wet weather	Prohibited Report µg/L See Section 5.4.1 for BMPs	No discharge 2.191 µg/L 0.00365 lbs/day 4.709 µg/L 0.00863 lbs/day
05B	Monitor µg/L monthly avg daily max	Wet weather	Report µg/L See Section 5.4.1 for BMPs	 11.26 µg/L 13.08 µg/L
006	Monitor µg/L Monitor lbs/day monthly avg daily max Monitor µg/L Monitor lbs/day monthly avg daily max	Dry weather Wet weather	Prohibited Report µg/L See Section 5.4.1 for BMPs	0.0000007 lbs/day 0.2681 µg/L 0.0000018 lbs/day 0.2796 µg/L 0.0017 lbs/day 1.1411 µg/L 0.0051 lbs/day 2.732 µg/L
06A	Monitor µg/L Monitor lbs/day monthly avg daily max	Wet weather	Report µg/L See Section 5.4.1 for BMPs	0.00091 lbs/day 7.876 µg/L 0.00091 lbs/day 7.876 µg/L

SRO5	---	---	Report µg/L See Section 5.4.1 for BMPs	---
009	Monitor µg/L Monitor lbs/day monthly avg daily max Monitor µg/L Monitor lbs/day monthly avg daily max	Dry weather Wet weather	Not authorized (Outfall 009 and 09B combined as Outfall 009)	No discharges 0.000481 lbs/day 0.3822 µg/L 0.001442 lbs/day 0.879 µg/L
09B (Outfall 009 in the Draft Permit)	Monitor µg/L Monitor lbs/day monthly avg daily max	When discharging	Dry weather discharges prohibited Wet weather Report µg/L See Section 5.4.1 for BMPs	0.000169 lbs/day 0.0564 µg/L 0.0003 lbs/day 0.1388 µg/L
Yard drains 10,12,13,16	---	---	---	---

The 2009 Permit also included non-numeric limits for PCBs (i.e., BMPs) which required a variety of cleaning and inspection activities, receiving water monitoring, and reporting requirements, as well as implementation of multiple structural and non-structural controls intended to minimize discharges of PCBs. The monitoring and reporting requirements were intended, in part, to ensure that EPA would have sufficient information to better assess the characteristics of the discharges and determine if discharges of PCBs from the Facility's outfalls cause, or have a reasonable potential to cause, or contribute to an excursion above WQSs.

The Permittee has obtained monitoring data for total PCBs in the discharge and the receiving waters in conjunction with both the routine monitoring requirements and as a result of implementing the Ambient Monitoring Plan requirements of the 2009 Permit. Monitoring data for the discharges and the receiving waters collected by the Permittee for PCBs since the 2009 Permit was issued is included in Appendices A, B, and E. EPA evaluated these data to determine if discharges from the Facility cause, or have a reasonable potential to cause, or contribute to an excursion above Massachusetts WQSs (Appendix C). Massachusetts WQSs contain minimum criteria for toxic pollutants including PCBs. *See* 314 CMR 4.00, Table 29. As aforementioned, the Housatonic River and Unkament Brook are both Class B waters under the Massachusetts *Surface Water Quality Standards* (314 CMR 4.00). For Class B waters, 314 CMR § 4.00, Table 29 establishes the following water quality criteria for PCBs:

Total PCBs
Freshwater aquatic life criterion continuous concentration (CCC) = 0.014 µg/L
Human health organism-only criterion (Fish and Shellfish Consumption Only) = 0.000064 µg/L

EPA considered the freshwater aquatic life criteria and the human health Fish and Shellfish Consumption-Only criterion, rather than the Drinking Water plus Fish and Shellfish Consumption criterion because the receiving water is not a public water supply. The results of monitoring since 2018 at the Facility indicate that discharges from the Facility at all outfalls causes, or has a reasonable potential to cause, or contribute to an excursion above the applicable water quality criterion for both aquatic life, 0.014 µg/L and human health, fish and shellfish consumption-only, 0.000064 µg/L.

Where results of EPA's analysis indicate discharges of PCBs cause, have a reasonable potential to cause, or contribute to an excursion above WQSs, the Draft Permit must include limits. *See* 40 CFR § 122.44(d)(1)(iii). EPA has proposed both Monitoring for total PCBs continues to be required and is unchanged from the 2009 Permit, except to remove mass-based reporting, where appropriate. Because the PCB water quality-based limits and water quality criteria from which those limits were derived are concentration-based, mass-based monitoring is unnecessary and does not inform compliance with these concentration-based limits or water quality criteria.

In addition to the effluent limitations and monitoring requirements, the Draft Permit also contains non-numeric effluent limitations for PCBs. These non-numeric limitations consist of BMPs implemented through an iterative process to eliminate discharges of PCBs. Refer to Section 5.4.1 for additional information regarding these BMPs. The requirement to eliminate discharges of PCBs is necessary to meet the regulatory prohibition on discharges of PCBs as described previously.

While the Facility no longer discharges process wastewaters, this prohibition also applies to: "All discharges from the manufacturing or incineration areas, loading and unloading areas, storage areas and other areas which are subject to direct contamination by PCBs as a result of the manufacturing process, including but not limited to: (1) Stormwater and other runoff except as hereinafter provided…; and (2) Water used for routine cleanup or cleanup of spills." The exception referred to states: "These standards do not apply to stormwater runoff or other discharges from areas subject to contamination solely by fallout from air emissions of PCBs; or to stormwater runoff that exceeds that from the 10-year 24-hour rainfall event." To account for this exception, the Draft Permit includes requirements for the Permittee to determine the current (i.e., baseline) and future 10-year 24-hour rainfall event (i.e., design storm). To demonstrate compliance with these non-numeric effluent limits, the Draft Permit requires monitoring and indicates that the compliance level is a non-detect sample result.

Where effluent limits have been established in NPDES permits but compliance cannot be determined using currently approved analytical methods (e.g. if WQBEL is less than the analytical capability of the methods), EPA must establish a compliance level. This approach is consistent with EPA's TSD, page 111, which recommends, "the compliance level be defined in the permit as the minimum level (ML)." Further, the *National Pollutant Discharge Elimination System (NPDES): Use of Sufficiently Sensitive Test Methods for Permit Applications and Reporting Rule*[23] (SSTM) requires the use of an EPA-approved method that is sufficiently sensitive. Therefore, the Draft Permit requires that the quantitative methodology used for PCB analysis must achieve the ML of ≤0.095 µg/L and ≤0.01 µg/L using EPA Method 608.3 or EPA draft Method 1628, respectively. The MLs are the compliance level for the total PCB limits and are required for all PCB monitoring for this Permit. This requirement is consistent with

[23] Fed. Reg. 49,001 (Aug. 19, 2014).

EPA's DRGP for the required test method and minimum levels, which apply to discharges of stormwater, groundwater, potable water and material dewatering wastewater that contains PCBs. Because this revision also constitutes the compliance level specified for PCB monitoring, any requirement in the Draft Permit to "remove" or "eliminate" PCBs means that the PCB sample result for each individual compound is non-detect and the ML of the analysis is at or below 0.095-0.01 µg/L. The test method currently approved at 40 CFR Part 136 for measuring PCBs in wastewater is Method 608.3, which targets seven common Aroclor mixtures and has a published MDL and ML for PCB–1242 of 65 ng/L and 95 ng/L (0.095 µg/L), respectively.[24] However, most PCB contamination in the environment is highly weathered and often does not resemble any of the Aroclor mixtures. As a result, Aroclor results are likely to underestimate PCB contamination or provide non-detects in a sample when compared to the analysis of individual PCB congeners. Therefore, in 2020, EPA's Office of Water completed a multi-laboratory validation of Method 1628, a PCB congener method using low-resolution gas chromatography - mass spectrometry with selected ion monitoring (GC-MS-SIM). This method identifies and quantifies PCBs using individual congeners, not Aroclors, and is more sensitive than Method 608.3, but not so sensitive that it is susceptible to background contamination issues. Specifically, Method 1628 is implemented for determination of all 209 polychlorinated biphenyl (PCBs) congeners in wastewater and other matrices, by low-resolution gas chromatography/mass spectrometry (GC/MS) using selected ion monitoring (SIM). The method calibrates and quantifies 65 PCB congeners selected by EPA as priorities because of their:

- Chromatographic retention times on the column used for this analysis (e.g., first and last eluting congeners in a level of chlorination)
- Prevalence in environmental samples
- High concentrations in Aroclors
- Their toxicities (e.g., the World Health Organization's list of dioxin-like PCB congeners).[25]

The MLs for individual congeners using Method 1628 vary from 0.5 to 10 ng/L (0.0005 µg/L to 0.01 µg/L) and up to 20 ng/L (0.02 µg/L) for congener sums. The MLs for Method 608.3 can achieve comparable sensitivity in a relatively clean matrix with a low calibration standard of 0.05 µg/L and a final volume of 1mL. This could be further reduced by using a larger sample volume (e.g., 2L yields a ML of 0.025 µg/L).

While Method 1628 is not yet approved at 40 CFR Part 136 for use in CWA compliance monitoring, because a multi-laboratory validation study has been completed, EPA considers the method suitable for release to laboratories, regulated entities, and the general public. Therefore, EPA Region 1 has incorporated the use of this method into this Draft Permit. The Permittee requested that EPA discontinue the use of modified Method 8082 for analysis. EPA has granted this request and removed this requirement. In addition to the rationale provided by the Permittee, essentially that the EPA approved test methods perform at least as well as the modified Method 8082 in meeting the permit requirements, EPA issued the SSTM since the reissuance of the 2009 Permit, which requires use of EPA Part 136 test methods, where they exist.

[24] See Table 1 in 40 CFR Part 136, Method 608.3 - Organochlorine Pesticides and PCBs By GC/HSD, Part 21.
[25] See EPA 821-R-21-002, July 2021.

In addition, EPA has proposed a revised limit for total PCBs of 0.01 µg/L in the Draft Permit for Outfall 64G and requires that the Permittee use EPA Method 608.3 or EPA draft Method 1628 for PCB analyses. This revision is necessary because the existing limit for Outfall 64G, 0.014 µg/L was based on the level EPA determined could be measured at the time of the 2009 Permit development and because the 2009 Permit specified that a modified Method 8082 be used for analyses. Since that time, EPA published the *National Pollutant Discharge Elimination System (NPDES): Use of Sufficiently Sensitive Test Methods for Permit Applications and Reporting Rule*[26] and promulgated the corresponding regulations. Further, the performance of EPA Method 608.3 has demonstrated lower measurement sensitivity and EPA has further developed EPA draft Method 1628 with even lower measurement sensitivity. Lastly, the Permittee has requested, and EPA has agreed, given the aforementioned test method updates, discontinuing the use of a modified Method 8082 for PCB analyses for this Permit.

In addition, monitoring for PCBs in the receiving water continues to be required during dry weather conditions, twice per year. Ambient monitoring during wet weather conditions is no longer required since monitoring has indicated that PCBs are not present at detectable concentrations under these conditions. Ambient monitoring has been adjusted to coincide with the timing of WET testing ambient monitoring requirements and the results must be reported on DMRs.

As is the case for TSS sampling, the Draft Permit has revised the sample type for PCBs from composite to grab. In addition to advantages of grab samples for the purposes of characterizing the "first flush" described above, the average error in a sample due to compositing may be problematic in the case of PCBs at this Facility for several reasons. First, the water quality criteria are concentration, not mass-based. Second, the effluent limitation and is significantly below the level at which these compounds can be detected such that any compositing error would produce non-representative samples. Third, the receiving water is already impaired for PCBs. As a result, the limitations, to the extent currently analytically possible to measure, require sampling of the worst-case conditions (i.e., the first flush), since any addition has a reasonable potential to cause, or contribute to an excursion of water quality standards. Further, concentrations measured at a point in time can be useful for the evaluation of BMP efficiency. Concentrations resulting from samples collected at specific, identical times during a discharge generate a comparable dataset of the concentration of pollutants over long timeframes. The generation of these data facilitates the analysis of temporal variations in concentration, especially to identify the "first-flush" phenomenon for a given discharge. Detailed concentration data is one of the approaches for assessing concentrations of pollutants that have toxic effects during a given event, and chronic effects with repeated events by aggregating these individual toxic effects over longer periods of time and extrapolating intervals to predict effects. These data further enable EPA to require and the Permittee to implement BMPs that address reduction of peak effluent concentrations.

5.3.6 Volatile and Semi-Volatile Organic Compounds (VOCs and SVOCs)

An organic compound is any of a large class of chemical compounds whose molecules contain carbon. For historical reasons, a few types of compounds such as carbonates, simple oxides of carbon and cyanides, as well as the allotropes of carbon, are considered inorganic. Volatile organic compounds, or VOCs, are organic compounds whose composition makes it possible for them to evaporate under normal indoor atmospheric conditions of temperature and pressure. This is the general definition of VOCs that

[26] Fed. Reg. 49,001 (Aug. 19, 2014).

is used in the scientific literature and is consistent with the definition used for regulatory purposes. The World Health Organization (WHO) categorizes these organic pollutants by the ease they will be emitted as:

- Very volatile organic compounds (VVOCs) (e.g., propane, butane, methyl chloride)
- Volatile organic compounds (VOCs) (e.g., formaldehyde, toluene, acetone, ethanol (ethyl alcohol), isopropyl alcohol)
- Semi-volatile organic compounds (SVOCs) (e.g., pesticides (DDT, chlordane, plasticizers (phthalates), fire retardants (PCBs, PBB))

The higher the volatility, the more likely the compound will be emitted from a material or surface into the air. Very volatile organic compounds are so volatile that they are difficult to measure and are found almost entirely as gases in the air rather than in materials or on surfaces. The least volatile compounds found in air constitute a far smaller fraction of the total present indoors while the majority will be in solids or liquids that contain them or on surfaces including dust, furnishings and building materials.

VOCs, in µg/L, is as follows for each of the authorized outfalls:

Table 13: Summary of VOCs/SVOCs at the Facility

Outfall Number	2009 Permit Limitation	Draft Permit Limitation	DMRs - VOCs Daily Max	DMRs – Volatile fractions Daily Max	Discharge Condition
64G	Monitor	Monitor	4.36 µg/L	187 µg/L	When discharging
64T	---	Monitor ---	---	---	Dry weather Wet weather
005	---	Monitor ---	---	---	When discharging Wet weather
05A	---	Monitor ---	---	---	Dry weather Wet weather
05B	---	Monitor ---	---	---	Dry weather Wet weather
006	Monitor	Monitor ---	5.47 µg/L	106 µg/L	Dry weather Wet weather
06A	---	Monitor ---	---	---	Dry weather Wet weather
SRO5	---	Monitor ---	---	---	Dry weather Wet weather
009	---	Not authorized (Outfall 009 and 09B combined as Outfall 009)	---	---	Dry weather Wet weather

09B (Outfall 009 in the Draft Permit)	---	Monitor	---	---	When discharging
Yard drains 10,12,13,16	---	---	---	---	Wet weather

The 2009 Permit required monitoring for total VOCs using EPA Method 624 as well as volatile fraction analysis at Outfalls 64G and 006. VOCs and SVOCs at the Facility are generally found in groundwater or liquid or solid hazardous wastes (soil, sediment, remedial activity wastes). Because the Draft Permit contains both numeric and non-numeric limits for certain SVOCs (PCBs, PFAS), as well as non-numeric limits, such as prohibitions (e.g., discharges of groundwater and liquid and solid hazardous wastes), both VOCs and SVOCs serve as indicator parameters for the presence of these discharges. As a result, the Draft Permit includes monitoring requirements for VOCs and SVOCs at all outfalls that are authorized to discharge during dry weather. In addition, at outfalls where dry weather discharges are prohibited, the Draft Permit includes monitoring requirements for VOCs and SVOCs in the event of a dry weather discharge. Should VOCs or SVOCs be detected, as this is an indication of either the infiltration of groundwater that contains VOCs or SVOCs or the presence of liquid or solid hazardous wastes within the stormwater collection system, such a detection serves as a corrective action trigger for the non-numeric requirements pertaining to the required control measures for these discharges. Depending on the source of the VOCs/SVOCs, the control measure requirements specify the corrective action. For example, if the source of VOCs/SVOCs is identified as groundwater infiltration, the corrective actions the Permittee must take to eliminate such infiltration are described in the Dry Weather Flow Elimination requirements. If the source of VOCs/SVOCs is identified as liquid or solid hazardous wastes, the Prohibited Discharges requirements apply.

5.3.7 Per- and polyfluoroalkyl substances (PFAS)

As explained at https://www.epa.gov/pfas, PFAS are a group of synthetic chemicals that have been in use since the 1940s. PFAS are found in a wide array of consumer and industrial products. PFAS manufacturing and processing facilities, facilities using PFAS in production of other products, airports, and military installations can be contributors of PFAS releases into the air, soil, and water. Due to their widespread use and persistence in the environment, most people in the United States have been exposed to PFAS. Exposure to some PFAS above certain levels may increase risk of adverse health effects.[27] EPA is collecting information to evaluate the potential impacts that discharges of PFAS from certain industrial facilities and wastewater treatment plants may have on downstream drinking water, recreational and aquatic life uses.

On October 20, 2020, MassDEP published final regulations establishing a drinking water standard, or a Maximum Contaminant Level (MCL) of 20 parts per trillion (ppt) for the sum of the following six PFAS. *See* 310 CMR 22.00.

- Perfluorohexanesulfonic acid (PFHxS)
- Perfluoroheptanoic acid (PFHpA)

[27] EPA, *EPA's Per- and Polyfluoroalkyl Substances (PFAS) Action Plan,* EPA 823R18004, February 2019. Available at: https://www.epa.gov/sites/production/files/2019-02/documents/pfas_action_plan_021319_508compliant_1.pdf

- Perfluorononanoic acid (PFNA)
- Perfluorooctanesulfonic acid (PFOS)
- Perfluorooctanoic acid (PFOA)
- Perfluorodecanoic acid (PFDA)

Although the Massachusetts water quality standards do not include numeric criteria for PFAS, the Massachusetts narrative criterion for toxic substances at 314 CMR 4.05(5)(e) states: "All surface waters shall be free from pollutants in concentrations or combinations that are toxic to humans, aquatic life or wildlife." The narrative criterion is further elaborated at 314 CMR 4.05(5)(e)2, which states:

> Human Health Risk Levels. Where EPA has not set human health risk levels for a toxic pollutant, the human health-based regulation of the toxic pollutant shall be in accordance with guidance issued by the Department of Environmental Protection's Office of Research and Standards. The Department's goal is to prevent all adverse health effects which may result from the ingestion, inhalation or dermal absorption of toxins attributable to waters during their reasonable use as designated in 314 CMR 4.00.

The Agency published the *PFAS Strategic Roadmap: EPA's Commitments to Action 2021-2024 (PFAS Strategic Roadmap)*, in October 2021.[28] On page 14, of this document, EPA identifies categories known or suspected to discharge PFAS including: organic chemicals, plastics & synthetic fibers (OCPSF); metal finishing; electroplating; electric and electronic components; landfills; pulp, paper & paperboard; leather tanning & finishing; plastics molding & forming; textile mills; paint formulating, and airports. This list, however, does not include all possible industrial sources that discharge PFAS. "For example, Centralized Waste Treatment (CWT) facilities may receive wastes from the aforementioned industries and should be considered for monitoring. There may also be categories of dischargers that do not meet the applicability criteria of any existing ELG; for instance, remediation sites, chemical manufacturing not covered by OCPSF, and military bases."[29]

Since PFAS chemicals are persistent in the environment and may lead to adverse human health and environmental effects, and consistent with recent EPA guidance,[30] the Draft Permit requires that the Facility conduct quarterly effluent sampling for PFAS chemicals. The quarterly monitoring shall begin the first full calendar quarter beginning six months after the effective date of the permit.

The purpose of this monitoring and reporting requirement is to better understand potential discharges of PFAS from this Facility and to inform future permitting decisions, including the potential development of water quality-based effluent limits on a facility-specific basis. EPA is authorized to require this monitoring and reporting by CWA § 308(a), which states:

> SEC. 308. (a) Whenever required to carry out the objective of this Act, including but not limited to (1) developing or assisting in the development of any effluent limitation, or other limitation,

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[28] See https://www.epa.gov/system/files/documents/2021-10/pfas-roadmap_final-508.pdf
[29] Radhika Fox, Assistant Administrator, EPA to Water Division Directors, EPA Regions 1-10, December 5, 2022, Subject: "Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs." Available at: https://www.epa.gov/system/files/documents/2022-12/NPDES_PFAS_State%20Memo_December_2022.pdf
[30] *Id*.

> prohibition, or effluent standard, pretreatment standard, or standard of performance under this Act; (2) determining whether any person is in violation of any such effluent limitation, or other limitation, prohibition or effluent standard, pretreatment standard, or standard of performance; (3) any requirement established under this section; or (4) carrying out sections 305, 311, 402, 404 (relating to State permit programs), 405, and 504 of this Act—
>
> > (A) the Administrator shall require the owner or operator of any point source to (i) establish and maintain such records, (ii) make such reports, (iii) install, use, and maintain such monitoring equipment or methods (including where appropriate, biological monitoring methods), (iv) sample such effluents (in accordance with such methods, at such locations, at such intervals, and in such manner as the Administrator shall prescribe), and (v) provide such other information as he may reasonably require….

On April 28, 2022, EPA issued a memorandum addressing PFAS discharges in EPA-issued NPDES Permits with recommendations for monitoring requirements for different types of facilities.[31] For direct discharges from industrial facilities, in the absence of a final 40 CFR § 136 method, the memo recommends the use of CWA wastewater draft analytical method 1633 or, when it becomes available, the multi-lab validated Method 1633. (See 40 CFR § 122.21(e)(3)(ii) and 40 CFR § 122.44(i)(1)(iv)(B)).[32] Monitoring should include each of the 40 PFAS parameters detectable by draft method 1633 (see Draft Permit Attachment B for list of PFAS parameters) and the monitoring frequency is quarterly. All PFAS results must be reported on DMRs (see 40 CFR § 122.41)(l)(4)(i)). This approach is consistent with 40 CFR § 122.44(i)(1)(iv)(B) which states that "[i]n the case of pollutants or pollutant parameters for which there are no approved methods under 40 CFR Part 136 or methods are not otherwise required under 40 CFR chapter I, subchapter N or O, monitoring shall be conducted according to a test procedure specified in the permit for such pollutants or pollutant parameters."

EPA also notes that Method 1621 was recently published to screen for organofluorines in wastewater. Organofluorines (molecules with a carbon-fluorine bond) are rarely naturally occuring and the most common source of organofluorines are PFAS and non-PFAS fluorinated compounds such as pesticides and pharmaceuticals. The April 28, 2022, memo states that the draft Adsorbable Organic Fluorine CWA wastewater method 1621 can be used in conjunction with draft method 1633, if appropriate. The Draft Permit does not propose monitoring for Adsorbable Organic Fluorine at this time. However, EPA invites comment as to whether this monitoring should be conducted concurrently with PFAS monitoring to screen for a broader range of these types of emerging contaminants.

All monitoring results may be used by EPA in the next permit reissuance to ensure the discharge continues to protect designated uses.

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[31] Radhika Fox, Assistant Administrator, EPA to Water Division Directors, EPA Regions 1-10, April 28, 2022, Subject: "Addressing PFAS Discharges in EPA-Issued NPDES Permits and Expectations Where EPA is the Pretreatment Control Authority." Available at: https://www.epa.gov/system/files/documents/2022-04/npdes_pfas-memo.pdf

[32] Available at, https://www.epa.gov/system/files/documents/2021-09/method_1633_draft_aug-2021.pdf.

5.3.8 Whole Effluent Toxicity Testing

CWA §§ 402(a)(2) and 308(a) provide EPA and States with the authority to require toxicity testing. Section 308 specifically describes biological monitoring methods as techniques that may be used to carry out objectives of the CWA. Whole effluent toxicity (WET) testing is conducted to ensure that the additivity, antagonism, synergism, and persistence of the pollutants in the discharge do not cause toxicity, even when the individual pollutants are present at low concentrations in the effluent. The inclusion of WET requirements in the Draft Permit will assure that the Facility does not discharge combinations of pollutants into the receiving water in amounts that would be toxic to aquatic life or human health.

In addition, under CWA § 301(b)(1)(C), discharges are subject to effluent limitations based on WQSs. Under CWA §§ 301, 303 and 402, EPA and the States may establish toxicity-based limitations to implement narrative water quality criteria calling for "no toxics in toxic amounts." *See also* 40 CFR § 122.44(d). The regulations at 40 CFR §122.44(d)(ii) state, "*When determining whether a discharge causes, has the reasonable potential to cause, or contributes to an in-stream excursion above a narrative or numeric criteria within a State water quality standard, the permitting authority shall use procedures which account for existing controls on point and non-point sources of pollution...(including) the sensitivity of the species to toxicity testing...*"

EPA generally considers WET testing in addition to chemical specific criteria when evaluating whether discharges from a facility meet WQSs. The Massachusetts WQSs at 314 CMR 4.05(5)(e) state, "*All surface waters shall be free from pollutants in concentrations or combinations that are toxic to humans, aquatic life or wildlife*." In addition, the Massachusetts WQSs at 314 CMR 4.05(5)(e)(3) requires an additional margin of safety when establishing water quality based effluent limits to assure that pollutants do not persist in the environment or accumulate in organisms to levels that: 1) Are toxic to humans, wildlife or aquatic life; or 2) Result in unacceptable concentrations in edible portions of marketable fish or shellfish or for the recreational use of fish, shellfish, other aquatic life or wildlife for human consumption and 314 CMR 4.03(2)(a) require no lethality to organisms passing through a mixing zone. Further, State implementation policy[33] specifies WET testing requirements as part of its interpretation of the narrative criteria for toxic pollutants, stating that "[w]*hole effluent toxicity testing will be used to complement specific chemical testing*." This State implementation policy establishes numeric criteria for toxicity. Whole effluent chronic effects are regulated by limiting the highest measured continuous concentration of an effluent that causes no observed chronic effect on a representative standard test organism, known as the chronic No Observed Effect Concentration (C-NOEC).

Whole effluent acute effects are regulated by limiting the concentration that is lethal to 50% of the test organisms, known as the LC_{50}. The State recommended criterion to prevent acutely toxic effects is 0.3 toxic units (T.U.). This is based on an adjustment factor of one-third used to extrapolate the LC_{50} to an LC_1 (concentration at which 1% of the test organisms die). The effects of an effluent in chronic toxicity tests is estimated based on the IC_{25} is a statistical calculation of the effluent concentration which causes a 25% reduction in growth or reproduction of test organisms. It is used to determine if toxicity has occurred at a level of concern by comparing it to the instream waste concentration (IWC). If the IC_{25} is

[33] *Massachusetts Water Quality Standards Implementation Policy for the Control of Toxic Pollutants in Surface Waters*. February 23, 1990.

lower than the IWC, the effluent has the potential to inhibit aquatic organisms in the receiving water. IC_{25} is also known as Inhibition Concentration 25%. LOEL refers to the Lowest Observed Effect Level, which is another measure of toxicity that is used to determine the lowest effluent concentration that is significantly different from the control based on statistical analysis. The IC_{25} and NOEL chronic test endpoints show toxicity in the effluent.

The 2009 Permit required acute and chronic WET testing for effluent and chemical analysis requirements for the receiving water quarterly for Outfall 64G. The 2009 Permit required that testing be conducted for the Daphnid (*Ceriodaphnia dubia*). The 2009 Permit also authorized the Permittee to request elimination of WET testing following two years of testing if the IC_{25} results were all 100%. Since 2018, WET testing results for 21 tests indicate that toxicity was detected in the effluent as follows:

Table 14: Summary of WET at Internal Outfall 64G

Test Type	LC50 Acute Ceriodaphnia	IC25 7-Day Ceriodaphnia	NOEL 7-Day Chronic Ceriodaphnia
Units	%	%	%
Minimum	100	10.47	6.25
Maximum	100	100	100
# <100%	0	7	8

Therefore, in accordance with EPA guidance,[34] EPA maintains that WET testing is warranted because: 1) the receiving water is impaired for one or more of its designated uses; 2) the discharges from this Facility is a source of the pollutants listed as the cause of one or more of these impairments; 3) one or more of these pollutants are known environmentally persistent pollutants that exhibit additive, synergistic or antagonistic effects for which bioavailability can vary; 4) analytical testing cannot detect to the numeric water quality criteria and/or to the levels at which aquatic life and/or human health effects can occur for one or more pollutants present in the discharge; and 5) it is technically infeasible to identify and to impose chemical-specific numeric limitations for every pollutant potentially present in the discharge. The Facility has documented toxicity in eight of the WET tests completed since 2018 for chronic toxicity endpoints. Therefore, EPA maintains that chronic WET testing is necessary to ensure WQSs are met. WET testing will also address monitoring necessary for additional pollutants required in this permit reissuance for the discharge, the receiving water, or both (e.g., metals in the discharge and receiving water).

In accordance with current EPA guidance and State implementation policy cited above, given that chronic toxicity has been detected, EPA has determined that there is a reasonable potential to cause or contribute to an excursion above the criteria for toxicity. *See* 40 CFR § 122.44(d)(1)(ii) (Appendix D). Therefore, the WET limitations and requirements are necessary and appropriate to carry out the provisions of the CWA and ensure compliance with State WQSs. *See* CWA §308(a), 33 U.S.C.

[34] See *Policy for the Development of Water Quality-Based Permit Limitations for Toxic Pollutants*, 49 FR 9016, March 9, 1984, *NPDES Permit Writer's Manual*, EPA-833-K-10-001, September 2010, and *Technical Support Document for Water Quality-based Toxics Control,* EPA/505/2-90-001, March 1991 (Second Printing).

§1318(a). Because the discharge has not shown acute toxicity, the Draft Permit does not propose limits related to acute toxicity and has proposed removal of the acute WET testing requirement. MassDEP has established chronic toxicity criteria for water quality-limited receiving waters as no observed effect, chronic, either equal to or greater than the receiving water concentration. Therefore, the Draft Permit includes chronic toxicity limits of NOEC≥RWC. These limits are equal to the State criteria for chronic toxicity to assure that the criteria are met. The testing must continue to be conducted quarterly and the daphnid (*Ceriodaphnia dubia*) continues to be the required test species.

Toxicity testing must be performed in accordance with the EPA Region 1 test procedures and protocols specified in **Attachment A,** *Freshwater Chronic Toxicity Test Procedure and Protocol* (April 2013) of the Draft Permit. The Permittee must collect the required receiving water sample (i.e., diluent) from the Housatonic River at a point immediately upstream of the permitted discharge's zone of influence at a reasonably accessible location. A receiving water control (0% effluent) must also be tested. If toxicity is indicated, the Permittee may use alternate dilution water in accordance with the provisions in the Draft Permit. Results of these toxicity tests will demonstrate compliance with State WQSs for toxicity. The Draft Permit continues the requirement to report the IC_{25} percent.

5.3.9 Metals

Metals are naturally occurring constituents in the environment and generally vary in concentration according to local geology. Metals are neither created nor destroyed by biological or chemical processes. However, metals can be transformed through processes including adsorption, precipitation, co-precipitation, and complexation. Some metals are essential nutrients at low levels for humans, animals, plants and microorganisms, but toxic at higher levels (e.g., copper and zinc). Other metals have no known biological function (e.g., lead). The environmental chemistry of metals strongly influences their fate and transport in the environment and their effects on human and ecological receptors. In aquatic systems, metal bioavailability refers to the concentration of soluble metal that adsorb onto, or absorb into and across, membranes of living organisms. The greater the bioavailability, the greater the potential for bioaccumulation, leading to increased toxicological effects.[35] Toxicity results when metals are biologically available at toxic concentrations affecting the survival, reproduction and behavior of an organism.

The Permittee has obtained quarterly monitoring data for total recoverable aluminum, cadmium, copper, lead, nickel and zinc in the discharge and the receiving water in conjunction with Whole Effluent Toxicity testing for Outfall 64G. Total recoverable aluminum, cadmium, lead, and zinc were not detected above laboratory minimum levels. Total recoverable copper and nickel were detected at relatively low concentrations. In developing the 2009 Permit, EPA determined that discharges of metals do not cause, or have a reasonable potential to cause, or contribute to an excursion above State WQSs. EPA has completed an analysis to determine if monitoring results continue to support this determination (Appendix C).

[35] Magelhaes, Danielly et al. 2015. *Metal bioavailability and toxicity in freshwaters.* Environmental Chemistry Letters. DOI 10.1007/s10311-015-0491-9.

The acute and chronic EPA *National Recommended Water Quality Criteria* for copper and nickel, expressed as dissolved metal in the water column where the median receiving water hardness is 78 mg/L, are as follows:

Copper
Freshwater acute aquatic life = 11.1 µg /L (*or based on the Biotic Ligand Model, if data is available)
Freshwater chronic aquatic life = 7.5 µg/L (*or based on the Biotic Ligand Model, if data is available)

Nickel
Freshwater acute aquatic life = 380.2 µg /L
Freshwater chronic aquatic life = 42.3 µg /L

The results of EPA's analysis (Appendix C) indicate the concentrations of copper and nickel detected in the discharges from Outfall 64G do not exceed the above criteria. As a result, the Draft Permit does not include effluent limitations for these metals. Monitoring for total recoverable copper and nickel in the discharge and the receiving water continue to be required in conjunction with Whole Effluent Toxicity Testing, discussed above.

5.4 Special Conditions

5.4.1 Best Management Practices

Best management practices (BMPs) may be expressly incorporated into a permit on a case-by-case basis where it is determined that they are necessary to achieve effluent limitations and standards or to carry out the purpose and intent of the CWA under § 402(a)(1). BMPs may be necessary to control or abate the discharge of pollutants when: 1) authorized under section 304(e) of the CWA for the control of toxic pollutants and hazardous substances from ancillary industrial activities; 2) authorized under CWA § 402(p) for the control of storm water discharges; 3) numeric effluent limitations are infeasible; or 4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA. *See* 40 CFR § 122.44(k). Pollutants may be present in areas where industrial activity has taken place in the past and significant materials remain and are exposed to storm water, such as when pollutant sources are generated during remedial activities at the Facility, or when pollutants are present in groundwater or soil that comes into contact with stormwater, which could result in significant amounts of these pollutants reaching waters of the United States via discharges of stormwater.

In this case, the Draft Permit requires the selection, design, installation, and implementation of control measures for stormwater, including stormwater that comingles with groundwater infiltration, to comply with the non-numeric technology- and water quality-based effluent limits in the Draft Permit. The Draft Permit requires the Permittee to implement and continually evaluate the Facility's structural controls (e.g., treatment systems, containment areas, holding tanks), and non-structural controls (operational procedures, site inspections, and operator training). Proper implementation of BMPs will minimize (i.e., reduce or eliminate) the potential discharge of pollutants related to inadequate treatment, human error, and/or equipment malfunction. The non-numeric limitations consist of the technology-based effluent limitations and control measures specified in Part 2.1 and the water quality-based effluent limitations specified in Part 2.2 of EPA's *Multi-Sector General Permit for Stormwater Discharges Associated with*

Industrial Activity (MSGP), effective March 1, 2021,[36] and as required in 314 CMR 4.05 for Class B waterbodies. These non-numeric limitations apply, in part, to comply with anti-backsliding requirements in CWA §§ 402(o) and 303(d)(4) and 40 CFR § 122.44(*l*) because stormwater-only outfalls at the Facility were previously covered under the MSGP and remain necessary and appropriate. Non-numeric limitations include:

- Minimize exposure of processing and material storage areas to stormwater discharges;
- Design good housekeeping measures to maintain areas that are potential sources of pollutants;
- Implement preventative maintenance programs to avoid leaks, spills, and other releases of pollutants to stormwater that is discharged to receiving waters;
- Implement spill prevention and response procedures to ensure effective response to spills and leaks if or when they occur;
- Design erosion and sediment controls to stabilize exposed areas and contain runoff using structural and/or non-structural control measures to minimize onsite erosion and sedimentation, and the resulting discharge of pollutants;
- Utilize runoff management practices to the extent feasible at the Facility to divert, infiltrate, reuse, contain, or otherwise reduce stormwater runoff;
- Develop proper handling procedures for salt or materials containing chlorides that are used for snow and ice control;
- Conduct employee training to ensure personnel understand the requirements of the Draft Permit;
- Evaluate for the presence of non-stormwater discharges. Any non-stormwater discharges not explicitly authorized in the Draft Permit or covered by another NPDES permit are not authorized for discharge and must be eliminated (*see* Authorized Non-Stormwater Discharges in Section 5.4.3 for the non-stormwater discharges explicitly authorized, and Prohibited Discharges in Section 5.4.5 for non-stormwater discharges expressly prohibited, below;
- Minimize dust generation and vehicle tracking of industrial materials; and

In addition to the general limitations described above, the Draft Permit also includes BMPs on a case-by-case basis informed by EPA's MSGP and DRGP.[37] These BMP requirements include:

- Administrative controls: requires the Permittee to incorporate the inspection and visual assessment requirements in Part 3.1 and 3.2 of the 2021 MSGP and the corrective action requirements in Part 5.1 through 5.3 of the 2021 MSGP;[38]
- Control measures: requires the Permittee to incorporate the control measure requirements in Part 2.1 and 2.1.1 of the 2021 MSGP and Part 2.5.2.d of the 2022 DRGP in order to identify pollutant sources and select, design, install and maintain the pollution control technology necessary to meet the effluent limitations in the permit and that ensure dilution is not used as a form of treatment. In accordance with § 125.3(f), technology-based treatment requirements cannot be satisfied through the use of "non-treatment" techniques such as flow augmentation and in-stream

[36] The 2021 MSGP is currently available at: https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp#.
[37] The DRGP is currently available at: https://www.epa.gov/npdes-permits/dewatering-and-remediation-general-permit-drgp.
[38] Where the MSGP refers to limitations, conditions or benchmarks, including the SWPPP, for the purposes of this permit, EPA has revised the requirement to refer to the limitations and conditions in this permit.

mechanical aerators;[39]

- Effluent flow requirements: requires the Permittee to document the measures and methods used to control flow through the treatment systems to ensure that the design flows of the treatment systems are not exceeded;
- Pollutant minimization requirements: requires the Permittee to document the selection, design, installation and proper operation and maintenance of pollution control technologies used to meet the permit's effluent limits and ensure dilution is not used as a form of treatment, or as a means to achieve the limitations and requirements;
- Quality Assurance/Quality Control: requires the Permittee to document monitoring requirements, sample collection procedures, sample analysis procedures,[40] a schedule for the review of sample results and data validation and reporting processes; and
- Major Storm and Flood Events: requires the Permittee to implement adaptive measures that minimize discharges that result from impacts from major storm events such as hurricanes, extreme/heavy precipitation, and pluvial, fluvial and flash flood events.[41] This BMP requirement is based on a similar requirement in Part 2.1.1.8 of EPA's 2021 MSGP,[42] and Part 2.2.2.7 of EPA's 2022 DRGP, and includes site-specific data requirements for the risk assessment at this location for baseline (i.e., current) and future conditions, and site-specific considerations for the required adaptive measures that must be considered, and implemented if necessary to minimize discharges from impacts such as bypass, upset or failure, overflow, increased inflow and infiltration or discharges of pollutants, and effluent limit exceedance..

EPA requests information on whether the permit should include additional specific adaptive measures, (e.g., structural improvements, enhanced pollution prevention measures, or other adaptive measures to eliminate and/or minimize discharges that may result from impacts from major storm and flood events in addition to or as an alternative to those proposed. EPA also requests comment on the proposed process for the Permittee to follow in assessing areas of the Facility or specific systems that are at the highest risk for impacts from major storms or flood events that could result in increased discharges of pollutants from the Facility. For example, to determine incidences of past flood events, the Permittee may refer to NOAA's Storm Event Database is available at: http://www.ncdc.noaa.gov/stormevents/. Events listed in this database include: The occurrence of storms and other significant weather phenomena having sufficient intensity to cause loss of life, injuries, significant property damage, and/or disruption to commerce; rare, unusual, weather phenomena that generate media attention; and other significant meteorological events that occur in connection with another event.

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[39] These techniques may be considered as a method of achieving water quality standards on a case-by-case basis when: 1) The technology-based treatment requirements applicable to the discharge are not sufficient to achieve the standards; 2) The discharger agrees to waive any opportunity to request a variance under section 301 (c), (g) or (h) of the Act; and 3) The discharger demonstrates that such a technique is the preferred environmental and economic method to achieve the standards after consideration of alternatives such as advanced waste treatment, recycle and reuse, land disposal, changes in operating methods, and other available methods.

[40] Sample analysis must comply with the *National Pollutant Discharge Elimination System (NPDES): Use of Sufficiently Sensitive Test Methods for Permit Applications and Reporting Rule*. *See* Fed. Reg. 49,001 (Aug. 19, 2014).

[41] If such stormwater control measures are already in place due to existing requirements mandated by other state, local or federal agencies, the Permittee must document in the SWPPP a brief description of the controls and a reference to the existing requirement(s). If the Facility may be exposed to or has previously experienced such major storm events, additional stormwater control measures required are specified in the Draft Permit.

[42] The 2021 MSGP is currently available at: https://www.epa.gov/npdes/stormwater-discharges-industrial-activities-epas-2021-msgp#

Finally, the following additional site-specific BMP requirements, which were included in the 2009 Permit, are included in the Draft Permit to address unique site conditions and have been revised based on the completion of some requirements and to reflect new information and proposed effluent limitations:

- Stormwater Collection System Management: requires the Permittee to conduct cleaning and inspection of the existing stormwater collection system components, enhancements to the treatment systems, complete previously identified optimization, elimination of site stormwater bypasses of the treatment systems, including reducing mixing of site stormwater with City of Pittsfield stormwater inflow.

This Stormwater Collection System Management requirement is a revision of the Storm Water BMP Activities. Certain requirements are continued from the 2009 requirements, such as those that ensure that the accumulated sediment does not contribute pollutants to stormwater and that previously identified optimization measures were implemented. Cleaning and inspection of stormwater collection system infrastructure is also consistent with BMPs found in Part 9.10.7.2.d.ii. of EPA's 2021 MSGP, which specifies Additional Effluent Limits for Discharges to Certain Impaired Waters and Sediment Cleanup Sites for certain MSGP sites and are applicable to discharges either directly or indirectly through a stormwater drainage system.

Specific revisions made to the 2009 Permit requirements include new design flow and design storm evaluations, including determination of the design storm for the Facility under current (i.e., baseline) and future conditions. A storm event is at 40 CFR 122.21(g)(7)(ii) as a rainfall event with greater than 0.1 inch of rainfall and at least 72 hours from the previously measurable—greater than 0.1-inch rainfall—storm event. For baseline conditions, the draft permit specifies that the Permittee must update its estimate of the 10-year, 24-hour storm event for baseline and future conditions. The purpose of re-evaluating the Facility's design storm under baseline and future conditions is to ensure that the stormwater collection and treatment systems are adequately sized to both the current potential for runoff, given the changes in size and extent of impervious surfaces at the Facility since any such design storm was last considered; and to ensure that the design of the stormwater collection and treatment systems reflect current conditions. Specifically, between 1895 and 2011, precipitation increased in the northeast by approximately five inches, or more than 10% (0.4 inches per decade) and a greater recent increase in extreme precipitation than any other region in the United States; between 1958 and 2010, the Northeast saw more than a 70% increase in the amount of precipitation falling in very heavy events (defined as the heaviest 1% of all daily events).[43] Further increases in rainfall intensity are expected, with increases in monthly about 1 inch greater for December through April by end of century (2070–2100) under the higher scenario (RCP8.5).[44] EPA requests comment on the precipitation frequency data that should be used to determine the design storm under current and future conditions. For example, the current National Precipitation Frequency Standard for the northeastern U.S., (i.e., Atlas 14) is available, but is in the process of being updated (i.e., Atlas 15 is expected in 2027), and alternate precipitation frequency data may be necessary to accurately reflect current conditions for the site.

[43] Refer to findings of the 2014 National Climate Assessment, U.S. Global Change Research Program available at: https://nca2014.globalchange.gov/
[44] Refer to findings of the 2018 National Climate Assessment, U.S. Global Change Research Program available at: https://nca2018.globalchange.gov/

Additional revisions to this BMP also update the requirements for physical modifications to the stormwater collection and treatment systems that address bypasses, infiltration and inflow. Infiltration refers to groundwater In this case, inflow specifically refers to the City of Pittsfield stormwater generated offsite that flows onto the site. These inflow discharges are considered authorized discharges because stormwater discharges from the Municipal Separate Storm Sewer System (MS4) are covered under a separate NPDES permit, the 2016 Massachusetts Small MS4 General Permit.[45] As a result, GE is not required to provide treatment to these discharges. However, the current configuration of GE's stormwater collection system results in a significant amount of stormwater inflow from the City of Pittsfield, and further results in 1) treatment of some portion of this inflow; and 2) non-treatment of some portion of site stormwater and groundwater infiltration that has comingled with this inflow. Therefore, where cross-connections are identified (i.e., inflow stormwater from the City of Pittsfield that comingles with site stormwater or other site wastewaters), have been identified, or are identified in the future, the Permittee must follow the BMP requirements to remove any cross-connection that combines site stormwater or other authorized site wastewaters with inflow. See also Section 5.3.5, below. With the exception of monitoring requirements for flow, effluent limitations at any outfall where discharges may contain both authorized site wastewaters and City of Pittsfield stormwater inflow only apply to site wastewaters.

- Dry Weather Flow Elimination: requires the Permittee to eliminate infiltration of groundwater to the stormwater collection system to ensure that the groundwater does not contribute pollutants to stormwater and that the stormwater collection system does not convey pollutants from areas where soil and/or groundwater remediation activities have taken or are taking place to the receiving waters. The Draft Permit also proposes the routine inspection and sampling requirements necessary to ensure identification and elimination of this groundwater infiltration.

This BMP is a revision of the Dry Weather Flow Elimination requirements from the 2009 Permit. This BMP remains necessary because the Draft Permit explicitly prohibits discharges of groundwater, except when treated and discharged via Outfall 64G and Outfall 64T. See Section 5.5.3, below and prohibits dry weather flows at certain outfalls. In the event prohibited dry weather or groundwater discharges have been identified (e.g., dry weather discharges are observed) or are identified in the future (e.g., groundwater infiltration into the stormwater collection system is observed), because these discharges are now considered prohibited under the Draft Permit except for specific outfalls, the Permittee must follow the corrective action requirements described above to eliminate such discharges. See also Section 5.5.6, below.

- Non-numeric PCB Limitations: requires the evaluation, selection, design, implementation, and maintenance of a BMP program that minimizes discharges of PCBs[46] through an iterative approach over the permit term, which must include the following:

[45] The MA MS4 was signed April 4, 2016 and became effective July 1, 2018. EPA proposed modifications to the 2016 MA MS4 General Permit on April 23, 2020 and finalized those modifications on December 7, 2020. Modification became effective January 6, 2021.

[46] To "minimize" discharges of PCBs means: in any sample required by this provision and at the specified outfalls, the PCB sample result for each individual compound is non-detect using EPA Method 608.3 or 1628 and the minimum level of the analysis is at or below 0.01 µg/L.

- Source identification: requires identification of the components of the collection system and tracing the components that may contribute PCBs to the discharge. Specifically, the collection system must be accurately mapped and the sources of PCBs that may be contributing to the outfalls must be specifically identified. Specific potential sources that must be evaluated are specified.
- Optimization: requires evaluation, selection, design, implementation, and maintenance of abatement and removal activities for existing infrastructure including removing accumulated solids from the existing collection system, treatment systems, enhancing capacity of the existing treatment systems, and evaluating the effectiveness of the optimization measures taken through routine site inspections, referenced above, and evaluation, described below.
- Minimization: requires the evaluation, selection, design, implementation, and maintenance of new control measures (i.e., BMPs) that eliminate or otherwise minimize the discharge of PCBs to the receiving waters via the stormwater collection system. Minimization must address source control and elimination of PCBs associated with soils, sediments, stormwater or groundwater entering the collection system via inflow and infiltration for the significant source areas at the site.
- Design Standards: requires evaluation, selection, design, and implementation of design standards (e.g., procedures and protocols) that eliminate the discharge of PCBs during and following site redevelopment.
- Evaluation: requires ongoing evaluation for which must maintain an accurate site plan depicting all drainage features and connections to the collection system. In addition, routine sampling for PCBs must be conducted no less than annually to assess areas to prioritize BMPs and to evaluate the effectiveness of BMPs and design standards. Specifically, the permittee must conduct representative sampling during both wet weather and dry weather conditions. Wet weather sampling must be representative of first flush characteristics and dry weather sampling must be representative of high groundwater elevation relative to a given collection system component.

