



February 10, 2023

Don Kelly, Chairman, Wastewater Agency Board  
Sarpy County and Cities Wastewater Agency  
1210 Golden Gate Drive  
Papillion, NE 68046

RE: Sarpy County and Cities Wastewater Agency - Springfield Creek Cooling  
Water Blowdown (CWB) System  
NDEE ID: 117619  
PROGRAM ID: NE0139891

Enclosed are the NPDES Draft Permit, Fact Sheet, and Public Notice for the above referenced facility.

The draft permit contains the Department's tentative determination concerning the requirements that would apply to future discharges from your facility. The Department will submit the public notice to a local newspaper for publication in the near future at no cost to the facility. The public notice may also be found on the NDEE website: <http://dee.ne.gov>. The public notice specifies the length of the public comment period and contains instructions on submitting comments and/or requesting a hearing. Following the completion of the public notice period and prior to making a final determination for the issuance of the permit, the Department will review any comments and hearing requests.

Permittees are encouraged to review the draft permit and fact sheet during the public comment period, and to provide the Department with any technical comments or other input that should be considered in the Department's final determination of the issuance of the permit. *All formal comments must be submitted in writing as set forth in the public notice.*

If you have any questions, please contact me at [kim.bubb@nebraska.gov](mailto:kim.bubb@nebraska.gov).

Thank you,

Kim Bubb, Administrative Specialist  
NPDES and State Permits Section  
Permitting and Engineering Division

Enclosure

cc without enclosure: Jeffrey Thompson, Sewer Utility Superintendent, Sarpy County and Cities Wastewater Agency





Jim Pillen, Governor

## NOTICE OF PERMIT ISSUANCE

The Nebraska Department of Environment and Energy (NDEE) proposes to issue a new National Pollutant Discharge Elimination System (NPDES) permit to Sarpy County and Cities Wastewater Agency - Springfield Creek Cooling Water Blowdown (CWB) System, 17305 State Hwy. 50, Springfield, NE (NPDES# NE0139891). This facility will receive non-contact cooling water intermittently from data center type facilities operating in the Sarpy County and Cities Wastewater Agency service area. Non-process wastewater will flow through a detention basin before being discharged through Outfall 001 to Springfield Creek, Segment LP1-10900 in the Lower Platte River Basin. The permit would be issued for a period of up to five years and would restrict pollutant discharges to comply with the requirements of Department regulations. The draft permit, fact sheet, and other public information are available for review and copying at NDEE's Lincoln Office, 245 Fallbrook Boulevard, Suite 100, Lincoln, Nebraska 68521 between 8:00 a.m. and 5:00 p.m. (CT), weekdays, excluding holidays. To request copies of the draft permit and other information, call 402-471-3557. Individuals requiring special accommodations or alternate formats of materials should notify the Department by calling 402-471-2186. TDD users should call 800-833-7352 and ask the relay operator to call the Department at 402-471-2186. Written comments, objections, and/or hearing requests concerning permit issuance may be submitted to NPDES and State Permits Section, Nebraska Department of Environment and Energy, PO Box 98922, Lincoln, NE 68509-8922; before the comment period ending date of March 17, 2023. A determination to hold a hearing will be based upon factual environmental or regulatory consideration. The NDEE does not discriminate on the basis of race, color, national origin, disability, age, or sex in administration of its programs or activities, and NDEE does not intimidate or retaliate against any individual or group because they have exercised their rights to participate in or oppose actions protected/prohibited by 40 C.F.R. Parts 5 and 7, or for the purpose of interfering with such rights.



**Authorization to Discharge Under the  
National Pollutant Discharge Elimination System  
(NPDES)**

This NPDES permit is issued in compliance with the provisions of the Federal Water Pollution Control Act (33-U.S.C. Secs. 1251 *et. seq.* as amended to date), the Nebraska Environmental Protection Act (Neb. Rev. Stat. Secs. 81-1501 *et. seq.* as amended to date), and the Rules and Regulations promulgated pursuant to these Acts. The facility and outfall(s) identified in this permit are authorized to discharge wastewater and are subject to the limitations, requirements, prohibitions, and conditions set forth herein. This permit regulates and controls the release of pollutants in the discharge(s) authorized herein. This permit does not relieve permittees of other duties and responsibilities under the Nebraska Environmental Protection Act, as amended, or established by regulations promulgated pursuant thereto.

NPDES Permit No.	<b>NE0139891</b>
NDEE ID	<b>117619</b>
Permittee	<b>Sarpy County and Cities Wastewater Agency</b>
Facility Name	<b>Springfield Creek Cooling Water Blowdown (CWB) System</b>
Facility Address	<b>17305 State Hwy. 50, Springfield, NE 68059</b>
Facility Mailing Address	<b>1210 Golden Gate Drive, Papillion, NE 68046</b>
Latitude/Longitude	<b>41.06416 °N, 96.13338 °W</b>
Legal Description	<b>NW ¼, SW ¼, Section 25, Township 13 N, Range 11 E, Sarpy County, NE</b>
Receiving Water	<b>Springfield Creek (Segment LP1-10900 in the Lower Platte River Basin)</b>
Effective Date	
Expiration Date	

Pursuant to the Delegation Memorandum dated July 1, 2021, and signed by the Director, the undersigned hereby executes this document on the behalf of the Director.

Signed this \_\_\_\_\_ day of \_\_\_\_\_, \_\_\_\_\_

DRAFT

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Shelley Schneider  
Permitting and Engineering Division Administrator

### **Permit Action Items**

The following is a brief summary of action items pertaining to this permit that are required of Sarpy County and Cities Wastewater Agency and the Nebraska Department of Environment and Energy (NDEE). The summary is a schedule of permit and compliance items for the facility. See the permit and fact sheet for more specific information on the permit conditions.

#### **Daily**

- Monitor flow for Outfall 001.

#### **Monthly**

- Sample the effluent of Outfall 001 for temperature, total residual chlorine, iron, manganese, pH, conductivity, and chloride.

#### **Quarterly**

- Sample the effluent of Outfall 001 for total extractable hydrocarbons, selenium, and sulfate.
- Discharge monitoring reports (DMRs) must be submitted electronically, see Appendix A for schedule.

#### **Annually**

- Sample the effluent of Outfall 001 for whole effluent toxicity.

#### **Per Permit Term**

- No later than two years after the commencement of discharge, sample for pollutants according to 40 CFR Part 122.21(h). See the attached guidance document for more information.
- Within 365 days of submitting the NPDES non-process wastewater application, sample for pollutants according to 40 CFR Part 122.21(h). See the attached guidance document for more information; provide the results with the application.
- Springfield Creek Cooling Water Blowdown (CWB) System must submit a NPDES non-process wastewater application to the Department 180 days prior to permit expiration.
- NDEE will conduct a compliance inspection of the facility.

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### Part I. Discharge Limits and Monitoring Requirements for Outfall 001

The discharge of recirculated non-contact cooling water from Outfall 001, final effluent to Springfield Creek (LP1-10900), is authorized and shall be monitored and limited as specified in the tables below. Monitoring shall be conducted by sampling prior to discharge to the receiving stream, unless an alternative or more specific monitoring point is specified by the NDEE.

#### A. Discharge Limits and Monitoring Requirements

<b>Table 1: Discharge Limits and Monitoring Requirements</b>						
Parameters	Storet #	Units	Discharge Limits		Monitoring Frequency	Sample Type
			Monthly Average	Daily Maximum		
Flow	50050	MGD	Report	Report	Daily	Measured or Calculated
Temperature	00011	°F	Report	90.0	Monthly	Grab <sup>(a)</sup>
Dissolved Iron	01046	mg/L	8.40	16.81	Monthly	24-Hour Composite
Dissolved Manganese	01056	mg/L	8.40	16.81	Monthly	24-Hour Composite
Total Residual Chlorine (TRC)	50060	mg/L	0.014	0.028	Monthly	Grab <sup>(a)</sup>
Total Sulfate	00945	mg/L	Report	Report	Quarterly	24-Hour Composite
Dissolved Selenium	01045	mg/L	Report	Report	Quarterly	24-Hour Composite
Total Extractable Hydrocarbons	46116	mg/L	Report	10.0	Quarterly	Grab <sup>(b)</sup>
Parameter	Storet #	Units	Discharge Limit		Monitoring Frequency	Sample Type
Acute Toxicity – <i>Ceriodaphnia sp.</i>	61425	TUa	1.0		Annually	24-Hour Composite
Acute Toxicity – <i>Pimephales promelas</i>	61427	TUa	1.0		Annually	24-Hour Composite
Parameters	Storet #	Units	Discharge Limits		Monitoring Frequency	Sample Type
			Daily Minimum	Daily Maximum		
pH	00400	S.U.	6.5	9.0	Monthly	Grab <sup>(a)</sup>