The purpose of these requirements is to ensure that PCBs that are present in the discharges to a waters of the United States as authorized by this NPDES permit are eliminated. The requirements and conditions outlined above have been selected on a case-by-case basis based on those appropriate for this specific facility and are continued, with revisions, from the 2009 Permit. These requirements in no way change the performance standards for soil or groundwater cleanup at the site, nor do these requirements direct the Permittee to conduct any soil or groundwater remediation at the Facility; these requirements only address PCBs to the extent that these pollutants enter the stormwater collection system and are conveyed in stormwater discharges to the receiving waters via the authorized outfalls. See CWA §§ 301(b)(1)(C), 304(e), 402(a)(1); 40 CFR § 122.44(k). These requirements will ensure that discharges from the Facility will meet Massachusetts SWQSs pursuant to CWA § 301(b)(1)(C) and 40 CFR § 122.44(d)(1). Unless otherwise stated, the Permittee may select, design, install, implement and maintain BMPs as the Permittee deems appropriate to meet the permit requirements. The selection, design, installation, implementation and maintenance of control measures must be in accordance with good engineering practices and manufacturer's specifications and must take future conditions into consideration.

These BMPs are also consistent with Part 9.10.7.2 of EPA's 2021 MSGP, which specifies Additional Effluent Limits for Discharges to Certain Impaired Waters and Sediment Cleanup Sites applicable to

discharges to a 303(d)-listed waterbody (Category 5), or a sediment cleanup site in certain parts of the U.S. either directly or indirectly through a stormwater drainage system. Given that the discharges from the GE site are to a sediment cleanup site, and TSS is an indicator parameter used to control toxic pollutants that are readily transported by solids (i.e., PCBs), the Draft Permit includes these site-specific BMPs to address TSS as an indicator for PCBs in addition to the numeric, technology-based effluent limitations applied to TSS described above. Further, these requirements include specificity for the significant source areas (i.e. dry weather/groundwater infiltration) at the site.

The Draft Permit requires the Permittee to document these components in the SWPPP. The Draft Permit also requires the Permittee to submit a report annually to EPA certifying that discharges comply with these permit requirements and summarizing activities conducted to achieve such compliance. EPA notes that the Permittee may have existing site information characterization that may support compliance with the identification requirements specified by this permit. The Permittee may incorporate this information as long it remains representative of current site conditions and supplements the minimum requirements specified.

All of the above non-numeric effluent limitations support, and are as equally enforceable as, the numeric effluent limitations included in the Draft Permit. The purpose of these requirements is to ensure that discharges from the Facility will meet Massachusetts WQSs pursuant to CWA § 301(b)(1)(C) and 40 CFR § 122.44(d)(1). They have been selected on a site-specific basis based on those appropriate for this facility. *See* CWA §§ 304(e), 402(a)(1); 40 CFR § 122.44(k). Unless otherwise stated, the Permittee may select, design, install, implement and maintain BMPs as the Permittee deems appropriate to meet the permit requirements. The selection, design, installation, implementation and maintenance of control measures must be in accordance with good engineering practices and manufacturer's specifications and must take future conditions into consideration.

EPA invites comment on whether it should consider other data or information for any of the aforementioned BMPs, and, if so, requests that commenters identify any such data and information with particularity. Specifically, EPA requests comment on the accuracy of the technical specifications of the new and/or revised BMPs specified in the permit regarding control measures required to: eliminate discharges of PCBs; eliminate dry weather flows/groundwater infiltration; and segregate site wastewaters from the City of Pittsfield's stormwater inflow. If alternate technical specifications are more accurate for the Facility, comments should provide sufficient detail to incorporate into the Final Permit. EPA requests that such comments address with specificity: the specific data sources the Permittee should rely on for assessing risks of major storm and flood events; where areas of known contamination intersect the stormwater collection system; areas where stormwater collection system structures have degraded or infiltration has been identified but not eliminated; and information pertaining to planned improvements.

Regarding the site-specific Dry Weather Flow Elimination requirements, which requires the Permittee to eliminate through repair, replacement or abandonment, points of groundwater infiltration into the stormwater collection system, among other activities, the Permittee was specifically required in the 2009 Permit to identify and document any stormwater system components that potentially contribute such discharges and assess through appropriate measures the level of infiltration/accumulation that occurs (e.g., conduct a visual inspection of the readily accessible portions of the stormwater collection system, and/or measurement of groundwater and stormwater accumulation points as verification of segregation).

The Permittee completed the evaluation activities required in the 2009 Permit, but the 2009 Permit did not require the elimination of such discharges. Therefore, this requirement has been updated in the Draft Permit as listed in this section, above. EPA requests comment with specificity as to whether a compliance schedule is warranted in order to complete such eliminations in lieu of the corrective action process schedule. See also Part 5.4.7, below.

5.4.2 Stormwater Pollution Prevention Plan

EPA first issued its general permit for stormwater discharges associated with industrial activity in 1995, which, among other things, required all facilities to implement technology-based pollution prevention measures and to prepare a Stormwater Pollution Prevention Plan (SWPPP) documenting the implementation of these measures. [47] The general permit established a process whereby the operator of the industrial facility evaluates potential pollutant sources at the site and selects and implements appropriate measures designed to prevent or control the discharge of pollutants in stormwater runoff.[48] The current MSGP was issued in 2021. This Draft Permit contains BMPs for stormwater associated with industrial activity at the Facility based on this general permit. In addition to BMPs, the Draft Permit also requires the Permittee to develop, implement, and maintain a SWPPP for stormwater discharges associated with the operation of the Facility. These requirements are consistent with Part 5 of EPA's 2021 MSGP. The Draft Permit specifies that the SWPPP must include the following, at a minimum:

- Stormwater pollution prevention team;
- Site description;
- Drainage area site map;
- Summary of potential pollutant sources;
- Description of all stormwater control measures; and
- Schedules and procedures pertaining to implementation of stormwater control measures, inspections and assessments, and monitoring.

The development and implementation of the SWPPP is an enforceable element of the permit. The Draft Permit directs the Permittee to incorporate BMPs, as described above, directly into the SWPPP, which serves to document the selection, design and installation of control measures selected to meet the permit effluent limitations. The goal of the SWPPP is to document the implementation of BMPs designed to reduce or prevent the discharge of pollutants to waters of the United States either directly or indirectly through stormwater runoff.

Within ninety (90) days of the effective date of the permit, the Draft Permit requires the Permittee to certify that the SWPPP has been prepared, meets the requirements of the permit, and documents the control measures, including BMPs, that have been implemented or will be implemented to reduce or eliminate the discharge of pollutants from stormwater associated with the operation of the Facility and submit a copy of the SWPPP to EPA. The Permittee must also certify at least annually that the Facility has complied with the BMPs described in the SWPPP, including inspections, maintenance, and training activities and submit the most current SWPPP along with the certification to EPA. The Permittee is

[47] 57 Fed. Reg. 41,236, 41,264 (September 9, 1992). The latest reissuance of this permit was effective on March 1, 2021.
[48] *Id.* at 41242.

required to amend and update the SWPPP if any change occurs at the Facility affecting the SWPPP, such as changes in the design, construction, operation, or maintenance of the Facility, or revisions and improvements are made to the stormwater management program based on new information and experiences with wet weather events, including major storm events and extreme flooding conditions. The Permittee must continue to complete an annual summary report that describes all such amendments and updates and the change(s) that occurred and submit this report to EPA with the annual SWPPP and certification submittals. If EPA finds deficiencies in the SWPPP, or any subsequent revisions or summary reports, EPA will provide comments to the Permittee in writing that engage in good faith discussion to correct such deficiencies. The SWPPP must be maintained on site at the Facility. All SWPPP records must be maintained on-site for at least five years.

5.4.3 Authorized Non-Stormwater Discharges

EPA's MSGP, which provided NPDES coverage for stormwater discharges from the Facility in the past, authorizes certain additional non-stormwater discharges. EPA typically includes these non-stormwater discharges in individual NPDES permits in the Region, provided the additional non-stormwater discharges meet all effluent limitations in the permit. Except for discharges of potable water, groundwater, and wash waters, which are wastewaters specifically authorized and limited in this permit, the non-stormwater discharges allowable under EPA's 2021 MSGP[49] have been included in the Draft Permit. These are:

- Discharges from emergency/unplanned fire-fighting activities;
- Fire hydrant flushings;
- Uncontaminated condensate from air conditioners, coolers/chillers, and other compressors and from the outside storage of refrigerated gases or liquids;
- Irrigation/landscape drainage, provided all pesticides, herbicides, and fertilizers have been applied in accordance with the approved labeling;
- Foundation or footing drains where flows are not contaminated with oil or hazardous materials;
- Incidental windblown mist from cooling towers that collects on rooftops or adjacent portions of the facility, but not intentional discharges from the cooling tower (e.g., "piped" cooling tower blowdown; drains); and
- Any discharge authorized by a different NPDES permit and/or a discharge that does not require NPDES permit authorization.

EPA notes that at this Facility, a "discharge authorized by a different NPDES permit" refers to the stormwater inflow from the City of Pittsfield Municipal Separate Storm Sewer System.

5.4.4 Discharges of Chemicals and Additives

Chemicals and additives include, but are not limited to: algaecides/biocides, antifoams, coagulants, corrosion/scale inhibitors/coatings, disinfectants, flocculants, neutralizing agents, oxidants, oxygen scavengers, pH conditioners, and surfactants. The Draft Permit allows the discharge of only those

[49] *See* Part 1.2.2.1 of EPA's 2021 MSGP.

chemicals and additives specifically disclosed by the Permittee to EPA and the State. The following types of chemicals and additives used for wastewater treatment were disclosed to EPA:

- Coagulants: Aries Chemical #1666, Aries Chemical # 1146
- Flocculants: Jamestown Chemical J-FLOC 407, Floc Enhancer-725
- pH Adjustment; Sodium Hydroxide, 25%, Sulfuric Acid, 7.5%
- Iron Reduction: Fe-Remede

However, EPA recognizes that chemicals and additives may become necessary at a Facility during the term of the permit. As a result, the Draft Permit includes a provision that requires the Permittee to notify EPA and the State in writing of the proposed discharge of a new chemical or additive; allows for EPA and State review of the change; and provides the factors for EPA and State consideration of such a change. The Draft Permit specifies that for each chemical or additive, the Permittee must submit the following information, at a minimum, in writing to EPA and the State:

- Product name, chemical formula, and manufacturer of the chemical/additive.
- Purpose or use of the chemical/additive.
- Safety Data Sheet (SDS) and Chemical Abstracts Service (CAS) Registry number for each chemical/additive.
- The frequency (e.g., hourly, daily), magnitude (e.g., maximum application concentration), duration (e.g., hours, days), and method of application for the chemical/additive.
- If available, the vendor's reported aquatic toxicity (i.e., NOAEL and/or LC_{50} in percent for aquatic organism(s)).

The Permittee must also provide an explanation which demonstrates that the discharge of such chemical or additive will not: 1) add any pollutants in concentrations which exceed any permit effluent limitation; and 2) add any pollutants that would justify the application of permit conditions different from, or in addition to those currently in this permit.

Assuming these requirements are met, discharge of a new chemical or additive is authorized under the permit upon notification to EPA and the State unless otherwise notified by EPA or the State.

5.4.5 Prohibited Discharges

The 2009 Permit specified that discharges that are not authorized are explicitly prohibited. As previously described, under Part I.B (Unauthorized Discharges) of GE's NPDES Permit, GE conducted a survey of unauthorized point source discharges to determine whether there were any unauthorized pipes, ditches, swales, or other discrete conveyances that discharged pollutants from the Facility. GE conducted this survey in April and May 2009. The results of that evaluation were provided to the Agencies in a submittal entitled Part I.B Conveyance Survey Report on May 28, 2009. The conveyance survey report addressed three categories of conveyances: Conveyances Associated with Remedial Activities (i.e., CD-related response actions); Conveyances Associated with Non-Industrial Areas (e.g., parking lots); and Non-Point Source Runoff (areas where there has been no effort to change the surface, direct the water flow or otherwise impede its progress as defined by EPA). GE concluded that all point source discharges are covered under either the NPDES Permit or, alternatively, the Consent Decree as part of a

remediation action.[50] Therefore, no new point source discharges are authorized under this permit and point source discharges that are not subject to the NPDES Permit continue to be prohibited in the Draft Permit and have been revised as described below. Prohibition of these discharges is necessary to protect the receiving water from non-stormwater discharges that contain conventional, non-conventional, and toxic pollutants, including pollutants associated with ongoing remedial activities under the Consent Decree.

5.4.5.1 Solid Hazardous Waste

The 2009 Permit required the routine inspection and removal of sludge and bottom deposits from any tank(s), and collection infrastructure and/or appurtenance(s) such as the removal and disposal of accumulated solids during cleaning of OWSs 31W, 64W, 64X, 64Z, and 119W and Drainage Basins 005, 006, and 009 (total of approx. 211 manholes and 121 catch basins). Examples tanks, and/or collection infrastructure include, but are not limited to: manholes, catch basins, stormwater conveyance lines, oil/water separators, and collection structures used for stormwater or allowable non-stormwater discharges and/or spills/releases. The Draft Permit uses the term "solid and hazardous waste" to refer not just to sludge and solid bottom deposits but to also more broadly include any solids generated at the Facility that must be managed as hazardous waste. Discharges containing any solid hazardous waste, either alone or in combination with stormwater or other allowable non-stormwater discharges, are prohibited and not authorized in the Draft Permit.

5.4.5.2 Liquid Hazardous Waste

As for solid hazardous waste, several liquid hazardous waste sources may be inadvertently generated at the facility. For example, treatment system maintenance may include the recovery of water or chemical/additive used for treatment. Tank, basic and/or line cleaning may generate small volumes of waste released from surfaces when these components are purged of dead volume. Equipment drainage may include pocketing (i.e., pollutants trapped in low points in the piping that is not able to drain in either direction). Discharges of these, or any other liquid hazardous waste, either alone or in combination with stormwater or other allowable non-stormwater discharges, are prohibited and not authorized in the Draft Permit. The sole exception is the treated effluent at Outfall 64G, which is designed to provide treatment to wastewater.

5.4.5.3 Groundwater Infiltration

Several areas of the Facility have undergone soil/sediment and/or have undergone/are undergoing groundwater remedial activities, pursuant to the Consent Decree. Groundwater that contains or is in contact with oil or hazardous materials, and/or is free-floating or adsorbed is being pumped to the surface in certain areas, and is either disposed, or treated in-situ, or treated and discharged. The Draft Permit specifically:

1) Authorizes discharges of treated groundwater at Outfall 64G and Outfall 64T;

[50] See Attachment 2: General Electric's Recommendations Regarding Revision of NPDES Permit No. MA0003891, received January 23, 2023 from Matt Calacone, GE, to Shauna Little, EPA.

2) Prohibits discharges of groundwater either alone or in combination with stormwater or other allowable non-stormwater discharges from any other Facility outfall; and

3) Prohibits dilution as a form of treatment for groundwater and other site wastewaters.

As previously described, under Part I.B (Unauthorized Discharges) of GE's NPDES Permit, GE evaluated conveyances for groundwater infiltration to evaluate dry weather discharges. Under this revised prohibition, as further clarification, the Draft Permit explicitly prohibits discharges of groundwater, except when treated at Building 64G and discharged at internal Outfall 64G or when treated at Building 64T and discharged via Outfall 64T. In the event prohibited groundwater discharges (i.e., groundwater infiltration) have been identified or are identified in the future, this discharge is considered prohibited under the Draft Permit, and the Permittee must follow the corrective action requirements described above to eliminate such discharges. EPA notes that in order for discharges from the Facility to meet this prohibition, maintenance of the existing stormwater collection system may be necessary. See Part II. for more information regarding operation and maintenance.

5.4.5.4 Bypass

The 2009 Permit contained two conflicting provisions regarding discharges of stormwater exceeding the flow capacity of the treatment systems. Characterized as "bypass" in flow schematics provided by GE, these excess flows occur primarily as a result of inflow of stormwater from the City of Pittsfield.

First, pursuant to 40 CFR section 122.41(m)(1)(i), a "bypass" is defined as "the intentional diversion of waste streams from any portion of a treatment facility." Under the Standard Conditions[51] applicable to all NPDES discharges in accordance with 40 CFR § 122.41(m), "bypasses" that meet this regulatory definition are prohibited except under specific circumstances. Second, the 2009 Permit also specifies conditions under which the three treatment systems (i.e., OWS 119-W, OWS 64W, OWS 64X) could initiate "bypass." GE recently informed EPA that the "bypass" at Outfall 009 has been eliminated, so the Draft Permit reflects the removal of that "bypass."[52] Three additional outfalls with additional monitoring requirements are characterized as "bypasses" (i.e., Outfalls 05B, 06A, and SRO5). However, in considering the conditions under which these bypasses are allowed, namely, when the influent flow volume of stormwater exceeds the design flow capacity of the treatment system, EPA finds that these additional bypasses may be in conflict with EPA regulations. To address the conflicting provisions and ensure that these discharges are appropriately regulated in accordance with the applicable regulations, EPA has made the following changes in the Draft Permit.

First, EPA has removed the authorization for "bypass" discharges at OWS 119W, OWS 64T and OWS 64Z. As is always the case for an NPDES permittee, there are specific circumstances set forth in the regulations in which the prohibition of bypass does not apply. *See* 40 CFR § 122.41(m)(4); *see also* 40 CFR § 122.41(m)(3). GE may avail itself of the benefits and protections of these provisions by submitting the required documentation.

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[51] Indeed, the 2009 Permit includes such prohibition in the Standard Conditions located in Part II.

[52] GE correspondence titled *General Electric's Recommendations Regarding Revision of NPDES Permit No. MA0003891,* dated January 2023.

Second, EPA has also clarified that additional inflow of stormwater from the City of Pittsfield is an allowable discharge at Outfalls 05B, 06A, and SRO5 and is not a "bypass" under section 122.41(m) but is subject to the effluent limits when comingled with site wastewaters.

Third, the flow-related BMPs in the 2009 Permit have been modified to ensure that site stormwater receives treatment at the oil water separators and is not "bypassing" this treatment in violation of 40 CFR section 122.41(m). These modified BMPs are described in further detail in Part 5.3.1 of this Fact Sheet.

EPA is aware that in the current configuration of the stormwater collection system, the site stormwater and groundwater may comingle with stormwater from the City of Pittsfield and segregation may require engineering controls (e.g., reconfiguration of stormwater infrastructure). In the event GE or any commenter believes such reconfiguration is infeasible, as an alternative, EPA requests comment on how, with specificity, GE meets the requirements of 122.41(m)(4), how GE will demonstrate compliance with the numeric limitations that apply to the site discharges at Outfalls 005, 05A, 05B, 006, 06A, SRO5 and 009 when City of Pittsfield inflow is comingled, including any control measures that are necessary to meet Massachusetts WQSs, and how representative sampling can be conducted in accordance with the requirements of this permit consistent with applicable laws and regulations. If such comments provide sufficient detail and technical specificity, EPA may revise the Final Permit to include control measures for these outfalls. Should the Permittee identify with specificity an alternate means of management and treatment for inflow stormwater flows in excess of the existing treatment system capacity. Any such comments must contain an analysis of the design storm for each drainage basin that reflects current (e.g., baseline) and future conditions.

5.4.5.5 Fire Protection Foam

Aqueous fire protection foam is used for fire and vapor suppression of liquid fuel fires. This includes but is not limited to aqueous film-forming foam (AFFF) and alcohol-resistant foam. AFFF is a low expansion foam and can contain surfactants, solvents, or other additives such as corrosion inhibitors. Through 2001, surfactants used in the manufacturing of AFFF included the perfluorinated alkyl acid perfluorooctane sulfonate (PFOS). By 2002, manufacturers also began voluntary phase-out of perfluorooctanoic acid (PFOA).[53] Alcohol-resistant foams contain polymers that prevent alcohols from breaking down the foam. Because the Draft Permit allows discharges during testing or maintenance of the fire suppression system at the Facility, the Draft Permit prohibits discharges of AFFF either in concentrate form or as foam diluted with water during these activities. Refer to Section 5.3.4 for information regarding allowable non-stormwater discharges related to emergency fire-fighting activities.

5.4.6 Reopener Clause

Since indicator parameters are included in the Draft Permit and in accordance with 40 CFR § 122.44(d)(1)(vi)(c), the Draft Permit includes a reopener clause. The reopener clause in the Draft Permit allows EPA to modify or revoke and reissue the permit in accordance with 40 CFR § 122.62,

[53] U.S. EPA. *Technical Fact Sheet – Perfluoroctane Sulfonate (PFOS) and Perfluorooctanoic Acid (PFOA)*. November 2017.

including if the limits on the indicator parameters no longer attain and maintain applicable water quality standards.

5.4.7 Compliance Schedule

Several new or more stringent effluent limitations are proposed in the Draft Permit (e.g., PCBs, BMPs). The Draft Permit does not propose a compliance schedule. However, in order for discharges from the Facility to meet the proposed effluent limitations, physical modification of the existing stormwater treatment and/or collection system may be necessary. Therefore, EPA encourages public comment regarding whether the permit should include a compliance schedule(s) and, if so, what the terms of any schedule(s) should be. Federal regulations provide that any such schedule must require compliance "as soon as possible, but not later than the applicable statutory deadline under the CWA." 40 CFR § 122.47(a)(1). Thus, while a NPDES permit may not include a compliance schedule to meet technology-based effluent limits, a permit may include compliance schedules for meeting water quality-based effluent limits, provided that the schedule would achieve compliance with such limits "as soon as possible." *See id.* § 125.3(a)(2). Further, if a permit establishes a schedule of compliance which exceeds one year from the date of permit issuance, the schedule must include interim requirements and the dates for their achievement. *See id.* § 122.47(a). Massachusetts regulations for schedules of compliance can be found at 314 CMR 3.11(10).

6.0 Federal Permitting Requirements

6.1 Endangered Species Act

Section 7(a) of the Endangered Species Act of 1973, as amended (ESA), grants authority to and imposes requirements on Federal agencies regarding species of fish, wildlife, or plants that have been federally listed as endangered or threatened (listed species) and regarding habitat of such species that has been designated as critical (critical habitat).

Section 7(a)(2) of the ESA requires every federal agency, in consultation with and with the assistance of the Secretary of Interior, to ensure that any action it authorizes, funds or carries out, in the United States or upon the high seas, is not likely to jeopardize the continued existence of any listed species or result in the destruction or adverse modification of critical habitat. The United States Fish and Wildlife Service (USFWS) administers Section 7 consultations for terrestrial and freshwater species, while the National Oceanic and Atmospheric Administration Fisheries Service (NOAA Fisheries) administers Section 7 consultations for listed species of marine organisms (including marine mammals and reptiles), as well as for anadromous fish.

The federal action being considered in this case is EPA's proposed issuance of an NPDES permit for the Facility. The Draft Permit is intended to replace the 2009 Permit in governing the Facility. As the federal agency charged with authorizing the Facility's pollutant discharges, EPA assesses potential impacts to federally listed species and critical habitat and initiates consultation to the extent required under Section 7(a)(2) of the ESA.

EPA has reviewed the federal endangered or threatened species of fish, wildlife, and plants in the expected action area of the outfalls to determine if EPA's proposed NPDES permit could potentially

impact any such listed species in this segment of the receiving water. There are no known federally listed threatened or endangered species or their critical habitat under the jurisdiction of NOAA Fisheries within the vicinity of the Facility's discharges.[54] Therefore, ESA consultation with NOAA Fisheries is not required for this federal action.

For protected species under the jurisdiction of the USFWS, one endangered species, the northern long-eared bat (*Myotis septentrionalis*), was identified as potentially occurring in the action area of the Facility's discharges. According to the USFWS, the endangered northern long-eared bat is found in the following habitats based on seasons, "winter – mines and caves; summer – wide variety of forested habitats." This species is not considered aquatic. However, because the Facility's projected action area in Pittsfield, Massachusetts, overlaps with the general statewide range of the northern long-eared bat, EPA submitted an evaluation on potential effects of the project to the Information for Planning and Consultation (IPaC) system provided by the USFWS. The USFWS system confirmed by letter that, based on the specific project information submitted, the project would have "no effect" on the northern long-eared bat[55]. This concluded EPA's consultation responsibilities for the GE Pittsfield Facility NPDES permitting action under ESA section 7(a)(2) with respect to the northern long-eared bat. No ESA section 7 consultation is required with USFWS for this species.

At the beginning of the public comment period, EPA notified USFWS and NOAA Fisheries Protected Resources Division that the Draft Permit and Fact Sheet were available for review and provided a link to the EPA NPDES Permit website to allow direct access to the documents.

Initiation of consultation is required and shall be requested by EPA or by USFWS/NOAA Fisheries where discretionary federal involvement or control over the action has been retained or is authorized by law and if: 1) new information reveals that the action may affect listed species or critical habitat in a manner or to an extent not previously considered in the analysis; 2) the identified action is subsequently modified in a manner that causes an effect to the listed species or critical habitat that was not considered in the previous analysis; 3) a new species is listed or critical habitat designated that may be affected by the identified action; or 4) there is any incidental taking of a listed species that is not covered by an incidental take statement.

6.2 Essential Fish Habitat

Under the 1996 Amendments (PL 104-267) to the Magnuson-Stevens Fishery Conservation and Management Act, 16 U.S.C. §§ 1801, *et seq*., EPA is required to consult with NOAA Fisheries if proposed actions that EPA funds, permits, or undertakes, "may adversely impact any essential fish habitat." *See* 16 U.S.C. § 1855(b).

The Amendments broadly define "essential fish habitat" (EFH) as: "waters and substrate necessary to fish for spawning, breeding, feeding, or growth to maturity". *See* 16 U.S.C. § 1802(10). "Adverse impact" means any impact that reduces the quality and/or quantity of EFH. 50 CFR § 600.910(a). Adverse effects may include direct (e.g., contamination or physical disruption), indirect (e.g., loss of

[54] See [for USFWS at https://ecos.fws.gov/ipac/] and/or [for NOAA Fisheries at https://www.greateratlantic.fisheries.noaa.gov/protected/section7/index.html]
[55] USFWS IPaC Project code: 2023-0123595, August 30, 2023.

prey, reduction in species' fecundity), site-specific or habitat-wide impacts, including individual, cumulative, or synergistic consequences of actions.

EFH is only designated for fish species for which federal Fisheries Management Plans exist. *See* 16 U.S.C. § 1855(b)(1)(A). EFH designations for New England were approved by the U.S. Department of Commerce on March 3, 1999. A New England Fishery Management Council's Omnibus Essential Fish Habitat Amendment in 2017 updated the descriptions.

The Federal action being considered in this case is EPA's proposed NPDES permit for the Facility, which discharges though the outfalls described above, to the East Branch of the Housatonic River and Unkamet Brook (MA21-02), in Pittsfield, MA. The receiving water is not covered by EFH designation for riverine systems at Latitude 42° 26' 59" Longitude 73° 13' 53," as determined by the NOAA EFH Mapper.[56] EPA's review of available EFH information indicated that these water bodies are not designated EFH for any federally managed species. Therefore, essential fish habitat consultation with NOAA Fisheries under the Magnuson-Stevens Fishery Conservation and Management Act is not required.

At the beginning of the public comment period, EPA notified NOAA Fisheries Habitat and Ecosystem Services Division that the Draft Permit and Fact Sheet were available for review and provided a link to the EPA NPDES Permit website to allow direct access to the documents.

7.0 Public Comments, Hearing, and Permit Appeals

All persons, including applicants, who believe any condition of the Draft Permit is inappropriate must raise all issues and submit all available arguments and all supporting material for their arguments in full by the close of the public comment period, to the permit writer, Shauna Little at the following email address: little.shauna@epa.gov.

EPA intends to hold a public hearing in consideration of the Draft Permit. Any person may submit oral or written comments to EPA and the State Agency at the public hearing, which is scheduled for November 8, 2023. In reaching a final decision on the Draft Permit, EPA will respond to all significant comments in a Response to Comments document attached to the Final Permit and make these responses available to the public on EPA's website.

Following the close of the comment period, and after the public hearing, EPA will issue a Final Permit decision, forward a copy of the final decision to the applicant, and provide a copy or notice of availability of the final decision to each person who submitted oral or written comments or requested notice. Within 30 days after EPA serves notice of the issuance of the Final Permit decision, an appeal of the federal NPDES permit may be commenced by filing a petition for review of the permit with the Clerk of EPA's Environmental Appeals Board in accordance with the procedures at 40 CFR § 124.19.

If for any reason, comments on the Draft Permit cannot be emailed to the permit writer specified above, please contact them at telephone number: (617) 918-1989.

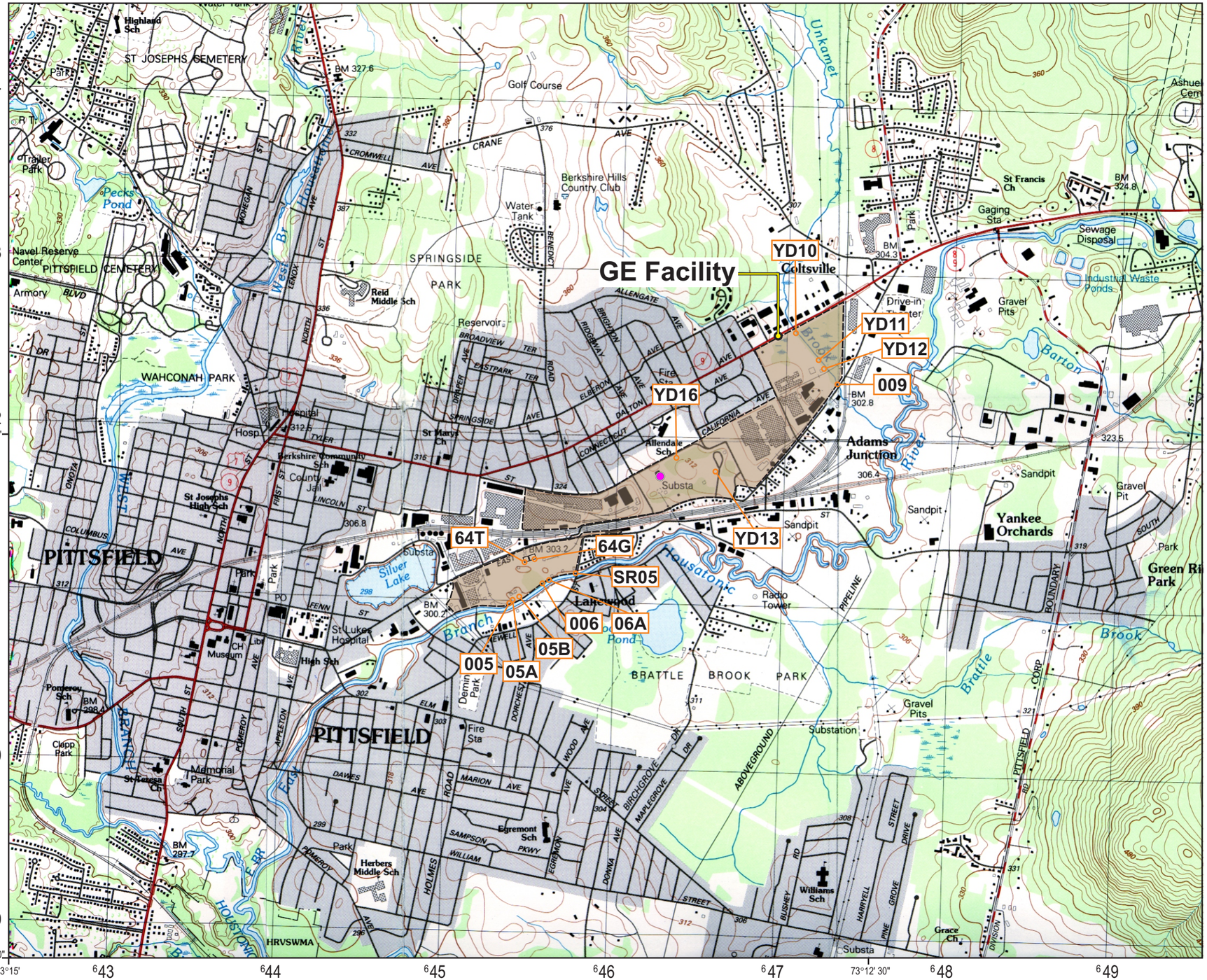
[56] NOAA EFH Mapper available at https://www.habitat.noaa.gov/apps/efhmapper/.

8.0 Administrative Record

The administrative record on which this Draft Permit is based may be accessed by contacting Shauna Little at 617-918-1989 or via email to little.shauna@epa.gov.

Ken Moraff, Director
Water Division
U.S. Environmental Protection Agency

Figure 1: Location Map



LEGEND:

009 = Approximate location of drainage discharge point

● = Approximate location of hazardous waste storage area

AREA LOCATION

2000' 0 2000'

Approximate Scale: 1" = 2000'

REFERENCE: Base Map Source USGS 7.5 Minute Quads. Series Pittsfield, East, Massachusetts, and Pittsfield West, Mass.-NY.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

NPDES PERMIT RENEWAL APPLICATION

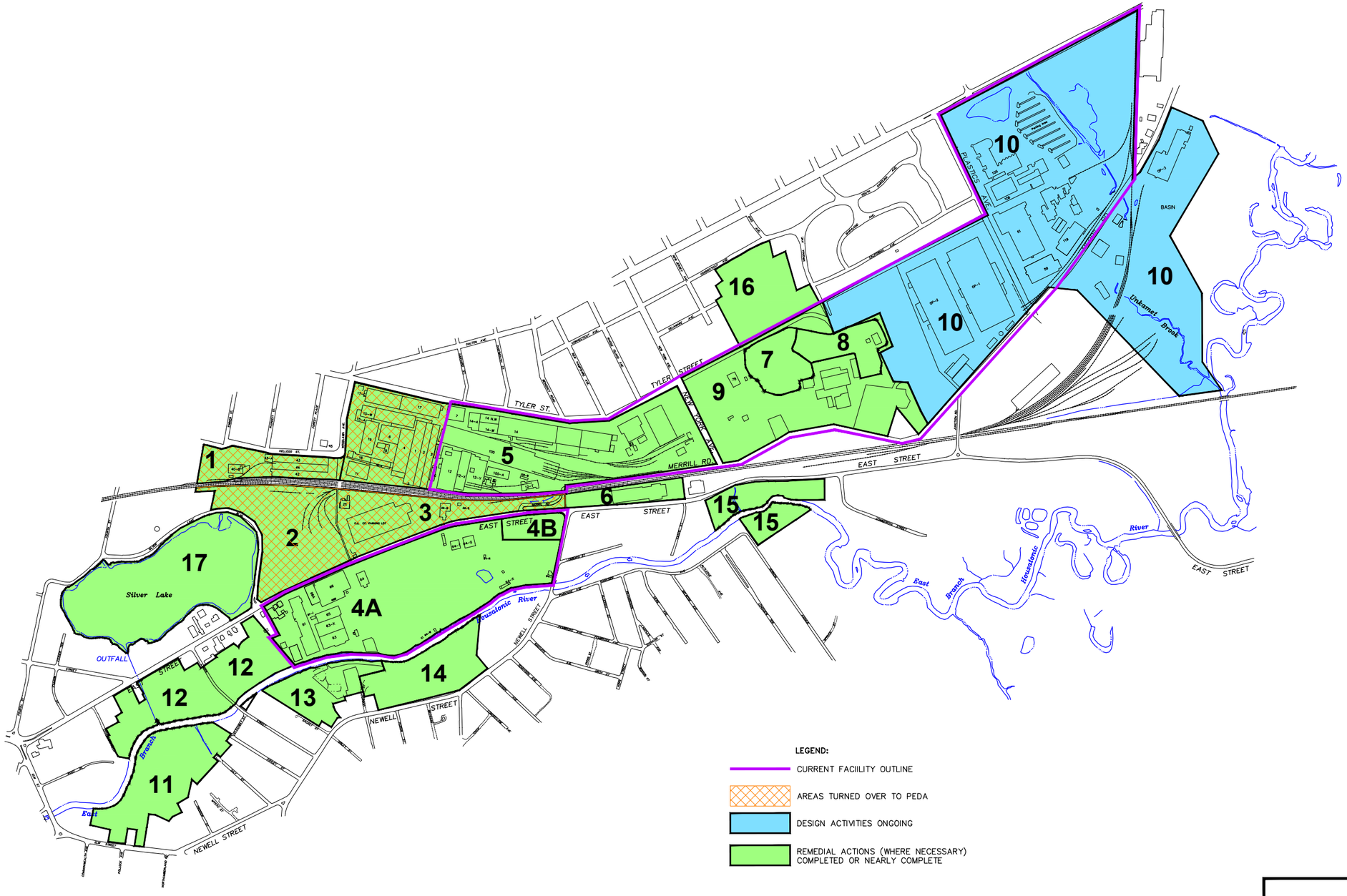
FACILITY LOCATION MAP AND APPROXIMATE NPDES OUTFALL LOCATIONS

ARCADIS

FIGURE **1**

06/24/2013 SYRACUSE, NY-ENV/CAD-DJHOWES
B0030124/0007/00002/CDR/30124G01.CDR

Figure 2: Site Plan



GENERAL ELECTRIC PLANT AREA

1 40s COMPLEX
2 30s COMPLEX
3 20s COMPLEX
4A EAST STREET AREA 2–SOUTH
4B CITY RECREATIONAL AREA
5 EAST STREET AREA 2– NORTH
6 EAST STREET AREA 1– NORTH
7 HILL 78 ON–PLANT CONSOLIDATION AREA
8 BUILDING 71 ON–PLANT CONSOLIDATION AREA
9 HILL 78 AREA–REMAINDER
10 UNKAMET BROOK AREA

FORMER OXBOW AREAS

11 FORMER OXBOW AREAS A AND C
12 LYMAN STREET AREA
13 NEWELL STREET AREA II
14 NEWELL STREET AREA I
15 FORMER OXBOW AREAS J AND K

OTHER AREAS

16 ALLENDALE SCHOOL PROPERTY
17 SILVER LAKE AREA

LEGEND:

- CURRENT FACILITY OUTLINE
- AREAS TURNED OVER TO PEDA
- DESIGN ACTIVITIES ONGOING
- REMEDIAL ACTIONS (WHERE NECESSARY) COMPLETED OR NEARLY COMPLETE

0 500' 1000'
GRAPHIC SCALE

NOTES:

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. – FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY; AND BLASLAND AND BOUCK ENGINEERS, P.C. P.C. CONSTRUCTION PLANS.
2. NOT ALL PHYSICAL FEATURES SHOWN.
3. SITE BOUNDARIES/LIMITS ARE APPROXIMATE.

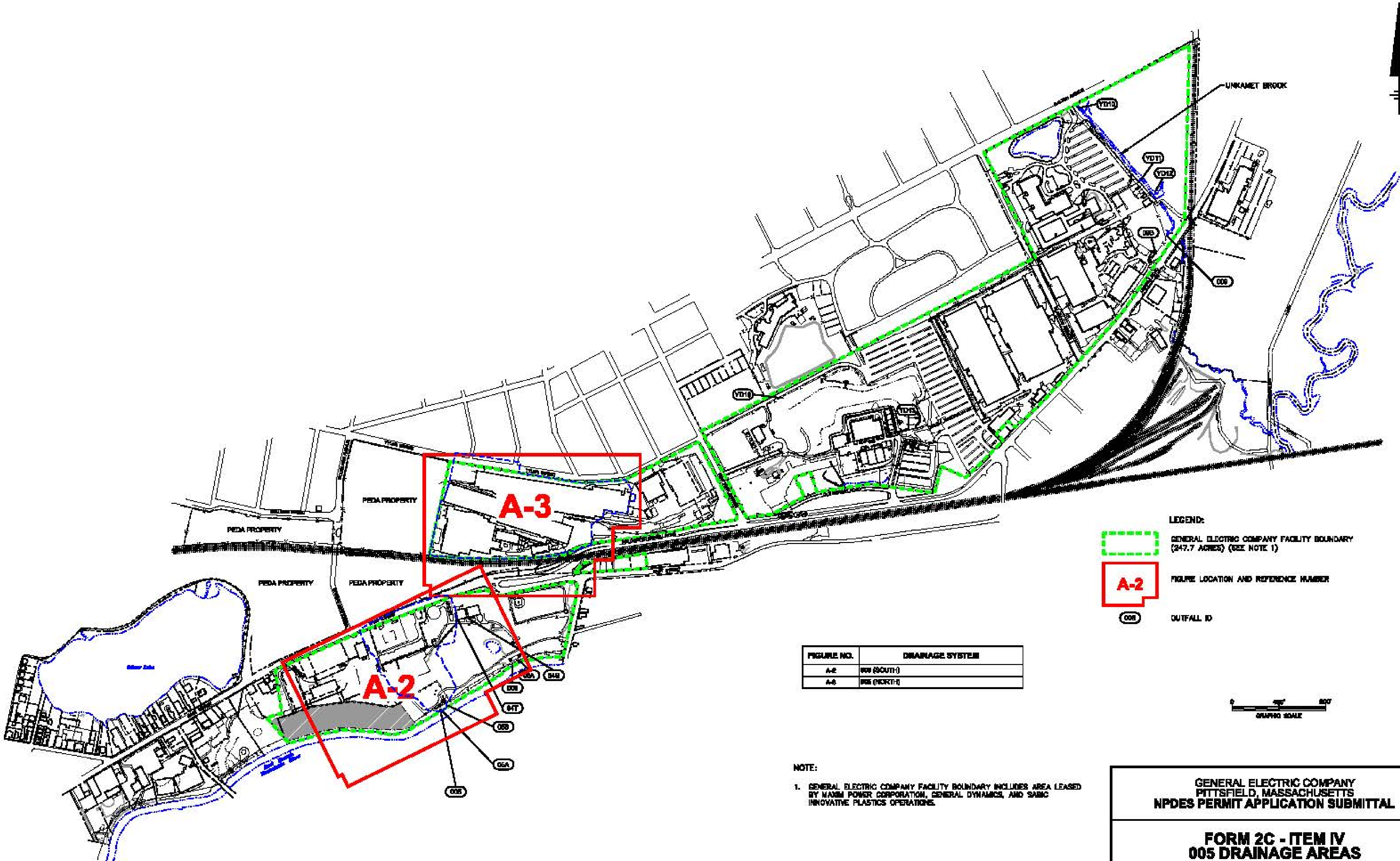
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2C - ITEM IV
REMOVAL ACTION AREAS AND PROPERTY TRANSFERRED TO PEDA

ARCADIS

FIGURE
2

CITY: SYRACUSE DIV/GROUP: ENVCAD DB: L.FORAKER LD: PIC: P.FARR PM: P. FILIPPETTI TM: P. FILIPPETTI LYR: ON=*; OFF=*REF*
V:\ENVCAD\SYRACUSE\ACTIVE\30030124\0070\0002\DWG\PERMIT\30124G10.DWG LAYOUT: 2 SAVED: 6/26/2013 4:32 PM ACADVER: 18.1S (LMS TECH) PAGESETUP: C:\LD28-PDF PLOTSTYLETABLE PLTFULL.CTB PLOTTED: 6/26/2013 4:32 PM BY: POSENAUER, LISA
XREFS: IMAGES: PROJECTNAME: ----
30124X00



LEGEND:

GENERAL ELECTRIC COMPANY FACILITY BOUNDARY (247.7 ACRES) (SEE NOTE 1)

A-2 FIGURE LOCATION AND REFERENCE NUMBER

005 OUTFALL ID

FIGURE NO.	DRAINAGE SYSTEM
A-2	005 (SOUTH)
A-3	005 (NORTH)

NOTE:

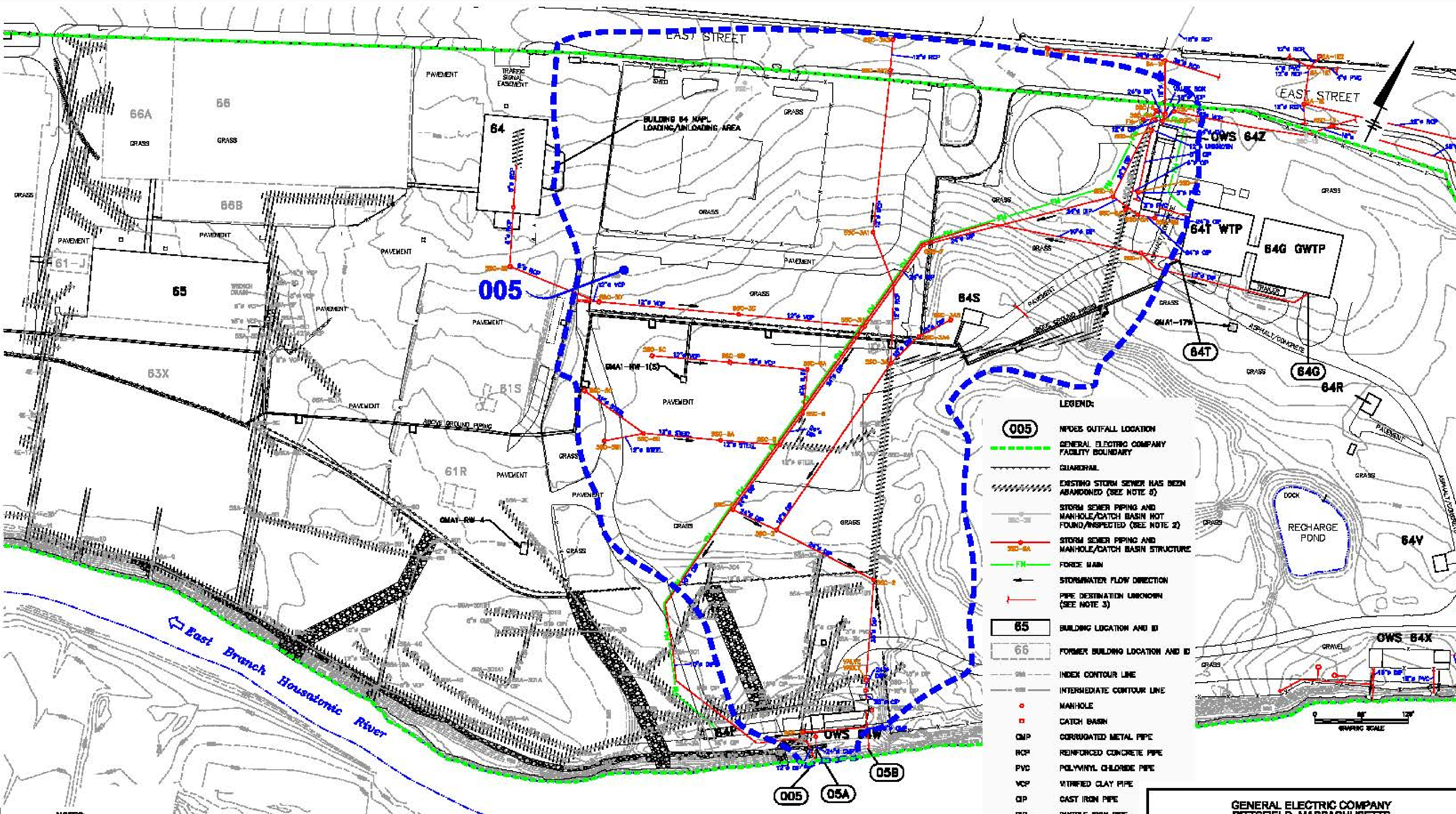
1. GENERAL ELECTRIC COMPANY FACILITY BOUNDARY INCLUDES AREA LEASED BY MAXIM POWER CORPORATION, GENERAL DYNAMICS, AND SABIC INNOVATIVE PLASTICS OPERATIONS.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2C - ITEM IV
005 DRAINAGE AREAS

ARCADIS

FIGURE
A-1



NOTES:

1. BASE MAP INFORMATION PRESENTED ON THIS FIGURE WAS ADOPTED FROM A SURVEY PREPARED BY HILL ENGINEERS, DRAWING NO. GE-1061-1, DATED MARCH 24, 2004. TOPOGRAPHIC FEATURES HAVE BEEN UPDATED BASED ON FINAL GRADING PLAN FOR AVERAGING AREA 4E DATED 4/2/2010; AND SURFACE FEATURES AND ITEMS SUBJECT TO INSPECTION FIGURE DATED 12/30/2011 DEVELOPED BY ARCADIS. PIPE SIZES AND MATERIAL TYPES ARE BASED ON STORM SEWER CATCH BASIN/MANHOLE INSPECTIONS CONDUCTED BY ARCADIS IN APRIL, MAY, AND JUNE 2009. PIPE CONNECTIONS AND APPROXIMATE LOCATIONS OF MANHOLES AND CATCH BASINS WERE VERIFIED BY ARCADIS IN 2009. PORTIONS OF STORM SEWER PIPE CONNECTIONS AND APPROXIMATE LOCATIONS WERE VERIFIED DURING PIPELINE CLEANING AND VIDEO INSPECTION RELATED ACTIVITIES CONDUCTED IN JUNE, JULY, AUGUST, AND SEPTEMBER 2009, IN ACCORDANCE WITH FIGURES 1 AND 2 OF THE NPDES PERMIT MODIFICATION.

2. PIPING AND/OR MANHOLES/CATCH BASINS NOT OBSERVED DURING FIELD INVESTIGATIONS CONDUCTED BY ARCADIS IN 2009.

3. THE DESTINATION OF PIPING COULD NOT BE DETERMINED/VERIFIED DURING MANHOLE/CATCH INSPECTIONS CONDUCTED BY ARCADIS IN 2009.

4. NOT ALL UTILITIES SHOWN FOR CLARITY PURPOSES. UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND SHALL BE FIELD VERIFIED PRIOR TO ANY CONSTRUCTION.

5. THE STORM SEWER ABANDONMENT AND REMEDIATION/RESTORATION ACTIVITIES (i.e., BACKFILLED/RESTORED, ENGINEERED BARRIER, ENHANCED PAVEMENT, ENGINEERED BARRIER ACCESS ROAD, AND RIPRAP DRAINAGE SWALE AREAS) WERE PERFORMED BETWEEN 6/28/2010 AND 11/11/2011 IN ACCORDANCE WITH GE'S REVISED FINAL RD/RA WORK PLAN FOR EAST STREET AREA 2-SOUTH (APRIL, 2010), AS CONDITIONALLY APPROVED BY EPA ON 6/3/2010.

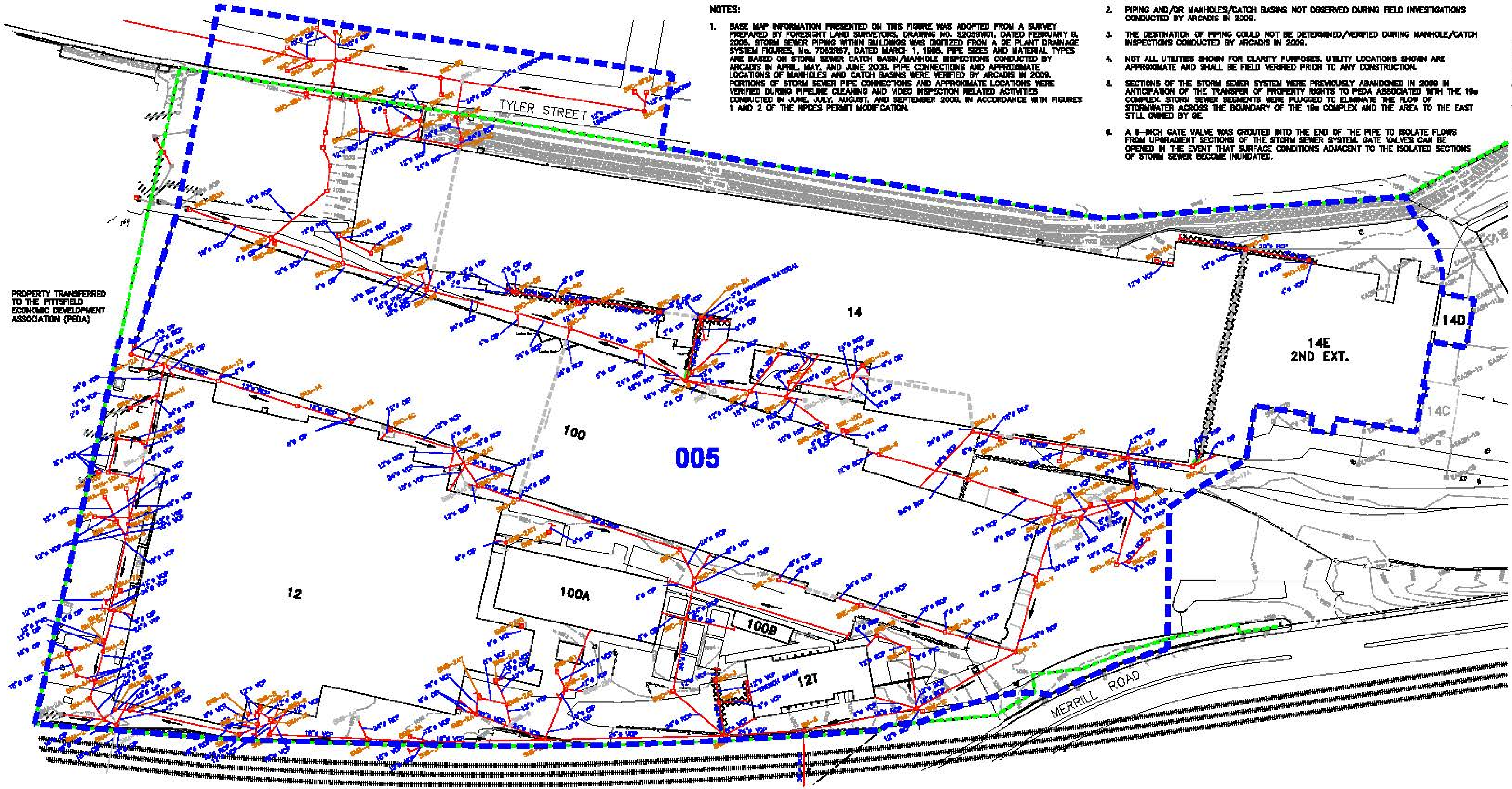
6. A 6-INCH GATE VALVE WAS GROUTED INTO THE END OF THE PIPE TO ISOLATE FLOWS FROM UPGRADIENT SECTIONS OF THE STORM SEWER SYSTEM. GATE VALVES CAN BE OPENED IN THE EVENT THAT SURFACE CONDITIONS ADJACENT TO THE ISOLATED SECTIONS OF STORM SEWER BECOME INUNDATED.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2C - ITEM IV
005 SOUTH DRAINAGE AREA

ARCADIS

FIGURE
A-2



NOTES:

1. BASE MAP INFORMATION PRESENTED ON THIS FIGURE WAS ADOPTED FROM A SURVEY PREPARED BY FORESIGHT LAND SURVEYORS, DRAWING NO. S2059W01, DATED FEBRUARY 8, 2005. STORM SEWER PIPING WITHIN BUILDINGS WAS DIGITIZED FROM A GE PLANT DRAINAGE SYSTEM FIGURES, No. 7062867, DATED MARCH 1, 1985. PIPE SIZES AND MATERIAL TYPES ARE BASED ON STORM SEWER CATCH BASIN/MANHOLE INSPECTIONS CONDUCTED BY ARCADIS IN APRIL, MAY, AND JUNE 2008. PIPE CONNECTIONS AND APPROXIMATE LOCATIONS OF MANHOLES AND CATCH BASINS WERE VERIFIED BY ARCADIS IN 2009. PORTIONS OF STORM SEWER PIPE CONNECTIONS AND APPROXIMATE LOCATIONS WERE VERIFIED DURING PIPELINE CLEANING AND VIDEO INSPECTION RELATED ACTIVITIES CONDUCTED IN JUNE, JULY, AUGUST, AND SEPTEMBER 2008, IN ACCORDANCE WITH FIGURES 1 AND 2 OF THE NPDES PERMIT MODIFICATION.
2. PIPING AND/OR MANHOLES/CATCH BASINS NOT OBSERVED DURING FIELD INVESTIGATIONS CONDUCTED BY ARCADIS IN 2009.
3. THE DESTINATION OF PIPING COULD NOT BE DETERMINED/VERIFIED DURING MANHOLE/CATCH INSPECTIONS CONDUCTED BY ARCADIS IN 2009.
4. NOT ALL UTILITIES SHOWN FOR CLARITY PURPOSES. UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND SHALL BE FIELD VERIFIED PRIOR TO ANY CONSTRUCTION.
5. SECTIONS OF THE STORM SEWER SYSTEM WERE PREVIOUSLY ABANDONED IN 2009 IN ANTICIPATION OF THE TRANSFER OF PROPERTY RIGHTS TO PEDA ASSOCIATED WITH THE 19s COMPLEX. STORM SEWER SEGMENTS WERE PLUGGED TO ELIMINATE THE FLOW OF STORMWATER ACROSS THE BOUNDARY OF THE 19s COMPLEX AND THE AREA TO THE EAST STILL OWNED BY GE.
6. A 8-INCH GATE VALVE WAS GROUTED INTO THE END OF THE PIPE TO ISOLATE FLOWS FROM UPGRADIENT SECTIONS OF THE STORM SEWER SYSTEM. GATE VALVES CAN BE OPENED IN THE EVENT THAT SURFACE CONDITIONS ADJACENT TO THE ISOLATED SECTIONS OF STORM SEWER BECOME INUNDATED.

LEGEND:

- GENERAL ELECTRIC COMPANY FACILITY BOUNDARY
- EXISTING STORM SEWER HAS BEEN ABANDONED (SEE NOTE 5)
- EXISTING STORM SEWER PIPING ABANDONED WITH 8" DRAIN VALVE
- SNO-17A — STORM SEWER PIPING AND MANHOLE/CATCH BASIN NOT FOUND/INSPECTED (SEE NOTE 2)
- SNO-100 — STORM SEWER PIPING AND MANHOLE/CATCH BASIN STRUCTURE
- STORMWATER FLOW DIRECTION
- PIPE DESTINATION UNKNOWN (SEE NOTE 3)
- CONCRETE PIPE PLUG
- 8-INCH GATE VALVE (SEE NOTE 6)
- 12 — BUILDING LOCATION AND ID
- 3 — FORMER BUILDING LOCATION AND ID
- 1030 — INDEX CONTOUR LINE
- 1028 — INTERMEDIATE CONTOUR LINE
- MANHOLE
- CATCH BASIN
- CMP — CORRUGATED METAL PIPE
- RCP — REINFORCED CONCRETE PIPE
- VCP — VITRIFIED CLAY PIPE
- CIP — CAST IRON PIPE
- MANHOLE FILLED WITH CONCRETE
- CATCH BASIN FILLED WITH CONCRETE

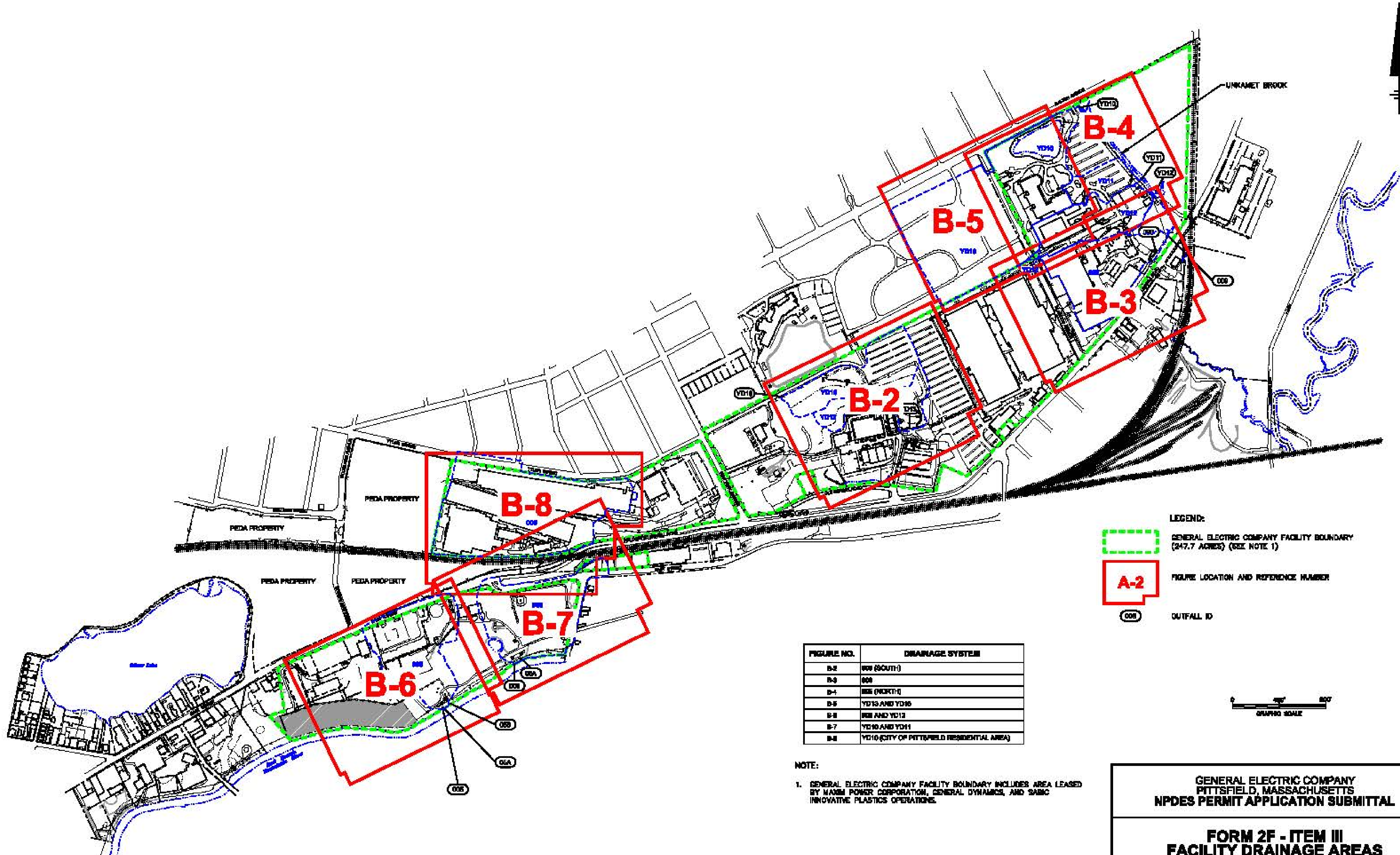
GRAPHIC SCALE: 0 — 60' — 120'

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2C - ITEM IV
005 NORTH DRAINAGE AREA

ARCADIS

FIGURE
A-3



LEGEND:

GENERAL ELECTRIC COMPANY FACILITY BOUNDARY (247.7 ACRES) (SEE NOTE 1)

A-2 FIGURE LOCATION AND REFERENCE NUMBER

OUTFALL ID

FIGURE NO.	DRAINAGE SYSTEM
B-2	[illegible] (SOUTH)
B-3	[illegible]
B-4	[illegible] (NORTH)
B-5	YD13 AND YD16
B-6	[illegible] AND YD12
B-7	YD10 AND YD11
B-8	YD10 (CITY OF PITTSFIELD RESIDENTIAL AREA)

NOTE:

1. GENERAL ELECTRIC COMPANY FACILITY BOUNDARY INCLUDES AREA LEASED BY MAXIM POWER CORPORATION, GENERAL DYNAMICS, AND SABIC INNOVATIVE PLASTICS OPERATIONS.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2F - ITEM III
FACILITY DRAINAGE AREAS

ARCADIS

FIGURE
B-1

YD16

YD13

TYLER STREET EXTENSION

STORMWATER BASIN

GENERAL DYNAMICS PARKING LOT

OPCA78

OPCA 71

K11-7-2

K11-7-201

GAS TURBINE BUILDING (MAXIM)

STEAM TURBINE GENERATING BUILDING (MAXIM)

EXISTING COOLING TOWER (MAXIM)

CONC. WALL

NOISE ATTENUATION WALL PAVED ROADWAY

RIPRAP DRAINAGE SWALES

OLD MERRILL ROAD

STEAMLINE EASEMENT

BITUMINOUS

GRAVEL WITH DEGRADED BITUMINOUS

GRASS/ GRAVEL ISLAND

GRASS

SWALE

RIP RAP

GATE

LEGEND:

- YD13 — NPDES OUTFALL LOCATION
- GENERAL ELECTRIC COMPANY FACILITY BOUNDARY
- STORM SEWER PIPING AND MANHOLE/CATCH BASIN NOT FOUND/INSPECTED (SEE NOTE 2)
- STORM SEWER PIPING AND MANHOLE/CATCH BASIN STRUCTURE
- STORMWATER FLOW DIRECTION
- SWALE
- BUILDING LOCATION
- INDEX CONTOUR LINE
- INTERMEDIATE CONTOUR LINE
- MANHOLE
- CATCH BASIN
- CMP — CORRUGATED METAL PIPE
- HDPE — HIGH DENSITY POLYETHYLENE
- VCP — VITRIFIED CLAY PIPE

NOTES:

1. BASE MAP INFORMATION PRESENTED ON THIS FIGURE WAS ADOPTED FROM SURVEYS PREPARED BY FORESIGHT LAND SURVEYORS, DRAWING NO. 52140701 AND HILL ENGINEERS, DRAWING NO. GE-1110-003-GX101-H (6/1/07), GE-1110-GX101-H (9/5/07), and GE-1110-GX102 (8/14/07). PIPE SIZES AND MATERIAL TYPES ARE BASED ON STORM SEWER CATCH BASIN/MANHOLE INSPECTIONS CONDUCTED BY ARCADIS IN APRIL, MAY, AND JUNE 2008. PIPE CONNECTIONS AND APPROXIMATE LOCATIONS OF MANHOLES AND CATCH BASINS WERE VERIFIED BY ARCADIS IN 2009.
2. PIPING AND/OR MANHOLES/CATCH BASINS NOT OBSERVED DURING FIELD INVESTIGATIONS CONDUCTED BY ARCADIS IN 2008.
3. NOT ALL UTILITIES SHOWN FOR CLARITY PURPOSES. UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND SHALL BE FIELD VERIFIED PRIOR TO ANY CONSTRUCTION.

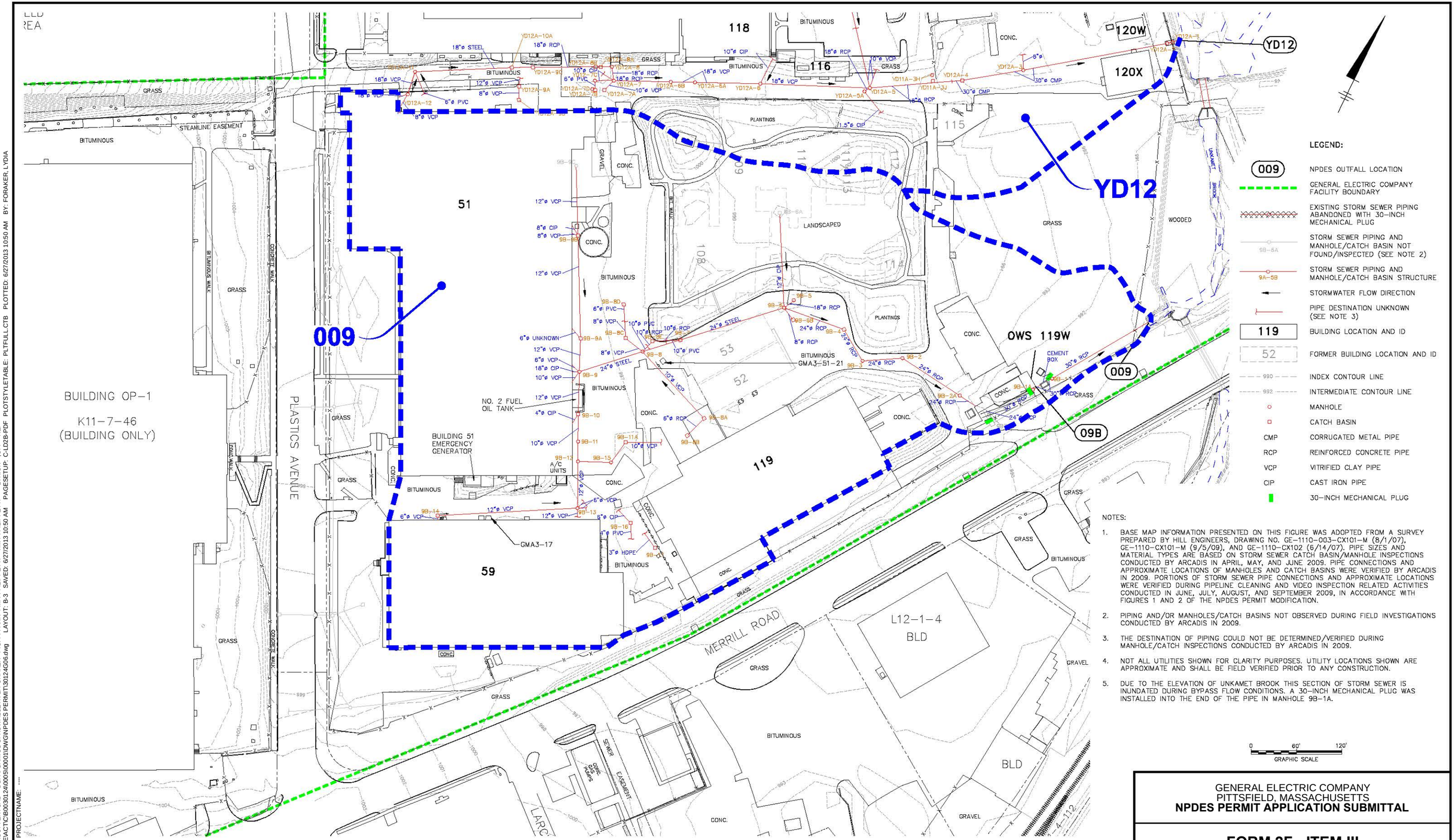
0 60' 120'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2F - ITEM III
YD13 AND YD16 DRAINAGE AREAS

ARCADIS

FIGURE
B-2



LEGEND:

- 009 — NPDES OUTFALL LOCATION
- GENERAL ELECTRIC COMPANY FACILITY BOUNDARY
- EXISTING STORM SEWER PIPING ABANDONED WITH 30-INCH MECHANICAL PLUG
- 9B-6A — STORM SEWER PIPING AND MANHOLE/CATCH BASIN NOT FOUND/INSPECTED (SEE NOTE 2)
- 9A-5B — STORM SEWER PIPING AND MANHOLE/CATCH BASIN STRUCTURE
- STORMWATER FLOW DIRECTION
- PIPE DESTINATION UNKNOWN (SEE NOTE 3)
- 119 — BUILDING LOCATION AND ID
- 52 — FORMER BUILDING LOCATION AND ID
- 990 — INDEX CONTOUR LINE
- 992 — INTERMEDIATE CONTOUR LINE
- MANHOLE
- CATCH BASIN
- CMP — CORRUGATED METAL PIPE
- RCP — REINFORCED CONCRETE PIPE
- VCP — VITRIFIED CLAY PIPE
- CIP — CAST IRON PIPE
- 30-INCH MECHANICAL PLUG

NOTES:

1. BASE MAP INFORMATION PRESENTED ON THIS FIGURE WAS ADOPTED FROM A SURVEY PREPARED BY HILL ENGINEERS, DRAWING NO. GE-1110-003-CX101-M (8/1/07), GE-1110-CX101-M (9/5/09), AND GE-1110-CX102 (6/14/07). PIPE SIZES AND MATERIAL TYPES ARE BASED ON STORM SEWER CATCH BASIN/MANHOLE INSPECTIONS CONDUCTED BY ARCADIS IN APRIL, MAY, AND JUNE 2009. PIPE CONNECTIONS AND APPROXIMATE LOCATIONS OF MANHOLES AND CATCH BASINS WERE VERIFIED BY ARCADIS IN 2009. PORTIONS OF STORM SEWER PIPE CONNECTIONS AND APPROXIMATE LOCATIONS WERE VERIFIED DURING PIPELINE CLEANING AND VIDEO INSPECTION RELATED ACTIVITIES CONDUCTED IN JUNE, JULY, AUGUST, AND SEPTEMBER 2009, IN ACCORDANCE WITH FIGURES 1 AND 2 OF THE NPDES PERMIT MODIFICATION.
2. PIPING AND/OR MANHOLES/CATCH BASINS NOT OBSERVED DURING FIELD INVESTIGATIONS CONDUCTED BY ARCADIS IN 2009.
3. THE DESTINATION OF PIPING COULD NOT BE DETERMINED/VERIFIED DURING MANHOLE/CATCH INSPECTIONS CONDUCTED BY ARCADIS IN 2009.
4. NOT ALL UTILITIES SHOWN FOR CLARITY PURPOSES. UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND SHALL BE FIELD VERIFIED PRIOR TO ANY CONSTRUCTION.
5. DUE TO THE ELEVATION OF UNKAMET BROOK THIS SECTION OF STORM SEWER IS INUNDATED DURING BYPASS FLOW CONDITIONS. A 30-INCH MECHANICAL PLUG WAS INSTALLED INTO THE END OF THE PIPE IN MANHOLE 9B-1A.

0 60' 120'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2F - ITEM III
009 AND YD12 DRAINAGE AREAS

ARCADIS

FIGURE
B-3

CITY: SYRACUSE DIV/GROUP: ENVCAD DB: A SAMIOS S. KOWALCZYK L. FORAKER PIC: P. FARR PM: P. FILIPPETTI TM: P. FILIPPETTI LYRON=*OFF=*REF*
G:\GE\ENVCAD\SYRACUSE\ACTIVE\B0030124\0005\0001\DWG\NPDES PERMIT\30124G06.dwg LAYOUT: B-3 SAVED: 6/27/2013 10:50 AM PAGESETUP: CLD2B-PDF PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 6/27/2013 10:50 AM BY: FORAKER, LYDIA
XREFS: IMAGES: PROJECTNAME: ----
30124X01
30124X00
30124X11
30124X12
30124X02

DALTON AVENUE

POND

YD10

YD11

YD12

PLASTICS AVENUE

UNKAMET BROOK

APPROX. 25' SEWER EASEMENT

BUILDING 116 EMERGENCY GENERATOR

LEGEND:

- YD12 — NPDES OUTFALL LOCATION
- GENERAL ELECTRIC COMPANY FACILITY BOUNDARY
- STORM SEWER PIPING AND MANHOLE/CATCH BASIN NOT FOUND/INSPECTED (SEE NOTE 2)
- STORM SEWER PIPING AND MANHOLE/CATCH BASIN STRUCTURE
- STORMWATER FLOW DIRECTION
- PIPE DESTINATION UNKNOWN (SEE NOTE 3)
- 121 — BUILDING LOCATION AND ID
- INDEX CONTOUR LINE
- INTERMEDIATE CONTOUR LINE
- MANHOLE
- CATCH BASIN
- CMP — CORRUGATED METAL PIPE
- HDPE — HIGH DENSITY POLYETHYLENE
- RCP — REINFORCED CONCRETE PIPE
- VCP — VITRIFIED CLAY PIPE

NOTES:

1. BASE MAP INFORMATION PRESENTED ON THIS FIGURE WAS ADOPTED FROM A SURVEY PREPARED BY HILL ENGINEERS, DRAWING NO. GE-1110-003-CX101-M (9/1/07), GE-1110-CX101-M (9/5/08), AND GE-1110-CX102 (8/14/07). PIPE SIZES AND MATERIAL TYPES ARE BASED ON STORM SEWER CATCH BASIN/MANHOLE INSPECTIONS CONDUCTED BY ARCADIS IN APRIL, MAY, AND JUNE 2009. PIPE CONNECTIONS AND APPROXIMATE LOCATIONS OF MANHOLES AND CATCH BASINS WERE VERIFIED BY ARCADIS IN 2009. PORTIONS OF STORM SEWER PIPE CONNECTIONS AND APPROXIMATE LOCATIONS WERE VERIFIED DURING PIPELINE CLEANING AND VIDEO INSPECTION RELATED ACTIVITIES CONDUCTED IN JUNE, JULY, AUGUST, AND SEPTEMBER 2009, IN ACCORDANCE WITH FIGURES 1 AND 2 OF THE NPDES PERMIT MODIFICATION.
2. PIPING AND/OR MANHOLES/CATCH BASINS NOT OBSERVED DURING FIELD INVESTIGATIONS CONDUCTED BY ARCADIS IN 2009.
3. THE DESTINATION OF PIPING COULD NOT BE DETERMINED/VERIFIED DURING MANHOLE/CATCH INSPECTIONS CONDUCTED BY ARCADIS IN 2009.
4. NOT ALL UTILITIES SHOWN FOR CLARITY PURPOSES. UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND SHALL BE FIELD VERIFIED PRIOR TO ANY CONSTRUCTION.

0 150' 300'
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2F - ITEM III
YD10, YD11, AND YD12 DRAINAGE AREAS

ARCADIS

FIGURE B-4

DALTON AVENUE

YD10

CONNECTICUT AVENUE

CITY OF PITTSFIELD
RESIDENTIAL AREA

SOUTH CAROLINA AVENUE

CITY OF PITTSFIELD
RESIDENTIAL AREA

MARYLAND AVENUE

CITY OF PITTSFIELD
RESIDENTIAL AREA

CALIFORNIA AVENUE

CITY OF PITTSFIELD
RESIDENTIAL AREA

PLASTICS AVENUE

YD12

YD11

POND

BRUSH

WOODED

GRASS

BITUMINOUS

PLANTER

SWALE

130

125

105

109

LEGEND:

- GENERAL ELECTRIC COMPANY FACILITY BOUNDARY
- STORM SEWER PIPING AND MANHOLE/CATCH BASIN NOT FOUND/INSPECTED (SEE NOTE 2)
- STORM SEWER PIPING AND MANHOLE/CATCH BASIN STRUCTURE
- STORMWATER FLOW DIRECTION
- PIPE DESTINATION UNKNOWN (SEE NOTE 3)
- 125 BUILDING LOCATION AND ID
- INDEX CONTOUR LINE
- INTERMEDIATE CONTOUR LINE
- MANHOLE
- CATCH BASIN
- HDPE HIGH DENSITY POLYETHYLENE
- RCP REINFORCED CONCRETE PIPE
- PVC POLYVINYL CHLORIDE PIPE
- VCP VITRIFIED CLAY PIPE
- CIP CAST IRON PIPE

NOTES:

1. BASE MAP INFORMATION PRESENTED ON THIS FIGURE EAST OF RESIDENTIAL AREAS WAS ADOPTED FROM A SURVEY PREPARED BY HILL ENGINEERS, DRAWING NO. GE-1110-003-CR101-M (8/1/07), GE-1110-CR101-M (9/5/08), AND GE-1110-CR102 (8/14/07). RESIDENTIAL AREA STREETS DIGITIZED FROM 2005 AERIAL PHOTO ACQUIRED FROM MASSACHUSETTS GIS WEBSITE. PIPE SIZES AND MATERIAL TYPES ARE BASED ON STORM SEWER CATCH BASIN/MANHOLE INSPECTIONS CONDUCTED BY ARCADIS IN APRIL, MAY, AND JUNE 2009. PORTIONS OF STORM SEWER PIPE CONNECTIONS AND APPROXIMATE LOCATIONS WERE VERIFIED DURING PIPELINE CLEANING AND VIDEO RELATED INSPECTION ACTIVITIES CONDUCTED IN JUNE, JULY, AUGUST, AND SEPTEMBER 2009, IN ACCORDANCE WITH FIGURES 1 AND 2 OF THE NPDES PERMIT MODIFICATION.
2. PIPE CONNECTIONS AND APPROXIMATE LOCATIONS OF MANHOLES AND CATCH BASINS WERE VERIFIED BY ARCADIS IN 2009.
3. PIPING AND/OR MANHOLES/CATCH BASINS NOT OBSERVED DURING FIELD INVESTIGATIONS CONDUCTED BY ARCADIS IN 2009.
4. THE DESTINATION OF PIPING COULD NOT BE DETERMINED/VERIFIED DURING MANHOLE/CATCH INSPECTIONS CONDUCTED BY ARCADIS IN 2009.
5. NOT ALL UTILITIES SHOWN FOR CLARITY PURPOSES. UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND SHALL BE FIELD VERIFIED PRIOR TO ANY CONSTRUCTION.

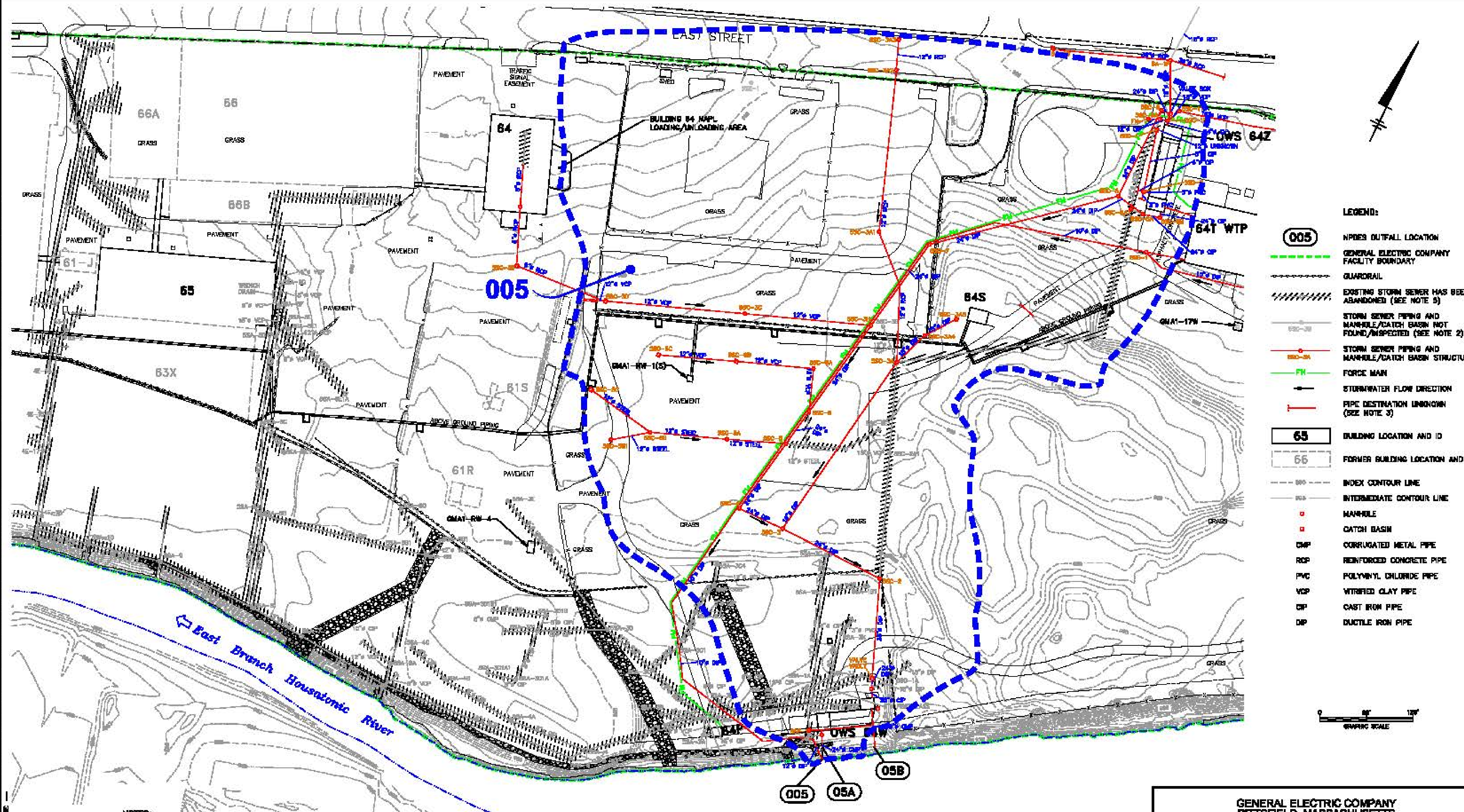
GRAPHIC SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2F - ITEM III
REMAINDER OF YD10 DRAINAGE AREA (CITY OF PITTSFIELD RESIDENTIAL AREA)

ARCADIS

FIGURE
B-5



NOTES:

1. BASE MAP INFORMATION PRESENTED ON THIS FIGURE WAS ADOPTED FROM A SURVEY PREPARED BY HILL ENGINEERS, DRAWING NO. GE-1081-1, DATED MARCH 24, 2004. TOPOGRAPHIC FEATURES HAVE BEEN UPDATED BASED ON FINAL GRADING PLAN FOR AVERAGING AREA 4E DATED 4/2/2010; AND SURFACE FEATURES AND ITEMS SUBJECT TO INSPECTION FIGURE DATED 12/30/2011 DEVELOPED BY ARCADIS. PIPE SIZES AND MATERIAL TYPES ARE BASED ON STORM SEWER CATCH BASIN/MANHOLE INSPECTIONS CONDUCTED BY ARCADIS IN APRIL, MAY, AND JUNE 2009. PIPE CONNECTIONS AND APPROXIMATE LOCATIONS OF MANHOLES AND CATCH BASINS WERE VERIFIED BY ARCADIS IN 2009. PORTIONS OF STORM SEWER PIPE CONNECTIONS AND APPROXIMATE LOCATIONS WERE VERIFIED DURING PIPELINE CLEANING AND VIDEO INSPECTION RELATED ACTIVITIES CONDUCTED IN JUNE, JULY, AUGUST, AND SEPTEMBER 2009, IN ACCORDANCE WITH FIGURES 1 AND 2 OF THE NPDES PERMIT MODIFICATION.

2. PIPING AND/OR MANHOLES/CATCH BASINS NOT OBSERVED DURING FIELD INVESTIGATIONS CONDUCTED BY ARCADIS IN 2009.

3. THE DESTINATION OF PIPING COULD NOT BE DETERMINED/VERIFIED DURING MANHOLE/CATCH INSPECTIONS CONDUCTED BY ARCADIS IN 2009.

4. NOT ALL UTILITIES SHOWN FOR CLARITY PURPOSES. UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND SHALL BE FIELD VERIFIED PRIOR TO ANY CONSTRUCTION.

5. THE STORM SEWER ABANDONMENT AND REMEDIATION/RESTORATION ACTIVITIES (i.e., BACKFILLED/RESTORED, ENGINEERED BARRIER, ENHANCED PAVEMENT, ENGINEERED BARRIER ACCESS ROAD, AND RIPRAP DRAINAGE SWALE AREAS) WERE PERFORMED BETWEEN 6/28/2010 AND 11/11/2011 IN ACCORDANCE WITH GE'S REVISED FINAL RD/RA WORK PLAN FOR EAST STREET AREA 2-SOUTH (APRIL, 2010), AS CONDITIONALLY APPROVED BY EPA ON 5/3/2010.

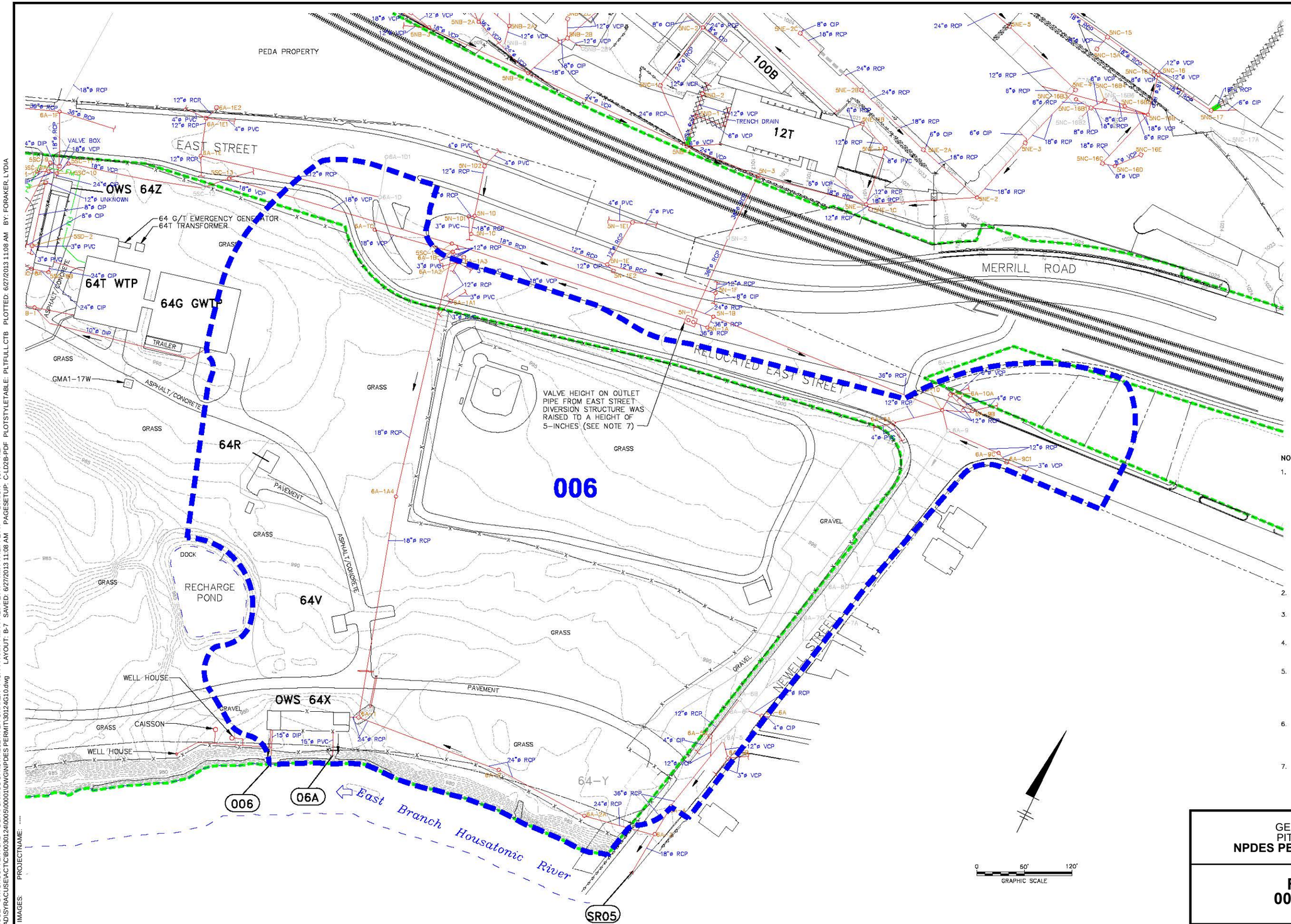
6. A 6-INCH GATE VALVE WAS GROUTED INTO THE END OF THE PIPE TO ISOLATE FLOWS FROM UPGRADIENT SECTIONS OF THE STORM SEWER SYSTEM. GATE VALVES CAN BE OPENED IN THE EVENT THAT SURFACE CONDITIONS ADJACENT TO THE ISOLATED SECTIONS OF STORM SEWER BECOME INUNDATED.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2F - ITEM III
005 SOUTH DRAINAGE AREA

ARCADIS

FIGURE
B-6



LEGEND:

- 006 — NPDES OUTFALL LOCATION
- GENERAL ELECTRIC COMPANY FACILITY BOUNDARY
- GUARDRAIL
- EXISTING STORM SEWER HAS BEEN ABANDONED (SEE NOTE 5)
- EXISTING STORM SEWER PIPING ABANDONED WITH 6" DRAIN VALVE
- 5NC-17A — STORM SEWER PIPING AND MANHOLE/CATCH BASIN NOT FOUND/INSPECTED (SEE NOTE 2)
- 5NC-16C — STORM SEWER PIPING AND MANHOLE/CATCH BASIN STRUCTURE
- FM — FORCE MAIN
- STORMWATER FLOW DIRECTION
- PIPE DESTINATION UNKNOWN (SEE NOTE 3)
- 6-INCH GATE VALVE (SEE NOTE 6)
- 64R — BUILDING LOCATION AND ID
- 64Y — FORMER BUILDING LOCATION AND ID
- 990 — INDEX CONTOUR LINE
- 995 — INTERMEDIATE CONTOUR LINE
- MANHOLE
- CATCH BASIN
- CMP — CORRUGATED METAL PIPE
- RCP — REINFORCED CONCRETE PIPE
- PVC — POLYVINYL CHLORIDE PIPE
- VCP — VITRIFIED CLAY PIPE
- CIP — CAST IRON PIPE
- DIP — DUCTILE IRON PIPE

NOTES:

1. BASE MAP INFORMATION PRESENTED ON THIS FIGURE WAS ADOPTED FROM A SURVEY PREPARED BY HILL ENGINEERS, DRAWING NO. GE-1081-1, DATED MARCH 24, 2004. TOPOGRAPHIC FEATURES HAVE BEEN UPDATED BASED ON FINAL GRADING PLAN FOR AVERAGING AREA 4E DATED 4/2/2010; AND SURFACE FEATURES AND ITEMS SUBJECT TO INSPECTION FIGURE DATED 12/30/2011 DEVELOPED BY ARCADIS. PIPE SIZES AND MATERIAL TYPES ARE BASED ON STORM SEWER CATCH BASIN/MANHOLE INSPECTIONS CONDUCTED BY ARCADIS IN APRIL, MAY, AND JUNE 2009. PIPE CONNECTIONS AND APPROXIMATE LOCATIONS OF MANHOLES AND CATCH BASINS WERE VERIFIED BY ARCADIS IN 2009. PORTIONS OF STORM SEWER PIPE CONNECTIONS AND APPROXIMATE LOCATIONS WERE VERIFIED DURING PIPELINE CLEANING AND VIDEO INSPECTION RELATED ACTIVITIES CONDUCTED IN JUNE, JULY, AUGUST, AND SEPTEMBER 2009, IN ACCORDANCE WITH FIGURES 1 AND 2 OF THE NPDES PERMIT MODIFICATION.
2. PIPING AND/OR MANHOLES/CATCH BASINS NOT OBSERVED DURING FIELD INVESTIGATIONS CONDUCTED BY ARCADIS IN 2009.
3. THE DESTINATION OF PIPING COULD NOT BE DETERMINED/VERIFIED DURING MANHOLE/CATCH INSPECTIONS CONDUCTED BY ARCADIS IN 2009.
4. NOT ALL UTILITIES SHOWN FOR CLARITY PURPOSES. UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND SHALL BE FIELD VERIFIED PRIOR TO ANY CONSTRUCTION.
5. THE STORM SEWER ABANDONMENT AND REMEDIATION/RESTORATION ACTIVITIES (i.e., BACKFILLED/RESTORED AREA) WERE PERFORMED BETWEEN 6/28/2010 AND 11/11/2011 IN ACCORDANCE WITH GE'S REVISED FINAL RD/RA WORK PLAN FOR EAST STREET AREA 2-SOUTH (APRIL, 2010), AS CONDITIONALLY APPROVED BY EPA ON 5/3/2010.
6. A 6-INCH GATE VALVE WAS GROUTED INTO THE END OF THE PIPE TO ISOLATE FLOWS FROM UPGRADIENT SECTIONS OF THE STORM SEWER SYSTEM. GATE VALVES CAN BE OPENED IN THE EVENT THAT SURFACE CONDITIONS ADJACENT TO THE ISOLATED SECTIONS OF STORM SEWER BECOME INUNDATED.
7. ON 1/26/2012 THE OPENING OF THE VALVE WAS MODIFIED FROM ITS HISTORICAL SETTING OF A HEIGHT OF 4-INCHES AND WAS RAISED ONE INCH TO DIVERT ADDITIONAL FLOW TO OWS 64Z AND REDUCE FLOW TO OUTFALL SR05. THE OPENING OF THE VALVE WAS MEASURED FROM THE CENTER OF THE VALVE BLADE TO THE SEAT.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2F - ITEM III
006 DRAINAGE AREA

ARCADIS

FIGURE
B-7

CITY: SYRACUSE DIV/GROUP: ENVCAD DB: A. SAMIOS S. KOWALCZYK L. FORAKER PIC: P. FARR PM: P. FILIPPETTI TM: P. FILIPPETTI LYR:ON=*;OFF=*REF*
G:\GE\ENVCAD\SYRACUSE\ACTIVE\B0030124\0005\00001\DWG\NPDES PERMIT\30124G10.dwg LAYOUT: B-7 SAVED: 6/27/2013 11:08 AM PAGESETUP: CLD2B-PDF PLOTSTYLETABLE: PLTFULL.CTB PLOTTED: 6/27/2013 11:08 AM BY: FORAKER, LYDIA
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30124X00
30124X11
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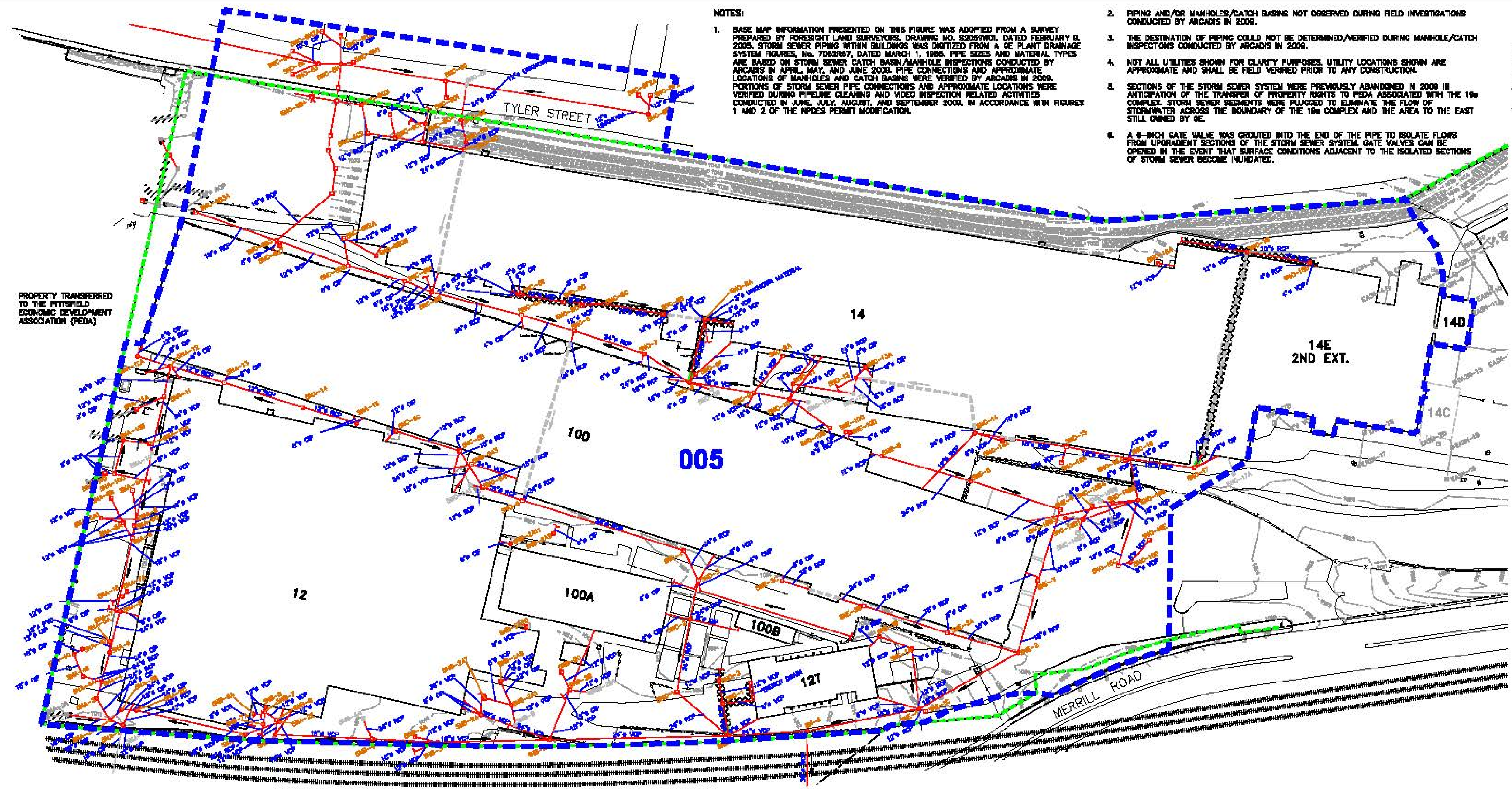
30124X13
30124X02



NOTES:

1. BASE MAP INFORMATION PRESENTED ON THIS FIGURE WAS ADOPTED FROM A SURVEY PREPARED BY FORESIGHT LAND SURVEYORS, DRAWING NO. S2059W01, DATED FEBRUARY 8, 2005. STORM SEWER PIPING WITHIN BUILDINGS WAS DIGITIZED FROM A GE PLANT DRAINAGE SYSTEM FIGURES, No. 7062R67, DATED MARCH 1, 1985. PIPE SIZES AND MATERIAL TYPES ARE BASED ON STORM SEWER CATCH BASIN/MANHOLE INSPECTIONS CONDUCTED BY ARCADIS IN APRIL, MAY, AND JUNE 2009. PIPE CONNECTIONS AND APPROXIMATE LOCATIONS OF MANHOLES AND CATCH BASINS WERE VERIFIED BY ARCADIS IN 2009. PORTIONS OF STORM SEWER PIPE CONNECTIONS AND APPROXIMATE LOCATIONS WERE VERIFIED DURING PIPELINE CLEANING AND VIDEO INSPECTION RELATED ACTIVITIES CONDUCTED IN JUNE, JULY, AUGUST, AND SEPTEMBER 2009, IN ACCORDANCE WITH FIGURES 1 AND 2 OF THE NPDES PERMIT MODIFICATION.
2. PIPING AND/OR MANHOLES/CATCH BASINS NOT OBSERVED DURING FIELD INVESTIGATIONS CONDUCTED BY ARCADIS IN 2009.
3. THE DESTINATION OF PIPING COULD NOT BE DETERMINED/VERIFIED DURING MANHOLE/CATCH INSPECTIONS CONDUCTED BY ARCADIS IN 2009.
4. NOT ALL UTILITIES SHOWN FOR CLARITY PURPOSES. UTILITY LOCATIONS SHOWN ARE APPROXIMATE AND SHALL BE FIELD VERIFIED PRIOR TO ANY CONSTRUCTION.
5. SECTIONS OF THE STORM SEWER SYSTEM WERE PREVIOUSLY ABANDONED IN 2009 IN ANTICIPATION OF THE TRANSFER OF PROPERTY RIGHTS TO PEDA ASSOCIATED WITH THE 19s COMPLEX. STORM SEWER SEGMENTS WERE PLUGGED TO ELIMINATE THE FLOW OF STORMWATER ACROSS THE BOUNDARY OF THE 19s COMPLEX AND THE AREA TO THE EAST STILL OWNED BY GE.
6. A 6-INCH GATE VALVE WAS GROUTED INTO THE END OF THE PIPE TO ISOLATE FLOWS FROM UPGRADIENT SECTIONS OF THE STORM SEWER SYSTEM. GATE VALVES CAN BE OPENED IN THE EVENT THAT SURFACE CONDITIONS ADJACENT TO THE ISOLATED SECTIONS OF STORM SEWER BECOME INUNDATED.