(a) Analysis shall occur within 15 minutes of sample collection.  
 (b) Total extractable hydrocarbons may be determined using the OA-2 test method (University Hygienic Laboratory, Iowa City, IA, Method OA-2).  
**Abbreviations:** MGD – million gallons per day °F – degrees Fahrenheit mg/L – milligrams per liter  
 S.U. – standard units TUa – acute toxicity units



<b>Table 2: Seasonal Discharge Limits and Monitoring Requirements</b>						
Parameters	Storet #	Units	Discharge Limits		Monitoring Frequency	Sample Type
			Monthly Average	Daily Maximum		
<b>Non-Ag Season Conductivity</b> (October 1 – March 31)	00094	µmhos/cm	Report	Report	Monthly	24-Hour Composite
<b>Ag Season Conductivity</b> (April 1 – September 30)	00094	µmhos/cm	12275	24626	Monthly	24-Hour Composite
<b>Spring Chloride</b> (March 1 – May 31)	00940	mg/L	621	1247	Monthly	24-Hour Composite
		kg/day	165	330		
<b>Summer Chloride</b> (June 1 – October 31)	00940	mg/L	620	1244	Monthly	24-Hour Composite
		kg/day	164	330		
<b>Winter Chloride</b> (November 1 – February 28[29])	00940	mg/L	619	1243	Monthly	24-Hour Composite
		kg/day	164	329		
<b>Abbreviations:</b> mg/L – milligrams per liter µmho/cm – microohms per centimeter kg/day – kilograms per day						

**Part II. Wastewater Control**

In order to protect water quality, the Sarpy County and Cities Wastewater Agency shall use the Springfield Creek Cooling Water Blowdown System as a best management practice. The Agency shall retain wastewater in the system as necessary to protect water quality and, if need be, pump the wastewater to the City of Omaha sanitary sewer system which sends water to the Papillion Creek Water Resource Recovery Facility.

**Part III. Other Requirements and Conditions**

**A. Narrative Limits, Discharges Authorized Under This Permit**

1. Shall not be toxic to aquatic life in surface waters of the State outside the mixing zones allowed in NDEE Title 117, *Nebraska Surface Water Quality Standards*,
2. Shall not contain pollutants at concentrations or levels that produce objectionable films, colors, turbidity, deposits, or noxious odors in the receiving stream or waterway, and
3. Shall not contain pollutants at concentrations or levels that cause the occurrence of undesirable or nuisance aquatic life in the receiving stream.

**B. Effluent Testing Requirements for Reapplication**

As a new discharger, the facility must complete the sampling and analysis requirements set forth in 40 CFR Part 122.21(h) no later than two years after commencement of discharge. Additionally, prior to permit renewal, Sarpy County and Cities Wastewater Agency must complete the sampling and analysis requirements set forth in 40 CFR Part 122.21(h). The sampling and analysis results must be submitted with the NPDES permit application. Testing must be conducted within 365 days of submitting the renewal application. Guidance is available on the Department website with the NPDES guidance documents and included as Attachment 1 – *Sampling and Analysis Requirements for Non-Process Wastewater Discharges for NPDES Permit Renewal Application*.

## Appendix A

### Standard Conditions Applicable to all NPDES and NPP Permits

The following conditions apply to all NDEE NPDES and NPP permits. These conditions shall not preempt any more stringent requirements found elsewhere in this permit. Please refer to the permit specific conditions located elsewhere in this permit for requirements specific to this permit. Timeframes and requirements specified elsewhere in this permit override these Standard Conditions. Unless specified, these standard conditions are set forth in NDEE, Title 119 - *Rules and Regulations Pertaining to the Issuance of Permits under the National Pollutant Discharge Elimination System*.

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## **1. Information Available**

All permit applications, fact sheets, permits, discharge data, monitoring reports, and any public comments concerning such shall be available to the public for inspection and copying, unless such information about methods or processes is entitled to protection as trade secrets of the owner or operator under Neb. Rev. Stat. §81-1527, (Reissue 1999) and NDEE Title 115 - *Rules of Practice and Procedure*, Chapter 2.

## **2. Duty to Comply**

- a. The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Federal Clean Water Act (CWA) and the applicable State Statutes and Regulations and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.
- b. The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the CWA 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.

## **3. Violations of this Permit**

- a. Any person who violates this permit may be subject to penalties and sanctions as provided by the CWA.
- b. Any person who violates this permit may be subject to penalties and sanctions as provided by the Nebraska Environmental Protection Act.

## **4. 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.

## **5. Need to Halt or Reduce Activity 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.

## **6. 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.

## **7. 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 include effective performance based on designed facility removals, effective management, adequate operator staffing and training, adequate process controls, adequate funding that reflects proper user fee schedules, 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 this permit.

## **8. Permit Actions**

- a. 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.

- b. This permit may be reopened and modified after public notice and opportunity for a public hearing for reasons specified in NDEE Title 119, Chapter 24.
- c. The attachments to this permit may be modified without a formal modification of the permit.

## 9. Property Rights

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

## 10. 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.

## 11. 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 CWA, any substances or parameters at any location.

## 12. Signatory Requirements

- a. All applications, reports, or information submitted to the Director shall be signed and certified.
- b. All permit applications shall be signed by a certifying official as follows:
  - i) *For a corporation*; by a responsible corporate officer. For the purpose of this section, a responsible corporate officer means:
    - A president, secretary, treasurer, or vice-president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
    - The manager of one or more manufacturing, production, or operating facilities, provided, the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiating and directing other comprehensive measures to assure long term environmental compliance with environmental laws and regulations; the manager can ensure that the necessary systems are established or actions taken to gather complete and accurate information for permit application requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
  - ii) *For a partnership or sole proprietorship*; by a general partner or the proprietor.
  - iii) *For a municipality, State, Federal, or other public agency*; by either a principal executive officer or ranking elected official.

For purposes of this section, a principal executive officer of a Federal agency includes:

- The chief executive officer of the agency, or

- A senior executive officer having responsibility for the overall operations of a principal geographic unit of the agency (e.g., Regional Administrators of EPA).
- c. All reports required by permits, and other information requested by the Director shall be signed by a person described above in section 12.b, or by a duly authorized representative of that person. A person is a duly authorized representative only if:
    - i) The authorization is made in writing by a person described in section 12.b;
    - ii) The authorization specifies either an individual or a position having responsibility for the overall operation of the regulated facility or activity such as the position of plant manager, operator of a well or a well field, superintendent, position of equivalent responsibility, or an individual or position having overall responsibility for environmental matters for the company, (a duly authorized representative may thus be either a named individual or any individual occupying a named position), and;
    - iii) The written authorization is submitted to the Director on the NPDES Signatory Authorization Form.
  - d. *Changes to Authorization.* If an authorization of sections 12.b or 12.c is no longer accurate because a different individual or position has responsibility than previously reported, a new Signatory Authorization Form satisfying the requirements of this section must be submitted to the Director prior to or together with any reports, information, or applications to be signed by a certifying official or authorized representative.
  - e. *Certification.* All applications, reports and information submitted as a requirement of this permit shall contain the following certification statement:
 

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. The information submitted is, to the best of my knowledge and belief, true, accurate, and complete.*
  - f. *False Statement, Representation, or Certification.*
    - i) 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 noncompliance 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.
    - ii) The Nebraska Environmental Protection Act provides criminal penalties and sanctions for false statement, representation, or certification in any application, label, manifest, record, report, plan, or other document required to be filed or maintained by the Environmental Protection Act, the Integrated Solid Waste Management Act, the Livestock Waste Management Act or the rules or regulations adopted and promulgated pursuant to such acts.

### **13. Monitoring and Records**

- a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
- b. 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. If the permit has requirements related to sewage sludge use and disposal activities, corresponding records must be retained for a period of at least five years (or longer as required by 40 CFR Part 503). This period may be extended by request of the Director at any time.
- c. Records of monitoring information shall include:
  - i) The date(s), exact place, time and methods of sampling or measurements;
  - ii) The individual(s) who performed the sampling or measurements;



- iii) The date(s) analyses were performed;
  - iv) The individual(s) who performed the analyses;
  - v) The analytical techniques or methods used; and
  - vi) The results of such analyses.
- d. Monitoring must be conducted according to test procedures approved under NDEE Title 119, Chapter 27 002 unless another method is required under 40 CFR Subchapters N – Effluent Guidelines and Standards Parts 425 to 471 or O – Sewer Sludge Parts 501 and 503.
- e. *Falsifies, Tamperers, or Knowingly Renders Inaccurate.*
- i) On actions brought by EPA, 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 section, 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.
  - ii) On action brought by the State, The Nebraska Environmental Protection 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 pursuant to Neb. Stat. §81-1508.01.
- f. The Department may require increases in the monitoring frequencies set forth in this permit to address new information concerning a discharge, evidence of potential noncompliance, suspect water quality in a discharge, evidence of water quality impacts in the receiving stream or waterway, or other similar concerns. The Department may require monitoring for additional parameters not specified in this permit to address new information concerning a discharge, evidence of potential noncompliance, suspect water quality in a discharge, evidence of water quality impacts in the receiving stream or waterway, or other similar concerns.

#### 14. 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:
- i) The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in NDEE Title 119, Chapter 4 and 8.
  - ii) 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 under NDEE Title 119, Chapter 15.
  - iii) 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. The sludge program is not delegated to the State so notification to the EPA Regional Administrator in addition to the State is required.
- 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 NDEE Title 119, Chapter 24 in some cases, modification or revocation and reissuance is mandatory.
- d. *Discharge Monitoring Reports.*
- i) The NPDES Electronic Reporting Rule, published October 22, 2015, requires electronic reporting of NPDES information rather than the previously required paper-based reports from the permitted

facilities. According to 40 CFR, Part 127 permittees that have reporting requirements must submit discharge monitoring reports (DMRs) electronically on EPA NetDMR, which is accessed via EPA's Central Data Exchange (CDX) located at [cdx.epa.gov](http://cdx.epa.gov). The Department elected for EPA to be the initial recipient for DMRs.

- ii) Permittees may submit a request for an electronic reporting waiver to the Department if the facility is physically located in a geographic area that is identified as under-served for broadband internet by the Federal Communications Commission, or there are limitations regarding computer access. The request must document the conditions the permittee meets and provide evidence supporting the claims. The Department will either approve or deny this electronic reporting waiver request. The duration of a temporary waiver may not exceed 5 years, which is the normal period for an NPDES permit term. Temporary waivers may be granted for a one-time use for a single information submittal. A waiver may only be considered granted once written confirmation from the Department is received by the permittee. If waiver has been granted, submit DMRs on forms provided or specified by the Department.
- iii) Monitoring results shall be submitted on a quarterly basis using the reporting schedule set forth below, unless otherwise specified in this permit or by the Department.

**Monitoring Quarters**

January – March  
April – June  
July – September  
October – December

**DMR Reporting Deadlines**

April 28  
July 28  
October 28  
January 28

- iv) If the permittee monitors any pollutant more frequently than required by the permit using test procedures approved in NDEE Title 119, Chapter 27 002, or another method required for an industry-specific waste stream under 40 CFR Subchapters N – Effluent Guidelines and Standards Parts 425 to 471 and O – Sewer Sludge Parts 501 and 503, 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 or EPA Regional Administrator.
- v) Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Director in the permit.
- vi) The minimum detection limit (MDL) is defined as the level at which the analytical system gives acceptable calibration points. If the analytical results are below MDL then the reported value on the DMR shall be a numerical value less than the MDL (e.g. <0.005).
- e. *Sludge or Biosolids*. For POTWs required to electronically submit Biosolids Annual Reporting to EPA Region VII, reports are due by February 19<sup>th</sup> of each year as implemented through 503 Sludge regulations. Submit the report using the NPDES eReporting Tool (NeT), which is accessed via EPA's Central Data Exchange (CDX) located at [cdx.epa.gov](http://cdx.epa.gov).
- f. *Compliance Schedule*. 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. *Twenty-four Hour Reporting*.
  - i) 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 report shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The 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. A Noncompliance Report Form is provided on the Department website.
  - ii) For POTWs with noncompliance events related to combined sewer overflows, sanitary sewer overflows, or bypass events, these reports must include the data described in 14.g.i (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. By or before December 2025, 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 Department, as defined in 40 CFR 127.2(b), in compliance with this section and 40 CFR Part 3 (including, in all cases, Subpart D to Part 3), §122.22, and 40 CFR Part 127. 40 CFR Part 127 is not intended to undo existing requirements for electronic reporting. Prior to this date, and independent of 40 CFR 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.

- iii) The following shall be included as information which must be reported within 24 hours under this section:
  - Any unanticipated bypass which exceeds any effluent limitation in this permit.
  - Any upset which exceeds any effluent limitation in this permit.
  - 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.
- iv) The Director may waive the written report on a case-by-case basis for reports under this section if the oral report has been received within 24 hours.
- h. *Other Noncompliance.* The permittee shall report all instances of noncompliance not reported under section 14.g, at the time monitoring reports are submitted. The reports shall contain the information listed in 14.g; a Noncompliance Report Form is available on the Department website. As per 40 CFR Part 127, the Director may require permittees to electronically submit these reports.
- i. *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.
- j. *Noncompliance Report Forms.* Noncompliance Report Forms are available on the Department website and shall be submitted with or as the written noncompliance report. The submittal of a written noncompliance report does not relieve the permittee of any liability from enforcement proceedings that may result from the violation of permit or regulatory requirements.

## 15. Bypass

- a. *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 sections 15.c. and 15.d.
- b. *Notice.*
  - i) *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.
  - ii) *Unanticipated Bypass* – The permittee shall submit notice of an unanticipated bypass as required in section 14.g (24-hour reporting).
  - iii) No later than December 2025, all notices submitted in compliance with this section must be submitted electronically by the permittee to the Department or initial recipient, as defined in 40 CFR Part 127.2(b), in compliance with this section and 40 CFR Part 3 (including, in all cases, subpart D to Part 3), §122.22, and 40 CFR 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.



- c. *Prohibition of Bypass.* Bypass is prohibited, and the Director may take enforcement action against a permittee for bypass, unless:
  - i) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage. 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;
  - ii) 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 preventive maintenance; and
  - iii) The permittee submitted notices as required under section 15.b.
- d. 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 section 15.c.

## 16. Upset

- a. *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 section 16.b. 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.
- b. *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:
  - i) An upset occurred, and that the permittee can identify the cause(s) of the upset;
  - ii) The permitted facility was at the time being properly operated;
  - iii) The permittee submitted notice of the upset as required in section 14.g (24-hour reporting); and
  - iv) The permittee complied with any remedial measures required under section 14.g.
- c. *Burden of Proof.* In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

## 17. Other Rules and Regulations Liability

The issuance of this permit in no way relieves the obligation of the permittee to comply with other rules and regulations of the Department.

## 18. Severability

If any provision of this permit is held invalid, the remainder of this permit shall not be affected.

## 19. Other Conditions that Apply to NPDES and NPP Permits

- a. *Land Application of Wastewater Effluent.* The permittee shall be permitted to discharge treated domestic wastewater effluent by means of land application in accordance with the regulations and standards set forth in NDEE Title 119, Chapter 12 002. The Wastewater Section of the Department must be notified in writing if the permittee chooses to land apply effluent.
- b. *Toxic Pollutants.* The permittee shall not discharge pollutants to waters of the state that cause a violation of the standards established in NDEE Titles 117, 118 or 119. All discharges to surface waters of the state shall be free of toxic (acute or chronic) substances which alone or in combination with other substances, create conditions unsuitable for aquatic life outside the appropriate mixing zone.
- c. *Oil and Hazardous Substances/Spill Notification.* Nothing in this permit shall preclude the initiation of any legal action or relieve the permittee from any responsibilities, liabilities, or penalties under section 311 of the CWA. The permittee shall conform to the provisions set forth in NDEE Title 126 – *Rules*

- and Regulations Pertaining to Management of Waste.* If the permittee knows, or has reason to believe, that oil or hazardous substances were released at the facility and could enter waters of the state or any of the outfall discharges authorized in this permit, the permittee shall immediately notify the Department of a release of oil or hazardous substances. During Department office hours (i.e., 8:00 a.m. to 5:00 p.m., Monday through Friday, except holidays), notification shall be made to NDEE at telephone numbers (402) 471-2186 or (877) 253-2603 (toll free). When NDEE cannot be contacted, the permittee shall report to the Nebraska State Patrol for referral to the NDEE Immediate Response Team at telephone number (402) 479-4921. It shall be the permittee's responsibility to maintain current telephone numbers necessary to carry out the notification requirements set forth in this section.
- d. *Removed Substances.* Solids, sludge, filter backwash, or other pollutants removed in the course of treatment or control of wastewater shall be disposed of at a site and in a manner approved by the Department.
- i) The disposal of nonhazardous industrial sludges shall conform to the standards established in or to the regulations established pursuant to 40 CFR Part 257.
  - ii) The disposal of sludge shall conform to the standards established in or to the regulations established pursuant to 40 CFR Part 503.
  - iii) If solids are disposed of in a licensed sanitary landfill, the disposal of solids shall conform to the standards established in NDEE Title 132 - *Integrated Solid Waste Management Regulations*.
- e. *Sewage Sludge.* Publicly owned treatment works (POTWs) shall dispose of sewage sludge in a manner that protects public health and the environment from any adverse effects which may occur from toxic pollutants as defined in Section 307 of the CWA.
- f. *Modification for Regulatory Limitations.* This permit may be modified or revoked and reissued to incorporate regulatory limitations established pursuant to 40 CFR Part 503.
- g. *Representative Sampling.* Samples and measurements taken as required within this permit shall be representative of the discharge. All samples shall be taken at the monitoring points specified in this permit and, unless otherwise specified, before the effluent joins or is diluted by any other waste stream, body of water, or substance. Monitoring points shall not be changed without notification to the Department and with the written approval of the Director
- h. *Sampling.*
- i) Composite sampling shall be conducted in one of the following manners:
    - Continuous discharge - a minimum of one discrete aliquot collected every three hours;
    - Less than 24 hours - a minimum of hourly discrete aliquots or a continuously drawn sample shall be collected during the discharge; or
    - Batch discharge - a minimum of three discrete aliquots shall be collected during each discharge.
  - ii) Composite samples shall be collected in one of the following manners:
    - The volume of each aliquot must be proportional to either the waste stream flow at the time of sampling or the total waste stream flow since collection of the previous aliquot;
    - A number of equal volume aliquots taken at varying time intervals in proportion to flow;
    - A sample continuously collected in proportion to flow; and
    - Where flow proportional sampling is infeasible or non-representative of the pollutant loadings, the Department may approve the use of time composite samples.
  - iii) Grab samples shall consist of a single aliquot collected over a time period not exceeding 15 minutes.
  - iv) All sample preservation techniques shall conform to the methods adopted in NDEE Title 119, Chapter 21 006 unless:
    - In the case of sludge samples, alternative techniques are specified in 40 CFR Part 503; or
    - Other procedures are specified in this permit.