GRAPHIC SCALE: 0, 60', 120'

LEGEND:

- GENERAL ELECTRIC COMPANY FACILITY BOUNDARY
- EXISTING STORM SEWER HAS BEEN ABANDONED (SEE NOTE 5)
- EXISTING STORM SEWER PIPING ABANDONED WITH 8" DRAIN VALVE
- SMO-17A — STORM SEWER PIPING AND MANHOLE/CATCH BASIN NOT FOUND/INSPECTED (SEE NOTE 2)
- SMO-100 — STORM SEWER PIPING AND MANHOLE/CATCH BASIN STRUCTURE
- STORMWATER FLOW DIRECTION
- PIPE DESTINATION UNKNOWN (SEE NOTE 3)
- CONCRETE PIPE PLUG
- 6-INCH GATE VALVE (SEE NOTE 6)
- 12 — BUILDING LOCATION AND ID
- 3 — FORMER BUILDING LOCATION AND ID
- 1030 — INDEX CONTOUR LINE
- 1025 — INTERMEDIATE CONTOUR LINE
- MANHOLE
- CATCH BASIN
- CMP — CORRUGATED METAL PIPE
- RCP — REINFORCED CONCRETE PIPE
- VCP — VITRIFIED CLAY PIPE
- CIP — CAST IRON PIPE
- MANHOLE FILLED WITH CONCRETE
- CATCH BASIN FILLED WITH CONCRETE

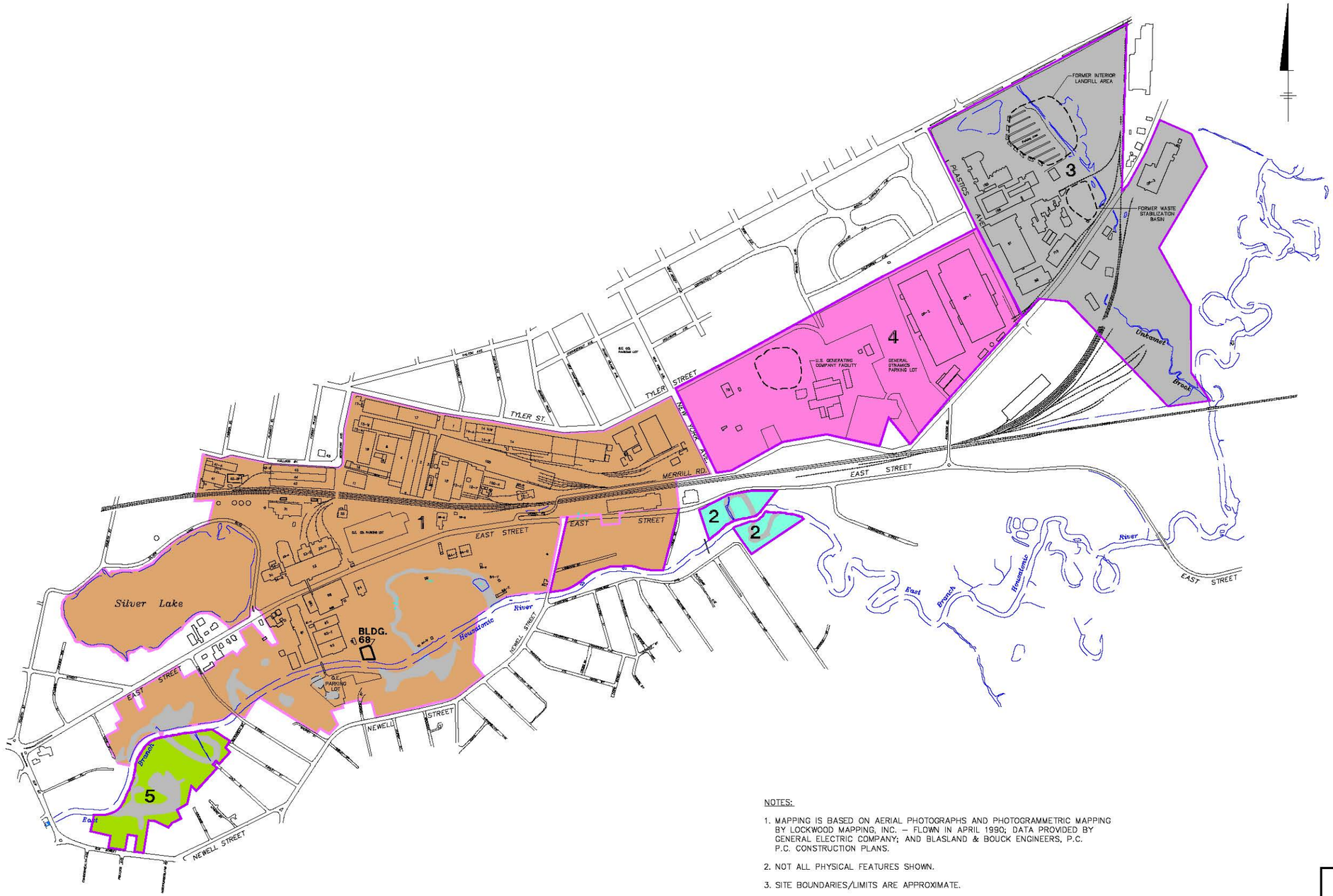
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
NPDES PERMIT APPLICATION SUBMITTAL

FORM 2F - ITEM III
005 NORTH DRAINAGE AREA

ARCADIS

FIGURE
B-8

Figure 3: Groundwater Management Area Plans



LEGEND

GMA 1 (PLANT SITE 1)

- RAA 1–40s COMPLEX
- RAA 2–30s COMPLEX
- RAA 3–20s COMPLEX
- RAA 4–EAST STREET AREA 2 SOUTH
- RAA 5–EAST STREET AREA 2 NORTH
- RAA 6–EAST STREET AREA 1 NORTH
- RAA 13–LYMAN STREET AREA (INCLUDING FORMER OXBOWS B, D AND E)
- RAA 14–NEWELL STREET AREA II
- RAA 15–NEWELL STREET AREA I
- RAA 18–SILVER LAKE AREA
- RAA 19–EAST STREET AREA 1 SOUTH (NAPL/GROUNDWATER ONLY)

GMA 2 (FORMER OXBOWS J AND K)

- RAA 16–FORMER OXBOWS J AND K

GMA 3 (PLANT SITE 2)

- RAA 11–UNKAMET BROOK AREA (EAST OF PLASTICS AVENUE)

GMA 4 (PLANT SITE 3)

- RAA 7–HILL 78 CONSOLIDATION AREA
- RAA 8–BUILDING 71 CONSOLIDATION AREA
- RAA 9–NEW YORK AVENUE/MERRILL ROAD CONSOLIDATION AREA
- RAA 10–HILL 78 (REMAINDER)
- RAA 11–UNKAMET BROOK AREA (WEST OF PLASTICS AVENUE)

GMA 5 (FORMER OXBOWS A AND C)

- RAA 12–FORMER OXBOWS A AND C

NOTES:

1. MAPPING IS BASED ON AERIAL PHOTOGRAPHS AND PHOTOGRAMMETRIC MAPPING BY LOCKWOOD MAPPING, INC. – FLOWN IN APRIL 1990; DATA PROVIDED BY GENERAL ELECTRIC COMPANY; AND BLASLAND & BOUCK ENGINEERS, P.C. P.C. CONSTRUCTION PLANS.
2. NOT ALL PHYSICAL FEATURES SHOWN.
3. SITE BOUNDARIES/LIMITS ARE APPROXIMATE.

0 500' 1000'
APPROXIMATE SCALE

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS
STATEMENT OF WORK FOR
REMOVAL ACTIONS OUTSIDE THE RIVER

GROUNDWATER MANAGEMENT AREAS

BLASLAND, BOUCK & LEE, INC.
engineers & scientists

FIGURE H-7

L: ON=*, OFF=REF
P: B01.PCP OR BSIZ.PCP
9/10/99 SYR-54-GMS GMS NES
20140001/SOWRPT/20140804.DWG

LEGEND:

- Approximate Extent of Dense NAPL Contamination
- Groundwater Contaminant Plume
- Approximate Extent of Light NAPL Contamination
- Former Oxbows

Note: NAPL = Non Aqueous Phase Liquid (Oil)

EPA United States Environmental Protection Agency

Notes:
1. Base features provived by General Electric Contractors .
2. Not all physical features are shown.
3. Site Boundaries are approximate.
4. Maps produced by Roy F. Weston, Inc.

N W E S

Scale in Feet

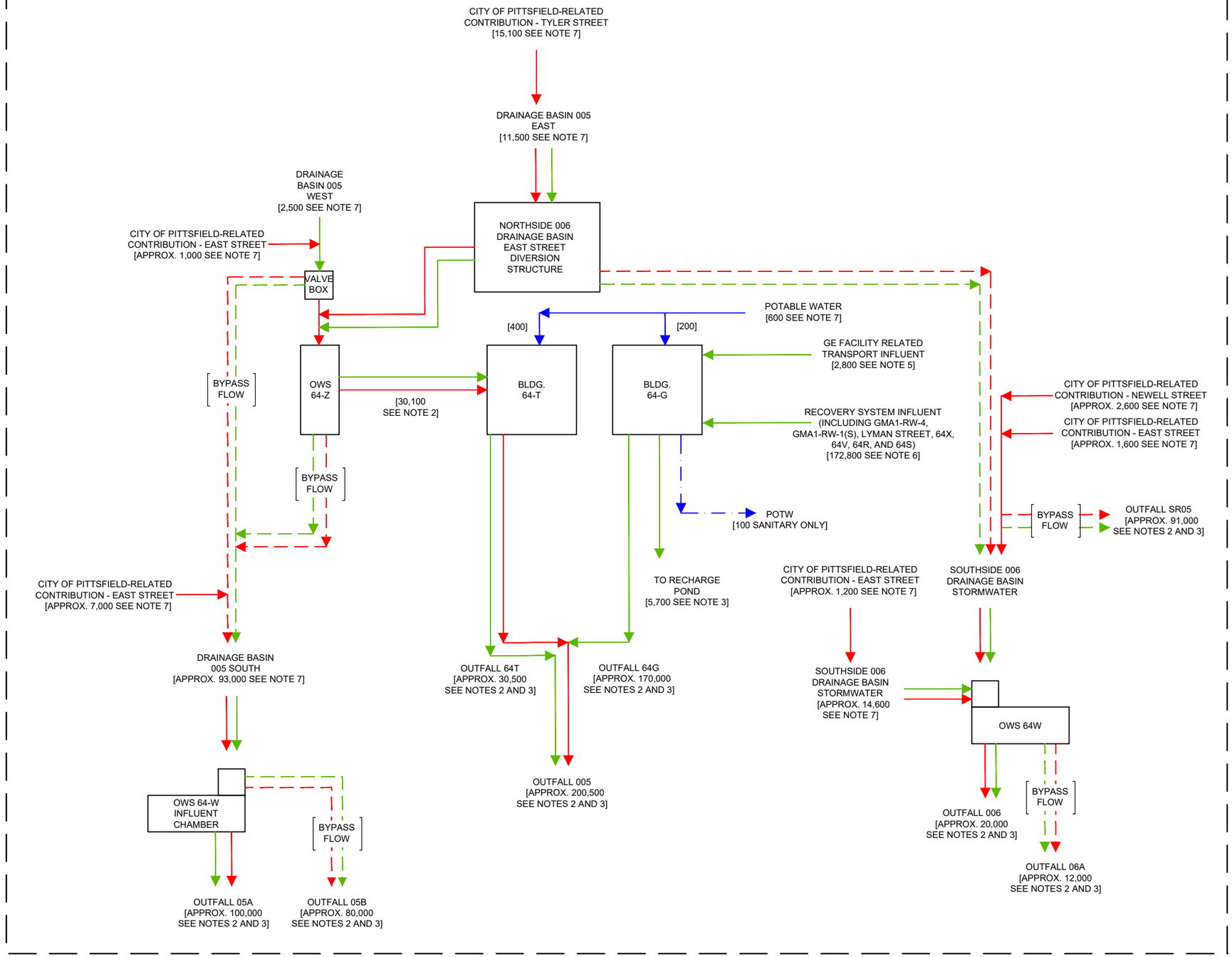
400 0 400 800 1200 1600

Housatonic River Project
Pittsfield, Massachusetts

Historic Extent Of Groundwater and NAPL Contamination

SDMS Doc ID 25146

Figure 4: Schematic of Water Flow



OUTFALLS 64G, 64T, 005, 05A, 05B, 006, 06A, SRO5

LEGEND

- CITY OF PITTSFIELD-RELATED DRY WEATHER/STORMWATER FLOW CONTRIBUTION
- CITY OF PITTSFIELD RELATED BYPASS FLOW
- POTW FLOW
- POTABLE WATER
- GE FACILITY-RELATED DRY WEATHER/STORMWATER FLOW
- GE FACILITY-RELATED BYPASS FLOW

NOTES:

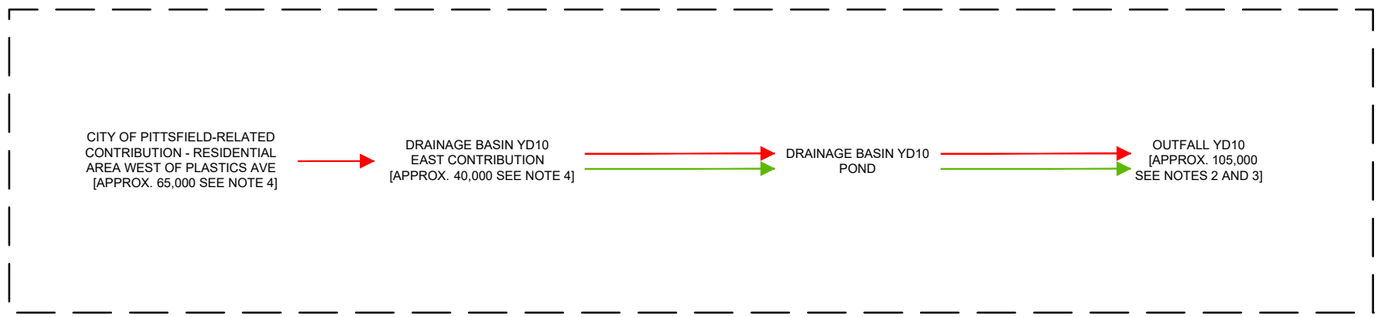
1. FLOWS PRESENTED ARE IN GALLONS PER DAY.
2. STORMWATER VALUES WERE CALCULATED BASED ON FLOW INFORMATION COLLECTED IN ACCORDANCE WITH GE'S NPDES PERMIT FROM JANUARY 2020 THROUGH DECEMBER 2022.
3. STORMWATER VALUES REPRESENT AVERAGE FLOWS FOR DAYS WITH OUTFALL DISCHARGE.
4. RECHARGE POND EFFLUENT VALUE IS BASED ON METERED VALUES COLLECTED FROM JANUARY 2020 THROUGH DECEMBER 2022.
5. GE FACILITY RELATED TRANSPORT INFLUENT IS BASED ON VOLUME ESTIMATES COLLECTED FROM JANUARY 2020 THROUGH DECEMBER 2022.
6. RECOVERY SYSTEM INFLUENT IS NOT METERED. ACCORDINGLY, RECOVERY SYSTEM INFLUENT CONTRIBUTION WAS DEVELOPED USING THE TOTAL APPROXIMATE 64G EFFLUENT VALUE AND SUBTRACTING POTABLE WATER AND GE FACILITY RELATED TRANSPORT INFLUENT VALUES.
7. STORMWATER FLOW CONTRIBUTION VALUES WERE DEVELOPED BASED ON THE DRAINAGE BASIN AREA AS A PERCENTAGE OF THE TOTAL FLOW OUTFALL DISCHARGE.
8. POTABLE WATER INFLUENT ESTIMATE VALUES ARE BASED ON CITY METERING. EFFLUENT ESTIMATE VALUE BASED ON INTERNAL USE OF POTABLE WATER.

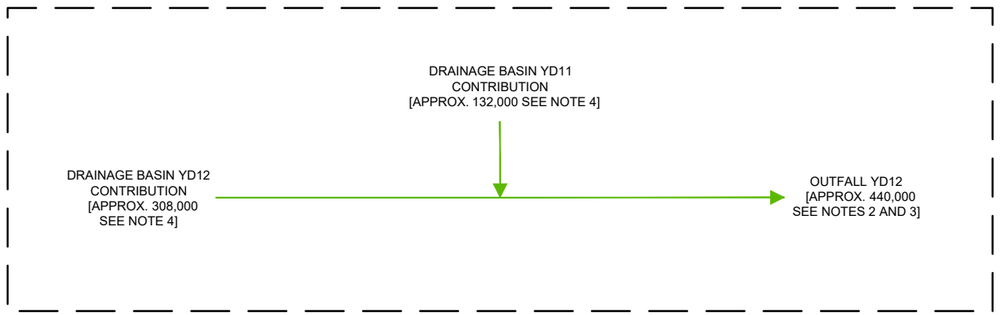
GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

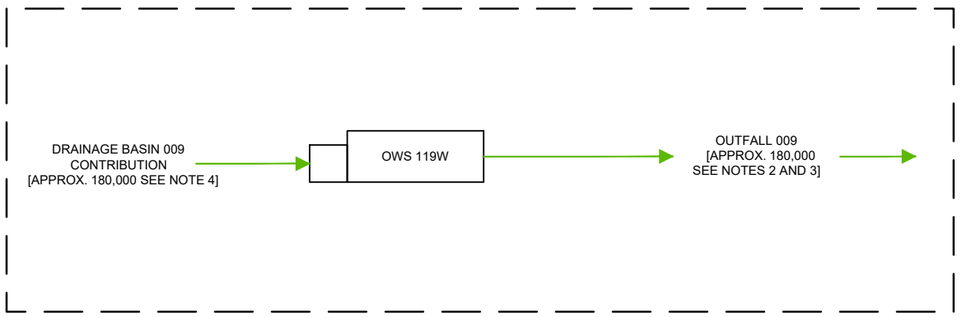
OUTFALLS 64G, 64T, 005, 05A, 05B, 006, 06A, SRO5 LINE DIAGRAM

ARCADIS

FIGURE 1







LEGEND

GE FACILITY-RELATED DRY WEATHER/STORMWATER FLOW

CITY OF PITTSFIELD-RELATED DRY WEATHER/STORMWATER FLOW

NOTES:

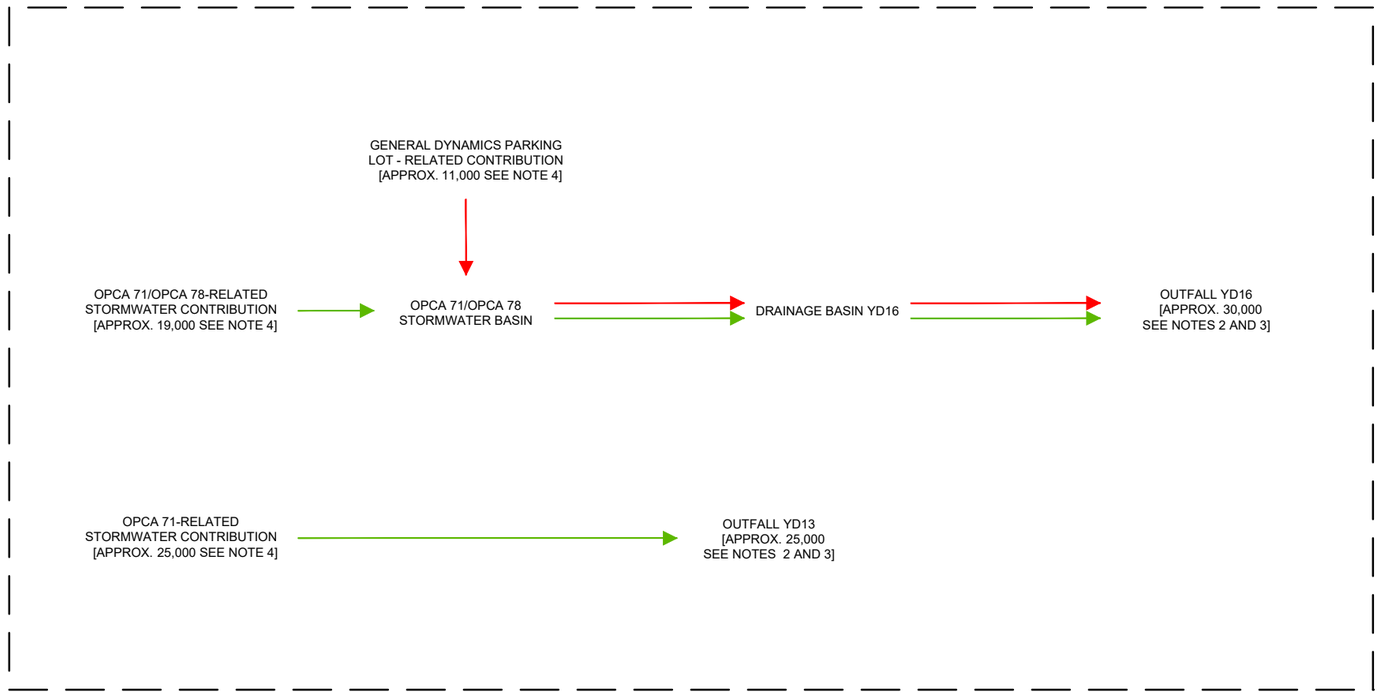
1. FLOWS PRESENTED ARE IN GALLONS PER DAY.
2. STORMWATER VALUES WERE CALCULATED BASED ON FLOW INFORMATION COLLECTED IN ACCORDANCE WITH GE'S NPDES PERMIT FROM JANUARY 2020 THROUGH DECEMBER 2022.
3. STORMWATER VALUES REPRESENT AVERAGE FLOWS FOR DAYS WITH OUTFALL DISCHARGE.
4. STORMWATER FLOW CONTRIBUTION VALUES WERE DEVELOPED BASED ON THE DRAINAGE BASIN AREA AS A PERCENTAGE OF THE TOTAL FLOW OUTFALL DISCHARGE.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

OUTFALL 009, YD10, AND YD12 LINE DIAGRAM

ARCADIS

FIGURE
2



LEGEND

- GE FACILITY-RELATED DRY WEATHER/STORMWATER FLOW
- CITY OF PITTSFIELD-RELATED DRY WEATHER/STORMWATER FLOW

NOTES:

1. FLOWS PRESENTED ARE IN GALLONS PER DAY.
2. STORMWATER VALUES WERE CALCULATED BASED ON FLOW INFORMATION COLLECTED IN ACCORDANCE WITH GE'S NPDES PERMIT FROM JANUARY 2020 THROUGH DECEMBER 2022.
3. STORMWATER VALUES REPRESENT AVERAGE FLOWS FOR DAYS WITH OUTFALL DISCHARGE.
4. STORMWATER FLOW CONTRIBUTION VALUES WERE DEVELOPED BASED ON THE DRAINAGE BASIN AREA AS A PERCENTAGE OF THE TOTAL FLOW OUTFALL DISCHARGE.

GENERAL ELECTRIC COMPANY
PITTSFIELD, MASSACHUSETTS

OUTFALL YD13 AND YD16 LINE DIAGRAM

ARCADIS

FIGURE
3

Appendix A: Discharge Monitoring Data

Outfall - Monitoring Location - Limit Set: 005 - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	**MGD**	**MGD**	**MGD**	**MGD**	**lb/d**	**mg/L**	**lb/d**	**mg/L**
Effluent Limit	**Report**	**Report**	**Report**	**Report**	**188**	**Report**	**270**	**Report**
Minimum	**0.085362**	**0.15247**	**0.06071**	**0.06524**	**0**	**0**	**0**	**0**
Maximum	**0.343202**	**0.71951**	**0.434617**	**0.60041**	**78.0784**	**23**	**156.1568**	**46**
Median	**0.162209**	**0.33452**	**0.147475**	**0.16582**	**0**	**0**	**0**	**0**
No. of Violations	**N/A**	**N/A**	**N/A**	**N/A**	**0**	**N/A**	**0**	**N/A**
Monitoring Period End Date								
1/31/2018	0.099342	0.52454	0.068415	0.07691	6.596	13.2	13.193	26.4
2/28/2018	0.162209	0.15247	0.147475	0.15247	0	0	0	0
3/31/2018	0.14011	0.20923	0.123505	0.13396	0	0	0	0
4/30/2018	0.127728	0.38778	0.11082	0.1221	0	0	0	0
5/31/2018	0.095876	0.214994	0.141618	0.196985	3.614	2.2	7.229	4.4
6/30/2018	0.091406	0.29405	0.07893	0.10912	2.093	2.3	4.186	4.6
7/31/2018	0.124592	0.3088	0.09485	0.10229	0	0	0	0
8/31/2018	0.175785	0.36549	0.160355	0.19148	0	0	0	0
9/30/2018	0.183449	0.40569	0.12012	0.12142	0	0	0	0
10/31/2018	0.177867	0.33078	0.13919	0.14659	0	0	0	0
11/30/2018	0.220149	0.43059	0.316945	0.40704	78.0784	23	156.1568	46
12/31/2018	0.21097	0.5698	0.19485	0.20436	1.7776	1.15	3.5552	2.3
1/31/2019	0.196883	0.55464	0.15728	0.16582	0	0	0	0
2/28/2019	0.185806	0.32444	0.17222	0.18061	0	0	0	0
3/31/2019	0.125894	0.24267	0.131665	0.16382	0	0	0	0
4/30/2019	0.126248	0.25267	0.122725	0.1342	0.7275	0.65	1.455	1.3
5/31/2019	0.148123	0.31381	0.220885	0.29679	0	0	0	0
6/30/2019	0.204505	0.41481	0.204385	0.273	0	0	0	0
7/31/2019	0.182917	0.50558	0.17351	0.18056	0	0	0	0
8/31/2019	0.108854	0.20916	0.100415	0.11377	0	0	0	0
9/30/2019	0.089717	0.19902	0.06071	0.06524	0	0	0	0
10/31/2019	0.118303	0.33452	0.064665	0.08617	0	0	0	0
11/30/2019	0.135298	0.31014	0.108298	0.14589	0	0	0	0
12/31/2019	0.202251	0.42596	0.135175	0.14589	4.38	3.6	8.76	7.2
1/31/2020	0.182486	0.38046	0.160575	0.16927	0	0	0	0
2/29/2020	0.156408	0.34429	0.09761	0.09847	0	0	0	0
3/31/2020	0.196667	0.29702	0.17445	0.29702	0	0	0	0
4/30/2020	0.208777	0.40917	0.283975	0.40917	4.607	1.35	9.214	2.7
5/31/2020	0.185495	0.36759	0.192765	0.22147	1.163	0.85	2.326	1.7
6/30/2020	0.14039	0.2561	0.1383	0.14094	0	0	0	0

Outfall - Monitoring Location - Limit Set: 005 - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	MGD	MGD	lb/d	mg/L	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	188	Report	270	Report
Minimum	**0.085362**	**0.15247**	**0.06071**	**0.06524**	**0**	**0**	**0**	**0**
7/31/2020	0.102437	0.17057	0.08391	0.0899	0	0	0	0
8/31/2020	0.091098	0.26384	0.076865	0.1073	0	0	0	0
9/30/2020	0.085362	0.33126	0.07265	0.07676	0	0	0	0
10/31/2020	0.117262	0.35026	0.10002	0.11742	0	0	0	0
11/30/2020	0.098137	0.21163	0.0816	0.0843	0	0	0	0
12/31/2020	0.120336	0.48979	0.07161	0.07681	0	0	0	0
1/31/2021	0.13957	0.38152	0.113515	0.1206	1.056	1.05	2.112	2.1
2/28/2021	0.109291	0.3078	0.087325	0.09649	0	0	0	0
3/31/2021	0.162741	0.30626	0.163005	0.22828	4.174	1.85	7.044	3.7
4/30/2021	0.142969	0.37041	0.104705	0.12462	0.04596	0.65	0.9193	1.3
5/31/2021	0.224523	0.53641	0.236565	0.27377	4.061	1.55	5.154	3.1
6/30/2021	0.155686	0.21903	0.156715	0.17975	0.6689	0.6	1.3379	1.2
7/31/2021	0.330611	0.67268	0.23509	0.32618	3.74	1.85	5.44	2
8/31/2021	0.284371	0.57327	0.28005	0.29008	0	0	0	0
9/30/2021	0.30812	0.5503	0.294085	0.30865	0	0	0	0
10/31/2021	0.343202	0.60041	0.434617	0.60041	2.224	0.65	4.447	1.3
11/30/2021	0.330817	0.59033	0.322905	0.37785	3.77	1.4	4.412	1.4
12/31/2021	0.30761	0.51904	0.2688	0.28402	0	0	0	0
1/31/2022	0.230796	0.3156	0.2644	0.27032	2.8024	1.3	5.605	2.6
2/28/2022	0.259206	0.68156	0.18219	0.20044	0	0	0	0
3/31/2022	0.223711	0.37837	0.19684	0.22716	0	0	0	0
4/30/2022	0.331284	0.52446	0.25823	0.27272	0	0	0	0
5/31/2022	0.256179	0.45698	0.311045	0.38828	0	0	0	0
6/30/2022	0.184966	0.29718	0.17768	0.18096	0.8727	0.6	1.7453	1.2
7/31/2022	0.121855	0.20394	0.11072	0.12422	0.9324	0.9	1.8648	1.8
8/31/2022	0.09894	0.15463	0.087665	0.09202	0	0	0	0
9/30/2022	0.110929	0.33545	0.187785	0.27361	1.1409537	0.5	2.2819074	1
10/31/2022	0.102785	0.22679	0.082655	0.0886	0	0	0	0
11/30/2022	0.100283	0.20273	0.15244	0.20137	0	0	0	0
12/31/2022	0.137252	0.33517	0.098945	0.10548	0	0	0	0
1/31/2023	0.17094	0.28822	0.168165	0.24688	2.470775	1.2	4.9415501	2.4
2/28/2023	0.139047	0.20195	0.11687	0.15843	1.8498287	1.4	3.6996574	2.8
3/31/2023	0.176629	0.32155	0.136585	0.14917	0	0	0	0
4/30/2023	0.227718	0.71951	0.156285	0.18223	0	0	0	0
5/31/2023	0.182734	0.21574	0.182195	0.19953	0.9984481	0.6	1.9968962	1.2

Outfall - Monitoring Location - Limit Set: 005 - 1 - A

Parameter	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Oil & grease	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	**SU**	**SU**	**lb/d**	**ug/L**	**in**	**lb/d**	**mg/L**	**lb/d**
Effluent Limit	**6.5**	**9**	**0.01**	**Report**	**Report**	**135**	**15**	**0.03**
Minimum	**7.02**	**7.03**	**0**	**0**	**0**	**0**	**0**	**0**
Maximum	**8.09**	**8.19**	**0.0002105**	**0.0684**	**0.77**	**2.45**	**4.9**	**0.0004209**
Median	**7.84**	**7.92**	**0**	**0**	**0.03**	**0**	**0**	**0**
No. of Violations	**0**	**0**	**0**	**N/A**	**N/A**	**0**	**0**	**0**
Monitoring Period End Date								
1/31/2018	7.83	7.95	0	0	0.29	0	0	0
2/28/2018	7.91	7.95	0.000043	0.0335	0.34	0	0	0.000085
3/31/2018	7.83	7.9	0	0	0.145	0	0	0
4/30/2018	7.86	7.94	0	0	0.075	0	0	0
5/31/2018	7.89	8.02	0	0	0	0	0	0
6/30/2018	7.91	7.92	0	0	0.17	0	0	0
7/31/2018	7.92	7.92	0	0	0	0	0	0
8/31/2018	7.87	7.96	0.0000425	0.0485	0.21	0	0	0.000155
9/30/2018	7.84	7.92	0	0	0.01	0	0	0
10/31/2018	7.78	7.92	0	0	0.11	0	0	0
11/30/2018	7.45	8	0.0002105	0.062	0.59	0	0	0.0004209
12/31/2018	7.83	8.02	0.00006	0.0358	0.01	0	0	0.00012
1/31/2019	7.91	7.96	0	0	0.03	0	0	0
2/28/2019	7.78	7.8	0	0	0.6	0	0	0
3/31/2019	7.35	7.84	0	0	0	0	0	0
4/30/2019	7.73	7.85	0	0	0.05	0	0	0
5/31/2019	7.51	7.88	0.000097	0.0394	0.22	0	0	0.000195
6/30/2019	7.93	7.94	0	0	0.24	0	0	0
7/31/2019	7.91	7.92	0	0	0	0	0	0
8/31/2019	7.9	7.95	0	0	0.01	0	0	0
9/30/2019	7.88	7.9	0	0	0	0	0	0
10/31/2019	7.88	8.01	0	0	0	0	0	0
11/30/2019	8.08	8.19	0	0	0.32	0	0	0
12/31/2019	7.92	8.16	0	0	0.65	0	0	0
1/31/2020	7.9	7.9	0	0	0.03	0	0	0
2/29/2020	7.9	7.91	0	0	0.18	0	0	0
3/31/2020	7.84	7.87	0	0	0	0	0	0
4/30/2020	7.84	7.86	0.00017	0.051	0.43	0	0	0.00035
5/31/2020	7.87	7.87	0	0	0.1	0	0	0
6/30/2020	7.83	7.92	0	0	0	0	0	0

Outfall - Monitoring Location - Limit Set: 005 - 1 - A

Parameter	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Oil & grease	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	SU	SU	lb/d	ug/L	in	lb/d	mg/L	lb/d
Effluent Limit	6.5	9	0.01	Report	Report	135	15	0.03
Minimum	7.02	7.03	0	0	0	0	0	0
7/31/2020	7.83	7.94	0	0	0.03	0	0	0
8/31/2020	7.93	7.94	0	0	0	0	0	0
9/30/2020	7.91	7.96	0	0	0	0	0	0
10/31/2020	7.92	7.98	0	0	0.12	0	0	0
11/30/2020	7.76	7.98	0	0	0	0	0	0
12/31/2020	7.9	8.03	0	0	0.08	0	0	0
1/31/2021	7.94	7.96	0	0	0	0	0	0
2/28/2021	7.83	7.89	0	0	0.27	0	0	0
3/31/2021	7.91	7.96	0.000069	0.0364	0.17	0	0	0.000138
4/30/2021	8.02	8.04	0	0	0.02	0	0	0
5/31/2021	7.24	7.94	0.00015	0.0677	0.24	0	0	0.00024
6/30/2021	7.82	7.85	0	0	0.05	0	0	0
7/31/2021	7.75	7.83	0	0	0.01	0	0	0
8/31/2021	7.37	7.51	0	0	0	0	0	0
9/30/2021	7.78	7.85	0	0	0	2.45	4.9	0
10/31/2021	7.68	7.92	0	0	0.34	0	0	0
11/30/2021	7.78	7.9	0	0	0.01	0	0	0
12/31/2021	7.65	7.75	0	0	0	0	0	0
1/31/2022	7.72	7.88	0	0	0	0	0	0
2/28/2022	7.9	7.92	0	0	0.05	0	0	0
3/31/2022	7.6	7.9	0	0	0.02	0	0	0
4/30/2022	7.84	7.89	0	0	0.03	0	0	0
5/31/2022	7.56	7.85	0	0	0.11	0	0	0
6/30/2022	7.96	7.97	0	0	0	0	0	0
7/31/2022	7.57	7.91	0	0	0	0	0	0
8/31/2022	7.93	7.94	0	0	0	0	0	0
9/30/2022	7.96	7.99	0.00015608	0.0684	0.4	0	0	0.00031216
10/31/2022	8.09	8.15	0	0	0.03	0	0	0
11/30/2022	7.88	8.06	0	0	0.06	0	0	0
12/31/2022	7.9	7.97	0	0	0	0	0	0
1/31/2023	7.84	7.94	0	0	0.22	0	0	0
2/28/2023	7.83	7.85	0	0	0.09	0	0	0
3/31/2023	7.85	7.91	0	0	0.77	0	0	0
4/30/2023	7.37	7.49	0	0	0.03	0	0	0
5/31/2023	7.02	7.03	0	0	0.02	0	0	0

Outfall - Monitoring Location - Limit Set: 005 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Rainfall
	Daily Max	Daily Max
Units	ug/L	in
Effluent Limit	Report	Report
Minimum	0	0
Maximum	0.1368	4.79
Median	0	0.06
No. of Violations	N/A	N/A
Monitoring Period End Date		
1/31/2018	0	4.79
2/28/2018	0.067	2.43
3/31/2018	0	0.29
4/30/2018	0	0.14
5/31/2018	0	0
6/30/2018	0	0.33
7/31/2018	0	0
8/31/2018	0.0969	0.42
9/30/2018	0	0.02
10/31/2018	0	0.21
11/30/2018	0.124	1.18
12/31/2018	0.0715	0.02
1/31/2019	0	0.06
2/28/2019	0	1.14
3/31/2019	0	0
4/30/2019	0	0.09
5/31/2019	0.0787	0.43
6/30/2019	0	0.48
7/31/2019	0	0
8/31/2019	0	0.02
9/30/2019	0	0
10/31/2019	0	0
11/30/2019	0	0.58
12/31/2019	0	1.3
1/31/2020	0	0.04
2/29/2020	0	0.36
3/31/2020	0	0
4/30/2020	0.1019	0.85
5/31/2020	0	0.19
6/30/2020	0	0

Outfall - Monitoring Location - Limit Set: 005 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Rainfall
	Daily Max	Daily Max
Units	ug/L	in
Effluent Limit	Report	Report
Minimum	**0**	**0**
7/31/2020	0	0.06
8/31/2020	0	0
9/30/2020	0	0
10/31/2020	0	0.23
11/30/2020	0	0
12/31/2020	0	0.14
1/31/2021	0	0
2/28/2021	0	0.53
3/31/2021	0.0727	0.33
4/30/2021	0	0.04
5/31/2021	0.1045	0.48
6/30/2021	0	0.1
7/31/2021	0	0.01
8/31/2021	0	0
9/30/2021	0	0
10/31/2021	0	0.67
11/30/2021	0	0.01
12/31/2021	0	0
1/31/2022	0	0
2/28/2022	0	0.09
3/31/2022	0	0.4
4/30/2022	0	0.06
5/31/2022	0	0.22
6/30/2022	0	0
7/31/2022	0	0
8/31/2022	0	0
9/30/2022	0.1368	0.71
10/31/2022	0	0.05
11/30/2022	0	0.12
12/31/2022	0	0
1/31/2023	0	0.43
2/28/2023	0	0.18
3/31/2023	0	1.54
4/30/2023	0	0.06
5/31/2023	0	0.03

Outfall - Monitoring Location - Limit Set: 09B - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	MGD	MGD	lb/d	mg/L	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	213	Report	876	Report
Minimum	0.005124	0.07035	0	0	0	0	0	0
Maximum	0.29999	4.32062	1.636092	34500	4.736	6.69628	14.208	11.10955
Median	0.049696	0.44618	0.093387	0.13799	Non-Detect	Non-Detect	Non-Detect	Non-Detect
No. of Violations	N/A	N/A	N/A	N/A	0	N/A	0	N/A
Monitoring Period End Date								
1/31/2018	0.067201	0.90125	0.77436	0.77436	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2018	0.254549	1.5623	0.65459	0.65459	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2018	0.200433	1.16323	0.01825	0.01825	4.736	0.733	14.208	2.2
4/30/2018	0.19481	1.32238	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	0.109521	1.4396	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.018037	0.1852	0.02251	0.02251	1.5203	1.27	4.204	1.9
7/31/2018	0.107165	1.10685	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2018	0.190775	1.09431	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0.161722	0.96162	0.347353	0.57471	0.8856079	0.4	3.5424317	1.6
10/31/2018	0.097886	1.20078	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	0.046428	0.593224	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.086641	0.57396	0.216072	0.3707	0.7588	0.4	2.3566	0.2
1/31/2019	0.130712	1.10134	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2019	0.135874	0.99593	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.230691	4.32062	0.287713	0.35991	0.7282	0.6	2.1845	1.8
4/30/2019	0.0822	0.56365	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2019	0.07065	0.42261	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0.041924	0.37126	0.303843	0.37126	2.3	6.69628	4	11.10955
7/31/2019	0.015634	0.266927	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2019	0.005124	0.07035	0.07035	0.07035	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2019	0.011789	0.13772	0.033918	0.07035	0.1108	0.43	0.4432	2.6
10/31/2019	0.031894	0.241838	0.17741	0.17741	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2019	0.038323	0.24114	0.08707	0.08707	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	0.069003	0.17741	0.10798	0.17741	0.2663	0.37	0.7988	1.1
1/31/2020	0.049433	0.982835	0.157858	0.157858	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/29/2020	0.120087	0.68152	0.11749	0.11749	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	0.060526	0.671795	0.151826	0.18013	0.7011	0.87	2.1032	1.4
4/30/2020	0.105031	0.786644	0.143981	0.143981	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2020	0.053156	0.659	0.264377	0.264377	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2020	0.020851	0.26305	0.170583	0.264377	0.102	1.23	3.307	2.2

Outfall - Monitoring Location - Limit Set: 09B - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	**MGD**	**MGD**	**MGD**	**MGD**	**lb/d**	**mg/L**	**lb/d**	**mg/L**
Effluent Limit	**Report**	**Report**	**Report**	**Report**	**213**	**Report**	**876**	**Report**
Minimum	**0.005124**	**0.07035**	**0**	**0**	**0**	**0**	**0**	**0**
7/31/2020	0.022792	0.15006	0.09007	0.09007	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2020	0.015511	0.32589	0.07283	0.07283	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2020	0.022733	0.49779	0.100297	0.13799	1.3112	1.6	1.878	2.5
10/31/2020	0.042907	0.399931	0.317551	0.317551	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2020	0.03429	0.309272	0.063656	0.063656	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0.057917	0.41559	0.148936	0.317551	0	0	0	0
1/31/2021	0.118935	1.636092	1.636092	1.636092	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2021	0.074714	0.79448	0.339235	0.339235	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2021	0.043551	0.87057	0.667399	1.636092	0	0	0	0
4/30/2021	0.046967	0.64351	0.20288	0.20288	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2021	0.066858	0.869919	0.0184	0.0184	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2021	0.012754	0.12199	0.08603	0.20288	0.8865	1.433	1.8612	2
7/31/2021	0.082657	0.29225	0.07438	0.07438	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2021	0.03694	0.40647	0.03272	0.03272	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2021	0.063923	0.54033	0.089707	0.16202	1.526	1.933	2.838	2.1
10/31/2021	0.042306	0.52455	0	0	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2021	0.054336	0.46083	0.362135	0.362135	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2021	0.047331	0.4574	0.186162	0.362135	0.0203	2.23	0.0259	3.3
1/31/2022	0.023157	0.27391	0.04329	0.04329	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2022	0.049696	0.41823	0.09606	0.09606	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2022	0.054385	0.38667	0.09287	0.13926	1.33	1.47	2.48	3.1
4/30/2022	0.054588	0.4477	0.0345	34500	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2022	0.035283	0.24927	0.15434	0.15434	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2022	0.025925	0.19505	0.093387	0.15434	2.0685	1.47	3.6041	3
7/31/2022	0.02618	0.1829	0.02771	0.02771	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2022	0.009711	0.08917	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	0.29999	0.33545	0.245205	0.38453	1.8213198	1.27	2.2819074	1.4
10/31/2022	0.092979	1.07876	0.29623	0.29623	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2022	0.044352	0.43608	0.16939	0.16939	NODI: 7	NODI: 7	NODI: 7	NODI: 7
12/31/2022	0.031448	0.20937	0.13618	0.13618	0.9418084	0.67	2.8254252	2
1/31/2023	0.011769	0.14017	0.02781	0.02781	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2023	0.007796	0.08449	0.00605	0.00605	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2023	0.031533	0.14553	0.09665	0.09665	0.1885869	1.65	0.5102579	2.2
4/30/2023	0.056403	0.44618	0.16692	0.16692	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2023	0.020327	0.27279	0.27279	0.27279	NODI: 9	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: 09B - 1 - A