- i. *Flow Measurements.* Appropriate flow measurement devices and methods consistent with accepted scientific practices shall be used to ensure the accuracy and reliability of measurements. The devices shall be installed, calibrated and maintained to ensure the accuracy of the measurements. The accepted capability shall be consistent with that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of +/- 10%. The amount of deviation shall be from the true discharge rates throughout the range of expected discharge volumes. Guidance can be obtained from the following references for the selection, installation, calibration, and operation of acceptable flow measurement devices:
  - “Water Measurement Manual,” U.S. Department of the Interior, Bureau of Reclamation, Third Edition, Revised Reprint, 2001.  
(Available online at <http://www.usbr.gov/tsc/techreferences/mands/wmm/index.htm>)
  - “NPDES Compliance Flow Measurement Manual,” U.S. Environmental Protection Agency, Office of Water Enforcement, Publication MCD-77, September 1981, 147 pp.  
(Available online at <http://www.epa.gov/nscep>, and enter ‘NPDES Compliance Flow Measurement Manual, Publication MCD-77’ in the search box)
- j. *Changes to Loading to POTWs.* All POTWs must provide adequate notice to the Director of the following:
  - i) Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to NDEE Title 119, Chapter 26, if it were directly discharging those pollutants; and
  - ii) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
  - iii) For purposes of this section, adequate notice shall include information on the quality and quantity of effluent introduced into the POTW, and any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

## 20. Definitions

Additional definitions are found at NDEE Title 119, Chapter 1.

**Administrator:** The Administrator of the USEPA.

**Aliquot:** An individual sample having a minimum volume of 100 milliliters that is collected either manually or in an automatic sampling device.

**Annually:** Once every calendar year.

**Bimonthly:** Once every other month.

**Biosolids:** Sewage sludge that is used or disposed through land application, surface disposal, incineration, or disposal in a municipal solid waste landfill.

**Biweekly:** Once every other week.

**Bypass:** The intentional diversion of wastes from any portion of a treatment facility.

**Daily Average:** An effluent limitation that cannot be exceeded and is calculated by averaging the monitoring results for any given pollutant parameter obtained during a 24-hour day.

**Department:** Nebraska Department of Environment and Energy, or NDEE.

**Director:** The Director of the Nebraska Department of Environment and Energy.

**Industrial Discharge:** Wastewater that originates from an industrial process and/or is non-contact cooling water and/or is boiler blowdown.

**Monthly Average:** An effluent limitation that cannot be exceeded. It is calculated by averaging any given pollutant parameter monitoring results obtained during a calendar month.

**Operator:** A person (often the general contractor) designated by the owner who has day-to-day operational control and/or the ability to modify project plans and specifications related to the facility.

**Owner:** A person or party possessing the title of the land on which the activities will occur; or if the activity is for a lease holder, the party or individual identified as the lease holder; or the contracting government agency responsible for the activity.

**Outfall:** A discernible, confined and discrete conveyance, including but not limited to any pipe, ditch, channel, tunnel, conduit, well, discrete fissure, or container from which pollutants are or may be discharged into Waters of the State.

**Passive Discharge:** A discharge from a POTW that occurs in the absence of an affirmative action and is not authorized by the NPDES permit (e.g., discharges due to a leaking valve, discharges from an overflow structure) and/or is a discharge from an overflow structure not designed as part of the POTW (e.g., discharges resulting from lagoon berm/dike breaches).

**Publicly Owned Treatment Works (POTW):** A treatment works as defined by Section 212 of the Clean Water Act (Public Law 100-4) which is owned by the state or municipality, excluding any sewers or other conveyances not leading to a facility providing treatment.

**Semiannually:** Twice every year.

**Significant Industrial User (SIU):** All industrial users subject to Categorical Pretreatment Standards or any industrial user that, unless exempted under Chapter 1, Section 105 of NDEE Title 119, discharges an average of 25,000 gallons per day or more of process water; or contributes a process waste stream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW; or is designated as such by the Director on the basis that the industrial user has a reasonable potential for adversely affecting the POTW's operation or for violating any National Pretreatment Standard or requirement.

**Sludge:** Any solid, semisolid, or liquid waste generated from a municipal, commercial, or industrial wastewater treatment plant, water supply treatment plant, or air pollution control facility, or any other such waste having similar characteristics and effect.

**Total Toxic Organics (TTO):** The summation of all quantifiable values greater than 0.01 milligrams per liter (mg/L) for toxic organic compounds that may be identified elsewhere in this permit. (If this term has application in this permit, the list of toxic organic compounds will be identified, typically in the Limitations and Monitoring Section(s) and/or in an additional Appendix or Attachment to this permit.)

**Toxic Pollutant:** Those pollutants or combination of pollutants, including disease causing agents, after discharge and upon exposure, ingestion, inhalation or assimilation into an organism, either directly from the environment or indirectly by ingestion through food chains will, on the basis of information available to the administrator, cause death, disease, behavioral abnormalities, cancer, genetic mutations, physiological malfunction (including malfunctions in reproduction), or physical deformations in such organisms or their offspring.

**Upset:** An exceptional incident in which there is unintentional and temporary noncompliance with technology-based permit effluent limitations because of factors beyond the reasonable control of the permittee, excluding such factors as operational error, improperly designed or inadequate treatment facilities, or improper operation and maintenance or lack thereof.

**Volatile Organic Compounds (VOC):** The summation of all quantifiable values greater than 0.01 milligrams per liter (mg/L) for volatile, toxic organic compounds that may be identified elsewhere in this permit. (See the definition for Total Toxic Organics above. In many instances, VOCs are defined as the volatile fraction of the TTO parameter. If the term VOC has application in this permit, the list of toxic organic compounds will be identified, typically in the Limitations and Monitoring Section(s) and/or in an additional Appendix or Attachment to this permit.)

**Waters of the State:** All waters within the jurisdiction of this state including all streams, lakes, ponds, impounding reservoirs, marshes, wetlands, watercourses, waterways, wells, springs, irrigation systems, drainage systems, and all other bodies or accumulations of water, surface and underground, natural or artificial, public or private, situated wholly or partly within or bordering upon the state.

**Weekly Average:** An effluent limitation that cannot be exceeded. It is calculated by averaging any given pollutant parameter monitoring results obtained during a fixed calendar week. The permittee may start their week on any weekday, but the weekday must remain fixed. The Department approval is required for any change of the starting day.

**"X" Day Average:** An effluent limitation defined as the maximum allowable "X" day average of consecutive monitoring results during any monitoring period where "X" is a number in the range of one to seven days.

## **21. Abbreviations**

**CFR:** Code of Federal Regulations

**CWA:** Clean Water Act

**NOI:** Notice of Intent

**NDEE:** Nebraska Department of Environment and Energy

**NDEE Title 115:** Rules of Practice and Procedure

**NDEE Title 117:** Nebraska Surface Water Quality Standards

**NDEE Title 118:** Ground Water Quality Standards and Use Classification

**NDEE Title 119:** Rules and Regulations Pertaining to the Issuance of Permits under the National Pollutant Discharge Elimination System

**NDEE Title 126:** Rules and Regulations Pertaining to the Management of Wastes

**NDEE Title 132:** Integrated Solid Waste Management Regulations

**NPDES:** National Pollutant Discharge Elimination System

**NPP:** Nebraska Pretreatment Program

**POTW:** Publicly Owned Treatment Works

**WWTF:** Wastewater Treatment Facility





## DEPT. OF ENVIRONMENT AND ENERGY

*This guidance document is advisory in nature but is binding on an agency until amended by such agency. A guidance document does not include internal procedural documents that only affect the internal operations of the agency and does not impose additional requirements or penalties on regulated parties or include confidential information or rules and regulations made in accordance with the Administrative Procedure Act. If you believe that this guidance document imposes additional requirements or penalties on regulated parties, you may request a review of the document.*

18-003

Revised April 2021

### **Guidance for Conducting Reapplication Sampling for Facilities Discharging Non-Process Wastewater (Formerly Known as Non-Process Wastewater Pollutant Scan)**

Except for storm water discharges, all manufacturing, commercial, mining and silvicultural dischargers applying for NPDES permits which directly discharge only non-process wastewater not regulated by an effluent limitations guideline or new source performance standard shall provide the information in Section A and B to the Department once per permit term. If any pollutants listed below are monitored in the accompanying NPDES permit, redundant sampling will not be necessary.