Parameter	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Oil & grease	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	SU	SU	lb/d	ug/L	in	lb/d	mg/L	lb/d
Effluent Limit	6.5	9	Report	Report	Report	438	15	Report
Minimum	6.61	6.61	0	0	0	0	0	0
Maximum	7.92	7.92	0.000169	0.0564	1.99	0	0	0.0003
Median	Non-Detect	Non-Detect	Non-Detect	Non-Detect	0.35	Non-Detect	Non-Detect	Non-Detect
No. of Violations	0	0	N/A	N/A	N/A	0	0	N/A
Monitoring Period End Date								
1/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.29	NODI: 9	NODI: 9	NODI: 9
2/28/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.34	NODI: 9	NODI: 9	NODI: 9
3/31/2018	7.32	7.32	0	0	1.73	0	0	0
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	7.1	7.1	0	0	0.47	0	0	0
7/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	6.67	6.67	0.0000514	0.0232	0.79	0	0	0.0001645
10/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	7.1	7.1	0	0	0.01	0	0	0
1/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	7.92	7.92	0.000169	0.0564	0	0	0	0.0003
4/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	7.44	7.44	0	0	1.29	0	0	0
7/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.49	NODI: 9	NODI: 9	NODI: 9
9/30/2019	6.9	6.9	0	0	0.14	0	0	0
10/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.8	NODI: 9	NODI: 9	NODI: 9
11/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.58	NODI: 9	NODI: 9	NODI: 9
12/31/2019	6.77	6.77	0	0	0.89	0	0	0
1/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.68	NODI: 9	NODI: 9	NODI: 9
2/29/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.91	NODI: 9	NODI: 9	NODI: 9
3/31/2020	6.76	6.76	0	0	0.65	0	0	0
4/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.06	NODI: 9	NODI: 9	NODI: 9
5/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.19	NODI: 9	NODI: 9	NODI: 9
6/30/2020	6.71	6.71	0.00008	0.00008	0.65	0	0	0

Outfall - Monitoring Location - Limit Set: 09B - 1 - A

Parameter	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Oil & grease	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	**SU**	**SU**	**lb/d**	**ug/L**	**in**	**lb/d**	**mg/L**	**lb/d**
Effluent Limit	**6.5**	**9**	**Report**	**Report**	**Report**	**438**	**15**	**Report**
Minimum	**6.61**	**6.61**	**0**	**0**	**0**	**0**	**0**	**0**
7/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.12	NODI: 9	NODI: 9	NODI: 9
8/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.57	NODI: 9	NODI: 9	NODI: 9
9/30/2020	7.02	7.02	0.000036	0.0551	0.22	0	0	0.000084
10/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.74	NODI: 9	NODI: 9	NODI: 9
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.22	NODI: 9	NODI: 9	NODI: 9
12/31/2020	6.89	6.89	0	0	0.14	0	0	0
1/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.54	NODI: 9	NODI: 9	NODI: 9
2/28/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.74	NODI: 9	NODI: 9	NODI: 9
3/31/2021	6.74	6.74	0	0	0.35	0	0	0
4/30/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.66	NODI: 9	NODI: 9	NODI: 9
5/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.1	NODI: 9	NODI: 9	NODI: 9
6/30/2021	7.37	7.37	0	0	0.1	0	0	0
7/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.05	NODI: 9	NODI: 9	NODI: 9
8/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.12	NODI: 9	NODI: 9	NODI: 9
9/30/2021	6.61	6.61	0	0	1.37	0	0	0
10/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0	NODI: 9	NODI: 9	NODI: 9
11/30/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.96	NODI: 9	NODI: 9	NODI: 9
12/31/2021	7.68	7.68	0	0	1.11	0	0	0
1/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.42	NODI: 9	NODI: 9	NODI: 9
2/28/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.36	NODI: 9	NODI: 9	NODI: 9
3/31/2022	7.34	7.34	0	0	0.04	0	0	0
4/30/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.05	NODI: 9	NODI: 9	NODI: 9
5/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.3	NODI: 9	NODI: 9	NODI: 9
6/30/2022	7.1	7.1	0	0	0.36	0	0	0
7/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.21	NODI: 9	NODI: 9	NODI: 9
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	7.31	7.31	0	0	1.13	0	0	0
10/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.42	NODI: 9	NODI: 9	NODI: 9
11/30/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.88	NODI: 9	NODI: 9	NODI: 9
12/31/2022	7.09	7.09	0	0	0.61	0	0	0
1/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.99	NODI: 9	NODI: 9	NODI: 9
2/28/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.08	NODI: 9	NODI: 9	NODI: 9
3/31/2023	7.66	7.66	0	0	0.68	0	0	0
4/30/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.17	NODI: 9	NODI: 9	NODI: 9
5/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.16	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: 09B - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Rainfall
	Daily Max	Daily Max
Units	ug/L	in
Effluent Limit	Report	Report
Minimum	0	0
Maximum	0.1388	4.79
Median	Non-Detect	0.54
No. of Violations	N/A	N/A
Monitoring Period End Date		
1/31/2018	NODI: 9	4.79
2/28/2018	NODI: 9	2.43
3/31/2018	0	4.79
4/30/2018	NODI: 9	NODI: 9
5/31/2018	NODI: 9	NODI: 9
6/30/2018	0	1.41
7/31/2018	NODI: 9	NODI: 9
8/31/2018	NODI: 9	NODI: 9
9/30/2018	0.0697	1.53
10/31/2018	NODI: 9	NODI: 9
11/30/2018	NODI: 9	NODI: 9
12/31/2018	0	1.53
1/31/2019	NODI: 9	NODI: 9
2/28/2019	NODI: 9	NODI: 9
3/31/2019	0.1	0
4/30/2019	NODI: 9	NODI: 9
5/31/2019	NODI: 9	NODI: 9
6/30/2019	0	2.51
7/31/2019	NODI: 9	NODI: 9
8/31/2019	NODI: 9	0.49
9/30/2019	0	0.14
10/31/2019	NODI: 9	0.8
11/30/2019	NODI: 9	0.58
12/31/2019	0	0.89
1/31/2020	NODI: 9	0.68
2/29/2020	NODI: 9	0.91
3/31/2020	0	0.65
4/30/2020	NODI: 9	0.06
5/31/2020	NODI: 9	0.19
6/30/2020	0.00016	0.65

Outfall - Monitoring Location - Limit Set: 09B - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Rainfall
	Daily Max	Daily Max
Units	ug/L	in
Effluent Limit	Report	Report
Minimum	0	0
7/31/2020	NODI: 9	0.12
8/31/2020	NODI: 9	0.57
9/30/2020	0.1388	0.22
10/31/2020	NODI: 9	0.74
11/30/2020	NODI: 9	0.22
12/31/2020	0	0.14
1/31/2021	NODI: 9	0.54
2/28/2021	NODI: 9	0.74
3/31/2021	0	0.54
4/30/2021	NODI: 9	1.66
5/31/2021	NODI: 9	0.1
6/30/2021	0	0.1
7/31/2021	NODI: 9	1.05
8/31/2021	NODI: 9	0.12
9/30/2021	0	1.37
10/31/2021	NODI: 9	0
11/30/2021	NODI: 9	0.96
12/31/2021	0	1.54
1/31/2022	NODI: 9	0.42
2/28/2022	NODI: 9	0.36
3/31/2022	0	0.04
4/30/2022	NODI: 9	1.05
5/31/2022	NODI: 9	0.6
6/30/2022	0	1.19
7/31/2022	NODI: 9	0.21
8/31/2022	NODI: 9	NODI: 9
9/30/2022	0	2.19
10/31/2022	NODI: 9	0.42
11/30/2022	NODI: 9	0.88
12/31/2022	0	0.61
1/31/2023	NODI: 9	1.99
2/28/2023	NODI: 9	0.08
3/31/2023	0	0.68
4/30/2023	NODI: 9	0.17
5/31/2023	NODI: 9	1.16

Outfall - Monitoring Location - Limit Set: 64G - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Minimum	Maximum
Units	**MGD**	**MGD**	**MGD**	**MGD**	**mg/L**	**mg/L**	**SU**	**SU**
Effluent Limit	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**6.5**	**9**
Minimum	**0.088438**	**0.11261**	**0.066855**	**0.06848**	**0**	**0**	**6.85**	**7.5**
Maximum	**0.245488**	**0.36583**	**0.232445**	**0.26293**	**3.9**	**4.4**	**7.6**	**8.5**
Median	**0.161144**	**0.19264**	**0.15112**	**0.16491**	**0**	**0**	**7.4**	**7.6**
No. of Violations	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**0**	**0**
Monitoring Period End Date								
1/31/2018	0.088721	0.12571	0.06993	0.07851	0	0	7.33	7.63
2/28/2018	0.134245	0.18647	0.123665	0.13025	0	0	7.43	7.81
3/31/2018	0.152814	0.17155	0.14277	0.15657	0	0	6.85	7.62
4/30/2018	0.148069	0.17365	0.15112	0.153616	0	0	7.42	7.64
5/31/2018	0.136419	0.17992	0.167725	0.17992	0	0	7.4	7.6
6/30/2018	0.113454	0.13892	0.12978	0.13654	0	0	7.4	7.6
7/31/2018	0.094358	0.1395	0.08829	0.09795	0	0	7.4	7.6
8/31/2018	0.123106	0.15404	0.111785	0.11483	0	0	6.9	7.7
9/30/2018	0.133083	0.15748	0.11584	0.11849	0	0	7.4	8.5
10/31/2018	0.153859	0.18147	0.125465	0.14847	0	0	7.4	7.6
11/30/2018	0.15517	0.19855	0.15066	0.15196	0	0	7.4	8.1
12/31/2018	0.166635	0.21245	0.15423	0.17762	0	0	7.4	7.7
1/31/2019	0.16985	0.18668	0.170775	0.17189	0	0	7.5	7.6
2/28/2019	0.161144	0.17531	0.15955	0.16508	0	0	7.4	7.6
3/31/2019	0.138245	0.14931	0.136215	0.1383	0	0	7.4	7.6
4/30/2019	0.16727	0.19788	0.13903	0.16491	0	0	7.4	7.7
5/31/2019	0.190978	0.21053	0.193005	0.19527	0	0	7.5	8.1
6/30/2019	0.173267	0.19924	0.164465	0.17007	0	0	7.4	7.6
7/31/2019	0.165846	0.19441	0.184045	0.18758	0	0	7.4	7.6
8/31/2019	0.103679	0.14363	0.108175	0.12151	0	0	7.4	7.7
9/30/2019	0.088438	0.1644	0.066855	0.06848	0	0	7.4	7.7
10/31/2019	0.090678	0.11261	0.08201	0.10927	0	0	7.4	8
11/30/2019	0.116928	0.14097	0.101525	0.11696	0	0	7.6	8.2
12/31/2019	0.171476	0.20871	0.12298	0.15324	0	0	7.4	7.7
1/31/2020	0.189969	0.20404	0.12298	0.15324	0	0	7	7.7
2/29/2020	0.174961	0.19264	0.1789	0.18214	0	0	7.4	7.7
3/31/2020	0.183156	0.1951	0.193245	0.1951	0	0	7.4	7.6
4/30/2020	0.193788	0.21229	0.186065	0.19517	0	0	7.4	7.6
5/31/2020	0.190433	0.21628	0.195915	0.20304	0.75	1.5	7.4	7.5
6/30/2020	0.152266	0.17979	0.18246	0.20304	0	0	7.4	7.6

Outfall - Monitoring Location - Limit Set: 64G - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Minimum	Maximum
Units	**MGD**	**MGD**	**MGD**	**MGD**	**mg/L**	**mg/L**	**SU**	**SU**
Effluent Limit	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**6.5**	**9**
Minimum	**0.088438**	**0.11261**	**0.066855**	**0.06848**	**0**	**0**	**6.85**	**7.5**
7/31/2020	0.114888	0.13803	0.102655	0.10401	0	0	7.5	7.7
8/31/2020	0.103733	0.13203	0.0879	0.08882	0	0	7	8.1
9/30/2020	0.090362	0.11607	0.086345	0.08689	0	0	7.4	7.6
10/31/2020	0.095569	0.13143	0.096445	0.09897	0	0	7.5	7.6
11/30/2020	0.099587	0.11466	0.1036	0.10662	0	0	7.4	7.6
12/31/2020	0.114231	0.14815	0.107965	0.1123	0	0	7.5	8.1
1/31/2021	0.150696	0.17995	0.14501	0.1519	0	0	7.4	8.2
2/28/2021	0.12445	0.14758	0.118905	0.12741	0	0	7.4	8.1
3/31/2021	0.147833	0.19481	0.12301	0.12685	0	0	7.4	7.7
4/30/2021	0.184584	0.20959	0.16676	0.17701	0	0	7.4	7.6
5/31/2021	0.233524	0.26759	0.2254	0.23062	0	0	7.4	7.6
6/30/2021	0.22459	0.25226	0.214645	0.24979	3.9	4.4	7.4	7.6
7/31/2021	0.245488	0.27099	0.22692	0.24317	1.85	3.7	7.4	7.7
8/31/2021	0.227279	0.25361	0.22443	0.22885	0	0	7.4	7.6
9/30/2021	0.223431	0.23882	0.227875	0.23736	0.9	1.8	7.4	7.6
10/31/2021	0.22841	0.27931	0.21797	0.21918	0	0	7.4	7.8
11/30/2021	0.242875	0.36583	0.231785	0.26293	0	0	7.4	8.2
12/31/2021	0.230798	0.26157	0.232445	0.25388	0	0	7.4	7.6
1/31/2022	0.204145	0.22995	0.212175	0.21651	0	0	7.4	7.5
2/28/2022	0.171258	0.21012	0.187615	0.19276	0	0	7.4	7.6
3/31/2022	0.195315	0.22122	0.191355	0.1924	0	0	7.4	7.6
4/30/2022	0.219195	0.23585	0.16356	0.2221	0	0	7.4	7.7
5/31/2022	0.208727	0.22909	0.219855	0.22436	0	0	7.3	7.5
6/30/2022	0.174723	0.21046	0.177995	0.17898	0	0	7.4	7.6
7/31/2022	0.133482	0.15795	0.13582	0.15425	0	0	7.4	7.7
8/31/2022	0.116491	0.15587	0.11022	0.11328	0	0	7.4	7.8
9/30/2022	0.112713	0.13518	0.128165	0.13518	0	0	7.4	7.6
10/31/2022	0.123171	0.14543	0.124895	0.1297	0	0	7.5	8.2
11/30/2022	0.121189	0.14075	0.118935	0.12275	0	0	7.5	7.9
12/31/2022	0.140536	0.17919	0.1288	0.13468	0	0	7.4	7.6
1/31/2023	0.204049	0.22547	0.18156	0.19328	0	0	7.3	7.5
2/28/2023	0.22742	0.25091	0.22229	0.22263	0	0	7.3	7.5
3/31/2023	0.191025	0.26452	0.181485	0.18282	0	0	7.3	7.6
4/30/2023	0.200136	0.22615	0.20016	0.20485	0	0	7.4	7.6
5/31/2023	0.182732	0.21574	0.182195	0.19953	0	0	7.4	7.5

Outfall - Monitoring Location - Limit Set: 64G - 1 - A

Parameter	Oil & grease	Polychlorinated biphenyls (PCBs)	Volatile fraction organics (EPA 624)	Volatile Organic Compound (VOC)	Oil & grease	Polychlorinated biphenyls (PCBs)	Volatile fraction organics (EPA 624)	Volatile Organic Compound (VOC)
	Monthly Avg	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max	Daily Max
Units	mg/L	ug/L	ug/L	ug/L	mg/L	ug/L	ug/L	ug/L
Effluent Limit	Report	0.065	Report	Report	Report	Report	Report	Report
Minimum	0	0	0	0	0	0	0	0
Maximum	6.4	0	7.8	93.5	12.8	0	4.36	187
Median	0	0	0.525	0	0	0	0.65	0
No. of Violations	N/A	0	N/A	N/A	N/A	N/A	N/A	N/A
Monitoring Period End Date								
1/31/2018	0	0	0	0	0	0	0	0
2/28/2018	0	0	0.12	0	0	0	0.24	0
3/31/2018	0	0	0.215	0	0	0	0.43	0
4/30/2018	0	0	0.525	0	0	0	0.609	0
5/31/2018	0	0	0.592	2.58	0	0	0.65	5.16
6/30/2018	0	0	0.717	0	0	0	0.752	0
7/31/2018	0	0	1.455	0	0	0	1.6	0
8/31/2018	0	0	1.063	0	0	0	1.163	0
9/30/2018	0	0	0.819	0	0	0	1	0
10/31/2018	0	0	1.073	0	0	0	1.13	0
11/30/2018	0	0	0.944	0	0	0	1.59	0
12/31/2018	0	0	0	0	0	0	0	0
1/31/2019	0	0	0	0	0	0	0	0
2/28/2019	0	0	0.42	0	0	0	0.84	0
3/31/2019	0	0	0.289	0	0	0	0.577	0
4/30/2019	0	0	0.56	0	0	0	0.58	0
5/31/2019	0	0	0.868	63	0	0	1.11	126
6/30/2019	0	0	0.935	2.705	0	0	1.01	5.41
7/31/2019	0	0	0.875	0	0	0	0.89	0
8/31/2019	0	0	0.419	93.5	0	0	0.44	187
9/30/2019	0	0	0.726	0	0	0	0.985	0
10/31/2019	0	0	0.854	0	0	0	0.957	0
11/30/2019	0	0	0	0	0	0	0	0
12/31/2019	0	0	0	2.41	0	0	0	4.82
1/31/2020	0	0	0	0	0	0	0	0
2/29/2020	0	0	0	0	0	0	0	0
3/31/2020	0	0	0.412	0	0	0	0.476	0
4/30/2020	0	0	0	0	0	0	0	0
5/31/2020	0	0	0.984	0	0	0	1.24	0
6/30/2020	0	0	7.8	0	0	0	1.14	0

Outfall - Monitoring Location - Limit Set: 64G - 1 - A

Parameter	Oil & grease	Polychlorinated biphenyls (PCBs)	Volatile fraction organics (EPA 624)	Volatile Organic Compound (VOC)	Oil & grease	Polychlorinated biphenyls (PCBs)	Volatile fraction organics (EPA 624)	Volatile Organic Compound (VOC)
	Monthly Avg	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max	Daily Max
Units	mg/L	ug/L	ug/L	ug/L	mg/L	ug/L	ug/L	ug/L
Effluent Limit	Report	0.065	Report	Report	Report	Report	Report	Report
Minimum	0	0	0	0	0	0	0	0
7/31/2020	0	0	0.636	0	0	0	0.811	0
8/31/2020	0	0	0.554	0	0	0	0.795	0
9/30/2020	0	0	1.397	2.8	0	0	1.84	5.6
10/31/2020	0	0	0.711	0	0	0	0.982	0
11/30/2020	0	0	0.365	0	0	0	0.729	0
12/31/2020	0	0	0	0	0	0	0	0
1/31/2021	0	0	0	0.73	0	0	0	1.46
2/28/2021	0	0	0	0	0	0	0	0
3/31/2021	0	0	0.149	0	0	0	0.298	0
4/30/2021	0	0	0.26	0	0	0	0.519	0
5/31/2021	0	0	0.471	0	0	0	0.492	0
6/30/2021	0	0	0.46	0	0	0	0.511	0
7/31/2021	0	0	0.648	0	0	0	0.93	0
8/31/2021	3.45	0	0.694	0	6.9	0	0.998	0
9/30/2021	0	0	1.012	0	0	0	1.05	0
10/31/2021	0	0	0.867	0	0	0	0.901	0
11/30/2021	0	0	0	0	0	0	0	0
12/31/2021	0	0	0	0	0	0	0	0
1/31/2022	0	0	0.306	0	0	0	0.315	0
2/28/2022	0	0	0.471	0.198	0	0	0.546	0.4
3/31/2022	0	0	0.563	11.2	0	0	0.66	22.4
4/30/2022	0	0	0.537	0	0	0	1.074	0
5/31/2022	0	0	1.085	0	0	0	1.15	0
6/30/2022	0	0	0.977	0	0	0	1.03	0
7/31/2022	0	0	0.851	0	0	0	1.06	0
8/31/2022	0	0	0.931	0	0	0	0.946	0
9/30/2022	0	0	2.138	0	0	0	2.216	0
10/31/2022	6.4	0	0.705	0	12.8	0	0.899	0
11/30/2022	0	0	0	0	0	0	0	0
12/31/2022	0	0	0	0.055	0	0	0	0.11
1/31/2023	0	0	0	0	0	0	0	0
2/28/2023	0	0	0	0	0	0	0	0
3/31/2023	0	0	2.32	0	0	0	4.36	0
4/30/2023	0	0	0	0	0	0	0	0
5/31/2023	0	0	0.148	0	0	0	0.295	0

Outfall - Monitoring Location - Limit Set: 64G - 1 - T

Parameter	LC50 Acute Ceriodaphnia	IC25 Statre 7Day Chrceriodaphnia	Noel Static 7Day Chronic Ceriodaphnia
	Monthly Avg Min	Monthly Avg Min	Monthly Avg Min
Units	%	%	%
Effluent Limit	Report	Report	Report
Minimum	100	10.47	6.25
Maximum	100	100	100
Median	100	100	100
No. of Violations	N/A	N/A	N/A
Monitoring Period End Date			
3/31/2018	100	70.21	100
6/30/2018	100	100	75
9/30/2018	100	38.01	25
12/31/2018	100	100	100
3/31/2019	100	100	100
6/30/2019	100	63.12	25
9/30/2019	100	100	25
12/31/2019	100	100	100
3/31/2020	100	100	100
6/30/2020	100	100	25
9/30/2020	100	12.2	100
12/31/2020	100	100	100
3/31/2021	100	100	100
6/30/2021	100	94.5	100
9/30/2021	100	100	100
12/31/2021	100	46.4	50
3/31/2022	100	100	75
6/30/2022	100	100	100
9/30/2022	100	10.47	6.25
12/31/2022	100	100	100
3/31/2023	100	100	100

Outfall - Monitoring Location - Limit Set: D006 - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	**MGD**	**MGD**	**MGD**	**MGD**	**lb/d**	**mg/L**	**lb/d**	**mg/L**
Effluent Limit	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**
Minimum	**0.000072**	**0.000144**	**0.000144**	**0.000144**	**0**	**0**	**0**	**0**
Maximum	**0.00198**	**0.00432**	**0.00144**	**0.00193**	**722978**	**54.55**	**0.9497**	**59.1**
Median	**0.000144**	**0.000144**	**0.000144**	**0.000144**	**0.008**	**5.45**	**0.012**	**9.9**
No. of Violations	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**
Monitoring Period End Date								
1/31/2018	0.000144	0.000144	0.000144	0.000144	0.0155	12.9	0.0175	14.6
2/28/2018	0.000972	0.00288	0.000216	0.000288	0.101	54.55	0.142	59.1
3/31/2018	0.00018	0.000288	0.000144	0.000144	0.027502	22.9	0.0302642	25.2
4/30/2018	0.00018	0.000288	0.000144	0.000144	0.0195	16.2	0.0276	23
5/31/2018	0.000144	0.000144	0.000144	0.000144	0.0093	7.75	0.013	10.8
6/30/2018	0.000144	0.000144	0.000144	0.000144	0.0018	1.5	0.0036	3
7/31/2018	0.000144	0.000144	0.000144	0.000144	0.0022818	1.9	0.0027622	2.3
8/31/2018	0.000576	0.000864	0.000192	0.00024	0.0039832	2.65	0.0040032	3.3
9/30/2018	0.000518	0.00144	0.000144	0.000144	0.00228	1.9	0.003	2.5
10/31/2018	0.00036	0.00072	0.000144	0.000144	0.0006605	0.55	0.0013211	1.1
11/30/2018	0.00198	0.00432	0.000144	0.000144	0.03849	32.05	0.05056	42.1
12/31/2018	0.000216	0.000432	0.000144	0.000144	0.0282	23.5	0.0306	25.5
1/31/2019	0.00024	0.000288	0.000288	0.000432	722978	15.8	0.113851	31.6
2/28/2019	0.00018	0.000288	0.000144	0.000144	0.026541	12.5	0.030024	25
3/31/2019	0.000126	0.000144	0.000144	0.000144	0.0151	12.55	0.0301	25.1
4/30/2019	0.00036	0.00072	0.000739	0.00193	0.3306	31.4	0.9497	59
5/31/2019	0.000216	0.000288	0.000288	0.000432	0.024	10.15	0.035	10.6
6/30/2019	0.000259	0.00072	0.000144	0.000144	0.0067	5.6	0.0119	9.9
7/31/2019	0.000288	0.000576	0.000288	0.000432	0.0076	3.05	0.0119	3.3
8/31/2019	0.000216	0.000288	0.000144	0.000144	0.006	5	0.012	10
9/30/2019	0.00023	0.000576	0.000144	0.000144	0.0011	0.95	0.0023	1.9
10/31/2019	0.00018	0.000288	0.000144	0.000144	0.0071	4.9	0.0118	9.8
11/30/2019	0.00018	0.000288	0.000144	0.000144	0.0106	8	0.0192	16
12/31/2019	0.00018	0.000288	0.000144	0.000144	0.0329	18.75	0.045	37.5
1/31/2020	0.000144	0.000144	0.000144	0.000144	0.0551	23	0.0552	46
2/29/2020	0.000144	0.000144	0.000144	0.000144	0.0343	16.4	0.0394	32.8
3/31/2020	0.000144	0.000144	0.000144	0.000144	0.0172	14.3	0.0216	18
4/30/2020	0.000144	0.000144	0.000144	0.000144	0.008	7	0.011	9.2
5/31/2020	0.000144	0.000144	0.000144	0.000144	0.004	2.4	0.008	6.9
6/30/2020	0.00018	0.000288	0.000144	0.000144	0.0035	2.95	0.0046	3.8

Outfall - Monitoring Location - Limit Set: D006 - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	MGD	MGD	lb/d	mg/L	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	Report	Report	Report	Report
Minimum	**0.000072**	**0.000144**	**0.000144**	**0.000144**	**0**	**0**	**0**	**0**
7/31/2020	0.000144	0.000144	0.000144	0.000144	0	0	0	0
8/31/2020	0.000144	0.000144	0.000144	0.000144	0.0017414	1.45	0.0034828	2.9
9/30/2020	0.000144	0.000144	0.000144	0.000144	0.001	0.85	0.002	1.7
10/31/2020	0.000144	0.000144	0.000144	0.000144	0.00432	2.8	0.00672	5.6
11/30/2020	0.000144	0.000144	0.000144	0.000144	0.0051	3.35	0.00805	6.7
12/31/2020	0.000288	0.000576	0.000216	0.000288	0.008	5.45	0.0131	10.9
1/31/2021	0.000144	0.000144	0.000144	0.000144	0.0247	10.7	0.0257	21.4
2/28/2021	0.000144	0.000144	0.000144	0.000144	0.0088	4.9	0.0118	9.8
3/31/2021	0.000108	0.000144	0.000144	0.000144	0.0599	28.6	0.069	57.2
4/30/2021	0.00018	0.000288	0.000144	0.000144	0.02	10.3	0.025	20.6
5/31/2021	0.000144	0.000144	0.000144	0.000144	0.0056	3.65	0.0088	7.3
6/30/2021	0.000144	0.000144	0.000144	0.000144	0.002	0.95	0.0023	1.9
7/31/2021	0.000144	0.000144	0.000144	0.000144	0.0015	0.65	0.00156	1.3
8/31/2021	0.000144	0.000144	0.000144	0.000144	0.0014412	1.2	0.0028823	2.4
9/30/2021	0.00018	0.000288	0.000144	0.000144	0.0031	1.6	0.0038	3.2
10/31/2021	0.000144	0.000144	0.000144	0.000144	0.0022	1.2	0.0029	2.4
11/30/2021	0.000144	0.000144	0.000144	0.000144	0.0025	1.25	0.003	2.5
12/31/2021	0.000108	0.000144	0.000144	0.000144	0.0283	13.1	0.0315	26.2
1/31/2022	0.000144	0.000144	0.000144	0.000144	0.0226	13.45	0.0323	26.9
2/28/2022	0.000144	0.000288	0.000144	0.000144	0.0361	18.1	0.0435	36.2
3/31/2022	0.000144	0.000144	0.000144	0.000144	0.0208	9.1	0.0219	18.2
4/30/2022	0.000217	0.000434	0.000144	0.000144	0.0055	2.5	0.006	5
5/31/2022	0.000144	0.000144	0.000144	0.000144	0.0058	2.55	0.0061	5.1
6/30/2022	0.000144	0.000144	0.000144	0.000144	0.0038	3.2	0.0053	4.4
7/31/2022	0.000144	0.000144	0.000144	0.000144	0.0035	2.2	0.0053	4.4
8/31/2022	0.000144	0.000144	0.000144	0.000144	0.0023419	1.95	0.0031225	2.6
9/30/2022	0.000144	0.000144	0.000144	0.000144	0.0051041	4.25	0.0066053	5.5
10/31/2022	0.000173	0.000432	0.000288	0.000432	0.0011409	0.95	0.0022818	1.9
11/30/2022	0.000144	0.000144	0.000792	0.00144	0.0120096	1	0.0240192	2
12/31/2022	0.00144	0.00144	0.00144	0.00144	0.2095675	17.45	0.2197757	18.3
1/31/2023	0.000173	0.000288	0.000144	0.000144	0.0416133	34.65	0.052602	43.8
2/28/2023	0.000072	0.000144	0.000144	0.000144	0.0166333	13.85	0.0189752	15.8
3/31/2023	0.000144	0.000144	0.000144	0.000144	0.0326661	27.2	0.0476781	39.7
4/30/2023	0.000108	0.000144	0.000288	0.000432	0.0357886	14.6	0.0547638	15.2
5/31/2023	0.000144	0.000144	0.000144	0.000144	0.0136309	11.35	0.0190953	15.9

Outfall - Monitoring Location - Limit Set: D006 - 1 - A

Parameter	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Volatile fraction organics (EPA 624)	Volatile Organic Compound (VOC)	Oil & grease	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	SU	SU	lb/d	ug/L	ug/L	ug/L	mg/L	lb/d
Effluent Limit	6.5	9	Report	Report	Report	Report	15	Report
Minimum	6.73	6.89	0	0	0	0	0	0
Maximum	7.8	8.35	0.0000007	0.2681	2.907	53	4.9	0.0000018
Median	7.09	7.3	0.00000004	0.0335	0.347	0	0	0.00000008
No. of Violations	0	0	N/A	N/A	N/A	N/A	0	N/A
Monitoring Period End Date								
1/31/2018	6.84	6.89	0	0	0	1.5	4.7	0
2/28/2018	7.5	7.68	0.0000002	0.1237	0.445	0	0	0.0000003
3/31/2018	7.6	7.7	0	0	0.53	0	0	0
4/30/2018	7.03	7.13	0.00000005	0.0374	0.741	0	0	0.0000001
5/31/2018	7.16	7.22	0	0	2.892	0	0	0
6/30/2018	6.99	7	0.00000011	0.0929	1.06	0	0	0.00000022
7/31/2018	6.92	7.14	0.00000007	0.0558	0.616	0	0	0.00000013
8/31/2018	7.18	7.3	0.00000013	0.0802	1.473	0	0	0.00000018
9/30/2018	6.97	7.26	0.00000007	0.0547	0	0	0	0.00000013
10/31/2018	7.16	7.78	0.00000004	0.0341	0.12	0	0	0.00000008
11/30/2018	7.3	7.41	0.00000018	0.149	1.264	1.585	0	0.00000022
12/31/2018	7.39	7.39	0.00000009	0.0737	1.485	0	0	0.00000009
1/31/2019	7.46	7.57	0.0000002	0.0906	0.546	0	0	0.0000004
2/28/2019	7.75	7.76	0.00000007	0.0554	0.551	0	0	0.0000001
3/31/2019	7.04	7.5	0.00000004	0.0364	0.646	53	0	0.00000009
4/30/2019	7.35	7.5	0.0000007	0.1092	0.195	0	0	0.0000018
5/31/2019	7.22	7.67	0	0	0.462	0.575	0	0
6/30/2019	7.39	7.39	0.00000005	0.0398	0.249	12.54	0	0.0000001
7/31/2019	7.27	7.41	0.0000003	0.1045	0.12	0	0	0.00000052
8/31/2019	7.13	7.47	0	0	0.146	0	0	0
9/30/2019	6.87	6.92	0	0	1.57	15.9	0	0
10/31/2019	6.94	7.13	0.0000001	0.0783	0.457	0	0	0.0000002
11/30/2019	7.16	7.19	0.0000001	0.08	0.12	0	0	0.00000011
12/31/2019	7.19	7.22	0.00000009	0.0755	0.361	0	0	0.0000001
1/31/2020	7.4	7.41	0	0	0.406	0	0	0
2/29/2020	7.01	7.27	0	0	0.515	0	0	0
3/31/2020	6.86	6.97	0	0	0.276	0	0	0
4/30/2020	6.86	6.91	0.00000004	0.0335	0	0	0	0.00000008
5/31/2020	6.91	7.11	0	0	0.669	0	0	0
6/30/2020	6.98	7.88	0.00000019	0.1577	1.31	0	0	0.00000032

Outfall - Monitoring Location - Limit Set: D006 - 1 - A

Parameter	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Volatile fraction organics (EPA 624)	Volatile Organic Compound (VOC)	Oil & grease	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	SU	SU	lb/d	ug/L	ug/L	ug/L	mg/L	lb/d
Effluent Limit	6.5	9	Report	Report	Report	Report	15	Report
Minimum	**6.73**	**6.89**	**0**	**0**	**0**	**0**	**0**	**0**
7/31/2020	6.8	6.91	0.0000002	0.1763	0.235	0	0	0.0000003
8/31/2020	6.79	7.01	0.00000013	0.1081	0	0.835	0	0.00000026
9/30/2020	7.06	7.24	0.00000004	0.0338	0.411	0	4.9	0.00000008
10/31/2020	7.12	7.15	0	0	0.283	0	0	0
11/30/2020	7.12	7.2	0	0	0.262	0	0	0
12/31/2020	7.12	7.3	0.00000012	0.0514	0.302	0	0	0.00000025
1/31/2021	7.07	7.91	0	0	1.173	0	0	0
2/28/2021	6.86	6.97	0	0	1.194	0	0	0
3/31/2021	6.89	6.94	0	0	1.413	0	0	0
4/30/2021	7.15	7.25	0.00000005	0.0438	0.151	0	0	0.00000011
5/31/2021	7.09	7.94	0	0	0.139	0	0	0
6/30/2021	7.09	7.12	0	0	0.104	0	0	0
7/31/2021	6.73	6.94	0	0	0	0	0	0
8/31/2021	6.84	7.01	0.00000005	0.0397	0	0	0	0.0000001
9/30/2021	7.09	7.27	0	0	0.154	0	0	0
10/31/2021	7.06	7.58	0	0	0.119	0	0	0
11/30/2021	7.32	7.42	0	0	0.295	0	0	0
12/31/2021	6.98	7	0.0000001	0.0841	0.785	0	0	0.00000012
1/31/2022	6.93	7.12	0.00000005	0.0414	2.907	0	0	0.0000001
2/28/2022	7.3	7.53	0	0	0.419	2.24	0	0
3/31/2022	7.22	7.51	0.00000032	0.2681	0.235	7.95	0	0.00000034
4/30/2022	7.3	7.33	0.00000005	0.045	0.112	0	0	0.00000011
5/31/2022	6.86	7.51	0	0	0.249	0	0	0
6/30/2022	7.22	7.44	0	0	0.158	0	0	0
7/31/2022	7.19	7.31	0.00000005	0.0431	0.354	0	0	0.0000001
8/31/2022	7.15	7.72	0.00000005	0.0398	0.331	0	0	0.0000001
9/30/2022	7.01	7.27	0	0	0.248	0	0	0
10/31/2022	6.84	7.1	0.00000032	0.0876	0.123	0	0	0.00000063
11/30/2022	7	7.05	0	0	0.347	0	0	0
12/31/2022	7.3	7.42	0	0	0.483	0.32	0	0
1/31/2023	7.49	7.53	0	0	0.579	0	0	0
2/28/2023	7.54	7.56	0	0	0.867	1.145	0	0
3/31/2023	7.8	8.35	0	0	0.415	0	0	0
4/30/2023	6.97	7.3	0	0	0	0	0	0
5/31/2023	6.8	7.28	0	0	0	0	0	0

Outfall - Monitoring Location - Limit Set: D006 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Volatile fraction organics (EPA 624)	Volatile Organic Compound (VOC)
	Daily Max	Daily Max	Daily Max
Units	ug/L	ug/L	ug/L
Effluent Limit	Report	Report	Report
Minimum	0	0	0
Maximum	0.2796	5.47	106
Median	0.067	0.425	0
No. of Violations	N/A	N/A	N/A
Monitoring Period End Date			
1/31/2018	0	0	1.6
2/28/2018	0.1276	0.53	0
3/31/2018	0	0.66	0
4/30/2018	0.0747	0.764	0
5/31/2018	0	3.2	0
6/30/2018	0.1858	2.119	0
7/31/2018	0.1115	0.852	0
8/31/2018	0.0875	2.66	0
9/30/2018	0.1093	0	0
10/31/2018	0.0682	0.24	0
11/30/2018	0.1863	1.273	3.17
12/31/2018	0.074	1.49	0
1/31/2019	0.1139	0.58	0
2/28/2019	0.1108	0.84	0
3/31/2019	0.0727	1.291	106
4/30/2019	0.1213	0.39	0
5/31/2019	0	0.689	1.15
6/30/2019	0.0795	0.268	25.08
7/31/2019	0.1439	0.24	0
8/31/2019	0	0.292	0
9/30/2019	0	2.86	31.8
10/31/2019	0.1565	0.656	0
11/30/2019	0.0894	0.24	0
12/31/2019	0.0818	0.367	0
1/31/2020	0	0.433	0
2/29/2020	0	0.53	0
3/31/2020	0	0.312	0
4/30/2020	0.067	0	0
5/31/2020	0	1.1	0
6/30/2020	0.266	1.36	0

Outfall - Monitoring Location - Limit Set: D006 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Volatile fraction organics (EPA 624)	Volatile Organic Compound (VOC)
	Daily Max	Daily Max	Daily Max
Units	ug/L	ug/L	ug/L
Effluent Limit	Report	Report	Report
Minimum	**0**	**0**	**0**
7/31/2020	0.2428	0.47	0
8/31/2020	0.2161	0	1.67
9/30/2020	0.0676	0.425	0
10/31/2020	0	0.566	0
11/30/2020	0	0.296	0
12/31/2020	0.1027	0.303	0
1/31/2021	0	1.201	0
2/28/2021	0	1.4	0
3/31/2021	0	1.547	0
4/30/2021	0.0876	0.302	0
5/31/2021	0	0.278	0
6/30/2021	0	0.208	0
7/31/2021	0	0	0
8/31/2021	0.0793	0	0
9/30/2021	0	0.307	0
10/31/2021	0	0.237	0
11/30/2021	0	0.589	0
12/31/2021	0.0994	0.81	0
1/31/2022	0.0827	5.47	0
2/28/2022	0	0.452	4.48
3/31/2022	0.2796	0.239	15.9
4/30/2022	0.0899	0.224	0
5/31/2022	0	0.249	0
6/30/2022	0	0.315	0
7/31/2022	0.0861	0.375	0
8/31/2022	0.0795	0.34	0
9/30/2022	0	0.255	0
10/31/2022	0.1751	0.245	0
11/30/2022	0	0.35	0
12/31/2022	0	0.686	0.64
1/31/2023	0	0.656	0
2/28/2023	0	1.254	2.29
3/31/2023	0	0.487	0
4/30/2023	0	0	0
5/31/2023	0	0	0

Outfall - Monitoring Location - Limit Set: D009 - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	MGD	MGD	lb/d	mg/L	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	Report	Report	Report	Report
Minimum	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Maximum	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Median	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
No. of Violations	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Monitoring Period End Date								
1/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/29/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D009 - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	MGD	MGD	lb/d	mg/L	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	Report	Report	Report	Report
Minimum	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
7/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D009 - 1 - A

Parameter	pH	pH	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	SU	SU	mg/L	lb/d	ug/L	mg/L	lb/d	ug/L
Effluent Limit	6.5	9	Report	Report	Report	15	Report	Report
Minimum	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Maximum	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Median	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
No. of Violations	No Data	No Data	N/A	N/A	N/A	No Data	N/A	N/A
Monitoring Period End Date								
1/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/29/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D009 - 1 - A

Parameter	pH	pH	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	SU	SU	mg/L	lb/d	ug/L	mg/L	lb/d	ug/L
Effluent Limit	6.5	9	Report	Report	Report	15	Report	Report
Minimum	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
7/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D05A - 1 - A

Parameter	Total Flow	Total Flow	Oil & grease	Oil & grease	Oil & grease
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	lb/d	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	15
Minimum	No Data	No Data	No Data	No Data	No Data
Maximum	No Data	No Data	No Data	No Data	No Data
Median	No Data	No Data	No Data	No Data	No Data
No. of Violations	N/A	N/A	N/A	N/A	No Data
Monitoring Period End Date					
1/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/29/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D05A - 1 - A

Parameter	Total Flow	Total Flow	Oil & grease	Oil & grease	Oil & grease
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	lb/d	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	15
Minimum	No Data	No Data	No Data	No Data	No Data
9/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D05A - Y - A

Parameter	TSS	TSS	TSS	TSS	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Minimum	Maximum	Monthly Avg	Monthly Avg
Units	lb/d	mg/L	lb/d	mg/L	SU	SU	lb/d	ug/L
Effluent Limit	Report	Report	Report	Report	6.5	9	Report	Report
Minimum	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Maximum	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
Median	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
No. of Violations	N/A	N/A	N/A	N/A	No Data	No Data	N/A	N/A
Monitoring Period End Date								
1/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/29/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D05A - Y - A

Parameter	TSS	TSS	TSS	TSS	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Minimum	Maximum	Monthly Avg	Monthly Avg
Units	lb/d	mg/L	lb/d	mg/L	SU	SU	lb/d	ug/L
Effluent Limit	Report	Report	Report	Report	6.5	9	Report	Report
Minimum	No Data	No Data	No Data	No Data	No Data	No Data	No Data	No Data
7/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
6/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
7/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
8/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
9/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
11/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D05A - Y - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Daily Max	Daily Max
Units	lb/d	ug/L
Effluent Limit	Report	Report
Minimum	No Data	No Data
Maximum	No Data	No Data
Median	No Data	No Data
No. of Violations	N/A	N/A
Monitoring Period End Date		
1/31/2018	NODI: C	NODI: C
2/28/2018	NODI: C	NODI: C
3/31/2018	NODI: C	NODI: C
4/30/2018	NODI: C	NODI: C
5/31/2018	NODI: C	NODI: C
6/30/2018	NODI: C	NODI: C
7/31/2018	NODI: C	NODI: C
8/31/2018	NODI: C	NODI: C
9/30/2018	NODI: C	NODI: C
10/31/2018	NODI: C	NODI: C
11/30/2018	NODI: C	NODI: C
12/31/2018	NODI: C	NODI: C
1/31/2019	NODI: C	NODI: C
2/28/2019	NODI: C	NODI: C
3/31/2019	NODI: C	NODI: C
4/30/2019	NODI: C	NODI: C
5/31/2019	NODI: C	NODI: C
6/30/2019	NODI: C	NODI: C
7/31/2019	NODI: C	NODI: C
8/31/2019	NODI: C	NODI: C
9/30/2019	NODI: C	NODI: C
10/31/2019	NODI: C	NODI: C
11/30/2019	NODI: C	NODI: C
12/31/2019	NODI: C	NODI: C
1/31/2020	NODI: C	NODI: C
2/29/2020	NODI: C	NODI: C
3/31/2020	NODI: C	NODI: C
4/30/2020	NODI: C	NODI: C
5/31/2020	NODI: C	NODI: C
6/30/2020	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D05A - Y - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Daily Max	Daily Max
Units	lb/d	ug/L
Effluent Limit	Report	Report
Minimum	No Data	No Data
7/31/2020	NODI: C	NODI: C
8/31/2020	NODI: C	NODI: C
9/30/2020	NODI: C	NODI: C
10/31/2020	NODI: C	NODI: C
11/30/2020	NODI: C	NODI: C
12/31/2020	NODI: C	NODI: C
1/31/2021	NODI: C	NODI: C
2/28/2021	NODI: C	NODI: C
3/31/2021	NODI: C	NODI: C
4/30/2021	NODI: C	NODI: C
5/31/2021	NODI: C	NODI: C
6/30/2021	NODI: C	NODI: C
7/31/2021	NODI: C	NODI: C
8/31/2021	NODI: C	NODI: C
9/30/2021	NODI: C	NODI: C
10/31/2021	NODI: C	NODI: C
11/30/2021	NODI: C	NODI: C
12/31/2021	NODI: C	NODI: C
1/31/2022	NODI: C	NODI: C
2/28/2022	NODI: C	NODI: C
3/31/2022	NODI: C	NODI: C
4/30/2022	NODI: C	NODI: C
5/31/2022	NODI: C	NODI: C
6/30/2022	NODI: C	NODI: C
7/31/2022	NODI: C	NODI: C
8/31/2022	NODI: C	NODI: C
9/30/2022	NODI: C	NODI: C
10/31/2022	NODI: C	NODI: C
11/30/2022	NODI: C	NODI: C
12/31/2022	NODI: C	NODI: C
1/31/2023	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: D64T - IM - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	MGD	MGD	lb/d	mg/L	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	Report	Report	Report	Report
Minimum	0.000144	0.000144	0.000144	0.000144	0	0	0	0
Maximum	0.01711	0.0432	0.106553	0.19307	0.8265	8.45	1.653	16.9
Median	0.00324	0.00648	0.006528	0.008333	0	0	0	0
No. of Violations	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Monitoring Period End Date								
1/31/2018	0.00024	0.000432	0.000144	0.000144	0	0	0	0
2/28/2018	0.003408	0.0072	0.000144	0.000144	0	0	0	0
3/31/2018	0.00624	0.0072	0.000144	0.000144	0	0	0	0
4/30/2018	0.00432	0.00576	0.000144	0.000144	0	0	0	0
5/31/2018	0.001152	0.00144	0.000144	0.000144	0	0	0	0
6/30/2018	0.000972	0.00288	0.000144	0.000144	0	0	0	0
7/31/2018	0.001066	0.0036	0.000144	0.000144	0	0	0	0
8/31/2018	0.00702	0.00864	0.013565	0.017666	0	0	0	0
9/30/2018	0.001123	0.00288	0.00969	0.013351	0	0	0	0
10/31/2018	0.00324	0.0072	0.003912	0.004317	0	0	0	0
11/30/2018	0.009792	0.0144	0.006155	0.006917	0	0	0	0
12/31/2018	0.00864	0.0216	0.018641	0.023167	0	0	0	0
1/31/2019	0.0036	0.0072	0.009047	0.011455	0	0	0	0
2/28/2019	0.00324	0.0072	0.009494	0.011029	0	0	0	0
3/31/2019	0.00756	0.0144	0.007336	0.011728	0.8265	8.45	1.653	16.9
4/30/2019	0.0153	0.0288	0.034697	0.043427	0.1115975	0.5	0.3347926	1
5/31/2019	0.00846	0.01008	0.013862	0.014049	0	0	0	0
6/30/2019	0.003456	0.0072	0.003348	0.004674	0	0	0	0
7/31/2019	0.00612	0.0144	0.006288	0.007272	0	0	0	0
8/31/2019	0.000522	0.00072	0.002642	0.002663	0	0	0	0
9/30/2019	0.000576	0.00072	0.00404	0.005065	0	0	0	0
10/31/2019	0.00252	0.0072	0.003207	0.005909	0	0	0	0
11/30/2019	0.01711	0.0432	0.006493	0.008333	0	0	0	0
12/31/2019	0.00882	0.0144	0.021029	0.028529	0.7729	6.85	1.5458	13.7
1/31/2020	0.00504	0.0072	0.106553	0.19307	0	0	0	0
2/29/2020	0.0045	0.00864	0.039381	0.070424	0	0	0	0
3/31/2020	0.0036	0.0072	0.005612	0.006798	0.0567	1	0.1134	2
4/30/2020	0.00378	0.0072	0.006528	0.006568	0.03	0.55	0.06	1.1
5/31/2020	0.003629	0.0072	0.003903	0.004404	0.018	0.5	0.037	1
6/30/2020	0.00288	0.00576	0.001472	0.002616	0	0	0	0