#### **A. Required Sampling and Analysis for Permit Renewal**

Quantitative data for the pollutants or parameters listed below is required, unless testing is waived by the Director. The quantitative data must be data collected within 365 days prior to application submittal, if they remain representative of current operations, and must include maximum daily value, average daily value, and number of measurements taken. The applicant must collect and analyze samples in accordance with 40 CFR Part 136. When analysis of pH, temperature, residual chlorine, oil and grease, or fecal coliform (including *E. coli*), and Enterococci (previously known as fecal streptococcus) and volatile organics is required, grab samples must be collected for those pollutants. For all other pollutants, a 24-hour composite sample, using a minimum of four (4) grab samples, must be used unless specified otherwise at 40 CFR Part 136. For a composite sample, only one analysis of the composite of aliquots is required. All levels must be reported or estimated as concentration and as total mass, except for flow, pH, and temperature.

1. Biochemical Oxygen Demand (BOD<sub>5</sub>) [00310].
2. Total Suspended Solids (TSS) [00530].
3. Fecal Coliform (if believed present or if sanitary waste is or will be discharged) [31615 or 31648].
4. Total Residual Chlorine (if chlorine is used) [50060].
5. Oil and grease [Hexane extractable method, 00552; the facility may submit sample results for total extractable hydrocarbons, 46116, or petroleum oil, 82180]
6. Chemical Oxygen Demand (COD) (if non-contact cooling water is or will be discharged) [81017].
7. Total Organic Carbon (TOC) (if non-contact cooling water is or will be discharged) [00680].
8. Ammonia (as N) [00610].
9. Discharge Flow [50050].
10. pH [00400].
11. Temperature (Winter and Summer) [00011].

The Director may waive the testing and reporting requirements for any of the pollutants or flow listed above if the applicant submits a request for such a waiver before or with his application which demonstrates that information adequate to support issuance of a permit can be obtained through less stringent requirements.

**B. New Discharges**

If the outfall is a new discharge, the applicant must complete and submit quantitative data for the above parameters no later than two years after commencement of discharge. However, the applicant need not submit data for parameters which he has already monitored and reported under the discharge monitoring requirements of his NPDES permit.

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*Produced by: Nebraska Department of Environment and Energy, P.O. Box 98922, Lincoln, NE 68509-8922; phone (402) 471-2186. To view this, and other information related to our agency, visit our web site at <http://dee.ne.gov>.*





# Nebraska Department of Environment and Energy

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## NPDES and State Permits Section

PO Box 98922  
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Fact Sheet  
Springfield Creek Cooling Water Blowdown (CWB) System  
Springfield, Sarpy County, Nebraska  
NPDES NE0139891 / NDEE ID 117619

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Attachment 1 – Site Maps

Attachment 2 – WLA Spreadsheets

### **A. Proposed Action – Tentative Determination**

On the basis of a preliminary staff review, the Nebraska Department of Environment and Energy has made a tentative determination to issue the NPDES Permit Number NE0139891 to the Sarpy County and Cities Wastewater Agency for the discharge of non-process wastewater from the Springfield Creek Cooling Water Blowdown (CWB) System to Springfield Creek in the Lower Platte River Basin.

### **B. Applicant and Facility Information**

<b>Applicant</b>	Sarpy County and Cities Wastewater Agency
<b>Facility</b>	Springfield Creek Cooling Water Blowdown (CWB) System
<b>Facility Address</b>	17305 State Hwy. 50, Springfield, NE 68059
<b>Legal Description</b>	NW ¼, SW ¼, Section 25, Township 13 N, Range 11 E, Sarpy County, NE
<b>Other Information</b>	Springfield Creek Cooling Water Blowdown (CWB) System receives non-contact cooling water intermittently from data center type facilities operating in the Sarpy County and Cities Wastewater Agency service area.

### **C. Segment, Use Designations, and Impairment**

The Springfield Creek CWB System discharges non-process wastewater to Springfield Creek in the Lower Platte River Basin. Segment, basin, and use designation are set forth in NDEE Title 117, Chapter 5, *Nebraska Surface Water Quality Standards*. Impairments and pollutants are from the NDEE 2020 *Water Quality Integrated Report*. Key species may include endangered, threatened, and/or sensitive species.

**Receiving Stream for the facility** Springfield Creek

**Basin / Segment** LP1-10900 in the Lower Platte River Basin

#### **Water Quality Usage Designations for Springfield Creek**

State Resource Water No

Recreation No

Aquatic Life Warmwater B

Public Drinking Water Supply No

Agriculture Water Supply A

Industrial Water Supply No

Aesthetics Yes

Key Species *Lake sturgeon, Pallid sturgeon, Sturgeon chub, Blue sucker, Fathead chub, Plains minnow, Western silvery minnow*

#### **Impairments and Parameters of Concern for Springfield Creek**

Impairments (Causes) None

TMDL None

Comments/Actions None

## **D. Description of Discharge and Potential Pollutants**

### **1. Description of Discharge**

Springfield Creek Cooling Water Blowdown (CWB) System is a facility located in Sarpy County, Nebraska that intermittently receives non-contact cooling water from data center type facilities operating in the Sarpy County and Cities Wastewater Agency service area. Wastewater from the data center type facilities is anticipated to be discharged as needed from cooling units, typically after three to five recirculation cycles. The Springfield Creek CWB System consists of a CWB sewer and equalization/detention basin. Non-contact cooling water will flow through the detention basin before it is discharged through Outfall 001 to Springfield Creek. Under abnormal/emergency conditions, a gate could be closed so that the non-contact cooling water is temporarily stored in the equalization/detention basin.

The facility is authorized to discharge non-contact cooling water. The discharge through Outfall 001 to Springfield Creek in the Lower Platte River Basin has an anticipated average daily flow of 70,000 gallons per day and is sourced from the Metropolitan Utilities District (MUD) system.

This permit does not authorize the discharge of process or sanitary wastewater.

### **2. Potential Pollutants**

The most prevalent pollutants of concern for this non-process wastewater include temperature, pH, and hydrocarbons. Chlorine may be present from the municipal source water and because it may be used in the disinfection of water conditioning units. Additionally, there may be other source water pollutants that are concentrated in the recirculated discharge such as metals, nutrients, chloride, and ions expressed as conductivity. Biocides may be present because of their use in tank cleaning.

## **E. Existing Permit Limits**

None. This is a new permit.

## **F. Summary of the Proposed Changes in the Draft Permit**

None. This is a new permit.

## **G. Basis for Requirements in the Draft Permit**

### **1. Overview of Permit Requirements**

When developing effluent limits for a NPDES permit, the NDEE considers limits based on both the technology available to treat the pollutants (technology-based effluent limits) and limits that are protective of the designated uses of the receiving water (water quality-based effluent limits). Technology-based effluent limits for facilities are derived from secondary treatment standards. The intent of technology-based effluent limitations is to require a minimum level of treatment for point sources based on currently available treatment technology. Water quality-based effluent limits are developed by the State of Nebraska to protect the beneficial uses of the receiving waters. The water quality-based effluent limits involve a site-specific evaluation of the effluent discharge and its effect on the receiving water. Permit limits are developed by a comprehensive assessment of both technology-based limits and water quality-based limits.

#### **a. Technology-Based Limits**

There are no effluent guidelines applicable to non-process wastewater discharged from the Springfield Creek CWB System.

#### **b. Water Quality-Based Effluent Limits**

Water quality monitoring and limitations are included in the permit to protect the receiving stream from the discharge of toxic substances in toxic amounts. If there is a reasonable potential to cause an

in-stream excursion of the water quality criteria for a parameter, then limitations are included in the NPDES permit. The permit limitations are established from the WLAs according to the procedures given in the *Technical Support Document for Water Quality-based Toxics Control (TSD)*.

**c. Best Professional Judgment**

Best professional judgment (BPJ) is the method used by permit writers to develop technology-based NPDES permit conditions when effluent guidelines and standards do not include limitations for an industrial category or subcategory. BPJ based limits are developed on a case-by-case basis using all reasonably available and relevant data. Technology-based treatment requirements, including BPJ, are adopted and incorporated by reference in Title 119, Chapter 20.

**d. Anti-backsliding**

Anti-backsliding is a statutory provision that prohibits the renewal, reissuance, or modification of an existing NPDES permit that contains effluent limitations, permit conditions, or standards that are less stringent than those established in the previous permit. Anti-backsliding provisions and exceptions are promulgated in Title 119, Chapter 17. If any of the limitations are less stringent than limitations on the same pollutant or narrative in the previous NPDES permit, the permit writer then conducts an anti-backsliding analysis and, if necessary, revises the limitations accordingly.

**2. Antidegradation Review**

An antidegradation review was performed for purposes of developing the permit pursuant to 40 CFR 131.12. The results of the evaluation indicate that Springfield Creek is a habitat for aquatic life. The designated uses of the Springfield Creek were considered during permit development. The limitations in the draft permit are protective of the Clean Water Act § 101(a)(2) fishable/swimmable goals and ensure the existing quality of water in the receiving stream is not lowered.

**3. Wastewater Control**

Sarpy County and Cities Wastewater Agency is not the source of the pollutants in the discharge from Outfall 001. The Agency receives the effluent from a data center type facility and is planning to receive wastewater from other similar non-process sources. In order to protect water quality, the Sarpy County and Cities Wastewater Agency shall use its Springfield Creek Cooling Water Blowdown System as a best management practice. The Sarpy County and Cities Wastewater Agency shall retain wastewater in the system as necessary to protect water quality and, if needed, pump the wastewater to the City of Omaha sanitary sewer system which sends water to the Papillion Creek Water Resource Recovery Facility.

**4. Basis for Monitoring and Limitations for Outfall 001**

The discharge's requirements are designed to meet the water quality requirements of the Clean Water Act. The basis for permit monitoring requirements and limitations are specified below.

**a. Basis for Monitoring Frequencies**

Monitoring frequencies are based on the Department's guidelines for non-process wastewater discharges.

**b. Basis for Flow Monitoring**

NDEE Title 119, Chapter 17.012.01B requires facilities to monitor the volume of effluent from each outfall. If necessary, the median flow rate from the facility will be used in subsequent permits to determine water quality-based limits. Daily monitoring for flow is implemented based on the anticipated flow rate of the discharge and because Sarpy County and Cities Wastewater Agency is not the source of the effluent and its pollutants.

**c. Basis for Temperature Monitoring and Limits**

Temperature monitoring is implemented in the permit. Temperature standards to protect aquatic life are set forth in NDEE Title 117 Nebraska Surface Water Quality Standards Chapter 4 – General

Criteria for Aquatic Life. According to the requirements of Title 117, the temperature of a receiving water shall not be increased by a total of more than 5° F. For warm waters, the maximum limit is 90° F. Facilities not directly adding heat to their effluent discharges are required to monitor the temperature of their effluent without limits. Non-contact cooling water has the potential to add heat to the facility discharge, so a maximum temperature of 90° F is implemented in the permit. Monthly monitoring is implemented in the permit given the anticipated flow rate of the discharge, the low receiving stream flow, and to be protective of the receiving stream.

**d. Basis for Total Residual Chlorine (TRC) Monitoring and Limits**

Chlorine may be present in the non-process wastewater because chlorine is used for disinfection of the water conditioning units and because it is known to be present in the municipal source water. The non-contact cooling water discharged from the Springfield Creek CWB System is a potential source of chlorine. In NDEE Title 117 *Nebraska Surface Water Quality Standards*, the water quality criteria for total residual chlorine (TRC) are determined as acute and chronic criteria. Seasonal (spring, summer, winter) wasteload allocations (WLAs) are developed to ensure that the effluent discharge from the end of the pipe does not exceed these criteria. The WLAs are developed to protect the assigned beneficial uses of the stream. The calculation of the WLAs from the TRC criteria is based on stream design flows, receiving stream parameters, effluent flow design parameters, and receiving stream information and is chosen using the most protective long-term average. NDEE Title 117, Chapter 2 requires that all mixing zones be based on critical condition of minimum dilution, which have been defined as the 1Q10 and 7Q10 flows (design flows).

The limits for Springfield Creek CWB System are based on anticipated facility discharge information and receiving stream data. The effluent flow was obtained from the anticipated average daily flow from the facility reported on the permit application. A default value of 0.6, which represents a reasonable degree of wastewater variability, was used as the coefficient of variation (CV) for effluent chloride because the no TRC data from the facility exists and a CV for TRC could not be calculated. NDEE assumed that there was no chlorine present in the stream. Therefore, the background chlorine was zero. Receiving stream flow, mixing zone percentages, and mixing zone length were obtained from NDEE Title 117, Chapter 2.

<b>Table FS-1. Springfield Creek CWB System – TRC Waste Load Allocations (WLAs)</b>			
<b>Parameter</b>	<b>Spring</b>	<b>Summer</b>	<b>Winter</b>
Acute TRC	0.03 mg/L	0.03 mg/L	0.03 mg/L
Chronic TRC	0.11 mg/L	0.11 mg/L	0.11 mg/L

The TRC permit limits are calculated from the WLAs according to the procedures given in the TSD for permit limit derivation from two-value, steady-state outputs for acute and chronic protection. The permit limits are chosen using the most protective long-term average which is the acute for the spring, summer, and winter seasons. The calculation of projected TRC limits is documented in Attachment 2 and presented in Table FS-2.



<b>Table FS-2. Springfield Creek CWB System - Projected TRC Limitations Derived from WLAs</b>		
<b>Parameter</b>	<b>Monthly Average</b>	<b>Daily Maximum</b>
Spring TRC (March 1 – May 31)	0.014 mg/L	0.028 mg/L
Summer TRC (June 1 – October 31)	0.014 mg/L	0.028 mg/L
Winter TRC (Nov. 1 – February 28 [29])	0.014 mg/L	0.028 mg/L

Limits for TRC are implemented for all seasons. The monitoring frequency for TRC is implemented as monthly given the anticipated flow rate of the discharge, the low receiving stream flow, the absence of data on TRC in the effluent, and to be protective of the receiving stream.

**e. Basis for Total Extractable Hydrocarbons Monitoring and Limits**

Non-contact cooling water and non-process wastewater are a potential source of petroleum oil and hydrocarbons. Testing for total extractable hydrocarbons is implemented in the permit consistent with Department permitting procedures. A 10 mg/L maximum discharge limit is implemented to ensure protection of water quality. The 10 mg/L limit is established in NDEE Title 117, Chapter 4 003.01D. Monitoring is implemented as quarterly due to the anticipated flow rate of the discharge, the low receiving stream flow, the absence of data on total extractable hydrocarbons in the effluent, and to be protective of the receiving stream.

**f. Basis for Selenium Monitoring**

Segment LP1-10000 of the Platte River, which is approximately two miles downstream of the Springfield Creek CWB System discharge, contains levels of selenium that are higher than the water quality criteria for streams set forth in NDEE Title 117, Chapter 4. Based on Metropolitan Utilities District data, selenium may also be present in the source water for the Springfield Creek CWB System. Selenium may be concentrated in the recirculated discharge. Therefore, selenium monitoring is implemented in the permit in order to determine the possible impact to selenium levels in the receiving stream and the Platte River. The monitoring frequency for selenium is implemented as quarterly given the anticipated flow rate of the discharge, the low receiving stream flow, the absence of data on selenium in the effluent, and to be protective of the receiving stream.

**g. Basis for Iron and Manganese Monitoring and Limits**

Iron and manganese are known to be present in the source water for the Springfield Creek CWB System and may be concentrated in the recirculated discharge. In NDEE Title 117 *Nebraska Surface Water Quality Standards*, the water quality criteria for iron and manganese are determined by the chronic criteria. Wasteload allocations (WLAs) are developed to ensure that the effluent discharge from the end of the pipe does not exceed these criteria. The WLAs are developed to protect the assigned beneficial uses of the stream. The calculation of the WLAs from the iron and manganese criteria is based on stream design flows, receiving stream parameters, effluent flow design parameters, and receiving stream information and is chosen using the most protective long-term average. NDEE Title 117, Chapter 2 requires that all mixing zones be based on critical condition of minimum dilution, which has been defined as 7Q10 flow (design flow).

The limits for Springfield Creek CWB System are based on anticipated facility discharge information and receiving stream data. The effluent flow was obtained from the anticipated average daily flow from the facility reported on the permit application. A default value of 0.6, which represents a reasonable degree of wastewater variability, was used as the coefficient of variation (CV) for effluent

chloride because the no iron or manganese data from the facility exists and a CV for these parameters could not be calculated. NDEE assumed that there was no iron or manganese present in the stream. Therefore, the background for both iron and manganese was zero. Receiving stream flow, mixing zone percentages, and mixing zone length were obtained from NDEE Title 117, Chapter 2.