Outfall - Monitoring Location - Limit Set: D64T - IM - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	MGD	MGD	lb/d	mg/L	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	Report	Report	Report	Report
Minimum	**0.000144**	**0.000144**	**0.000144**	**0.000144**	**0**	**0**	**0**	**0**
7/31/2020	0.00342	0.00432	0.004644	0.004802	0	0	0	0
8/31/2020	0.001584	0.00288	0.00277	0.003042	0.0104	0.5	0.0208	1
9/30/2020	0.000828	0.001152	0.000646	0.000702	0	0	0	0
10/31/2020	0.00198	0.00432	0.003218	0.003512	0	0	0	0
11/30/2020	0.00144	0.00216	0.004468	0.00582	0.0316	0.65	0.0631	1.3
12/31/2020	0.00714	0.0144	0.008536	0.00866	0.4333	6	0.8667	12
1/31/2021	0.00162	0.00432	0.007307	0.010337	0	0	0	0
2/28/2021	0.00144	0.00288	0.008789	0.012617	0	0	0	0
3/31/2021	0.003636	0.0072	0.023911	0.026904	0.3913	1.2	0.5385	2.4
4/30/2021	0.0081	0.0144	0.016389	0.017961	0	0	0	0
5/31/2021	0.00576	0.01224	0.023753	0.037873	0.143	0.6	0.286	1.2
6/30/2021	0.001386	0.0036	0.007535	0.009937	0.094	0.85	0.116	1.7
7/31/2021	0.00864	0.01728	0.014047	0.016048	0.0602	0.6	0.1206	1.2
8/31/2021	0.003197	0.00648	0.016397	0.023857	0	0	0	0
9/30/2021	0.00324	0.00576	0.007405	0.008728	0	0	0	0
10/31/2021	0.00408	0.00504	0.007224	0.007721	0	0	0	0
11/30/2021	0.000576	0.00144	0.00917	0.017812	0	0	0	0
12/31/2021	0.002268	0.0036	0.009829	0.018555	0.0064	0.7	0.0129	1.4
1/31/2022	0.002592	0.00648	0.006771	0.009248	0.0463	0.6	0.0926	1.2
2/28/2022	0.00648	0.0072	0.008617	0.011651	0.1226	0.95	0.1846	1.9
3/31/2022	0.000144	0.000144	0.020177	0.024559	0.2048	1	0.4096	2
4/30/2022	0.00342	0.00432	0.019631	0.021358	0.1336	0.75	0.2671	1.5
5/31/2022	0.0063	0.0072	0.007391	0.009716	0.0212	0.5	0.0423	1
6/30/2022	0.001836	0.0036	0.002666	0.003111	0.028	1.3	0.0296	1.6
7/31/2022	0.00144	0.00288	0.001479	0.002665	0.023	1.05	0.04	2.1
8/31/2022	0.000432	0.00072	0.00041	0.000486	0.0047747	1.35	0.0064852	1.6
9/30/2022	0.001098	0.00216	0.002277	0.002497	0	0	0	0
10/31/2022	0.001699	0.00432	0.006405	0.01115	0	0	0	0
11/30/2022	0.002052	0.00288	0.00388	0.004705	0.2217043	5.65	0.4434086	11.3
12/31/2022	0.00198	0.00288	0.009129	0.010877	0	0	0	0
1/31/2023	0.009245	0.0144	0.007526	0.00776	0.0819826	1.3	0.0970776	1.5
2/28/2023	0.002304	0.0072	0.006056	0.006958	0.75	0.032232	1.5	0.064464
3/31/2023	0.00864	0.01152	0.016186	0.022394	0.1536678	0.75	0.2241192	1.2
4/30/2023	0.004366	0.01444	0.0051	0.005535	0	0	0	0
5/31/2023	0.002088	0.002088	0.006017	0.009394	0	0	0	0

Outfall - Monitoring Location - Limit Set: D64T - IM - A

Parameter	pH	pH	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Oil & grease	Oil & grease	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	**SU**	**SU**	**lb/d**	**lb/d**	**ug/L**	**lb/d**	**mg/L**	**lb/d**
Effluent Limit	**6.5**	**9**	**Report**	**Report**	**Report**	**Report**	**15**	**Report**
Minimum	**6.88**	**7.03**	**0**	**0**	**0**	**0**	**0**	**0**
Maximum	**8.04**	**8.11**	**0.04567**	**0.1183**	**0.3535**	**0.137**	**5.4**	**0.2366**
Median	**7.53**	**7.7**	**0**	**0.0000059**	**0.1318**	**0**	**0**	**0.0000081**
No. of Violations	**0**	**0**	**N/A**	**N/A**	**N/A**	**N/A**	**0**	**N/A**
Monitoring Period End Date								
1/31/2018	7.17	7.2	0	0	0	0	0	0
2/28/2018	7.53	7.8	0	0.0000003	0.24232	0	0	0.0000004
3/31/2018	7.78	7.9	0	0.00000014	0.1184	0	0	0.00000016
4/30/2018	7.58	8	0	0.0000001	0.0804	0	0	0.0000001
5/31/2018	7.65	7.82	0	0.0000001	0.0838	0	0	0.00000011
6/30/2018	7.52	7.53	0	0.00000022	0.1837	0	0	0.00000024
7/31/2018	7.56	7.66	0	0.00000021	0.1742	0	0	0.00000021
8/31/2018	7.8	7.87	0	0.0000263	0.2388	0	0	0.0000321
9/30/2018	7.62	7.95	0	0.0000165	0.1948	0	0	0.0000245
10/31/2018	7.6	7.74	0	0.0000063	0.1965	0	0	0.0000065
11/30/2018	7.6	7.72	0	0.000002	0.0353	0	0	0.0000041
12/31/2018	7.87	7.88	0	0.000033	0.2071	0	0	0.000044
1/31/2019	7.64	7.66	0	0.000012	0.1457	0	0	0.00002
2/28/2019	7.55	7.6	0	0.0000115	0.1545	0	0	0.0000142
3/31/2019	7.5	7.68	0	0.000004	0.0411	0	0	0.000008
4/30/2019	7.52	7.53	0	0.000047	0.1502	0	0	0.000081
5/31/2019	7.64	7.68	0	0.000019	0.1646	0	0	0.00002
6/30/2019	7.39	7.45	0	0.0000028	0.1037	0	0	0.0000039
7/31/2019	7.9	7.92	0	0.0000072	0.1396	0	0	0.0000079
8/31/2019	7.32	7.65	0	0.0000035	0.16	0	0	0.0000042
9/30/2019	7.29	7.43	0	0.0000058	0.1718	0	0	0.0000071
10/31/2019	7.37	7.85	0	0.0000042	0.1292	0	0	0.0000081
11/30/2019	7.88	7.9	0	0.0000086	0.1634	0	0	0.00001
12/31/2019	8.04	8.06	0	0.000026	0.156	0	0	0.000033
1/31/2020	7.51	7.7	0	0.00032	0.3535	0	0	0.00057
2/29/2020	7.6	7.7	0	0.000021	0.0362	0	0	0.000042
3/31/2020	7.69	7.71	0	0.000011	0.2272	0	0	0.000017
4/30/2020	7.65	7.78	0	0.0000091	0.1667	0	0	0.0000092
5/31/2020	7.13	7.5	0	0.0000035	0.1062	0	0	0.0000045
6/30/2020	7.12	7.29	0	0.0000016	0.1136	0	0	0.0000029

Outfall - Monitoring Location - Limit Set: D64T - IM - A

Parameter	pH	pH	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Oil & grease	Oil & grease	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	**SU**	**SU**	**lb/d**	**lb/d**	**ug/L**	**lb/d**	**mg/L**	**lb/d**
Effluent Limit	**6.5**	**9**	**Report**	**Report**	**Report**	**Report**	**15**	**Report**
Minimum	**6.88**	**7.03**	**0**	**0**	**0**	**0**	**0**	**0**
7/31/2020	7.01	7.17	0	0.00000499	0.1294	0	0	0.00000543
8/31/2020	7	7.16	0.04567	0.000003	0.1281	0.137	5.4	0.0000033
9/30/2020	7.26	7.6	0	0.00000047	0.0861	0	0	0.00000053
10/31/2020	7.31	7.47	0	0.0000047	0.1772	0	0	0.0000048
11/30/2020	7.35	7.44	0	0.000004	0.1061	0	0	0.00006
12/31/2020	7.6	7.71	0	0.0000033	0.0466	0	0	0.0000065
1/31/2021	7.48	7.56	0	0.0000053	0.0816	0	0	0.0000081
2/28/2021	7.4	7.91	0	0.000003	0.0482	0	0	0.000006
3/31/2021	7.61	7.74	0	0.000026	0.1318	0	0	0.00003
4/30/2021	7.57	7.65	0	0.000019	0.1333	0	0	0.000024
5/31/2021	7.13	7.75	0	0.00005	0.2227	0	0	0.00009
6/30/2021	7.44	7.48	0	0.000011	0.1741	0	0	0.000015
7/31/2021	7.18	7.83	0	0.000028	0.2411	0	0	0.000033
8/31/2021	7.71	7.76	0	0.1183	0.2107	0	0	0.2366
9/30/2021	7.86	8.04	0	0.000016	0.2628	0	0	0.000019
10/31/2021	7.98	8.11	0	0.0000008	0.1897	0	0	0.00001
11/30/2021	7.65	7.94	0	0.000013	0.1573	0	0	0.000025
12/31/2021	7.53	7.81	0	0.000009	0.0979	0	0	0.000018
1/31/2022	7.85	7.93	0	0.0000065	0.106	0	0	0.0000101
2/28/2022	7.02	7.57	0	0.000008	0.1102	0	0	0.000012
3/31/2022	7.81	7.83	0	0.00006	0.3527	0	0	0.00008
4/30/2022	7.44	7.95	0	0.000036	0.2179	0	0	0.000045
5/31/2022	7.34	7.41	0	0.0000079	0.1302	0	0	0.00001
6/30/2022	7.23	7.65	0	0.0000059	0.2773	0	0	0.0000063
7/31/2022	6.92	7.11	0	0.0000012	0.1281	0	0	0.000002
8/31/2022	6.88	7.03	0	0.00000058	0.1222	0	0	0.0000008
9/30/2022	7.04	7.34	0	0.0000038	0.2474	0	0	0.0000068
10/31/2022	6.97	7.25	0	0.00000084	0.0605	0	0	0.00000168
11/30/2022	7.25	7.27	0	0.00000281	0.0878	0	0	0.00000328
12/31/2022	7.52	7.54	0	0.00000789	0.1066	0	0	0.00000827
1/31/2023	7.53	7.55	0	0.00000652	0.1028	0	0	0.00000891
2/28/2023	7.36	7.76	0	0.00000175	0.0408	0	0	0.00000351
3/31/2023	7.53	7.74	0	0.00001363	0.0946	0	0	0.00002079
4/30/2023	7.71	7.8	0	0.00000365	0.0856	0	0	0.0000041
5/31/2023	7.6	7.6	0	0	0	0	0	0

Outfall - Monitoring Location - Limit Set: D64T - IM - A

Parameter	Polychlorinated biphenyls (PCBs)
	Daily Max
Units	ug/L
Effluent Limit	Report
Minimum	0
Maximum	0.372
Median	0.1615
No. of Violations	N/A
Monitoring Period End Date	
1/31/2018	0
2/28/2018	0.301
3/31/2018	0.1303
4/30/2018	0.0809
5/31/2018	0.0915
6/30/2018	0.1982
7/31/2018	0.1787
8/31/2018	0.2594
9/30/2018	0.2202
10/31/2018	0.2219
11/30/2018	0.0706
12/31/2018	0.2253
1/31/2019	0.2045
2/28/2019	0.2136
3/31/2019	0.0821
4/30/2019	0.2417
5/31/2019	0.1739
6/30/2019	0.1083
7/31/2019	0.1481
8/31/2019	0.1903
9/30/2019	0.1747
10/31/2019	0.1644
11/30/2019	0.1818
12/31/2019	0.1737
1/31/2020	0.356
2/29/2020	0.0723
3/31/2020	0.2991
4/30/2020	0.1672
5/31/2020	0.1229
6/30/2020	0.1311

Outfall - Monitoring Location - Limit Set: D64T - IM - A

Parameter	Polychlorinated biphenyls (PCBs)
	Daily Max
Units	ug/L
Effluent Limit	Report
Minimum	0
7/31/2020	0.1452
8/31/2020	0.1297
9/30/2020	0.0911
10/31/2020	0.1901
11/30/2020	0.1202
12/31/2020	0.0932
1/31/2021	0.0941
2/28/2021	0.0963
3/31/2021	0.1332
4/30/2021	0.1615
5/31/2021	0.3
6/30/2021	0.1771
7/31/2021	0.2437
8/31/2021	0.2366
9/30/2021	0.2684
10/31/2021	0.2042
11/30/2021	0.1714
12/31/2021	0.115
1/31/2022	0.1321
2/28/2022	0.1279
3/31/2022	0.372
4/30/2022	0.2516
5/31/2022	0.1373
6/30/2022	0.342
7/31/2022	0.1661
8/31/2022	0.1329
9/30/2022	0.3267
10/31/2022	0.121
11/30/2022	0.0918
12/31/2022	0.1219
1/31/2023	0.1377
2/28/2023	0.0816
3/31/2023	0.1113
4/30/2023	0.0888
5/31/2023	0

Outfall - Monitoring Location - Limit Set: SRO5 - 1 - A

Parameter	Total Flow	Total Flow	Rainfall	Rainfall	Number of Events
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	TOTAL
Units	MGD	MGD	in	in	#
Effluent Limit	Report	Report	Report	Report	Report
Minimum	0.0086	0.0086	0.03	0.03	0
Maximum	0.4499	0.5866	3.9	4.79	10
Median	0.03755	0.0482	0.5	0.74	1
No. of Violations	N/A	N/A	N/A	N/A	N/A
Monitoring Period End Date					
1/31/2018	0.0321	0.0321	0.29	4.79	1
2/28/2018	NODI: C	NODI: C	0.34	2.43	0
3/31/2018	NODI: C	NODI: C	NODI: C	NODI: C	0
4/30/2018	NODI: C	NODI: C	NODI: C	NODI: C	0
5/31/2018	0.03755	0.067	1.44	1.88	2
6/30/2018	0.0674	0.0674	0.68	0.68	1
7/31/2018	0.09065	0.1587	1.17	1.81	4
8/31/2018	0.10285	0.3597	0.97	2.41	6
9/30/2018	0.03862	0.0605	0.94	1.05	5
10/31/2018	0.0096	0.0096	0.89	0.89	1
11/30/2018	0.056175	0.105	0.65	1.31	4
12/31/2018	0.0207	0.0207	1.47	1.47	1
1/31/2019	0.1489	0.1489	3.86	3.86	1
2/28/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2019	NODI: C	NODI: C	NODI: C	NODI: C	0
5/31/2019	0.0931	0.1341	0.48	0.49	2
6/30/2019	0.229133	0.5866	1.45	2.51	3
7/31/2019	0.06235	0.0846	0.39	0.77	2
8/31/2019	0.0143	0.0143	0.49	0.49	1
9/30/2019	0.0613	0.0728	0.96	0.99	2
10/31/2019	0.1323	0.2513	1.9	3	2
11/30/2019	0.0212	0.0212	1.2	1.2	1
12/31/2019	NODI: C	NODI: C	NODI: C	NODI: C	0
1/31/2020	0.0133	0.0133	0.74	0.74	1
2/29/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2020	0.03885	0.0557	0.88	0.91	2
5/31/2020	0.0481	0.0481	0.74	0.74	3
6/30/2020	0.1141	0.2151	0.83	1.33	4
7/31/2020	0.080025	0.2144	0.66	1.05	4
8/31/2020	0.0455	0.09	0.77	1.41	3

Outfall - Monitoring Location - Limit Set: SRO5 - 1 - A

Parameter	Total Flow	Total Flow	Rainfall	Rainfall	Number of Events
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	TOTAL
Units	MGD	MGD	in	in	#
Effluent Limit	Report	Report	Report	Report	Report
Minimum	**0.0086**	**0.0086**	**0.03**	**0.03**	**0**
9/30/2020	0.3938	0.3938	3.9	3.9	1
10/31/2020	0.0348	0.0348	0.04	0.04	1
11/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
12/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
1/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2021	0.1773	0.1773	2.28	2.28	1
5/31/2021	0.03225	0.0482	0.5	1	2
6/30/2021	0.10635	0.1779	0.79	1.09	2
7/31/2021	0.10085	0.2285	1.1	1.71	10
8/31/2021	0.098	0.1477	1.07	1.7	4
9/30/2021	0.045167	0.0872	1.71	2.46	3
10/31/2021	0.0528	0.114	1.37	1.6	3
11/30/2021	0.0702	0.1403	0.48	0.96	2
12/31/2021	0.0846	0.0846	0.67	0.67	1
1/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2022	0.4499	0.4499	0.03	0.03	1
3/31/2022	0.0312	0.053	0.71	0.71	2
4/30/2022	0.1294	0.1294	1.65	1.65	1
5/31/2022	0.03405	0.0429	0.49	0.6	2
6/30/2022	0.0704	0.0875	0.38	0.53	2
7/31/2022	0.01095	0.0127	0.41	0.49	2
8/31/2022	0.0377	0.0421	0.26	0.26	2
9/30/2022	0.0086	0.0086	0.23	0.23	1
10/31/2022	0.1004	0.1834	1.5	1.61	2
11/30/2022	0.1484	0.1484	0.88	0.88	1
12/31/2022	0.1507	0.1507	1.13	1.13	1
1/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: W005 - 1 - A

Parameter	Total Flow	Total Flow	TSS	TSS	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Minimum	Maximum
Units	MGD	MGD	lb/d	mg/L	lb/d	mg/L	SU	SU
Effluent Limit	Report	Report	Report	Report	Report	Report	6.5	9
Minimum	0	0	0	0	0	0	7.04	7.19
Maximum	0.460595	0.71951	5.62	3.67	13.24	6.9	7.98	7.98
Median	0.203803	0.26384	Non-Detect	Non-Detect	Non-Detect	Non-Detect	Non-Detect	Non-Detect
No. of Violations	N/A	N/A	N/A	N/A	N/A	N/A	0	0
Monitoring Period End Date								
1/31/2018	0.05203	0.05203	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2018	0.25082	0.29508	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2018	NODI: 9	NODI: 9	2.3065	1.33	5.9063	2.4	7.19	7.19
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.24278	0.38778	2.98	1.27	7.11	2.2	7.82	7.82
7/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0.157993	0.21284	0	0	0	0	7.64	7.96
10/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.26087	0.33078	0.92	0.33	2.7587	1	7.71	7.71
1/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.252807	0.29511	1.07	0.43	3.1996	1.3	7.98	7.98
4/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0.225107	0.25805	0.79	0.43	2.364	1.3	7.72	7.72
7/31/2019	0.25301	0.25301	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2019	0.13617	0.19154	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2019	0.181093	0.25301	1.55	0.88	3.67	2.3	7.7	7.75
10/31/2019	0.257187	0.31565	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	0.257187	0.31565	1.59	0.9	2.416	1.7	7.4	7.4
1/31/2020	0.289687	0.38046	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/29/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	0.289687	0.38046	5.59	2.4	8.163	3.5	7.86	7.86
4/30/2020	0.221763	0.29526	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2020	0.221763	0.29526	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2020	0.221763	0.29526	3.24	1.77	4.456	2.7	7.48	7.48

Outfall - Monitoring Location - Limit Set: W005 - 1 - A

Parameter	Total Flow	Total Flow	TSS	TSS	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Minimum	Maximum
Units	MGD	MGD	lb/d	mg/L	lb/d	mg/L	SU	SU
Effluent Limit	Report	Report	Report	Report	Report	Report	6.5	9
Minimum	0	0	0	0	0	0	7.04	7.19
7/31/2020	0.1575	0.17057	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2020	0.20492	0.26384	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2020	0.18121	0.26384	4.88	3.43	8.4	6.9	7.04	7.84
10/31/2020	0.192193	0.27816	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0.192193	0.27816	5.42	3.67	8.87	6.9	7.24	7.24
1/31/2021	0.26059	0.38152	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2021	0.3078	0.3078	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2021	0.283533	0.38152	4.5	1.95	8.591	2.7	7.94	7.98
4/30/2021	0.203803	0.34616	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2021	0.203803	0.34616	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2021	0.203803	0.34616	3.41	2.95	5.2	4.1	7.93	7.93
7/31/2021	0.379115	0.38508	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2021	0.28863	0.28863	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2021	0.35334	0.38506	0.293	0.367	3.533	1.1	7.54	7.81
10/31/2021	0.36085	0.40592	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2021	0	0	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2021	0.36085	0.40592	0	0	0	0	7.9	7.9
1/31/2022	0	0	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2022	0.460595	0.48937	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2022	0.412213	0.48937	5.62	1.75	13.24	4.5	7.81	7.81
4/30/2022	0.37946	0.50001	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2022	0.37946	0.50001	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2022	0.37946	0.50001	3.83	1.13	7.09	1.7	7.95	7.95
7/31/2022	0.134347	0.18862	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	0.21184	0.21184	1.8589526	1.18	6.1836096	3.5	7.16	7.57
10/31/2022	0.18608	0.25919	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2022	0.09831	0.09831	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2022	NODI: 9	NODI: 9	1.7118934	1.43	2.5939735	3.1	7.46	7.46
1/31/2023	0.225233	0.27792	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2023	NODI: 9	NODI: 9	4.0608961	1.8	9.5031965	4.1	7.88	7.88
4/30/2023	0.408443	0.71951	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: W005 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall
	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max	Daily Max
Units	lb/d	ug/L	in	mg/L	lb/d	ug/L	in
Effluent Limit	Report	Report	Report	15	Report	Report	Report
Minimum	0	0	0	0	0	0	0
Maximum	0.0006	0.2516	1.7	0	0.0015	0.3951	4.79
Median	Non-Detect	Non-Detect	0.54	Non-Detect	Non-Detect	Non-Detect	0.91
No. of Violations	N/A	N/A	N/A	0	N/A	N/A	N/A
Monitoring Period End Date							
1/31/2018	NODI: 9	NODI: 9	0.29	NODI: 9	NODI: 9	NODI: 9	4.79
2/28/2018	NODI: 9	NODI: 9	0.34	NODI: 9	NODI: 9	NODI: 9	2.43
3/31/2018	0.000098	0.0467	0.86	0	0.00024	0.0955	2.43
4/30/2018	NODI: 9	NODI: 9	0.17	NODI: 9	NODI: 9	NODI: 9	0.9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.000081	0.0252	0.52	0	0.000244	0.0755	1.56
7/31/2018	NODI: 9	NODI: 9	0.77	NODI: 9	NODI: 9	NODI: 9	1.64
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0.000176	0.1341	0.67	0	0.000218	0.1564	1.64
10/31/2018	NODI: 9	NODI: 9	0.57	NODI: 9	NODI: 9	NODI: 9	0.89
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.000387	0.1687	0.57	0	0.000667	0.242	0.89
1/31/2019	NODI: 9	NODI: 9	0.68	NODI: 9	NODI: 9	NODI: 9	0.8
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.000516	0.2516	0.68	0	0.000702	0.3951	0.8
4/30/2019	NODI: 9	NODI: 9	0.54	NODI: 9	NODI: 9	NODI: 9	0.72
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0	0	0.54	0	0	0	0.72
7/31/2019	NODI: 9	NODI: 9	0.77	NODI: 9	NODI: 9	NODI: 9	0.77
8/31/2019	NODI: 9	NODI: 9	0.31	NODI: 9	NODI: 9	NODI: 9	0.49
9/30/2019	0.000128	0.0679	0.99	0	0.000318	0.1506	0.99
10/31/2019	NODI: 9	NODI: 9	1.38	NODI: 9	NODI: 9	NODI: 9	3
11/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	0.00025	0.1281	1.38	0	0.00028	0.1999	3
1/31/2020	NODI: 9	NODI: 9	0.34	NODI: 9	NODI: 9	NODI: 9	0.68
2/29/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	0.00036	0.125	NODI: 9	0	0.0008	0.2529	NODI: 9
4/30/2020	NODI: 9	NODI: 9	0.47	NODI: 9	NODI: 9	NODI: 9	0.91
5/31/2020	NODI: 9	NODI: 9	0.47	NODI: 9	NODI: 9	NODI: 9	0.91
6/30/2020	0.00023	0.1074	0.47	0	0.00048	0.1947	0.91

Outfall - Monitoring Location - Limit Set: W005 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall
	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max	Daily Max
Units	lb/d	ug/L	in	mg/L	lb/d	ug/L	in
Effluent Limit	Report	Report	Report	15	Report	Report	Report
Minimum	0	0	0	0	0	0	0
7/31/2020	NODI: 9	NODI: 9	0.98	NODI: 9	NODI: 9	NODI: 9	1.05
8/31/2020	NODI: 9	NODI: 9	0.99	NODI: 9	NODI: 9	NODI: 9	1.41
9/30/2020	0.00024	0.1611	0.96	0	0.00035	0.1894	1.41
10/31/2020	NODI: 9	NODI: 9	0.4	NODI: 9	NODI: 9	NODI: 9	0.74
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0.00027	0.1621	0.4	0	0.00044	0.2126	0.74
1/31/2021	NODI: 9	NODI: 9	0.87	NODI: 9	NODI: 9	NODI: 9	1.19
2/28/2021	NODI: 9	NODI: 9	0.74	NODI: 9	NODI: 9	NODI: 9	0.74
3/31/2021	0.00017	0.0594	0.91	0	0.00026	0.1019	1.19
4/30/2021	NODI: 9	NODI: 9	0.84	NODI: 9	NODI: 9	NODI: 9	1.66
5/31/2021	NODI: 9	NODI: 9	0.84	NODI: 9	NODI: 9	NODI: 9	1.66
6/30/2021	0.00028	0.1235	0.84	0	0.00069	0.2402	1.66
7/31/2021	NODI: 9	NODI: 9	1.16	NODI: 9	NODI: 9	NODI: 9	1.26
8/31/2021	NODI: 9	NODI: 9	1.7	NODI: 9	NODI: 9	NODI: 9	1.7
9/30/2021	0.00036	0.116	1.37	0	0.00065	0.2033	1.37
10/31/2021	NODI: 9	NODI: 9	0.95	NODI: 9	NODI: 9	NODI: 9	1.44
11/30/2021	NODI: 9	NODI: 9	0	NODI: 9	NODI: 9	NODI: 9	0
12/31/2021	0.00012	0.0348	0.13	0	0.00035	0.1043	1.44
1/31/2022	NODI: 9	NODI: 9	0	NODI: 9	NODI: 9	NODI: 9	0
2/28/2022	NODI: 9	NODI: 9	0.85	NODI: 9	NODI: 9	NODI: 9	1.33
3/31/2022	0.0006	0.1549	0.37	0	0.0015	0.3652	0.71
4/30/2022	NODI: 9	NODI: 9	0.57	NODI: 9	NODI: 9	NODI: 9	1.19
5/31/2022	NODI: 9	NODI: 9	0.57	NODI: 9	NODI: 9	NODI: 9	1.19
6/30/2022	0.00054	0.1671	0.57	0	0.00085	0.2164	1.19
7/31/2022	NODI: 9	NODI: 9	0.21	NODI: 9	NODI: 9	NODI: 9	0.28
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	0.00007425	0.042	0.93	0	0.00029699	0.1681	0.93
10/31/2022	NODI: 9	NODI: 9	1.07	NODI: 9	NODI: 9	NODI: 9	1.56
11/30/2022	NODI: 9	NODI: 9	0.2	NODI: 9	NODI: 9	NODI: 9	0.2
12/31/2022	0.00007357	0.034	NODI: 9	0	0.0002207	0.1021	NODI: 9
1/31/2023	NODI: 9	NODI: 9	1.31	NODI: 9	NODI: 9	NODI: 9	1.99
2/28/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2023	0.00005076	0.0219	NODI: 9	0	0.00015228	0.0657	NODI: 9
4/30/2023	NODI: 9	NODI: 9	0.67	NODI: 9	NODI: 9	NODI: 9	1.06
5/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: W006 - 1 - A

Parameter	Total Flow	Total Flow	TSS	TSS	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Minimum	Maximum
Units	MGD	MGD	lb/d	mg/L	lb/d	mg/L	SU	SU
Effluent Limit	Report	Report	Report	Report	Report	Report	6.5	9
Minimum	0	0	4.676	0	8.218	0	6.81	6.81
Maximum	0.201335	0.34388	157.68	185.67	438.47	275	7.78	8.36
Median	0.043227	0.06194	Non-Detect	Non-Detect	Non-Detect	Non-Detect	Non-Detect	Non-Detect
No. of Violations	N/A	N/A	N/A	N/A	N/A	N/A	0	0
Monitoring Period End Date								
1/31/2018	0.01185	0.01185	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2018	0.013317	0.03543	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2018	NODI: 9	NODI: 9	5.018	54.18	15.366	87	7	7
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.070743	0.19118	157.68	185.67	438.47	275	7.7	7.7
7/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0.094993	0.17982	85.49	98.33	172.47	115	7.77	8.36
10/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.02533	0.06311	9.333	35.83	25.475	48.4	7.33	7.33
1/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.018123	0.04849	21.6509	86.43	61.8742	153	7.63	7.63
4/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0.044253	0.0964	16.39	79.27	21.32	122	7.42	7.42
7/31/2019	0.00606	0.00606	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2019	0.036625	0.06944	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2019	0.045763	0.10374	49.6587	91.03	106.5598	184	7.6	7.82
10/31/2019	0.18179	0.34388	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2019	0.02186	0.02186	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	0.12848	0.34388	64.47	0	190.432	0	7.05	7.05
1/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/29/2020	0.021665	0.03604	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	0.0175	0.03604	15.367	65.3	42.381	141	7.09	7.09
4/30/2020	0.085623	0.23284	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2020	0.085623	0.23284	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2020	0.085623	0.23284	132.86	76.2	396.14	204	6.94	6.94

Outfall - Monitoring Location - Limit Set: W006 - 1 - A

Parameter	Total Flow	Total Flow	TSS	TSS	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Minimum	Maximum
Units	MGD	MGD	lb/d	mg/L	lb/d	mg/L	SU	SU
Effluent Limit	Report	Report	Report	Report	Report	Report	6.5	9
Minimum	0	0	4.676	0	8.218	0	6.81	6.81
7/31/2020	0.127575	0.13236	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2020	0.13853	0.21168	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2020	0.133053	0.21168	75.41	63.83	126.98	124	7.01	8.02
10/31/2020	0.043227	0.05158	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0.043227	0.05158	12.855	43.07	27.463	103	7.01	7.01
1/31/2021	0.053095	0.09327	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2021	0.05941	0.05941	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2021	0.049198	0.09327	44.113	89.33	76.543	148	6.96	6.99
4/30/2021	0.062187	0.17438	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2021	0.062187	0.17438	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2021	0.062187	0.17438	68.698	53.83	205.06	141	7.78	7.78
7/31/2021	0.18808	0.23252	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2021	0.08325	0.08325	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2021	0.16739	0.23252	82.989	66.05	107.239	117	7.07	7.19
10/31/2021	0.187767	0.26463	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2021	0	0	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2021	0.187767	0.26463	54.85	33.03	143.03	83.6	7.37	7.37
1/31/2022	0.00113	0.00113	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2022	0	0	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2022	0.059943	0.13096	4.676	14.43	8.218	18.6	6.81	6.81
4/30/2022	0.067003	0.15351	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2022	0.067003	0.15351	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2022	0.067003	0.15351	22.28	55.63	57.32	158	7.69	7.69
7/31/2022	0.01564	0.02749	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	0.12951	0.12951	22.550159	28.55	82.520664	76.4	7.16	7.43
10/31/2022	0.201335	0.2256	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2022	0.06194	0.06194	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2022	NODI: 9	NODI: 9	125.17606	82.77	289.75162	154	7.16	7.16
1/31/2023	0.040373	0.10134	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2023	NODI: 9	NODI: 9	66.21115	136.63	182.55793	216	7.67	7.67
4/30/2023	0.04764	0.10017	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: W006 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall
	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max	Daily Max
Units	lb/d	ug/L	in	mg/L	lb/d	ug/L	in
Effluent Limit	Report	Report	Report	15	Report	Report	Report
Minimum	0.0000085	0.0494	0	0	0.0000208	0.0789	0
Maximum	0.0017	1.1411	1.73	15.2	0.0051	2.732	4.79
Median	Non-Detect	Non-Detect	0.53	Non-Detect	Non-Detect	Non-Detect	0.8
No. of Violations	N/A	N/A	N/A	1	N/A	N/A	N/A
Monitoring Period End Date							
1/31/2018	NODI: 9	NODI: 9	0.29	NODI: 9	NODI: 9	NODI: 9	4.79
2/28/2018	NODI: 9	NODI: 9	0.34	NODI: 9	NODI: 9	NODI: 9	2.43
3/31/2018	0.000022	0.105	0.7075	0	0.000085	0.2889	2.43
4/30/2018	NODI: 9	NODI: 9	0.17	NODI: 9	NODI: 9	NODI: 9	0.9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.00019	0.2204	0.58	0	0.00054	0.3373	1.75
7/31/2018	NODI: 9	NODI: 9	1.06	NODI: 9	NODI: 9	NODI: 9	1.64
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0.00128	1.1411	0.84	0	0.00326	2.175	1.64
10/31/2018	NODI: 9	NODI: 9	0.56	NODI: 9	NODI: 9	NODI: 9	0.89
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.000077	0.2049	0.56	0	0.00022	0.4186	0.89
1/31/2019	NODI: 9	NODI: 9	0.68	NODI: 9	NODI: 9	NODI: 9	0.8
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.000057	0.2435	0.68	0	0.000161	0.3987	0.8
4/30/2019	NODI: 9	NODI: 9	0.54	NODI: 9	NODI: 9	NODI: 9	0.72
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0.0002	0.6824	0.54	0	0.00035	1.5044	0.72
7/31/2019	NODI: 9	NODI: 9	0.77	NODI: 9	NODI: 9	NODI: 9	0.77
8/31/2019	NODI: 9	NODI: 9	0.37	NODI: 9	NODI: 9	NODI: 9	0.49
9/30/2019	0.000185	0.468	0.99	0	0.000439	0.7577	0.99
10/31/2019	NODI: 9	NODI: 9	1.73	NODI: 9	NODI: 9	NODI: 9	3
11/30/2019	NODI: 9	NODI: 9	0.53	NODI: 9	NODI: 9	NODI: 9	0.53
12/31/2019	0.0017	0.6326	1.33	0	0.0051	1.781	3
1/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/29/2020	NODI: 9	NODI: 9	0.49	NODI: 9	NODI: 9	NODI: 9	0.61
3/31/2020	0.0000085	0.0494	0.24	0	0.0000208	0.0789	0.24
4/30/2020	NODI: 9	NODI: 9	0.47	NODI: 9	NODI: 9	NODI: 9	0.91
5/31/2020	NODI: 9	NODI: 9	0.47	NODI: 9	NODI: 9	NODI: 9	0.91
6/30/2020	0.00033	0.2291	0.47	0	0.00098	0.5026	0.91

Outfall - Monitoring Location - Limit Set: W006 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall
	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max	Daily Max
Units	lb/d	ug/L	in	mg/L	lb/d	ug/L	in
Effluent Limit	Report	Report	Report	15	Report	Report	Report
Minimum	**0.0000085**	**0.0494**	**0**	**0**	**0.0000208**	**0.0789**	**0**
7/31/2020	NODI: 9	NODI: 9	0.98	NODI: 9	NODI: 9	NODI: 9	1.05
8/31/2020	NODI: 9	NODI: 9	0.99	NODI: 9	NODI: 9	NODI: 9	1.41
9/30/2020	0.00116	1.0686	0.99	0	0.0028	2.732	1.41
10/31/2020	NODI: 9	NODI: 9	0.4	NODI: 9	NODI: 9	NODI: 9	0.74
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0.000063	0.1987	0.4	0	0.000106	0.3953	0.74
1/31/2021	NODI: 9	NODI: 9	0.87	NODI: 9	NODI: 9	NODI: 9	1.19
2/28/2021	NODI: 9	NODI: 9	0.74	NODI: 9	NODI: 9	NODI: 9	0.74
3/31/2021	0.000036	0.0686	0.91	0	0.000083	0.1073	1.19
4/30/2021	NODI: 9	NODI: 9	0.33	NODI: 9	NODI: 9	NODI: 9	0.76
5/31/2021	NODI: 9	NODI: 9	0.33	NODI: 9	NODI: 9	NODI: 9	0.76
6/30/2021	0.00014	0.1199	0.33	0	0.00042	0.2909	0.76
7/31/2021	NODI: 9	NODI: 9	1.16	NODI: 9	NODI: 9	NODI: 9	1.26
8/31/2021	NODI: 9	NODI: 9	1.7	NODI: 9	NODI: 9	NODI: 9	1.7
9/30/2021	0.00077	0.6079	1.37	**15.2**	0.00105	1.0461	1.37
10/31/2021	NODI: 9	NODI: 9	1.13	NODI: 9	NODI: 9	NODI: 9	1.44
11/30/2021	NODI: 9	NODI: 9	0	NODI: 9	NODI: 9	NODI: 9	0
12/31/2021	0.00121	0.7218	1.13	0	0.00358	2.09	1.44
1/31/2022	NODI: 9	NODI: 9	0.35	NODI: 9	NODI: 9	NODI: 9	0.35
2/28/2022	NODI: 9	NODI: 9	0	NODI: 9	NODI: 9	NODI: 9	0
3/31/2022	0.00006	0.1256	0.4	0	0.00019	0.2006	0.71
4/30/2022	NODI: 9	NODI: 9	0.57	NODI: 9	NODI: 9	NODI: 9	1.19
5/31/2022	NODI: 9	NODI: 9	0.57	NODI: 9	NODI: 9	NODI: 9	1.19
6/30/2022	0.000048	0.0758	0.57	0	0.000086	0.1596	1.19
7/31/2022	NODI: 9	NODI: 9	0.27	NODI: 9	NODI: 9	NODI: 9	0.32
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	0.00001212	0.1234	0.93	0	0.00030459	0.282	0.93
10/31/2022	NODI: 9	NODI: 9	1.18	NODI: 9	NODI: 9	NODI: 9	1.56
11/30/2022	NODI: 9	NODI: 9	0.88	NODI: 9	NODI: 9	NODI: 9	0.88
12/31/2022	0.0005683	0.3489	NODI: 9	0	0.00125929	0.6693	NODI: 9
1/31/2023	NODI: 9	NODI: 9	0.89	NODI: 9	NODI: 9	NODI: 9	1.99
2/28/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2023	0.00005471	0.0647	NODI: 9	0	0.00016413	0.1942	NODI: 9
4/30/2023	NODI: 9	NODI: 9	0.38	NODI: 9	NODI: 9	NODI: 9	0.77
5/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: W009 - 1 - A

Parameter	Total Flow	Total Flow	TSS	TSS	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Minimum	Maximum
Units	MGD	MGD	lb/d	mg/L	lb/d	mg/L	SU	SU
Effluent Limit	Report	Report	Report	Report	Report	Report	6.5	9
Minimum	0	0	0.4362	0.7	1.3087	1.4	6.54	6.54
Maximum	0.869919	1.10134	27.63	8.87	80.7	16.4	7.96	7.96
Median	0.11036	0.162972	Non-Detect	Non-Detect	Non-Detect	Non-Detect	Non-Detect	Non-Detect
No. of Violations	N/A	N/A	N/A	N/A	N/A	N/A	0	0
Monitoring Period End Date								
1/31/2018	0.242895	0.242895	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2018	0.08548	0.08548	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2018	NODI: 9	NODI: 9	16.3913	7.73	36.9405	16.4	7.32	7.32
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.101417	0.20933	5.7102	3.9	16.2361	9.3	7.95	7.95
7/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0.23948	0.39028	3.3525	1.73	6.5099	2	6.64	6.64
10/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.182257	0.23547	2.8671	1.97	3.366	2.3	7.42	7.43
1/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.616029	1.10134	19.5992	3.17	49.5999	5.4	7.96	7.96
4/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0.090109	0.162972	1.603	3.13	2.175	8.2	7.37	7.37
7/31/2019	0.125301	0.125301	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2019	0.043289	0.07035	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2019	0.078619	0.125301	6.3594	8.23	17.0337	16.3	6.98	7.46
10/31/2019	0.080315	0.12842	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	0.080315	0.12842	0.8925	0.83	2.6776	2.5	7.52	7.52
1/31/2020	0.02724	0.02724	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/29/2020	0.147831	0.178172	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	0.107634	0.178172	1.3718	1.4	4.1154	4.2	7.53	7.53
4/30/2020	0.519573	0.786644	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2020	0.519573	0.786644	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2020	0.519573	0.786644	27.63	4.1	80.7	12.3	6.93	6.93

Outfall - Monitoring Location - Limit Set: W009 - 1 - A

Parameter	Total Flow	Total Flow	TSS	TSS	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Minimum	Maximum
Units	MGD	MGD	lb/d	mg/L	lb/d	mg/L	SU	SU
Effluent Limit	Report	Report	Report	Report	Report	Report	6.5	9
Minimum	0	0	0.4362	0.7	1.3087	1.4	6.54	6.54
7/31/2020	0.129163	0.15006	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2020	0.015511	0.32589	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2020	0.110634	0.15006	4.6673	2.63	7.1331	7.9	6.9	6.98
10/31/2020	0.137692	0.317551	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0.137692	0.317551	0.4362	0.97	1.3087	2.9	7.12	7.12
1/31/2021	0.588982	0.588982	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2021	0.56615	0.56615	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2021	0.513143	0.87057	4.4477	0.7	13.069	1.8	6.69	6.96
4/30/2021	0.11036	0.20288	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2021	0.869919	0.869919	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2021	0.363546	0.869919	3.9497	0.8	10.1572	1.4	7.33	7.33
7/31/2021	0.16899	0.21045	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2021	0.26226	0.26226	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2021	0.20008	0.26226	1.69	1.2	3.16	1.8	6.63	7.6
10/31/2021	0.52455	0.52455	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2021	0.362135	0.362135	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2021	0.308493	0.52455	8.3008	3.13	12.2493	3.9	7.19	7.68
1/31/2022	0	0	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2022	0.257145	0.41823	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2022	0.215553	0.41823	4.3709	1.77	11.5105	3.3	6.54	6.54
4/30/2022	0.111545	0.19557	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2022	0.111545	0.19557	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2022	0.111545	0.19557	1.4251	1.2667	2.318	2.6	6.75	6.75
7/31/2022	0.04787	0.04787	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2022	0.08917	0.08917	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	0.16069	0.16069	8.174751	8.87	15.143747	11.3	7.23	7.23
10/31/2022	0.29765	0.29907	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 7	NODI: 7
11/30/2022	0.02747	0.02747	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2022	NODI: 9	NODI: 9	4.584523	2.63	6.7344583	2.7	6.98	7
1/31/2023	0.040017	0.07439	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2023	NODI: 9	NODI: 9	1.768586	5.2	3.0400217	8.1	7.61	7.61
4/30/2023	0.05937	0.05937	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2023	0.27279	0.27279	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: W009 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	lb/d	ug/L	mg/L	lb/d	ug/L
Effluent Limit	Report	Report	15	Report	Report
Minimum	0	0	0	0	0
Maximum	0.000481	0.3822	0	0.001442	0.879
Median	Non-Detect	Non-Detect	Non-Detect	Non-Detect	Non-Detect
No. of Violations	N/A	N/A	0	N/A	N/A
Monitoring Period End Date					
1/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2018	0.000159	0.0971	0	0.000222	0.1076
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.000042	0.0239	0	0.000125	0.0718
7/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0	0	0	0	0
10/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.000405	0.3822	0	0.000725	0.879
1/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.000481	0.0523	0	0.001442	0.157
4/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0.0000023	0.0231	0	0.000007	0.0693
7/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2019	0.0000415	0.0624	0	0.0001177	0.1126
10/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	0	0	0	0	0
1/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/29/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	0.00013	0.0938	0	0.00032	0.214
4/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2020	0.0002	0.0471	0	0.0005	0.0756

Outfall - Monitoring Location - Limit Set: W009 - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	lb/d	ug/L	mg/L	lb/d	ug/L
Effluent Limit	Report	Report	15	Report	Report
Minimum	0	0	0	0	0
7/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2020	0.00011	0.1004	0	0.00028	0.226
10/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0	0	0	0	0
1/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2021	0	0	0	0	0
4/30/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2021	0	0	0	0	0
7/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2021	0.000047	0.0439	0	0.00014	0.1317
10/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2021	0	0	0	0	0
1/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2022	0	0	0	0	0
4/30/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2022	0	0	0	0	0
7/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	0	0	0	0	0
10/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2022	0	0	0	0	0
1/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2023	0	0	0	0	0
4/30/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: W05A - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	MGD	MGD	lb/d	mg/L	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	Report	Report	Report	Report
Minimum	0.003714	0.03197	0	0	17.942	5.5	46.1	10.5
Maximum	91399	0.78559	0.47061	0.58015	160.62	91.17	386.76	200
Median	0.084023	0.35993	0.10985	0.16971	Non-Detect	Non-Detect	Non-Detect	Non-Detect
No. of Violations	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Monitoring Period End Date								
1/31/2018	0.127833	0.58015	0.07715	0.58015	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2018	0.076769	0.52545	0.109305	0.13027	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2018	0.014615	0.03197	NODI: 9	NODI: 9	99.1977	40.88	321.757	66.5
4/30/2018	0.065091	0.31763	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	0.076267	0.14399	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.130241	0.36082	0.16612	0.31763	160.62	91.17	386.76	146
7/31/2018	0.137018	0.38887	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2018	0.06681	0.35792	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0.122685	0.45118	0.186287	0.38887	61.299	38.83	131.024	40.4
10/31/2018	0.170687	0.35993	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	0.121632	0.47875	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.109495	0.171043	0.171043	0.26986	31.976	20.03	54.915	24.4
1/31/2019	0.129209	0.76053	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2019	91399	0.34785	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.07825	0.76053	0.07933	0.15955	31.4814	51.2	48.0684	90
4/30/2019	0.07085	0.29194	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2019	0.039246	0.13678	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0.066396	0.32248	0.20458	0.29194	58.477	76.97	107.69	200
7/31/2019	0.0891	0.46682	0.06817	0.06817	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2019	0.035312	0.06167	0.04765	0.04945	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2019	0.070502	0.46682	0.094373	0.21402	32.774	46.45	63.008	68.8
10/31/2019	0.129854	0.56531	0.325825	0.56531	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2019	0.115526	0.56908	0.03906	0.03906	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	0.123123	0.56908	0.230237	0.56531	17.942	5.5	49.504	10.5
1/31/2020	0.090327	0.34469	0.19337	0.34469	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/29/2020	0.070291	0.26484	0.0719	0.0719	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	0.05622	0.34469	0.15288	0.34469	114.548	68	290.346	101
4/30/2020	0.062193	0.28754	0.188345	0.28754	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2020	0.04824	0.17889	0.14058	0.14058	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2020	0.06519	0.28754	0.172423	0.28754	113.56	57.1	292.57	122

Outfall - Monitoring Location - Limit Set: W05A - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	**MGD**	**MGD**	**MGD**	**MGD**	**lb/d**	**mg/L**	**lb/d**	**mg/L**
Effluent Limit	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**
Minimum	**0.003714**	**0.03197**	**0**	**0**	**17.942**	**5.5**	**46.1**	**10.5**
7/31/2020	0.059409	0.13193	0.09801	0.13193	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2020	0.105666	0.188	0.152215	0.188	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2020	0.106437	0.72712	0.125113	0.188	31.88	33.95	46.1	54.8
10/31/2020	0.065861	0.29212	0.14891	0.14891	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2020	0.077551	0.22895	0.09032	0.16971	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0.107102	0.6575	0.10985	0.16971	40.436	32.77	66.948	47.3
1/31/2021	0.084023	0.27092	0.146235	0.27092	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2021	0.014906	0.10419	0.10419	0.10419	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2021	0.07446	0.45454	0.145308	0.27092	68.5459	49.38	130.1456	93.6
4/30/2021	0.156903	0.47061	0.47061	0.47061	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2021	0.146921	0.44188	0.09299	0.1688	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2021	0.131314	0.47061	0.218863	0.47061	79.702	28.67	189.18	48.2
7/31/2021	0.238368	0.78559	0.397405	0.45875	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2021	0.117444	0.30186	0.04151	0.04151	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2021	0.212997	0.78559	0.34351	0.53772	36.27	20.33	73.84	46.4
10/31/2021	0.231088	0.54453	0.28288	0.36764	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2021	0.102384	0.34917	0	0	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2021	0.144253	0.54453	0.28288	0.36764	57.28	15.57	97.69	38.6
1/31/2022	0.006552	0.03936	0.00492	0.00492	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2022	0.122823	0.66313	0.21718	0.24773	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2022	0.06108	0.66313	0.146427	0.24773	54.045	38.17	147.556	94.8
4/30/2022	0.073082	0.40579	0.165007	0.22017	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2022	0.020682	0.09843	0.165007	0.22017	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2022	0.025452	0.15354	0.165007	0.22017	32.133	23.13	77.49	48
7/31/2022	0.003714	0.03353	0.01897	0.02077	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2022	0.022812	0.07022	0.0323	0.0323	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	0.185353	0.64372	0.30752	0.30752	18.1737	20.6	59.5014	34.9
10/31/2022	0.181108	0.43208	0.25213	0.43208	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2022	0.067094	0.33797	0.20258	0.20258	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2022	0.079587	0.29703	NODI: 9	NODI: 9	29.992653	12.77	58.01711	17.1
1/31/2023	0.101634	0.4496	0.124991	0.30617	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2023	0.005386	0.05177	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2023	0.054472	0.56826	NODI: 9	NODI: 9	104.6894	55.07	306.4149	120
4/30/2023	0.285268	0.66048	0.161643	0.27725	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2023	0.20857	0.41964	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: W05A - 1 - A

Parameter	pH	pH	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Oil & grease
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	SU	SU	lb/d	lb/d	ug/L	in	lb/d	mg/L
Effluent Limit	6.5	9	Report	Report	Report	Report	Report	15
Minimum	6.88	6.88	0	0.00050892	0.3579	0	0	0
Maximum	8.39	8.39	2.8311	0.00365	2.191	1.73	2.8311	4.4
Median	Non-Detect	Non-Detect	Non-Detect	Non-Detect	Non-Detect	0.62	Non-Detect	Non-Detect
No. of Violations	0	0	N/A	N/A	N/A	N/A	N/A	0
Monitoring Period End Date								
1/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.29	NODI: 9	NODI: 9
2/28/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.34	NODI: 9	NODI: 9
3/31/2018	7.19	7.19	2.8311	0.00191	0.6197	1.325	2.8311	4.4
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.17	NODI: 9	NODI: 9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	7.46	7.46	0	0.0014	0.894	0.58	0	0
7/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.06	NODI: 9	NODI: 9
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	7.52	8.29	0	0.00365	2.191	0.83	0	0
10/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.61	NODI: 9	NODI: 9
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	7.18	7.18	0	0.0013	0.9241	0.84	0	0
1/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.66	NODI: 9	NODI: 9
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	8.31	8.31	0	0.00106	1.2257	0.44	0	0
4/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.54	NODI: 9	NODI: 9
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	7.54	7.54	0	0.0013	1.1005	0.54	0	0
7/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.77	NODI: 9	NODI: 9
8/31/2019	NODI: 9	NODI: 9	NODI: 8	NODI: 9	NODI: 9	0.37	NODI: 8	NODI: 8
9/30/2019	7.99	8.1	0	0.00098	1.2034	0.99	0	0
10/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.73	NODI: 9	NODI: 9
11/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.53	NODI: 9	NODI: 9
12/31/2019	7.39	7.39	0	0.00197	1.1025	1.33	0	0
1/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.5	NODI: 9	NODI: 9
2/29/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.61	NODI: 9	NODI: 9
3/31/2020	7.53	7.53	0	0.0014	0.7787	NODI: 9	0	0
4/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.86	NODI: 9	NODI: 9
5/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.62	NODI: 9	NODI: 9
6/30/2020	6.88	6.88	0	0.0021	1.2361	0.86	0	0

Outfall - Monitoring Location - Limit Set: W05A - 1 - A

Parameter	pH	pH	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Oil & grease
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	**SU**	**SU**	**lb/d**	**lb/d**	**ug/L**	**in**	**lb/d**	**mg/L**
Effluent Limit	**6.5**	**9**	**Report**	**Report**	**Report**	**Report**	**Report**	**15**
Minimum	**6.88**	**6.88**	**0**	**0.00050892**	**0.3579**	**0**	**0**	**0**
7/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.98	NODI: 9	NODI: 9
8/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.99	NODI: 9	NODI: 9
9/30/2020	7.04	7.66	0	0.0018	2.136	0.96	0	0
10/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.74	NODI: 9	NODI: 9
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.34	NODI: 9	NODI: 9
12/31/2020	7.4	7.4	0	0.0012	1.0225	0.47	0	0
1/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.87	NODI: 9	NODI: 9
2/28/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.74	NODI: 9	NODI: 9
3/31/2021	7.12	8	0	0.0018	1.2029	0.91	0	0
4/30/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.66	NODI: 9	NODI: 9
5/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.21	NODI: 9	NODI: 9
6/30/2021	8.39	8.39	0	0.0027	0.9636	0.69	0	0
7/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.16	NODI: 9	NODI: 9
8/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.7	NODI: 9	NODI: 9
9/30/2021	6.95	7.61	0	0.0028	1.2855	1.37	0	0
10/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.13	NODI: 9	NODI: 9
11/30/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0	NODI: 9	NODI: 9
12/31/2021	7.28	7.28	0	0.0016	0.6615	1.13	0	0
1/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.35	NODI: 9	NODI: 9
2/28/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.85	NODI: 9	NODI: 9
3/31/2022	7.39	7.39	0	0.0008	0.5396	0.85	0	0
4/30/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.62	NODI: 9	NODI: 9
5/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.62	NODI: 9	NODI: 9
6/30/2022	7.33	7.33	0	0.00076	0.7404	0.62	0	0
7/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.35	NODI: 9	NODI: 9
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.25	NODI: 9	NODI: 9
9/30/2022	7.16	7.53	0	0.00050892	0.5535	0.93	0	0
10/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 7	NODI: 7	1.1	NODI: 9	NODI: 9
11/30/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.88	NODI: 9	NODI: 9
12/31/2022	7.22	7.22	0	0.00078149	0.3579	NODI: 7	0	0
1/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.57	NODI: 9	NODI: 9
2/28/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2023	7.62	7.62	0	0.00093979	0.5279	NODI: 9	0	0
4/30/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.55	NODI: 9	NODI: 9
5/31/2023	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9

Outfall - Monitoring Location - Limit Set: W05A - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Number of Events
	Daily Max	Daily Max	Daily Max	TOTAL
Units	lb/d	ug/L	in	#
Effluent Limit	Report	Report	Report	Report
Minimum	0.00098	0.45	0	3
Maximum	0.00863	4.709	4.79	26
Median	Non-Detect	Non-Detect	0.9	10
No. of Violations	N/A	N/A	N/A	N/A
Monitoring Period End Date				
1/31/2018	NODI: 9	NODI: 9	4.79	9
2/28/2018	NODI: 9	NODI: 9	2.43	18
3/31/2018	0.00673	1.39	2.56	6
4/30/2018	NODI: 9	NODI: 9	0.9	10
5/31/2018	NODI: 9	NODI: 9	NODI: 9	6
6/30/2018	0.0031	1.1689	1.75	8
7/31/2018	NODI: 9	NODI: 9	1.64	9
8/31/2018	NODI: 9	NODI: 9	NODI: 9	14
9/30/2018	0.00863	2.679	1.64	12
10/31/2018	NODI: 9	NODI: 9	0.89	7
11/30/2018	NODI: 9	NODI: 9	NODI: 9	19
12/31/2018	0.0019	1.218	1.31	15
1/31/2019	NODI: 9	NODI: 9	0.8	12
2/28/2019	NODI: 9	NODI: 9	NODI: 9	10
3/31/2019	0.002637	1.982	0.8	14
4/30/2019	NODI: 9	NODI: 9	0.72	26
5/31/2019	NODI: 9	NODI: 9	NODI: 9	19
6/30/2019	0.0015	2.0961	0.72	13
7/31/2019	NODI: 9	NODI: 9	0.77	7
8/31/2019	NODI: 9	NODI: 9	0.49	6
9/30/2019	0.00245	1.898	0.99	6
10/31/2019	NODI: 9	NODI: 9	3	10
11/30/2019	NODI: 9	NODI: 9	0.53	11
12/31/2019	0.00426	2.215	3	12
1/31/2020	NODI: 9	NODI: 9	0.68	7
2/29/2020	NODI: 9	NODI: 9	0.61	11
3/31/2020	0.0038	1.3319	NODI: 9	16
4/30/2020	NODI: 9	NODI: 9	0.91	14
5/31/2020	NODI: 9	NODI: 9	0.62	9
6/30/2020	0.0046	1.909	0.91	5

Outfall - Monitoring Location - Limit Set: W05A - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Number of Events
	Daily Max	Daily Max	Daily Max	TOTAL
Units	lb/d	ug/L	in	#
Effluent Limit	Report	Report	Report	Report
Minimum	**0.00098**	**0.45**	**0**	**3**
7/31/2020	NODI: 9	NODI: 9	1.05	9
8/31/2020	NODI: 9	NODI: 9	1.41	5
9/30/2020	0.00252	4.709	1.41	3
10/31/2020	NODI: 9	NODI: 9	0.74	10
11/30/2020	NODI: 9	NODI: 9	0.45	8
12/31/2020	0.0026	1.847	0.74	8
1/31/2021	NODI: 9	NODI: 9	1.19	4
2/28/2021	NODI: 9	NODI: 9	0.74	8
3/31/2021	0.0043	2.796	1.19	20
4/30/2021	NODI: 9	NODI: 9	1.66	9
5/31/2021	NODI: 9	NODI: 9	0.32	15
6/30/2021	0.0065	1.65	1.66	7
7/31/2021	NODI: 9	NODI: 9	1.26	24
8/31/2021	NODI: 9	NODI: 9	1.7	9
9/30/2021	0.0042	2.141	1.37	13
10/31/2021	NODI: 9	NODI: 9	1.29	13
11/30/2021	NODI: 9	NODI: 9	0	10
12/31/2021	0.0035	1.401	1.29	14
1/31/2022	NODI: 9	NODI: 9	0.35	10
2/28/2022	NODI: 9	NODI: 9	1.33	18
3/31/2022	0.002	1.282	1.33	23
4/30/2022	NODI: 9	NODI: 9	0.9	16
5/31/2022	NODI: 9	NODI: 9	0.9	9
6/30/2022	0.00098	1.448	0.9	9
7/31/2022	NODI: 9	NODI: 9	0.49	10
8/31/2022	NODI: 9	NODI: 9	0.25	5
9/30/2022	0.00170502	0.7795	0.93	6
10/31/2022	NODI: 7	NODI: 7	1.56	6
11/30/2022	NODI: 9	NODI: 9	0.88	10
12/31/2022	0.0016216	0.45	NODI: 7	7
1/31/2023	NODI: 9	NODI: 9	1.99	22
2/28/2023	NODI: 9	NODI: 9	NODI: 9	16
3/31/2023	0.00262751	1.029	NODI: 9	25
4/30/2023	NODI: 9	NODI: 9	1.06	16
5/31/2023	NODI: 9	NODI: 9	NODI: 9	7

Outfall - Monitoring Location - Limit Set: W05B - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Minimum	Maximum
Units	**MGD**	**MGD**	**MGD**	**MGD**	**mg/L**	**mg/L**	**SU**	**SU**
Effluent Limit	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**6.5**	**9**
Minimum	**0.0002**	**0.0002**	**0**	**0**	**12.6**	**12.6**	**6.6**	**6.6**
Maximum	**0.3868**	**0.7697**	**0.7697**	**0.7697**	**300**	**300**	**7.99**	**8.1**
Median	**0.024767**	**0.0587**	**Non-Detect**	**Non-Detect**	**Non-Detect**	**Non-Detect**	**Non-Detect**	**Non-Detect**
No. of Violations	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**N/A**	**0**	**0**
Monitoring Period End Date								
1/31/2018	0.3868	0.7697	0.7697	0.7697	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2018	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2018	NODI: 9	NODI: 9	0.3868	0.7697	117	117	6.97	6.97
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	0.0087	0.0087	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.0187	0.0521	0.0087	0.0087	289	289	7.49	7.49
7/31/2018	0.050814	0.1355	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2018	0.0651	0.1962	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0.05488	0.1962	0.052388	0.1355	83.47	169	7.41	7.82
10/31/2018	0.0002	0.0002	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	0.057417	0.2008	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.0505	0.2008	0.00189	0.00189	22.1	22.1	7.93	7.93
1/31/2019	0.179	0.3556	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2019	0.06845	0.1075	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.123725	0.3556	NODI: C	NODI: C	106	106	7.85	7.85
4/30/2019	0.024767	0.0724	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2019	0.01665	0.024	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0.03684	0.28	0.0185	0.0185	275	275	7.1	7.1
7/31/2019	0.0982	0.1642	0.0322	0.0322	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2019	0.01665	0.024	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2019	0.03795	0.1642	0.02605	0.0322	30.65	44.2	7.99	8.1
10/31/2019	0.1015	0.1015	0.1015	0.1015	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2019	0.0303	0.0773	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	0.0389	0.1015	0.1015	0.1015	173	173	7.08	7.08
1/31/2020	0.0041	0.0041	0.0041	0.0041	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/29/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	0.0041	0.0041	0.0041	0.0041	199	199	7.43	7.43
4/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2020	0.053995	0.147	0.147	0.147	143	143	6.6	6.6

Outfall - Monitoring Location - Limit Set: W05B - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	pH	pH
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Minimum	Maximum
Units	**MGD**	**MGD**	**MGD**	**MGD**	**mg/L**	**mg/L**	**SU**	**SU**
Effluent Limit	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**6.5**	**9**
Minimum	**0.0002**	**0.0002**	**0**	**0**	**12.6**	**12.6**	**6.6**	**6.6**
7/31/2020	0.043525	0.0587	0.0587	0.0587	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2020	0.0104	0.0163	0.0104	0.0163	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2020	0.11007	0.4425	0.0265	0.0587	67.2	113	7.02	7.38
10/31/2020	0.0059	0.0089	0.0029	0.0029	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2020	NODI: 9	NODI: 9	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0.023933	0.06	0.0029	0.0029	18.5	18.5	7.31	7.31
1/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2021	0.0451	0.0451	0.0451	0.0451	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2021	0.089667	0.2392	0.089667	0.2392	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2021	0.078525	0.2392	0.0451	0.0451	300	300	7.78	7.78
7/31/2021	0.056167	0.0793	0.0517	0.0517	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2021	0.03974	0.0644	0.0595	0.0595	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2021	0.040904	0.0793	0.038123	0.0595	53.2	107	7.24	7.43
10/31/2021	0.143733	0.2946	0.2946	0.2946	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2021	0.1402	0.1468	0	0	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2021	0.12305	0.2946	0.2946	0.2946	60.7	60.7	7.82	7.82
1/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2022	0.13485	0.4307	0.0719	0.0719	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2022	0.139675	0.4307	0.0719	0.0719	33.7	33.7	7.31	7.31
4/30/2022	0.241	0.241	0.241	0.241	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2022	0.104967	0.241	0.0069	0.0069	12.6	12.6	7.32	7.32
7/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2022	0.0665	0.0665	0.0665	0.0665	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2022	0.0106	0.0106	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2022	NODI: C	NODI: C	NODI: 9	NODI: 9	12.9	12.9	6.83	6.83
1/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: W05B - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Polychlorinated biphenyls (PCBs)	Rainfall	Number of Events
	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max	TOTAL
Units	ug/L	in	mg/L	ug/L	in	#
Effluent Limit	Report	Report	15	Report	Report	Report
Minimum	0.0098	0	0	0.3863	0	0
Maximum	11.26	4.79	8.8	13.08	4.79	10
Median	Non-Detect	0.31	Non-Detect	Non-Detect	0.31	1
No. of Violations	N/A	N/A	0	N/A	N/A	N/A
Monitoring Period End Date						
1/31/2018	NODI: 9	0.29	NODI: 9	NODI: 9	4.79	2
2/28/2018	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: C	0
3/31/2018	2.215	4.79	0	2.215	4.79	0
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1
6/30/2018	2.664	1	0	2.664	1	3
7/31/2018	NODI: 9	1.06	NODI: 9	NODI: 9	1.64	7
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	10
9/30/2018	3.183	0.83	0	4.924	1.64	3
10/31/2018	NODI: 9	0.89	NODI: 9	NODI: 9	0.89	1
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	6
12/31/2018	1.535	0.89	0	1.535	0.89	3
1/31/2019	NODI: 9	3.86	NODI: 9	NODI: 9	3.86	2
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	2
3/31/2019	0.941	3.86	0	0.941	3.86	0
4/30/2019	NODI: 9	0.41	NODI: 9	NODI: 9	0.41	9
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	4
6/30/2019	2.978	0.41	0	2.978	0.41	7
7/31/2019	NODI: 9	0.77	NODI: 9	NODI: 9	0.77	2
8/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	4
9/30/2019	1.6995	0.99	0	2.322	0.99	2
10/31/2019	NODI: 9	3	NODI: 9	NODI: 9	3	1
11/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	3
12/31/2019	11.26	3	0	11.26	3	1
1/31/2020	NODI: 9	0.74	NODI: 9	NODI: 9	0.74	1
2/29/2020	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: C	NODI: C
3/31/2020	3.381	NODI: 9	8.8	3.381	NODI: 9	NODI: C
4/30/2020	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: C	NODI: C
5/31/2020	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: C	NODI: C
6/30/2020	8.684	0.74	0	8.684	0.74	4

Outfall - Monitoring Location - Limit Set: W05B - 1 - A

Parameter	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Polychlorinated biphenyls (PCBs)	Rainfall	Number of Events
	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max	TOTAL
Units	ug/L	in	mg/L	ug/L	in	#
Effluent Limit	Report	Report	15	Report	Report	Report
Minimum	**0.0098**	**0**	**0**	**0.3863**	**0**	**0**
7/31/2020	NODI: 9	0.91	NODI: 9	NODI: 9	0.91	2
8/31/2020	NODI: 9	0.99	NODI: 9	NODI: 9	1.41	2
9/30/2020	5.64	0.96	0	13.08	1.41	1
10/31/2020	NODI: 9	0.31	NODI: 9	NODI: 9	0.31	2
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0
12/31/2020	2.35	0.31	0	2.35	0.31	1
1/31/2021	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: C	NODI: C
2/28/2021	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: C	NODI: C
3/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2021	NODI: 9	2.28	NODI: 9	NODI: 9	2.28	1
5/31/2021	NODI: 9	2.28	NODI: 9	NODI: 9	2.28	3
6/30/2021	7.119	2.28	0	7.119	2.28	0
7/31/2021	NODI: 9	1.26	NODI: 9	NODI: 9	1.26	9
8/31/2021	NODI: 9	1.7	NODI: 9	NODI: 9	1.7	5
9/30/2021	3.849	1.37	0	6.834	1.37	6
10/31/2021	NODI: 9	1.29	NODI: 9	NODI: 9	1.29	3
11/30/2021	NODI: 9	0	NODI: 9	NODI: 9	0	2
12/31/2021	0.0098	1.29	0	3.999	1.29	3
1/31/2022	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: C	NODI: C
2/28/2022	NODI: 9	0.36	NODI: 9	NODI: 9	0.36	6
3/31/2022	0.3863	0.36	0	0.3863	0.36	2
4/30/2022	NODI: 9	0	NODI: 9	NODI: 9	0	1
5/31/2022	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: C	NODI: C
6/30/2022	0.5433	0.53	0	0.5433	0.53	2
7/31/2022	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: C	NODI: C
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2022	NODI: 9	1.39	NODI: 7	NODI: 9	1.39	1
11/30/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1
12/31/2022	1.0101	NODI: 9	0	1.0101	NODI: 9	NODI: C
1/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: W06A - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	MGD	MGD	MGD	MGD	lb/d	mg/L	lb/d	mg/L
Effluent Limit	Report	Report	Report	Report	Report	Report	Report	Report
Minimum	0	0	0	0	0.0065	3.1	0.0065	3.1
Maximum	0.3883	0.3883	0.3883	0.3883	134.558	1150	134.558	1150
Median	0.00272	0.00372	0	0	Non-Detect	Non-Detect	Non-Detect	Non-Detect
No. of Violations	N/A	N/A	N/A	N/A	N/A	N/A	N/A	N/A
Monitoring Period End Date								
1/31/2018	0.07605	0.07605	0.07605	0.07605	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2018	0.001517	0.00221	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2018	NODI: 9	NODI: 9	0.038025	0.07605	62.791	99	62.791	99
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	0.00476	0.00476	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	0.00186	0.00372	0.00476	0.00476	0.5915	149	0.5915	149
7/31/2018	0.00499	0.01063	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2018	0.00581	0.02469	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	0.004781	0.02469	0.00294	0.00561	5.225	169.5	12.445	266
10/31/2018	0.0009	0.0009	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	0.002353	0.004	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	0.010568	0.0531	0.004	0.004	4.704	141	4.704	141
1/31/2019	0.0445	0.0445	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2019	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	0.0445	0.0445	NODI: C	NODI: C	42.3088	114	42.3088	114
4/30/2019	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2019	0.015195	0.01633	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	0.01633	0.01633	0.01633	0.01633	134.558	988	134.558	988
7/31/2019	0.00607	0.00607	0.00607	0.00607	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2019	0.00146	0.00146	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2019	0.021398	0.04101	0.02156	0.03705	21.218	97.6	38.934	126
10/31/2019	0.09114	0.28572	0.28572	0.28572	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2019	0.00419	0.00702	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	0.0471	0.26572	0.26572	0.26572	49.64	22.4	49.64	22.4
1/31/2020	0.00272	0.00272	0.00272	0.00272	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/29/2020	0.00155	0.00305	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	NODI: C	NODI: C	NODI: 9	NODI: 9	7.531	332	7.531	332
4/30/2020	0.00032	0.00032	0.00032	0.00032	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2020	0.020079	0.020079	0.020079	0.020079	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2020	0.040133	0.05485	0.00032	0.00032	0.1153	43.2	0.1153	43.2

Outfall - Monitoring Location - Limit Set: W06A - 1 - A

Parameter	Flow	Flow	Total Flow	Total Flow	TSS	TSS	TSS	TSS
	Monthly Avg	Daily Max	Monthly Avg	Daily Max	Monthly Avg	Monthly Avg	Daily Max	Daily Max
Units	**MGD**	**MGD**	**MGD**	**MGD**	**lb/d**	**mg/L**	**lb/d**	**mg/L**
Effluent Limit	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**	**Report**
Minimum	**0**	**0**	**0**	**0**	**0.0065**	**3.1**	**0.0065**	**3.1**
7/31/2020	0.01208	0.01767	0.01767	0.01767	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2020	0.00394	0.00604	0.00394	0.00604	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2020	0.3883	0.3883	0.3883	0.3883	9.994	127.67	24.168	164
10/31/2020	0.01063	0.01523	0.00602	0.00602	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2020	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2020	0	0	0	0	16.669	332	16.669	332
1/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2021	0.01777	0.01777	0.01777	0.01777	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2021	0.00265	0.0027	0.00265	0.0027	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2021	0.01046	0.01492	0.01777	0.01777	58.243	393	58.243	393
7/31/2021	0.01601	0.08449	0.00038	0.00038	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2021	0.0028	0.00396	0.00396	0.00396	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2021	0.00171	0.00308	0.00308	0.00308	2.97	104.13	6.54	198
10/31/2021	0.00397	0.01163	0.00025	0.00025	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2021	0.00298	0.00539	0	0	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2021	0.01343	0.01343	0.00025	0.00025	0.0065	3.1	0.0065	3.1
1/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
2/28/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2022	0.00499	0.00937	0.00937	0.00937	89.87	1150	89.87	1150
4/30/2022	0.01431	0.01431	0.01431	0.01431	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2022	0.00324	0.00324	0.00324	0.00324	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2022	0.00001	0.00001	0.00001	0.00001	6.755	250	6.755	250
7/31/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2022	0.00862	0.01642	0.01642	0.01642	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2022	0.00088	0.00088	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2022	NODI: C	NODI: C	NODI: 9	NODI: 9	24.786647	181	24.786647	181
1/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: W06A - 1 - A

Parameter	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	SU	SU	lb/d	ug/L	in	mg/L	lb/d	ug/L
Effluent Limit	6.5	9	Report	Report	Report	15	Report	Report
Minimum	6.58	6.58	0.0000002	0.0947	0	0	0.0000002	0.0947
Maximum	7.89	8.36	0.00091	7.876	4.79	7.6	0.00091	7.876
Median	Non-Detect	Non-Detect	Non-Detect	Non-Detect	0.31	Non-Detect	Non-Detect	Non-Detect
No. of Violations	0	0	N/A	N/A	N/A	0	N/A	N/A
Monitoring Period End Date								
1/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.29	NODI: 9	NODI: 9	NODI: 9
2/28/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2018	7.01	7.01	0.000212	0.3347	4.79	0	0.000212	0.3347
4/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
5/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2018	7.76	7.76	0.000023	0.576	1	0	0.000023	0.576
7/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.06	NODI: 9	NODI: 9	NODI: 9
8/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2018	7.2	8.36	0.000039	1.0255	0.83	0	0.000106	2.263
10/31/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
11/30/2018	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2018	7.76	7.76	0.000018	0.5436	0.46	0	0.000018	0.5436
1/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	3.86	NODI: 9	NODI: 9	NODI: 9
2/28/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2019	7.89	7.89	0.000102	0.2738	3.86	5	0.000102	0.2738
4/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 8	NODI: 9	NODI: 9
5/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
6/30/2019	7.6	7.6	0.00045	3.338	0.49	0	0.00045	3.338
7/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.77	NODI: 9	NODI: 9	NODI: 9
8/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2019	7.27	7.9	0.00016	0.8145	0.99	0	0.0003	0.9551
10/31/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	3	NODI: 9	NODI: 9	NODI: 9
11/30/2019	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2019	7.07	7.07	0.00091	0.4092	3	0	0.00091	0.4092
1/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.74	NODI: 9	NODI: 9	NODI: 9
2/29/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
3/31/2020	7.43	7.43	0.000019	0.8289	NODI: 9	7.6	0.000019	0.8289
4/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.85	NODI: 9	NODI: 9	NODI: 9
5/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.74	NODI: 9	NODI: 9	NODI: 9
6/30/2020	7.34	7.34	0.000001	0.365	0.85	0	0.000001	0.365

Outfall - Monitoring Location - Limit Set: W06A - 1 - A

Parameter	pH	pH	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)	Rainfall	Oil & grease	Polychlorinated biphenyls (PCBs)	Polychlorinated biphenyls (PCBs)
	Minimum	Maximum	Monthly Avg	Monthly Avg	Monthly Avg	Daily Max	Daily Max	Daily Max
Units	SU	SU	lb/d	ug/L	in	mg/L	lb/d	ug/L
Effluent Limit	6.5	9	Report	Report	Report	15	Report	Report
Minimum	6.58	6.58	0.0000002	0.0947	0	0	0.0000002	0.0947
7/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.91	NODI: 9	NODI: 9	NODI: 9
8/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.99	NODI: 9	NODI: 9	NODI: 9
9/30/2020	6.99	7.3	0.00014	1.256	0.96	0	0.00039	2.654
10/31/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.31	NODI: 9	NODI: 9	NODI: 9
11/30/2020	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: 9
12/31/2020	6.97	6.97	0.000395	7.876	0.31	0	0.000395	7.876
1/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: 9
2/28/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: 9
3/31/2021	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	2.28	NODI: 9	NODI: 9	NODI: 9
5/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	2.28	NODI: 9	NODI: 9	NODI: 9
6/30/2021	7.26	7.26	0.0008	5.427	2.28	0	0.0008	5.427
7/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.05	NODI: 9	NODI: 9	NODI: 9
8/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.7	NODI: 9	NODI: 9	NODI: 9
9/30/2021	7.03	7.1	0.000013	0.5047	1.37	0	0.000028	0.8574
10/31/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.6	NODI: 9	NODI: 9	NODI: 9
11/30/2021	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0	NODI: 9	NODI: 9	NODI: 9
12/31/2021	7.25	7.25	0.0000002	0.0947	1.6	0	0.0000002	0.0947
1/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: 9
2/28/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: C	NODI: 9	NODI: 9	NODI: 9
3/31/2022	7.5	7.5	0.00009	1.198	0.71	7.5	0.00009	1.198
4/30/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0	NODI: 9	NODI: 9	NODI: 9
5/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	0.6	NODI: 9	NODI: 9	NODI: 9
6/30/2022	7.03	7.03	0.000019	0.701	0.6	0	0.000019	0.701
7/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
8/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
9/30/2022	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
10/31/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	1.39	NODI: 9	NODI: 9	NODI: 9
11/30/2022	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9	NODI: 9
12/31/2022	6.58	6.58	0.0002428	1.773	NODI: 9	0	0.0002428	1.773
1/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C	NODI: C

Outfall - Monitoring Location - Limit Set: W06A - 1 - A

Parameter	Rainfall	Number of Events
	Daily Max	TOTAL
Units	in	#
Effluent Limit	Report	Report
Minimum	0	0
Maximum	4.79	10
Median	0.31	1
No. of Violations	N/A	N/A
Monitoring Period End Date		
1/31/2018	4.79	1
2/28/2018	NODI: 9	3
3/31/2018	4.79	0
4/30/2018	NODI: 9	NODI: 9
5/31/2018	NODI: 9	1
6/30/2018	1	1
7/31/2018	1.64	4
8/31/2018	NODI: 9	7
9/30/2018	1.64	4
10/31/2018	NODI: 9	1
11/30/2018	NODI: 9	4
12/31/2018	0.46	1
1/31/2019	3.86	1
2/28/2019	NODI: 9	NODI: C
3/31/2019	3.86	0
4/30/2019	NODI: 9	0
5/31/2019	NODI: 9	2
6/30/2019	0.49	4
7/31/2019	0.77	1
8/31/2019	NODI: 9	1
9/30/2019	0.99	2
10/31/2019	3	3
11/30/2019	NODI: 9	2
12/31/2019	3	1
1/31/2020	0.74	1
2/29/2020	NODI: 9	2
3/31/2020	NODI: 9	NODI: C
4/30/2020	0.85	1
5/31/2020	0.74	1
6/30/2020	0.85	4

Outfall - Monitoring Location - Limit Set: W06A - 1 - A

Parameter	Rainfall	Number of Events
	Daily Max	TOTAL
Units	in	#
Effluent Limit	Report	Report
Minimum	0	0
7/31/2020	0.91	2
8/31/2020	1.41	2
9/30/2020	1.41	1
10/31/2020	0.31	2
11/30/2020	NODI: C	0
12/31/2020	0.31	0
1/31/2021	NODI: C	NODI: C
2/28/2021	NODI: C	NODI: C
3/31/2021	NODI: C	NODI: C
4/30/2021	2.28	1
5/31/2021	2.28	2
6/30/2021	2.28	0
7/31/2021	1.05	10
8/31/2021	1.7	4
9/30/2021	1.37	5
10/31/2021	1.6	3
11/30/2021	0	2
12/31/2021	1.6	1
1/31/2022	NODI: C	NODI: C
2/28/2022	NODI: C	NODI: C
3/31/2022	0.71	2
4/30/2022	0	1
5/31/2022	0.6	1
6/30/2022	0.6	1
7/31/2022	NODI: 9	NODI: C
8/31/2022	NODI: 9	NODI: 9
9/30/2022	NODI: C	NODI: C
10/31/2022	1.39	2
11/30/2022	NODI: 9	1
12/31/2022	NODI: 9	NODI: C
1/31/2023	NODI: C	NODI: C
2/28/2023	NODI: C	NODI: C
3/31/2023	NODI: C	NODI: C
4/30/2023	NODI: C	NODI: C
5/31/2023	NODI: C	NODI: C

Appendix B: Ambient Data

Whole Effluent Toxicity Testing Ambient Sampling – provided by MassDEP

Sample Date	Hardness (mg/L)	Ammonia (mg/L)	Aluminum (mg/L)	Cadmium (mg/L)	Copper (mg/L)	Nickel (mg/L)	Lead (mg/L)	Zinc (mg/L)
12-Mar-18	54	-0.05	-0.09	-0.0002	-0.0007		-0.0005	-0.003
11-Jun-18	120	-0.05		-0.00007				-0.0025
10-Sep-18	124	-0.05		-0.00007	-0.0007			-0.0025
10-Dec-18	60	-0.05		-0.00007	-0.0007			-0.0025
11-Mar-19	78	-0.05		-0.0004	-0.0007		-0.0006	-0.0025
10-Jun-19	86	-0.05		-0.0004	0.001			-0.0025
09-Sep-19	124	-0.05		-0.0004	-0.0007		-0.0006	-0.0025
02-Dec-19	56	-0.05		-0.0004	-0.0007		-0.0006	-0.0025
09-Mar-20	50	-0.05		-0.0004	0.0011			
08-Jun-20	114	-0.05	-0.04	-0.0004	0.0026		-0.0006	-0.0025
14-Sep-20	146	-0.05	-0.04	-0.0004			-0.0006	-0.0025
07-Dec-20	60	-0.05	-0.04	-0.0004	-0.0007		-0.0006	-0.0025
22-Mar-21	54	-0.05	-0.04	-0.0004	-0.0007		-0.0006	-0.0025
07-Jun-21	92	-0.05	-0.04	-0.0004	-0.0007		-0.0002	
15-Sep-21	78	-0.05	-0.04	-0.0004	-0.0007		-0.0002	-0.0025
06-Dec-21	72	-0.05	-0.04	-0.0004	-0.0007	-0.0005	-0.0002	-0.0025
07-Mar-22	48	-0.05		-0.0004	-0.0007	-0.0005		-0.0025
06-Jun-22	112	-0.05	-0.04	-0.0004			-0.0002	-0.0025
12-Sep-22	128	-0.05	-0.04	-0.0004	0.0013		-0.0002	-0.0025
05-Dec-22	48	-0.05	-0.04	-0.0002	-0.0007	-0.0005	-0.0002	-0.0025

Note: A negative value indicates a non-detect result and the value shown is the minimum level of analysis.

Dry Weather Ambient PCB Sampling – provided by Permittee

Outfall ID	Sample Location	Sampling Date	Channel Width (feet)	Percent of Channel Width	Sample Width (feet)	Channel Depth (feet)	Sample Depth (feet)	Total PCB (µg/L)	O&G (mg/L)	TSS (mg/L)	pH (S.U.)
05A	Upstream	6/4/2013	60	25%	15	1.2	0.6	0.0061J	ND(4.2)	5.1	7.99
				50%	30	1.2	0.6	0.0066J	ND(4.2)	5.3	
				75%	45	1.5	0.75	0.0067J	ND(4.2)	4.9	
	Downstream	6/4/2013	58	25%	14.5	2.4	1.2	0.0074J	ND(4.2)	5.4	8.03
				50%	29	2.5	1.25	0.0074J	ND(4.2)	6.1	
				75%	43.5	2.2	1.1	0.0084J	ND(4.2)	5.5	
	Upstream	6/20/2013	60	25%	15	1.5	0.75	0.0092J	ND(4.1)	5.4	8.01
				50%	30	1.5	0.75	0.0095J	ND(4.0)	5.7	
				75%	45	1.9	0.95	0.0103J	ND(4.1)	5.2	
	Downstream	6/20/2013	60	25%	15	3.2	1.6	0.0077J	ND(4.0)	4.9	8.02
				50%	30	2.9	1.45	0.0068J	ND(4.2)	4.9	
				75%	45	3.1	1.55	0.0089J	ND(4.0)	5.3	
006	Upstream	6/4/2013	60	25%	15	2.1	1.05	0.0063J	ND(4.1)	4.7	7.98
				50%	30	1.9	0.95	0.0061J	ND(4.1)	4.6	
				75%	45	1.2	0.6	0.0057J	ND(4.1)	4.8	
	Downstream	6/4/2013	45	25%	11	3.4	1.7	0.0173J	ND(4.2)	4.6	7.99
				50%	22	2.8	1.4	0.0056J	ND(4.2)	4.3	
				75%	33	2.1	1.05	0.0056J	ND(4.1)	4.4	
	Upstream	6/20/2013	66	25%	16.5	2.2	1.1	0.0074J	ND(4.0)	4.2	7.98
				50%	33	1.5	0.75	0.0069J	ND(4.1)	5.6	
				75%	49.5	2.2	1.1	0.0067J	ND(4.0)	5.0	
	Downstream	6/20/2013	48	25%	12	2.7	1.35	0.0090J	ND(4.1)	5.7	7.98
				50%	24	3.1	1.55	0.0090J	ND(3.9)	5.3	
				75%	36	4	2	0.0087J	ND(4.2)	5.1	

Notes for Dry Weather Ambient PCB Sampling:

1. Samples were collected by ARCADIS and submitted to Columbia Analytical Services, Inc. and SGS Environmental Services, Inc. for analysis of total suspended solids (TSS) and total oil and grease (O&G), and total polychlorinated biphenyls (PCBs), respectively.
2. A 24-hour dry weather period as defined in the Permit Modification was confirmed prior to initiating sampling activities.
3. Upstream and downstream samples were collected from the 1 foot depth increment for channel depths greater than 2 feet and mid-depth for channel depths less than 2 feet, at three locations across the width of the channel.
4. All samples were collected as discrete-grab samples.
5. pH readings were collected at the upstream and downstream sample locations.
6. Upstream sample collection activities were initiated once dry weather sampling had been initiated at Outfalls 05A and 006 in accordance with Parts I.A.1 through I.A.13 of the Permit. Downstream sample collection activities were initiated immediately following the collection of the upstream samples.
7. ND = Analyte was not detected. The number in parentheses is the associated detection limit.
8. J – Indicates an estimated value less than the practical quantization limit (PQL).
9. mg/L = milligrams per liter.
10. µg/L = micrograms per liter.

Wet Weather Ambient PCB Sampling – provided by Permittee

Receiving Water Body	Outfalls Discharging	Sample Location	Sampling Date	Channel Width (feet)	Percent of Channel Width	Sample Width (feet)	Channel Depth (feet)	Sample Depth (feet)	Total PCB (µg/L)	O&G (mg/L)	TSS (mg/L)	pH (S.U.)
Housatonic River	005, 05A, 006	Upstream	9/22/2022	32	25%	8.0	0.8	0.50	0.01758J	ND(4.8)	16.6	7.12
					50%	16.0	1.0	0.50		ND(4.8)		
					75%	24.0	0.8	0.50		ND(4.7)		
			10/5/2022	40	25%	10.0	1.0	0.50	0.1143	5.8	59.8	7.94
					50%	20.0	3.0	1.50		ND(4.9)		
					75%	30.0	1.2	0.60		ND(4.7)		
		Downstream	9/22/2022	38	25%	9.5	1.5	0.75	0.0514	ND(4.8)	15.4	7.30
					50%	19.0	2.0	1.00		ND(4.7)		
					75%	28.5	2.0	1.00		ND(4.7)		
			10/5/2022	43	25%	10.8	1.6	0.80	0.1644	ND(4.7)	88.2	7.66
					50%	21.5	2.3	1.15		ND(4.7)		
					75%	32.3	2.3	1.15		ND(4.8)		
Unkamet Brook	009	Upstream	########	14	25%	3.50	2.0	1.00	0.0510J	ND(4.7)	2.4	7.56
					50%	7.00	2.5	1.25		ND(4.7)		
					75%	10.50	2.0	1.00		ND(4.6)		
			11/1/2022	10	25%	2.5	2.0	1.00	0.1719	ND(4.7)	38.5	7.49
					50%	5.0	2.2	1.10		ND(4.6)		
					75%	7.5	2.2	1.10		ND(4.7)		
		Downstream	########	11	25%	2.75	0.6	0.30	0.0461	ND(4.7)	26.6	7.55
					50%	5.50	1.0	0.50		ND(4.6)		
					75%	8.25	0.9	0.45		ND(4.7)		
			11/1/2022	14	25%	3.5	1.6	0.80	0.01105J	ND(4.6)	6.9	7.41
					50%	7.0	1.7	0.85		ND(4.7)		
					75%	10.5	1.6	0.80		ND(4.7)		

Notes for Wet Weather Ambient PCB Sampling:

1. Samples were collected by Arcadis and submitted to ALS Environmental and SGS Environmental Services, Inc. for analysis of total suspended solids (TSS) and total oil and grease (O&G), and total polychlorinated biphenyls (PCBs), respectively.
2. A 24-hour dry weather period as defined in the Permit Modification was confirmed prior to initiating sampling activities.
3. Upstream and downstream samples were collected from the mid-depth of the channel at three locations across the width of the channel.
4. pH readings were collected at the upstream and downstream sample locations.
5. Upstream sample collection activities were initiated once wet weather outfall sampling, in accordance with Parts I.A.1 through I.A.13 of the Permit, had been initiated at the outfalls identified in the table above. Downstream sample collection activities in the Housatonic River and Unkamet Brook were initiated based on the requirements set forth in the Wet Weather Ambient Monitoring Plan (December 2009).
6. ND = Analyte was not detected. The number in parentheses is the associated detection limit.
7. mg/L = milligrams per liter.
8. µg/L = micrograms per liter.
9. J - Indicates an estimated value less than the practical quantification limit (PQL).

Appendix C: Reasonable Potential Analysis

Methodology

A reasonable potential analysis is completed using a single set of critical conditions for flow and pollutant concentrations that will ensure the protection of water quality standards. To determine the critical condition of the effluent, EPA projects an upper bound of the effluent concentration based on the observed monitoring data and a selected probability basis. EPA generally applies the quantitative approach found in Appendix E of the *Technical Support Document for Water Quality-based Toxics Control* (TSD)[1] to determine the upper bound of the effluent data. This methodology accounts for effluent variability based on the size of the dataset and the occurrence of non-detects (i.e., samples results in which a parameter is not detected above laboratory minimum levels). EPA used this methodology to calculate the 95th percentile.

EPA uses the calculated upper bound of the effluent data, along with a concentration representative of the parameter in the receiving water, the critical effluent flow, and the critical upstream flow to project the downstream concentration after complete mixing using the following simple mass-balance equation:

$$Q_s C_s + Q_e C_e = Q_d C_d$$

Where:

C_d = downstream concentration
C_s = upstream concentration
C_e = effluent concentration
Q_s = upstream flow
Q_e = effluent flow of the Facility
Q_d = downstream flow

Solving for the receiving water concentration downstream of the discharge (C_d) yields:

$$C_d = \frac{C_s Q_s + C_e Q_e}{Q_d}$$

When both the downstream concentration (C_d) and the effluent concentration (C_e) exceed the applicable criterion, there is reasonable potential for the discharge to cause, or contribute to an excursion above the water quality standard. *See* 40 C.F.R. § 122.44(d). When EPA determines that a discharge causes, has the reasonable potential to cause, or contribute to such an excursion, the permit must contain WQBELs for the parameter. *See* 40 C.F.R. § 122.44(d)(1)(iii). Limits are calculated by using the criterion as the downstream concentration (C_d) and rearranging the mass balance equation to solve for the effluent concentration (C_e).

However, because dilution is not being considered in the Draft Permit, the downstream concentration is the same as the effluent concentrations. The table below presents the calculations.

[1] USEPA, *Technical Support Document for Water Quality-Based Toxics Control*, Office of Water, Washington, D.C., March 1991.

Pollutant	Conc. Units	Q_s (MGD)	C_s [1]	Q_e (MGD)	C_e [2]		Q_d (MGD)	C_d		Criteria		Reasonable Potential	
					Acute	Chronic		Acute	Chronic	Acute	Chronic	C_e & C_d > Acute Criteria	C_e & C_d > Chronic Criteria
Copper	µg/L	0	0	0.27	6.4	4.8	0.27	6.4	4.8	11.1	7.5	N	N
Nickel	µg/L	0	0	0.27	3.2	2.6	0.27	3.2	2.6	380.2	42.3	N	N

[1]Median concentration for the receiving water just upstream of the facility's discharge taken from the WET testing data during the review period (see Appendix B).

[2]Values represent the 95th and 99th percentile concentrations from the WET testing data during the review period (see Appendix A).

Appendix D: Whole Effluent Toxicity Analysis

No dilution factor applies to an internal outfall (i.e., internal Outfall 64G). For discharges with dilution less than 10 the criterion recommended in the *Massachusetts Water Quality Standards Implementation Policy for the Control of Toxic Pollutants in Surface Waters* (February 23, 1990) for acute effects is 0.3 toxic units (T.U.) with additional maximum limits based on dilution, and for chronic effects, at critical conditions, the NOEC measured in percent must be greater than or equal to the receiving water concentration (RWC) of effluent in percent by volume. Since no toxicity was detected in the acute Whole Effluent Toxicity testing conducted since 2018 at the Facility, EPA reviewed only chronic WET results. To determine whether discharges from the Facility have reasonable potential to cause or contribute to an excursion above the chronic water quality standards for toxicity, EPA compared the following results to the requirement that there be "no observed effect" in the receiving water.

Summary of WET Testing Results

Parameter	**IC25 7Day Ceriodaphnia**	**Noel 7Day Ceriodaphnia**
Units	**%**	**%**
Date		
3/31/2018	70.21	100
6/30/2018	100	75
9/30/2018	38.01	25
12/31/2018	100	100
3/31/2019	100	100
6/30/2019	63.12	25
9/30/2019	100	25
12/31/2019	100	100
3/31/2020	100	100
6/30/2020	100	25
9/30/2020	12.2	100
12/31/2020	100	100
3/31/2021	100	100
6/30/2021	94.5	100
9/30/2021	100	100
12/31/2021	46.4	50
3/31/2022	100	75
6/30/2022	100	100
9/30/2022	10.47	6.25
12/31/2022	100	100
3/31/2023	100	100

Effluent Limitations

For discharges with no dilution, any instance of chronic toxicity exceeds the chronic water quality criteria in the *Massachusetts Water Quality Standards Implementation Policy for the Control of Toxic Pollutants in Surface Waters* (February 23, 1990). Therefore, effluent limits for chronic toxicity are required.

Summary of Effluent Limitations

Parameter	**Criterion**	**Limitation in %**
Units	**T.U.**	**%**
IC_{25}	---	Report
NOEC	≥RWC	≥RWC

Appendix E: Derivation of Technology-Based Effluent Limitations (TBELs) for Total Suspended Solids (TSS)

Assessment of Technology Based on EPA's Best Professional Judgement (BPJ)

According to 40 CFR § 125.3(c)(2), in determining technology-based requirements, EPA should consider the "appropriate technology for the category of point sources of which the applicant is a member, based on all available information," and also "any unique factors relating to the applicant." While TSS is itself a conventional pollutant, for the purposes of this permit, TSS is also an indicator parameter for PCBs at this Facility since adsorption to solids that are then transported in groundwater and stormwater discharges is a transport mechanism at this Facility.[1] Since PCBs are designated toxic pollutants in 40 CFR § 401.15 pursuant to section 307(a)(1) of the Clean Water Act, and are prohibited under 40 CFR § 129.105 in discharges including stormwater and other runoff and water used for routine cleanup, EPA is applying the best available technology economically achievable (BAT) standard in accordance with 40 CFR § 125.3(h)(2)(ii).

To determine site-specific technology-based limitations for TSS based on BAT, EPA must determine limits based on use of the most effective pollution control technologies that are technologically and economically achievable, and that will result in reasonable progress toward eliminating discharges of the toxic pollutant(s). EPA may determine BAT by the effluent guidelines, or in the absence of relevant effluent guidelines, determine BAT by the same performance-based approach using best professional judgement (BPJ). Specifically, to determine the BAT for TSS, EPA will consider the following factors: 1) age of the equipment and facilities involved; 2) process employed; 3) engineering aspects of the application of various types of control techniques; 4) process changes; 5) the cost of achieving such effluent reductions; and 6) non-water quality environmental impacts (including energy requirements). *See* CWA § 304(b)(2) and 40 CFR § 125.3(d)(3). When setting BAT limits, EPA's consideration of the required factors and determination of BAT is governed by a reasonableness standard. *See* CWA § 304(b)(1)(B).

EPA reviewed use of the site's existing requirement to develop and implement a Stormwater Pollution Prevention Plan (SWPPP) in conjunction with the required general and site-specific Best Management Practices (BMPs), including any existing pollution control technologies (i.e., treatment systems) when taking into account site-specific information in its analysis of the six BAT factors. To describe the technologies that effectively address TSS, EPA has referred to descriptions of these technologies found in the Federal Remediation Technology Roundtable (FRTR) Technology Screening Matrix.[2] Additionally, EPA considers BAT limits previously derived under the Clean Water Act found in EPA's *Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity* and *General Permit for Dewatering and Remediation Activity Discharges* as described in Section 5.1, as well as treatability information in the summary statistics of the *International Stormwater Best Management Practices*

[1] *Remediation Technologies Screening Matrix and Reference Guide, Version 4.0, Section 2.6.1: Properties and Behavior of Halogenated SVOCs* (2007).
[2] This screening tool provides technology information from the following federal government agencies: U.S. Air Force, U.S. Army, U.S. Navy, U.S. Department of Energy, U.S. Department of the Interior, U.S. Department of Transportation, U.S. Environmental Protection Agency, National Aeronautics and Space Administration, National Institutes of Health, National Institute of Environmental Health Sciences, Superfund Research Program, and the Nuclear Regulatory Commission. *See* https://www.frtr.gov/.