<b>Table FS-3. Springfield Creek CWB System – Iron and Manganese Waste Load Allocations (WLAs)</b>	
<b>Parameter</b>	<b>All Seasons</b>
Chronic Iron	10.23 mg/L
Chronic Manganese	10.23 mg/L

The iron and manganese permit limits are calculated from the WLAs according to the procedures given in the TSD for permit limit derivation from two-value, steady-state outputs and chronic protection. The permit limits are chosen using the most protective long-term average which is the chronic for the spring, summer, and winter seasons. The calculation of projected iron and manganese limits is documented in Attachment 2 and presented in Table FS-4.

<b>Table FS-4. Springfield Creek CWB System - Projected Iron and Manganese Limitations Derived from WLAs</b>		
<b>Parameter</b>	<b>Monthly Average</b>	<b>Daily Maximum</b>
Iron	8.40 mg/L	16.81 mg/L
Manganese	8.40 mg/L	16.81 mg/L

Limits for both iron and manganese are implemented in the permit. Monitoring frequency for both iron and manganese is implemented as monthly given the anticipated flow rate of the discharge, the low receiving stream flow, the absence of data on iron and manganese in the effluent, and to be protective of the receiving stream.

**h. Basis for Sulfate Monitoring and Limits**

Sulfate is known to be present in the source water for the Springfield Creek CWB System and may be concentrated in the recirculated discharge. Additionally, the Platte River, located approximately two miles from the cooling water discharge, is impaired for the public drinking water criteria for sulfate. In NDEE Title 117 *Nebraska Surface Water Quality Standards*, the water quality criterion for sulfate is determined by the chronic criteria. Seasonal (spring, summer, winter) wasteload allocations (WLAs) were developed to ensure that the effluent discharge from the end of the pipe does not exceed these criteria. The WLAs are developed to protect the assigned beneficial uses of the stream. The calculation of the WLAs from the sulfate criteria is based on stream design flows, receiving stream parameters, effluent flow design parameters, and receiving stream information and is chosen using the most protective long-term average. NDEE Title 117, Chapter 2 requires that all mixing zones be based on critical condition of minimum dilution, which have been defined as the 7Q10 flow (design flow). The draft WLA is located in Attachment 2.

The limits for Springfield Creek CWB System were developed based on anticipated facility discharge information and receiving stream data. Based on the anticipated effluent data provided by Sarpy County and Cities Wastewater Agency, Springfield Creek CWB System will not violate water quality for sulfate. However, Segment LP1-10000 of the Platte River, which is approximately two miles downstream from the Springfield Creek CWB System discharge, is a public drinking supply water. Therefore, quarterly monitoring for total sulfate is implemented in the permit given the anticipated flow rate of the discharge, the low receiving stream flow, the absence of data on sulfate in the effluent, and to be protective of LP1-10000.

**i. Basis for Whole Effluent Toxicity Monitoring and Limits**

Acute whole effluent toxicity (WET) monitoring and limits are included in the current permit to determine if the biocides added to the non-contact cooling water or combinations of pollutants will cause toxicity in the receiving stream. WET testing can also aid in identifying if additional pollutants that are not being monitored are present in the discharge and if additional monitoring is needed. Whole effluent toxicity limits are included in the permit because toxicity to aquatic life shall not be allowed at any time outside of either an acute or chronic mixing zone. According to NDEE Title 117, the pollutant levels or concentrations of wastewaters, which contain unknown or complex mixtures or potentially additive or synergistic toxic pollutants, shall not exceed 0.3 acute toxicity units (TUa) or 1.0 chronic toxicity units (TUc). The permit limitations are established from the acute toxic criteria according to the procedures given in the *Technical Support Document for Water Quality-based Toxics Control* (TSD) and are documented in Attachment 2. The Department established limits using the mixing zone calculations for the chloride limit WLA. A limit of 1.0 acute toxicity units (TUa) is implemented in the permit. Monitoring frequency is implemented as annually given the anticipated flow rate of the discharge, the low receiving stream flow, the absence of WET testing data, and to be protective of receiving water quality.

**j. Basis for pH Monitoring and Limits**

According to NDEE Title 117, hydrogen ion concentrations, expressed as pH, shall be maintained between 6.5 to 9.0 standard units (S.U.) in order to ensure water quality is not impacted. Therefore, the pH limits for the Springfield Creek CWB System are implemented in the permit in the range of “6.5 to 9.0” based on Title 117 and NDEE permitting procedures. Monthly monitoring is implemented in the permit given the anticipated flow rate of the discharge, the low receiving stream flow, the absence of pH data for the effluent, and to be protective of receiving stream quality.

**k. Basis for Conductivity Monitoring and Limits**

Source water pollutants including ions expressed as conductivity may be concentrated in the recirculated discharge. In NDEE Title 117 *Nebraska Surface Water Quality Standards*, the water quality criteria for conductivity are determined by the chronic criterion. Agricultural season wasteload allocations (WLAs) are developed to ensure that the effluent discharge from the end of the pipe does not exceed these criteria. The WLAs are developed to protect the assigned beneficial uses of the stream. The calculation of the WLAs from the conductivity criterion is based on stream design flows, receiving stream parameters, effluent flow design parameters, and receiving stream information and is chosen using the most protective long-term average. NDEE Title 117, Chapter 2 requires that all mixing zones be based on critical condition of minimum dilution, which has been defined as 7Q10 flow (design flow).

The limits for Springfield Creek CWB System are based on anticipated facility discharge information and receiving stream data. The effluent flow was obtained from the anticipated average daily flow from the facility reported on the permit application. A default value of 0.6, which represents a reasonable degree of wastewater variability, was used as the coefficient of variation (CV) for effluent chloride because the no conductivity data from the facility exists and a CV for conductivity could not be calculated. Monitoring data from LP1-10000, a stream segment downstream from Outfall 001, was utilized for background data. A monitoring station on LP1-10900 only had one season of monitoring data, and those data were similar to LP1-10000, so the ambient monitoring station on LP1-10000 was used. Receiving stream flow, mixing zone percentages, and mixing zone length were obtained from NDEE Title 117, Chapter 2.

<b>Table FS-5. Springfield Creek CWB System - Conductivity Waste Load Allocations (WLAs)</b>	
<b>Parameter</b>	<b>Ag Season</b>
Agricultural Season Conductivity	14991 µmho/cm



The conductivity permit limits are calculated from the WLAs according to the procedures given in the TSD for permit limit derivation from two-value, steady-state outputs for chronic protection. The permit limits are chosen using the most protective long-term average which is the chronic for the agricultural season. The calculation of projected conductivity limits is documented in Attachment 2 and presented in Table FS-6.

<b>Parameter</b>	<b>Monthly Average</b>	<b>Daily Maximum</b>
Agricultural Season Conductivity (April 1 – Sept. 30)	12275 µmho/cm	24626 µmhos/cm
Non-Agricultural Season Conductivity (Oct. 1 – March 31)	Report	Report

Limits for conductivity are implemented in the permit for the agricultural season. Report-only monitoring for conductivity is implemented in the permit for the non-agricultural season. The monitoring frequency for both the agricultural and non-agricultural season is implemented as monthly given the anticipated flow rate of the discharge, the low receiving stream flow, the absence of conductivity data for the effluent, and to be protective of the receiving stream.

**I. Basis for Chloride Monitoring and Limits**

Chloride is known to be present in the source water for the Springfield Creek CWB System and may be concentrated in the recirculated discharge. In NDEE Title 117 *Nebraska Surface Water Quality Standards*, the water quality criteria for chloride are determined as acute and chronic criteria. Seasonal (spring, summer, winter) wasteload allocations (WLAs) are developed to ensure that the effluent discharge from the end of the pipe does not exceed these criteria. The WLAs are developed to protect the assigned beneficial uses of the stream. The calculation of the WLAs from the chloride criteria is based on stream design flows, receiving stream parameters, effluent flow design parameters, and receiving stream information and is chosen using the most protective long-term average. NDEE Title 117, Chapter 2 requires that all mixing zones be based on critical condition of minimum dilution, which have been defined as the 1Q10 and 7Q10 flows (design flows).

The limits for Springfield Creek CWB System are based on anticipated facility discharge information and receiving stream data. The effluent flow was obtained from the anticipated average daily flow from the facility reported on the permit application. A default value of 0.6, which represents a reasonable degree of wastewater variability, was used as the coefficient of variation (CV) for effluent chloride because the no chloride data from the facility exists and a CV for chloride could not be calculated. Monitoring data from LP1-10000, a stream segment downstream from Outfall 001, was utilized for background data. A monitoring station on LP1-10900 only had one season of monitoring data, and those data were similar to LP1-10000, so the ambient monitoring station on LP1-10000 was used. Receiving stream flow, mixing zone percentages, and mixing zone length were obtained from NDEE Title 117, Chapter 2.