Database,[3] which are all comparable in terms of effectiveness and costs to technologies that the Permittee has already installed and operates.

Outfalls 05B, 06A, SRO5, YD10, YD12, YD13, YD16
Treatment: General SWPPP, site-specific solids BMPs
Basis: EPA's 2021 MSGP

EPA's MGSP requires control of total suspended solids through a stormwater pollution prevention plan (SWPPP), including best management practices (BMPs) that achieve a benchmark value of 100 mg/L, and applies to all sectors. In addition, Part 9.10.7.2 of EPA's 2021 MSGP (p. 199) specifies Additional Effluent Limits for Discharges to Certain Impaired Waters and Sediment Cleanup Sites applicable to discharges to a 303(d)-listed waterbody (Category 5), or a sediment cleanup site in certain parts of the U.S., either directly or indirectly through a stormwater drainage system. Specifically, Table 9.10.7.2.1 requires a numeric daily maximum limit of 30 mg/L for TSS. The MSGP further provides that where a discharge point is to an impaired waterbody and is subject to an effluent limit for a parameter that also has a benchmark, the effluent limit supersedes the benchmark. The applicability and coverage for these limits was proposed in the Draft MSGP for all EPA Regions, including Region 1. However, in the final MSGP, these limits were applied only to specific sediment cleanup sites located in the State of Washington, where EPA has extensive information that stormwater discharges are a source of sediment cleanup site recontamination. EPA Region 10 has seen both the actual recontamination of sites from stormwater discharge points and the potential for recontamination from source control information gathered at sites not yet cleaned up. In the remaining EPA Regions, including EPA Region 1, these limits may apply in other States at the discretion of the permitting authority and EPA would evaluate conditions at a given site on a case-by-case basis. This approach was taken in response to comments generally that, unlike in Puget Sound, EPA did not have the information needed to identify the specific sites and waterbodies to which these limits will apply at the time.

EPA has sufficient information for the Facility and the receiving water. NPDES-permitted stormwater discharges from this Facility both occur within the bounds of the GE Pittsfield/Housatonic River Site and discharge to areas that have been remediated or are undergoing remediation for solids impacted by PCBs and other pollutants. Further, as described previously, the Housatonic River is a Category 5 waterbody, specifically impaired as a result of PCBs and other pollutants, and the Facility is specifically identified as a cause. In addition, discharge monitoring data included in Appendix A show that PCB concentrations exceed the Massachusetts Surface WQSs numeric criteria the majority of sampling events and available ambient monitoring data included in Appendix B show that at multiple outfalls and under both dry weather and wet weather conditions, not only do receiving water concentrations already exceed the Massachusetts Surface WQSs numeric criteria, but on multiple occasions, the downstream concentrations (i.e., the concentration of the receiving water below the outfall, after the discharge has mixed with the receiving water) increase relative to the upstream concentration, indicating that the discharge contributes to the exceedance of Massachusetts Surface WQSs numeric criteria. As a result, EPA has determined that limitations and conditions in this NPDES permit must control discharges sufficiently to minimize impacts from discharges

[3] This repository is currently available at: https://bmpdatabase.org/.

of solids that act as a mode of transport for PCBs, to prevent recontamination of this site, avoid subsequent exceedances of State water quality standards, and protect aquatic life and human health. The daily maximum limit of 30 mg/L will be considered for outfalls at the Facility where stormwater is discharged and the BAT is a SWPPP/BMPs, consistent with the 2021 MSGP SWPPP and Control Measure requirements, including the additional solids-related BMPs in Part 9.10.7.2.

1) Age of the equipment and facilities involved

In setting requirements for the development of a SWPPP, including selection, design, implementation and operation and maintenance of BMPs, EPA took into consideration the age of equipment and the facilities involved by not directly or immediately requiring that the permittees make changes to the Facility or install new treatment systems. Further, both the requirement for a SWPPP, and site-specific BMPs pertaining to solids (e.g., cleaning and inspection) are not new requirements. However, in implementing these BMPs, it is contemplated that the Permittee will satisfy the statutory duty to mitigate, including making any changes necessary to properly operate and maintain the stormwater collection system, or taking corrective action where pollutant limits cannot be met through past practices, including treatment, if necessary. The Permittee may consider new technologies or plan new systems to be consistent with the goal of overall reduction in the sources of pollutants.

2) Process(es) employed

In setting requirements for the development of a SWPPP, including selection, design, implementation and operation and maintenance of BMPs, EPA took into consideration the processes employed. All BMPs to be implemented pursuant to the SWPPP are directly related to processes at the Facility which pose the potential for introduction of pollutant sources into the discharges. Also, the EPA has taken into consideration other requirements relating to the processes employed. For example, the current processes employed at the site include site-specific BMPs pertaining to solids that involve inspection and cleaning of the stormwater collection and treatment systems where solids accumulate. Again, these requirements are not new, and GE has implemented these practices since the 2009 Permit. Further BMP (and SWPPP) implementation consistent with the additional BMPs pertaining to solids from the MSGP would not interfere with current processes at the property. The BMPs required to be implemented through the SWPPP are designed to give the Permittee flexibility to establish site-specific measures to meet BAT standards required by the Clean Water Act. Providing this flexibility helps to ensure there is minimal interference with processes at the Facility.

3) Engineering aspects of the application of various types of control techniques

In setting requirements for the development of a SWPPP, including selection, design, implementation and operation and maintenance of BMPs, EPA took into consideration the engineering aspects related to the application of the BMPs. The final permit does not specify in advance that the Permittees must perform specific engineering tasks in order to implement the BMPs required under the SWPPP. Rather, the permit leaves the implementation of site-specific BMPs to the Permittee (subject to EPA review and comment at EPA's discretion. As stated above, the pollution prevention plan approach required by EPA gives the Facility flexibility to

identify specific stormwater control measures within general constructs and then choose where and how to implement these measures to meet the BAT standards required by the Clean Water Act. This approach is employed instead of imposing prescriptive implementation. Of course, for the BMP framework established by the permit requirements to be effective, selection, design, implementation and operation and maintenance of BMPs must be fully implemented to meet BAT standards.[4] And while the SWPPP provisions in the permit require the Permittee to develop site-specific BMPs, the permit generally does not require specific engineering measures to achieve these goals.

From an engineering standpoint, the Facility is expected to achieve significant reductions in TSS by maintaining the stormwater collection system and focusing BMPs on source reduction. Finally, implementation of the TSS BMPs will not entail engineered actions or installation of new infrastructure.

Requiring the Permittee to install different treatment technology other than the wet basin would involve engineering changes and may interfere with use of the site.

4) Process changes

In setting requirements for the development of a SWPPP, including selection, design, implementation and operation and maintenance of BMPs, EPA took into consideration process changes. As discussed above, the Facility's stormwater discharges are managed through development of a SWPPP, including selection, design, implementation and operation and maintenance of BMPs. Because the Permittee currently engages in remedial activities associated with former industrial processes, continued implementation of the BMPs do not interfere with current use of the site, and likely will not interfere with future use of the property. Pursuant to this factor, process changes may exceed the status quo. While in this permit EPA generally does not require process changes, this permit does include specific permit requirements that may result in process changes, the extent of which will be determined by the Permittee upon implementation.

As stated above, new technologies not currently in use may require process changes and interfere with current or future use of the property.

5) Cost of achieving effluent reductions

The costs associated with development of a SWPPP, including selection, design, implementation and operation and maintenance of BMPs, including installation, operation, and maintenance of pollution control technologies, if necessary, are expected to be reasonable compared to the benefits of reducing TSS and PCBs in the discharges from the Facility for the reasons explained below.

[4] *See* Storm Water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices, EPA 832-R-92-006.

The costs associated with developing the SWPPP and implementing BMPs are expected to be reasonable compared to the benefits of reducing conventional (TSS) and toxic (PCBs) pollutants expected in the discharge, for the reasons explained below.

This permit borrows from the BAT analysis determinations used when developing the original regulatory requirements for stormwater discharges associated with industrial activities under EPA's General Permits. In a 1992 determination EPA stated that "EPA has determined that all the components of the storm water pollution prevention plan required under today's permits are necessary to reflect BAT/BCT."[5] Additionally, in 1995, EPA made a similar determination when promulgating the Multi-Sector General Permit for Industrial Activities (See 60 FR 50804, Sept. 29, 1995) ("MSGP 1995"). EPA stated that, "EPA believes the pollution prevention approach is the most environmentally sound and cost-effective way to control the discharge of pollutants in storm water runoff from industrial facilities."[6] As noted by EPA, "This position is supported by the results of a comprehensive technical survey EPA completed in 1979."[7] The survey found that two classes of management practices are generally employed at industries to control the non-routine discharge of pollutants from sources such as storm water runoff, drainage from raw material storage and waste disposal areas, and discharges from places where spills or leaks have occurred. The first class of management practices are those that are low in costs, applicable to a broad class of industries and substances, and widely considered essential to a good pollution control program. Some examples of practices in this class are good housekeeping, employee training, and spill response and prevention procedures. The second class includes management practices that provide additional assurance against the introduction of pollutants to discharges. This class addresses containment, mitigation, and cleanup. Since publication of the 1979 survey, EPA has imposed management practices and controls in NPDES permits on a case-by-case basis. EPA continues to review the appropriateness and effectiveness of such practices, as well as the techniques used to prevent and contain spills of oil and hazardous materials. Although limits are derived on a site-specific basis, these practices and controls have been used extensively in stormwater permits throughout Region 1 and to reduce pollutants in stormwater discharges in a cost-effective manner. In keeping with both the past and present objective to attain environmental goals through pollution prevention, pollution prevention "has been and continues to be the cornerstone for the NPDES Permitting program for storm water." Id. at 50815.

Based on the 1979 survey and other information developed and analysis done in connection with the General Permits, the similar approach being taken in this permit imposes requirements that are cost-effective, and reasonable in terms of the relationship between the cost of attaining a reduction in effluent and the effluent reduction benefits derived.

In the Preamble Notice for the 1995 Final National Pollutant Discharge Elimination System Storm Water Multi-Sector General Permit for Industrial Activities, 60 Fed. Reg. 50804 (1995) (1995 MSGP), EPA estimated the costs of developing and implementing baseline storm water pollution prevention plans. The high-cost estimates are applicable to development of baseline SWPPPs for larger, more complex facilities with more potential sources of pollutants, such as the Facility. The high-end costs for developing and implementing a plan were estimated to be

[5] *See* 57 FR 41265, Sept. 9, 1992.
[6] See 60 FR 50815, Sept. 29, 1995.
[7] Storm Water Management for Industrial Activities, EPA, September 1992, EPA 832-R-92-006.

approximately $120,000 (in 1992 dollars) for the first year. High-end annual costs for implementation were estimated to be approximately $18,000 (in 1992 dollars). Adjusting for inflation using the inflation calculator from the Bureau of Labor Statistics,[8] the cost estimate for developing and implementing a SWPPP in 2023 is approximately $230,565 for the first year and an additional $34,600 for each subsequent year. In addition, since the MSGP estimation did not include the costs of solids-related BMPs for discharges to sediment cleanup sites, an additional 15% was added to the estimate for the this permit. The final cost estimate for developing and implementing a storm water pollution prevention plan at the Facility is thus estimated at $265,200 for the first year and about $39,800 for each subsequent year.

On the other hand, requiring any additional or different treatment technology beyond the current treatment systems as BAT for TSS would result in additional and potentially significant installation fees and capital costs.

6) Non-water quality environmental impacts (including energy requirements)

Finally, EPA considers the non-water quality environmental impacts associated with the treatment of wastewater, including energy consumption, air emissions, noise, and visual impacts. The Permittee has not indicated or provided any information to suggest that development of a SWPPP, including selection, design, implementation and operation and maintenance of BMPs result in an increase in energy usage, air emissions and noise as compared to the existing system prior to this permitting action. EPA does not expect any non-water quality environmental impacts associated with continuing to operate and maintain the new treatment system. Furthermore, any impacts of implementing the SWPPP and/or BMPs would be minor compared to current and future active remedial activities and usage throughout the rest of the site and will be negligible in considering the activities across the site as a whole.

Outfalls 005, 05A, 006, and 009, internal Outfalls 64G and 64T
Treatment: General SWPPP, site-specific solids BMPs, pollution control technologies including separation (i.e., oil/water separation), clarification/removal (i.e., coagulation and flocculation) and/or filtration (i.e., carbon adsorption)
Basis: EPA's 2022 DRGP

EPA's DRGP requires compliance with a numeric TSS limit of 30 mg/L (a daily maximum). See EPA's 2022 DRGP, Part 2.1.1, Table 1-3. The DRGP also requires a best management practices plan (BMP Plan) and includes treatment technologies for pollution control. More specifically, the DRGP applies a daily maximum TSS limit of 30 mg/L for discharges of groundwater, stormwater, potable water and surface waters where the treatment technology consists of one or more of the following: adsorption/absorption, advanced oxidation processes, air stripping, granulated activated carbon (GAC)/liquid phase carbon adsorption, ion exchange, precipitation/coagulation/flocculation, separation/filtration. The 2022 DRGP does not require use of any of these treatment technologies unless necessary to meet the effluent limitations in the permit.

[8] CPI Inflation Calculator accessed at: https://www.bls.gov/data/inflation_calculator.htm.

This TBEL was established using BPJ as authorized by §402(a)(1) of the CWA. EPA selected the TSS limitation based on the application of EPA-promulgated BPT/BCT limitations contained in numerous industrial point source categories and the information in the supporting documentation for those ELGs. This TSS limitation assumes treatment using one or more of the treatment technologies evaluated in the technical factors supporting the development of these limitations. Treatment technologies for TSS are well understood, and widely used at remediation and dewatering sites. Properly designed treatment systems such as those utilizing sedimentation and/or filtration can readily remove TSS to concentrations at or below the TBEL. The following list of example effluent limitations previously derived for TSS are based on levels attainable by TSS treatment technologies for wastewaters that include stormwater that comes into contact with materials and/or wastewaters from that point source category, such as through exposure to precipitation or runoff; groundwater infiltration; or comingling within a collection system:

- Secondary treatment technology standards at 40 CFR § 133 for POTWs, 30 mg/L monthly average, and 45 mg/L weekly average;
- Promulgated ELGs at 40 CFR § 440 for Ore Mining and Dressing, Subpart A-H and J, 20 mg/L monthly average and 30 mg/L daily maximum, based on BPT;
- Promulgated ELGs at 40 CFR § 436.42 for Mineral Mining and Processing, Subpart D, 25 mg/L monthly average and 45 mg/L daily maximum, based on BPT;
- Promulgated ELGs at 40 CFR § 437.11 for Centralized Waste Treatment, Subpart A, 30 mg/L monthly average and 60 mg/L daily maximum, based on BPT/BCT; and
- Promulgated ELGs at 40 CFR § 437.21 and § 437.42 for Centralized Waste Treatment, Subpart B and D, respectively, 30.6 mg/L monthly average and 74.1 mg/L daily maximum, based on BPT/BCT.

Sites to be covered under the 2005 RGP were consistent with the discharges for which a daily maximum limit of 30 mg/L for TSS could be achieved using existing technology. The level of treatment that could be technologically achieved for TSS at RGP sites included separation (e.g., oil/water separator) and/or filtration. This informed the issuance of EPA's DRGP (which combined EPA's DGP with EPA's RGP). EPA maintained the daily maximum effluent limitation (30 mg/L) originally established in the 2005 RGP for discharges of groundwater, stormwater, potable water and surface waters.

In consideration of the range of applicability of this TBEL, and the technical factors supporting this limitation, EPA has determined that discharges of groundwater, stormwater, potable water and other wastewaters from this Facility, is most similar to sites "where soils and organic materials are being disturbed and mixed with ground waters or storm waters," as originally considered in the 2005 RGP.

Assessment of BAT Based on EPA's BPJ

1) Age of the equipment and facilities involved

In setting requirements for the development of BMPs, including operation and maintenance of pollution control technologies, EPA took into consideration the age of equipment and the facilities involved by not directly or immediately requiring that the permittees make changes to

the treatment systems currently in place or install new treatment systems. However, as noted above, in developing BMPs, it is required that the Permittee will properly operate and maintain the treatment systems, including any equipment changes necessary to provide treatment to the wastewaters generated at the site, and consider new technologies or plan new systems to be consistent with the goal of overall reduction in the sources of pollutants. See Part II.B.1.

There is nothing about the age of the equipment and facilities involved that would prevent the ongoing use of the same or similar treatment in combination with the development and implementation of a SWPPP and BMPs as described above for the specified outfalls. The Permittee has used oil/water separators at its permitted outfalls since at least 1972. Further, advanced treatment consisting of solids removal (i.e., coagulation and flocculation) and filtration (i.e., carbon adsorption) was installed independent of the NPDES permit process prior to the issuance of the 1992 permit. The treatment components continue to be subject to routine inspection and maintenance, as required in the 2009 Permit.

2) Process(es) employed

The current processes employed at the site include sedimentation using oil/water separators and, at two internal outfalls leading to Outfall 005, additional treatment consisting of coagulation and/or flocculation and filtration. Oil/water separators are used primarily to remove free oil, large oil globules (unstable primary dispersions), and oil and/or non-oil-coated solids in suspension. Oil-water separators can handle large flowrates, have low power requirements, and need minimum operator attention; however, a large residence time and therefore properly-sized equipment are required. At internal outfalls, precipitation, consisting of coagulation and flocculation processes transform dissolved contaminants into an insoluble solid that is easily separated by sedimentation or filtration. For pollutants that adsorb to solids (e.g., PCBs), or removal of oils (e.g., Oil and Grease), coagulation/flocculation involves the removal of suspended or settleable solids by physical methods such as settling. At an additional internal outfall, filtration is applied to achieve mechanical separation by forcing the fluid through a porous medium. As fluid passes through the medium, pollutants are trapped on the surface of the medium and/or within its body.

Again, these technologies were installed independent of the permit issuance process, and GE has operated this treatment technology since installation. Additional BMP (and SWPPP) implementation would not interfere with current operation of these treatment systems.

3) Engineering aspects of the application of various types of control techniques

Treatment for TSS and toxic pollutants adsorbed to TSS through sedimentation and solids removal, with or without flocculation and/or coagulation, as needed is a straightforward process using relatively standard technology that is capable of treating many types of wastewaters containing suspended solids. The wastewater for the noted outfalls is treated using sedimentation, at a minimum, which is one of the well-established treatment techniques. In addition, the use of coagulants/flocculants and carbon filters are treatment processes that have been in use at the site prior to this permitting action and were installed specifically to enhance the treatment efficacy. From an engineering standpoint, the Facility is expected to achieve

significant reductions in TSS by maintaining the design performance of the treatment technology. The applicability and effectiveness of carbon filtration, for example, is impacted by several factors. The presence of multiple contaminants can impact process performance. Streams with high suspended solids (> 50 mg/L) and oil and grease (>10 mg/L) may cause fouling of the carbon and may require frequent maintenance. In such cases, pretreatment is generally required. Finally, implementation of the TSS BMPs will not entail engineered actions or installation of new treatment technologies.

Requiring the Permittee to install different treatment technology other than the wet basin would involve engineering changes and may interfere with use of the site.

4) Process changes

As discussed above, the Facility's wastewater is treated using existing treatment systems and continued implementation of the systems will not require process changes at the Facility. Further, the treatment technologies do not appear to interfere with the BMP activities required by the permit, and likely will not interfere with current or future use of the Facility.

As stated above, new technologies not currently in use may require process changes and interfere with current or future use of the property.

5) Cost of achieving effluent reductions

The costs associated with continued operation and maintenance of the existing pollution control technologies are expected to be reasonable compared to the benefits of reducing TSS and PCBs in the discharges from the Facility for the reasons explained below.

The Facility installed the existing treatment systems independent of the NPDES permit prior to 1992 and continues to operate them. As such, applying BAT limits based on use of the site's current technology will not result in any new installation costs to the Permittee. EPA expects that there are no additional capital costs and minimal non-routine operating costs associated with continuing to operate and maintain the treatment technology. To the extent the Facility incurs additional costs due to the operation of the new treatment technology, EPA notes that that the Permittee installed these treatment technologies and has been operating it for several permit terms. As such, implementation of the OWSs and additional treatment are, without question, "economically achievable." Additionally, EPA reviewed performance data for the existing treatment technologies. Because the majority of the outfalls where sedimentation, coagulation/flocculation, and filtration are in use already achieve or exceed the proposed numeric limits for TSS, EPA does not expect significant engineering modifications or capital costs to these treatment systems. EPA does not have information regarding GE's annual operation and maintenance costs for its existing treatment systems, but EPA would expect GE to provide this information to the extent relevant to the requirements of the Draft Permit during the public comment period. However, the performance of the current treatment systems for the discharge of TSS from this site is consistent with performance of technology addressing discharges of groundwater, stormwater, and potable water discharges under EPA's 2022 DRGP. While the Facility's discharges are not covered by this general permit, the presence of TSS

contamination in the Facility's discharges as well as the Facility's existing treatment systems is similar with respect to the technology and type of discharges evaluated in this permit.

On the other hand, requiring any additional or different treatment technology beyond the current treatment systems as BAT for TSS would result in additional and potentially significant installation fees and capital costs.

6) Non-water quality environmental impacts (including energy requirements)

Finally, EPA considers the non-water quality environmental impacts associated with the treatment of wastewater, including energy consumption, air emissions, noise, and visual impacts. The Permittee has operated the treatment systems for the currently authorized wastewaters since before the 2009 Permit was issued and has not indicated or provided any information to suggest that operation of the treatment systems result in an increase in energy usage, air emissions and noise as compared to the existing system prior to this permitting action. EPA does not expect any non-water quality environmental impacts associated with continuing to operate and maintain the new treatment system. Furthermore, any impacts of treatment equipment would be dwarfed by current and future active re-development and usage throughout the rest of the site and will be negligible in considering the activities across the site.

EPA's Finding

EPA has considered the factors set forth in 40 CFR § 125.3(h)(2)(ii) and finds that the TSS limitation reflects BAT-level control of discharges of TSS and PCBs present in the waste streams at this Facility.

As required by 40 CFR § 124.56 EPA finds that compliance with the TSS limitations will result in BAT-level control of the toxic pollutant discharges as well and that it would be economically or technically infeasible to directly limit the toxic pollutant(s) at these outfalls. The technical infeasibility is that both the numeric effluent guideline of 0.001 µg/L and the State numeric water quality criteria for the protection of human health (0.000064 µg/L) cannot be quantified using the sufficiently sensitive test method required in 40 CFR Part 136. At the same time, the effluent standard promulgated at 40 CFR § 129.105(1)(i)(b) through (d) for polychlorinated biphenyls (PCBs) for existing sources states that "PCBs are prohibited in any discharge."[9]

Based on consideration of the appropriate factors above and its best professional judgment, EPA has determined that performance of the existing treatment technologies (i.e., development of a SWPPP, including selection, design, implementation and operation and maintenance of BMPs for all outfalls and sedimentation with or without coagulation, flocculation and/or filtration for a portion of the outfalls) is BAT for treatment of TSS at the Facility and removal of TSS will also reduce PCBs. EPA further concludes that the current treatment systems for the discharge of TSS from this site are consistent with technology addressing stormwater and other non-stormwater discharges under EPA's 2021 MSGP and groundwater, stormwater, and potable water discharges under EPA's 2022 DRGP. While the Facility's discharges are not currently covered by these general permits, the presence of TSS contamination in the Facility's discharges as well as the

[9] *See* 42 FR 6555, Feb. 2, 1977.

Facility's existing treatment systems is similar with respect to the technology and type of discharges evaluated in these permits.

With respect to benefits, the Region has made a qualitative judgment, in accordance with agency policy and applicable law. The Region's judgment is that the benefits to be expected from this permit are reasonably related to the relatively modest level of costs required to develop the SWPPP and BMPs, which are consistent with similar requirements imposed in prior permits. Also, it is the Region's further preliminary judgment that the benefits to be expected from this permit do appear to be reasonably related to the potential costs for implementation of BMPs, which may be required pursuant to the SWPPP to be developed by the Permittee.

The Region's determinations regarding benefits are consistent with the many determinations that EPA Headquarters has made with respect to the general permits, which have consistently found that similar levels of costs associated with similar required pollution prevention measures meet technology requirements of the Clean Water Act.

In further judging benefits, the Region has made the conservative assumption that the Facility's discharges will meet State water quality standards and anticipates that MassDEP will affirm this assumption in its CWA § 401 certification and include any additional requirements necessary to ensure State water quality standards are met. This does not necessarily mean that discharges of pollutants have been eliminated, and thusly, further reducing discharges of pollutants would have further benefit. Indeed, the Clean Water Act contains the goal of eliminating the discharge of pollutants into waters of the United States. This reflects the judgment of the Congress that any amount of pollution may cause environmental harm.

Although commercial production of PCBs was banned in the United States in 1979 with the passage of the Toxic Substances Control Act (TSCA), studies have shown that PCBs are highly persistent in the environment and therefore continue to present a potential health hazard to humans. PCBs have been shown to cause cancer in animals as well as a number of serious non-cancer health effects in animals, including: effects on the immune system, reproductive system, nervous system, endocrine system and other health effects. Studies in humans support evidence for potential carcinogenic and non-carcinogenic effects of PCBs. PCBs are classified as a probable human carcinogen by numerous national and international health-protective organizations, such as the EPA, the Agency for Toxic Substances and Disease Registry and the World Health Organization. PCBs build up (bioaccumulate) in the environment, increasing in concentration as PCBs are taken up into the bodies of small organisms and fish that are then also taken up by other animals that eat these aquatic animals as food. PCBs especially accumulate in fish.[10] This is of special concern in areas where fish are exposed to PCB contamination and may be consumed by humans (as in the Housatonic River).

Therefore, the benefits of preventing addition of PCBs (and the accumulation of solids) in the receiving water where remediation of PCB-contaminated media has occurred or is ongoing downstream of the Facility is of particular benefit in this case. Significant costs have been accrued to date to achieve the cleanup goals of the GE Pittsfield/Housatonic River Site and areas

[10] Agency for Toxic Substances and Disease Registry (ATSDR). 2000. Toxicological profile for Polychlorinated Biphenyls (PCBs). Atlanta, GA: U.S. Department of Health and Human Services, Public Health Service.

that have been remediated or are undergoing remediation for solids impacted by PCBs and other pollutants. Further, as described previously, the Housatonic River is a Category 5 waterbody, specifically impaired as a result of PCBs and other pollutants, and the Facility is specifically identified as the source of PCBs. Protecting surface waters from further degradation (or reversing improvements) is therefore reasonable at the projected levels of costs.

Attachment 1: General Electric's Recommendations Regarding Revision of NPDES Permit No. MA0003891

General Electric's Recommendations Regarding Revision of NPDES Permit No. MA0003891

On December 1, 2021, GE hosted representatives from the U.S. Environmental Protection Agency (EPA) and the Massachusetts Department of Environmental Protection (MassDEP) (jointly the Agencies) for a facility site walk and reaffirmed its commitment, pursuant to the February 2020 Rest of River Settlement Agreement, to engage in good-faith discussions regarding renewal of NPDES Permit No. MA0003891. Subsequently, on October 6, 2022, GE participated in a call with the Agencies to discuss, in part, GE's involvement in the Permit reissuance process. At the Agencies' suggestion, GE agreed to provide a summary of recommendations and concerns that it would like the Agencies to consider during the NPDES Permit drafting process. In furtherance of our collaborative relationship and the agreement by GE and EPA to engage in good-faith discussions regarding the permit renewal based on Best Management Practices (BMPs), GE respectfully submits the information presented below, which was developed from a review of GE's current Permit and the Pittsfield Economic Development Authority's (PEDA's) August 18, 2021 NPDES Permit, as suggested by EPA.

This memo first discusses technical updates to GE's current Permit. It then discusses other recommendations for the Permit renewal. Next, it discusses several provisions of PEDA's 2021 NPDES Permit that EPA may be considering for GE's revised Permit and provides GE's recommendations regarding those provisions. Finally, this memo describes prior pertinent information submitted to EPA and reiterates GE's reservation of legal rights under the 2000 Consent Decree (CD) for the GE-Pittsfield/Housatonic River Site. In the first three sections, this memo first states the subject requirement in italics and then presents GE's comments and recommendations regarding it.

A. Technical Updates to GE's Current Permit:

Part I C.2.b: Requires GE to include within its Stormwater Pollution Prevention Plan (SWPPP) a plan for sampling all the stormwater discharges listed under Part I.A.14. of the Permit (i.e., YD10, YD11, YD12, YD13 and YD16), once each year.

As part of the Unkamet Brook Area Removal Action, Outfall YD11 was abandoned in 2015. Stormwater associated with the YD11 Drainage Area was re-directed to the YD12 Drainage Area stormwater conveyance system. GE provided the Agencies with a summary of the YD11 abandonment in a corresponding BMP Summary Report in March 2016 and reflected the changes to the stormwater conveyance system in updated stormwater collection figures provided in corresponding SWPPP updates. Accordingly, the YD11-associated requirements should be removed from the NPDES Permit.

Part I A.11: The Effluent Limitations and Monitoring Requirements provision authorizes GE to discharge treated effluent from internal outfall 09B (discharge from oil/water separator [OWS] 119W, which discharges through outfall 009) to Unkamet Brook.

Historically, Outfall 09B was a bypass for OWS 119W, which discharged only under high-flow stormwater conditions. As a result of building demolition and site restoration activities, the surface runoff area in the 009 Drainage Basin has decreased. As a result, bypass Outfall 09B was no longer functional and was abandoned. On June 17, 2013, a letter summarizing the elimination of Outfall 09B was submitted to the Agencies. Accordingly, the bypass Outfall 09B-associated requirements should be removed from the NPDES Permit.

Part II – Standard Conditions: This provision requires oil and grease analysis by the freon extractable material method.

This analytical method should be updated to EPA Method 1664B utilizing the hexane extractable material method.

B. Other Recommendations for NPDES Permit Renewal:

Part I.A - Footnote 14: Use of Modified Method 8082 for the analysis of polychlorinated biphenyls (PCBs).

During the previous permit development cycle, GE spent considerable effort developing and implementing a Modified Method 8082 for PCB analysis in order to achieve a detection limit lower than the typical detection limits provided by laboratories using EPA Method 8082. Since the previous permit development, significant advances in analytical methods have occurred and GE's Modified 8082 Method is no longer necessary. Conventional EPA Method 608.3 can achieve detection limits similar to GE's Modified Method 8082. Therefore, GE proposes that future analysis for PCBs be conducted using EPAs standard Method 608.3.

Part I A.5 Outfall 05A Dry Weather Flow Sampling and Monitoring Conditions:

As shown on the monthly DMRs, there has not been a dry weather flow event at Outfall 05A since 2015. Dry weather flow reductions conducted at the site have eliminated dry weather flow from this outfall. Therefore, GE proposes that no dry weather flow sampling or monitoring be required at Outfall 05A.

Part I A.12 Outfall 009 Dry Weather Flow Sampling and Monitoring Conditions:

As shown on the monthly DMRs, there has not been a dry weather flow event at Outfall 009 since 2012. Dry weather flow reductions conducted at the site have eliminated dry weather flow from this outfall. Therefore, GE proposes that no dry weather flow sampling or monitoring be required at Outfall 009.

Part I.E: The Dry Weather Ambient Monitoring provision requires GE to develop and submit a dry weather ambient monitoring plan. The plan is to include at least two rounds of dry weather ambient sampling per year and is to include sampling stations in the Housatonic River and Unkamet Brook

upstream and downstream of the authorized discharges sufficient to determine the impact of each authorized discharge on instream water quality.

At the time of the previous permit development, several outfalls to the Housatonic River and Unkamet Brook had dry weather flow contributions. Since that time, significant flow reduction measures have occurred, including cleaning and rehabilitating certain pipe sections, building demolition, and elimination of large segments of drainage area conveyance. For Unkamet Brook, no dry weather flow has been observed at Outfall 009 in many years, and no sampling has occurred within the brook as part of the Dry Weather Ambient Plan. Similarly, for the Housatonic River, no dry weather flow has been observed at Outfall 05A in many years, and no sampling has occurred within the river as part of the Dry Weather Ambient Plan. However, dry weather flow has been and continues to be observed at Outfall 006 to the Housatonic River. GE notes that previous flow investigation measures have shown that the inter-connection of City of Pittsfield-owned storm sewers along East Street and Newell Street are the likely sources of dry weather flow into GE's system. In-river dry weather ambient sampling for oil and grease (O&G), total suspended solids (TSS), and PCBs has occurred at various stream widths upstream and downstream of Outfall 006. A review of those results indicates the following

- Sampling at various stream widths shows no significant difference among analytical results for all parameters.
- Sampling for O&G shows very few detections and indicates that GE's outfalls are not a source of O&G.
- Sampling for TSS shows similar concentration in the upstream and downstream samples.
- Sampling for PCBs shows similar concentrations in the upstream and downstream samples.

Based on these results, GE believes that a Dry Weather Ambient Monitoring Plan is no longer required for Unkamet Brook or the Housatonic River. There is no longer dry weather flow at Outfall 009 into Unkamet Brook. The only remaining dry weather flow into the Housatonic River is from Outfall 006, which consists primarily of infiltration from a City-owned conveyance. For detected parameters (PCBs and TSS), the upstream and downstream sampling at Outfall 006 shows no significant differences. Further, Outfall 006 is located within the 0.5-Mile Reach of the Housatonic River, which is already subject to long-term monitoring under other EPA-approved programs.

Part I.E: The Wet Weather Ambient Monitoring provision requires GE to develop and submit a wet weather ambient monitoring plan. The plan is to include at least two rounds of wet weather ambient sampling per year and is to include sampling stations in the Housatonic River and Unkamet Brook upstream and downstream of the authorized discharges sufficient to determine the impact of each authorized discharge on instream water quality.

As with the Dry Weather Ambient Plan, a review of the data available from wet weather ambient monitoring indicates that concentration detected upstream of the discharging outfalls are similar to the concentrations detected downstream. Moreover, the nature of the wet weather ambient

sampling requires in-river sampling during adverse weather conditions and high-flow river conditions, which presents certain health and safety risks, especially for the Housatonic River sampling. There are no readily available sampling locations along the bank of the brook and river, and many times technicians need to traverse rip-rap installed along the river banks and enter the flowing streams to collect samples. Given the significant amount of data compiled to date showing no significant difference between upstream and downstream monitoring and the health and safety risks associated with the in-river sampling, GE recommends that the in-river wet weather ambient monitoring be eliminated, as the significant risks associated with the sampling procedure outweigh the limited value of the data collected.

Part I.C.2: The Permit requires the SWPPP to be updated annually, and a copy submitted to the Agencies by March 1 each year.

GE notes that modifications to the SWPPP over the past five years have been minor in nature. In addition, GE continues to submit an annual BMP Summary Report in accordance with Part I.C.4 of the Permit, which summarizes all activities conducted under the BMP requirements and SWPPP during the previous year. Accordingly, GE proposes that EPA eliminate the annual requirement to provide an updated copy unless substantive modifications to the SWPPP are necessary. GE could also submit an updated copy of the SWPPP every three years regardless of modifications.

C. Comments Regarding Applicability of Provisions of PEDA's 2021 NPDES Permit

Part I.C.2.a: This provision requires the permittee to select, design, implement, and maintain control measures (e.g., BMPs) to minimize the discharge of pollutants in stormwater to waters of the United States. The control measures must ensure that several specified effluent limitations are met. Those limitations include (as # 9) evaluating for the presence of non-stormwater discharges and eliminating any non-stormwater discharges not explicitly authorized in the permit or covered by another NPDES permit.

In accordance with Part I.B (Unauthorized Discharges) of GE's NPDES Permit, an extensive evaluation of unauthorized point source discharges was completed across the facility. The results of that evaluation were provided to the Agencies in a submittal entitled *Part I.B Conveyance Survey Report* on May 28, 2009. The conveyance survey report addressed three categories of conveyances: Conveyances Associated with Remedial Activities (i.e., CD-related response actions); Conveyances Associated with Non-Industrial Areas (e.g., parking lots); and Non-Point Source Runoff (areas where there has been no effort to change the surface, direct the water flow or otherwise impede its progress as defined by EPA). The evaluation confirmed that there were no unauthorized point source discharges. Accordingly, GE requests that the Agencies consider this information and not require GE to evaluate for non-stormwater discharges and to eliminate any non-authorized point source discharges.

Part I.C.2.b(1): This provision requires the permittee to implement the control measure requirements in Part 2.1 and 2.1.1 of EPA's 2021 Multi-Sector General Permit (MSGP) to identify pollutant sources,

and select, design, install and maintain the pollution control technology necessary to meet the effluent limitations in the permit that ensure dilution is not used as a form of treatment. It includes footnote 3, which refers to Part 2.5.2.d of the 2017 Remediation General Permit for example technologies and additional resources.

In accordance with GE's NPDES Permit, GE completed a study on various technologies to further increase the effectiveness of OWS 64Z in removing solids from stormwater. The results of that study were provided to the Agencies on September 29, 2010, in a submittal entitled *Oil/Water Separator 64Z Pilot Study Report*. The study concluded that further modifications of OWS 64Z were not feasible to increase sedimentation. In addition, technologies such as those listed in the document referenced in Footnote 3 of the PEDA NPDES Permit (granulated activated carbon [GAC], separation/flocculation, and filtration) are either already used to treat the majority of stormwater from the facility (separation/flocculation and filtration) or would not be feasible given the amount of stormwater discharged (GAC). GE requests the Agencies to consider the investigations completed to date and the treatment technologies currently implemented when drafting GE's revised NPDES Permit.

Part I.C.2.c: This provision requires the permittee to select, design, implement, and maintain control measures to eliminate discharges of PCBs from the site to the receiving water through an iterative approach over the permit term.

As the Agencies are aware, GE is committed to the reduction of stormwater discharges of PCBs to Unkamet Brook and the Housatonic River through the implementation of BMPs. GE has implemented and continues to implement BMPs under the current NPDES Permit to reduce stormwater discharges of PCBs. Although GE is committed to further reductions, the elimination of all discharges of PCBs in stormwater to Unkamet Brook and the Housatonic River, would not be achievable over the Permit term given the residual PCBs in the soil and groundwater that are allowed by the CD. Indeed, elimination of such discharges would contradict the performance standards set forth in the CD, which require achievement, in the associated drainage basins, of certain specified average PCB concentrations in soil and groundwater that specifically contemplate the presence of residual PCBs in those media. Accordingly, GE requests the use of language such as "diminish discharges of PCBs" over the Permit term.

Part I.C.2.c(1): Source Identification: This provision requites the permittee to identify the components of the conveyance system and trace the components that contribute PCBs to the discharge. Specifically, it requires that the conveyance system be accurately mapped and that the sources of PCBs or other site-related contaminants of concern contributing to the Outfall 001 be specifically identified. It lists numerous potential sources that must be evaluated at a minimum. The Permit states further that the permittee may rely on existing site characterization to the extent that it meets the listed source identification requirements, and that the permittee must use the results of this evaluation to prioritize the implementation of BMPs as appropriate.

As the Agencies are aware, GE has evaluated and continues to evaluate the presence of constituents of concern (COCs), including PCBs, in soil, groundwater, and building materials under the requirements of the CD and the current NPDES Permit. In addition, GE has performed significant evaluations of the storm sewer conveyance system under the NPDES Permit and reported those findings to EPA. In an effort to avoid replicating any source identification performed to date under both the CD and the NPDES Permit, GE requests the Agencies to consider those evaluations during the drafting of the NPDES Permit and not to require duplicative evaluations. Furthermore, specific identification of COC contributions associated with the entire stormwater conveyance system may not be feasible as required in PEDA's NPDES Permit. GE proposes that further evaluations of the stormwater conveyance system be limited to areas that were not investigated under the current NPDES Permit.

Part I.C.2.c(3): This provision requires the permittee to evaluate, select, design, implement, and maintain control measures (i.e., BMPs) that eliminate or otherwise minimize (i.e., render non-detect) the discharge of PCBs to the receiving water. Minimization must address source control and elimination of PCBs from contaminated soils, sediments, stormwater and groundwater entering the conveyance system via inflow and infiltration by, for example, disconnecting, replacing, relining, or abandoning contributing sections of the stormwater conveyance system.

Part I.C.2.c(4): This provision requires the permittee to evaluate, select, design, implement, and maintain design standards that eliminate the discharge if PCBs during and following site development.

As noted above, although GE is committed to the implementation of certain additional BMPs that diminish the concentrations of PCBs in stormwater discharges, the total elimination of PCBs in the stormwater conveyance system is not feasible given the residual levels of PCBs in soils and groundwater in the area, as allowed by the CD. In addition, the term "eliminate" is not consistent with the CD, which recognizes that, under the applicable performance standards, residual PCBs will remain in soil and groundwater at the facility. Nevertheless, GE agrees with EPA that techniques such as disconnecting, replacing, relining, and abandoning conveyances can be used as source control measures to minimize the discharge of PCBs in stormwater. In this situation, GE requests use of the terms "minimize" or "reduce" the discharge of PCBs in this and similar contexts.

D. Other Information and Reservation of Rights

In addition to the recommendations discussed above, GE notes that from the effective date of Permit No. MA0003891 (e.g., October 1, 2009) and in certain cases earlier, GE has implemented the Permit provisions and submitted to the Agencies numerous submittals documenting those activities. A summary of that information was provided to the Agencies in GE's October 5, 2018 Response *to Request for Information Under Section 308 of Clean Water Act Docket No. CWA-308-Ro1-FY18-55*. That Response also contained substantial information regarding the "potential pollutant sources" to stormwater at the GE facility (as defined by EPA in its request for information) and the actions that GE has taken and is taking to address these "potential pollutant sources," notably under the CD That

Response highlights that a substantial amount of information regarding GE's Permit implementation and potential sources of COCs in stormwater has been submitted to the Agencies, which should be considered during the permit renewal process.

Finally, as discussed at length in GE's cover letter for the above-referenced October 5, 2018 Response, GE believes that, for "potential pollutant sources" that are subject to requirements under the CD (including residual contamination in surface and subsurface soil, groundwater, and non-aqueous-phase liquid at the GE facility), the CD bars the Agencies from using the NPDES Permit to impose additional requirements on GE beyond those required by the CD. In fact, it is GE's position that, to address such "potential pollutant sources," there is no requirement for GE to obtain an NPDES Permit at all given the permit exemption in CERCLA and the CD. Thus, GE reserves its right, following issuance of a revised NPDES Permit, to challenge under the CD any NPDES-driven requirement that GE undertake additional response actions to address the "potential pollutant sources" subject to the CD. In the meantime, however, GE stands by its commitment to engage in good-faith discussions regarding a renewal of the Permit based on BMPs.

GE appreciates the opportunity to provide to the Agencies a summary of the above recommendations for consideration that may assist in the GE's NPDES Permit renewal process. In pursuit of our collaborative and good-faith relationship, GE welcomes any comments from the Agencies regarding the above topics or in general that may assist the Agencies in developing GE's revised NPDES Permit.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY – REGION 1 (EPA)
WATER DIVISION
5 POST OFFICE SQUARE
BOSTON, MASSACHUSETTS 02109

MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION (MASSDEP)
COMMONWEALTH OF MASSACHUSETTS
100 CAMBRIDGE STREET, SUITE 900
BOSTON, MASSACHUSETTS 02114

EPA PUBLIC NOTICE OF A DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE INTO WATERS OF THE UNITED STATES UNDER SECTION 402 OF THE CLEAN WATER ACT (CWA), AS AMENDED, AND MASSDEP PUBLIC NOTICE OF EPA REQUEST FOR STATE CERTIFICATION UNDER SECTION 401 OF THE CWA.

PUBLIC NOTICE PERIOD: **9/19/2023 – 11/20/2023**

PERMIT NUMBER: **MA0003891**

PUBLIC MEETING DATE: **11/8/2023**

PUBLIC HEARING DATE: **11/8/2023**

PERMIT NUMBER, NAME AND MAILING ADDRESS OF APPLICANT, AND NAME AND ADDRESS OF THE FACILITY WHERE DISCHARGES OCCUR:

MA0003891
General Electric Company
159 Plastics Avenue
Pittsfield, MA 01201

RECEIVING WATERS: East Branch Housatonic River and Unkamet Brook

RECEIVING WATERS CLASSIFICATION: Class B

PREPARATION OF THE DRAFT PERMITS AND EPA REQUEST FOR CWA § 401 CERTIFICATION:

EPA is issuing for public notice and comment a Draft NPDES Permit for the above-identified facility, which discharges some combination of stormwater, groundwater, potable water, and/or other allowable non-stormwater sources from 13 outfalls. The effluent limits and permit conditions have been drafted pursuant to, and assure compliance with, the CWA, including EPA-approved State Surface Water Quality Standards at 314 CMR 4.00. MassDEP cooperated with EPA in the development of the Draft NPDES Permit. MassDEP retains independent authority under State law to publish for public notice and issue a separate Surface Water Discharge Permit for the discharge, not the subject of this notice, under the Massachusetts Clean Waters Act, M.G.L. c. 21, §§ 26-53.

In addition, EPA has requested that MassDEP grant or deny certification of this Draft Permit pursuant to Section 401 of the CWA and implementing regulations. Under federal regulations governing the NPDES program at 40 Code of Federal Regulations (CFR) § 124.53(e), state certification shall contain conditions that are necessary to assure compliance with the applicable provisions of CWA sections 208(e), 301, 302, 303, 306, and 307 and with appropriate requirements of State law, including any conditions more stringent than those in the Draft Permit that MassDEP finds necessary to meet these requirements. Furthermore, MassDEP may provide a statement of the extent to which each condition of the Draft Permit can be made less stringent without violating the requirements of State law.

INFORMATION ABOUT THE DRAFT PERMIT:

The Draft Permit and explanatory Fact Sheet may be obtained at no cost at https://www.epa.gov/npdes-permits/massachusetts-draft-individual-npdes-permits or by contacting:

Shauna Little
U.S. Environmental Protection Agency – Region 1
5 Post Office Square, Suite 100 (WIP06-1)
Boston, MA 02109-3912
Telephone: (617) 918-1989
Little.Shauna@epa.gov

PUBLIC COMMENT:

All persons, including applicants, who believe any condition of this Draft Permit is inappropriate must raise all reasonably ascertainable issues and submit all reasonably available arguments supporting their position by **November 20, 2023,** which is the close of the public comment period. Comments, including those pertaining to EPA's request for CWA § 401 certification, should be submitted to the EPA contact at the address or email listed above. Upon the close of the public comment period, EPA will make all comments available to MassDEP. All commenters who want MassDEP to consider their comments in the state decision-making processes (i.e., the separate state permit and the CWA § 401 certification) must submit such comments to MassDEP during the state comment period for the state Draft Permit and CWA § 401 certification. For information on submitting such comments to MassDEP, please follow the instructions found in the state public notice at: https://www.mass.gov/service-details/massdep-public-hearings-comment-opportunities.

If comments are submitted in hard copy form, please also email a copy to the EPA contact above.

PUBLIC MEETING AND PUBLIC HEARING:

The Regional Administrator has determined, pursuant to 40 CFR §124.12, that a significant degree of public interest exists in the proposed permits and that a public hearing should be held to consider the permit. This notice serves to announce that a public hearing will be held. A public meeting and public hearing will be held on the following dates and times:

Public Informational Meeting:
DATE: **November 8, 2023**
TIME: 6:00 PM
LOCATION: Virtual Meeting Information will be provided on EPA's website, noted above

Public Hearing:
DATE: **November 8, 2023**
TIME: 7:00 PM
LOCATION: Virtual Meeting Information will be provided on EPA's website, noted above

The following is a summary of the procedures that will be followed at the public informational meeting:

a. The Presiding Chairperson will have the authority to open and conclude the meeting and to maintain order.
b. EPA will make a short presentation describing the NPDES permit process and the draft permit conditions, and then accept clarifying questions from the audience.
c. Formal oral comments concerning the draft permit will not be accepted at the public meeting.

Formal oral comments will be accepted at the subsequent public hearing.

The following is a summary of the procedures that will be followed at the public hearing:

a. The Presiding Chairperson will have the authority to open and conclude the hearing and to maintain order.
b. Any person appearing at such a hearing may submit oral or written statements concerning the draft permit.

FINAL PERMIT DECISION:

Following the close of the comment period, and after the public hearing, the Regional Administrator will issue a final permit decision and notify the applicant and each person who has submitted written comments or requested notice.

KEN MORAFF, DIRECTOR
WATER DIVISION
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY – REGION 1

LEALDON LANGLEY, DIRECTOR
DIVISION OF WATERSHED MGMT
MASSACHUSETTS DEPARTMENT OF ENVIRONMENTAL PROTECTION