<b>Parameter</b>	<b>Spring</b>	<b>Summer</b>	<b>Winter</b>
Acute Chloride	1246.56 mg/L	1244.29 mg/L	1242.58 mg/L
Chronic Chloride	2197.61 mg/L	2170.37 mg/L	2188.84 mg/L

The chloride permit limits are calculated from the WLAs according to the procedures given in the TSD for permit limit derivation from two-value, steady-state outputs for acute and chronic protection. The permit limits are chosen using the most protective long-term average which is the acute for the

spring, summer, and winter seasons. The calculation of projected chloride limits is documented in Attachment 2 and presented in Table FS-8.

<b>Table FS-8. Springfield Creek CWB System - Projected Chloride Limitations Derived from WLAs</b>		
<b>Parameter</b>	<b>Monthly Average</b>	<b>Daily Maximum</b>
Spring Chloride (March 1 – May 31)	621.36 mg/L 164.63 kg/day	1246.56 mg/L 330.28 kg/day
Summer Chloride (June 1 – October 31)	620.23 mg/L 164.33 kg/day	1244.29 mg/L 329.68 kg/day
Winter Chloride (Nov. 1 – February 28 [29])	619.37 mg/L 164.10 kg/day	1242.58 mg/L 329.22 kg/day

The projected chloride limits are based on the criteria, effluent flow rate, CV, background concentration, and receiving stream characteristics. Chloride limits are implemented in the permit for all seasons. Monthly monitoring for chloride is implemented the anticipated flow rate of the discharge, the low receiving stream flow, the absence of chloride data for the effluent, and to be protective of the receiving stream.

**5. Other Requirements and Conditions**

The *Other Requirements and Conditions* section has been updated. Method detection limit reporting requirements, additional monitoring, permit attachments, and permit modification and reopening requirements are included in Appendix A. These requirements are removed from Part II of the permit to reduce duplicative sections.

**a. Narrative Limits**

The narrative limits on toxicity, noxious odors, objectionable materials, and undesirable aquatic life are in accordance with water quality criteria in NDEE Title 117.

**b. Effluent Testing Requirements for Reapplication**

40 CFR Part 122.21(h) requires facilities which discharge non-process wastewater to scan for multiple parameters, many not regularly monitored by the facility. Any parameters that are monitored regularly by the facility do not need to be tested during the sampling event. As a new discharger, the facility must provide sampling results no later than two years after commencement of discharge. The facility must also provide sampling results with their application submittal collected within 365 days prior to application submittal. Reapplication testing requirements are included on the Department website with the NPDES guidance documents.

**H. Supporting Documentation**

The following documents and regulations were used in the preparation of the draft permit.

1. NDEE Title 117, *Nebraska Surface Water Quality Standards*, June 24, 2019.
2. NDEE Title 118, *Ground Water Quality Standards and Use Classifications*, March 27, 2006.
3. NDEE Title 119, *Rules and Regulations Pertaining to the Issuance of Permits under the National Pollutant Discharge Elimination System*, July 2, 2017.
4. NDEE, *2020 Water Quality Integrated Report*, May 14, 2021.
5. *Technical Support Document for Water Quality-based Toxic Control* (EPA 505/2-90-001 PB91-127415, March 1991).
6. 40 CFR Parts 122, 124, and 125, NPDES Regulations.

7. Permit application form 1 and 2E from Sarpy County and Cities Wastewater Agency received on April 4, 2022.

**I. Information Requests**

Inquiries concerning the draft permit, its basis or the public comment process may be directed to:

Kim Bubb Telephone: (402) 471-8830 or (402) 471-4220 Fax: (402) 471-2909

Individuals requiring special accommodations or alternate formats of materials should notify the Department by calling (402) 471-2186. TDD users should call (800) 833-7352 and ask the relay operator to call the Department at (402) 471-2186.

Copies of the application and other supporting material used in the development of the permit are available for review and copying at the Department's office between 8:00 A.M. and 5:00 P.M. on weekdays.

Office Location: 245 Fallbrook Boulevard, Lincoln, NE

Mailing Address: NPDES and State Permits Section  
Nebraska Department of Environment and Energy  
PO Box 98922  
Lincoln, Nebraska 68509-8922

**J. Submission of Formal Comments or Requests for Hearing**

The date on which the public comment period ends is specified in the public notice. During the public notice period, the public may submit formal comments or objections, and/or petition the Department to hold a public hearing concerning the issuance of the draft permit. All such requests need to: be submitted in written form, state the nature of the issues to be raised, and present arguments and factual grounds to support them. The Department shall consider all written comments, objections and/or hearing petitions, received during the public comment period, in making a final decision regarding permit issuance.

Formal comments, objections and/or hearing requests need to be submitted to:

Kim Bubb; NPDES and State Permits Section

Office Location: 245 Fallbrook Boulevard, Lincoln, NE

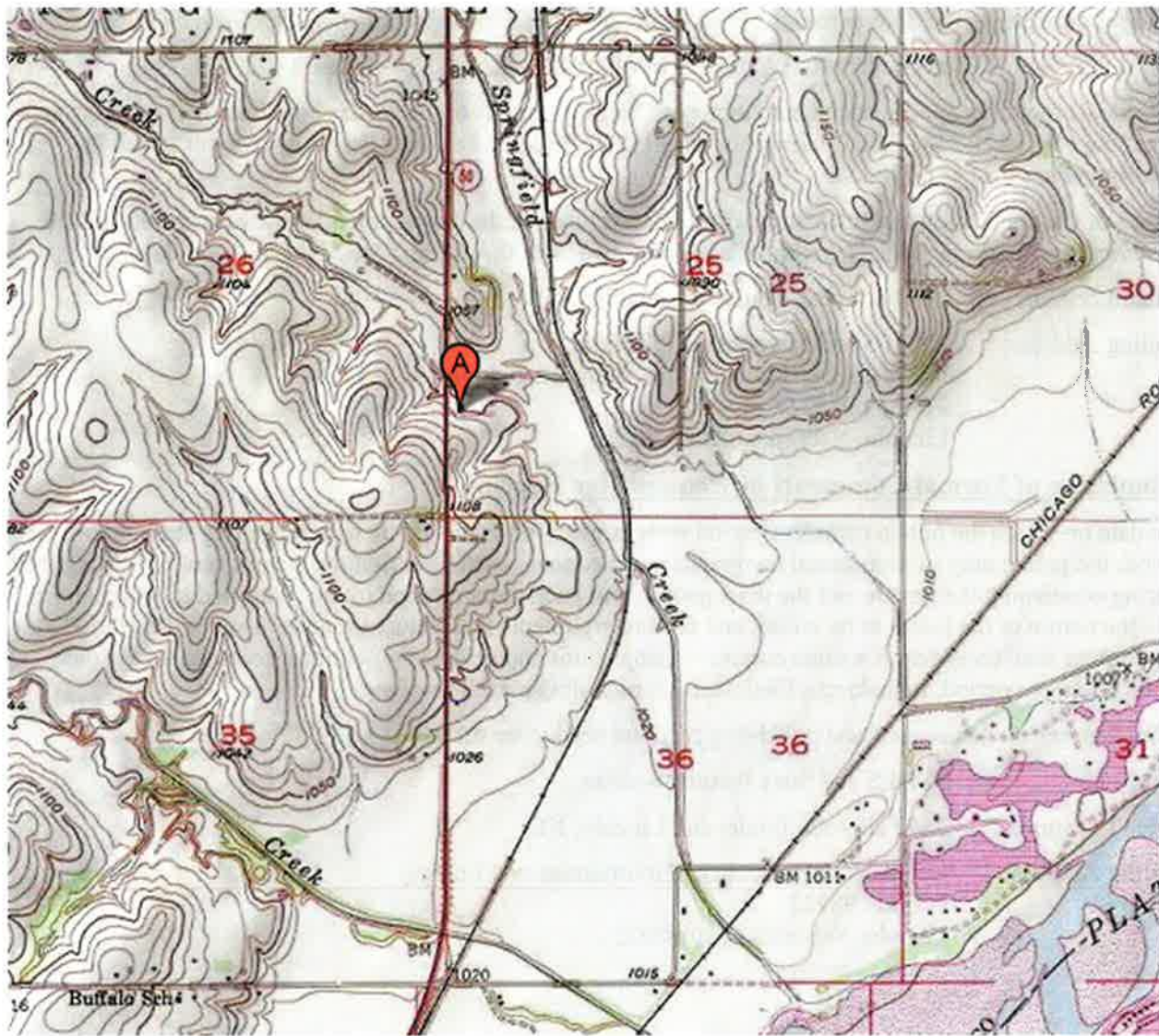
Mailing Address: Nebraska Department of Environment and Energy  
PO Box 98922  
Lincoln, Nebraska 68509-8922



Attachment 1 – Site Maps

Map 1 – Topographic Map

A – Springfield Creek Cooling Water Blowdown (CWB) System

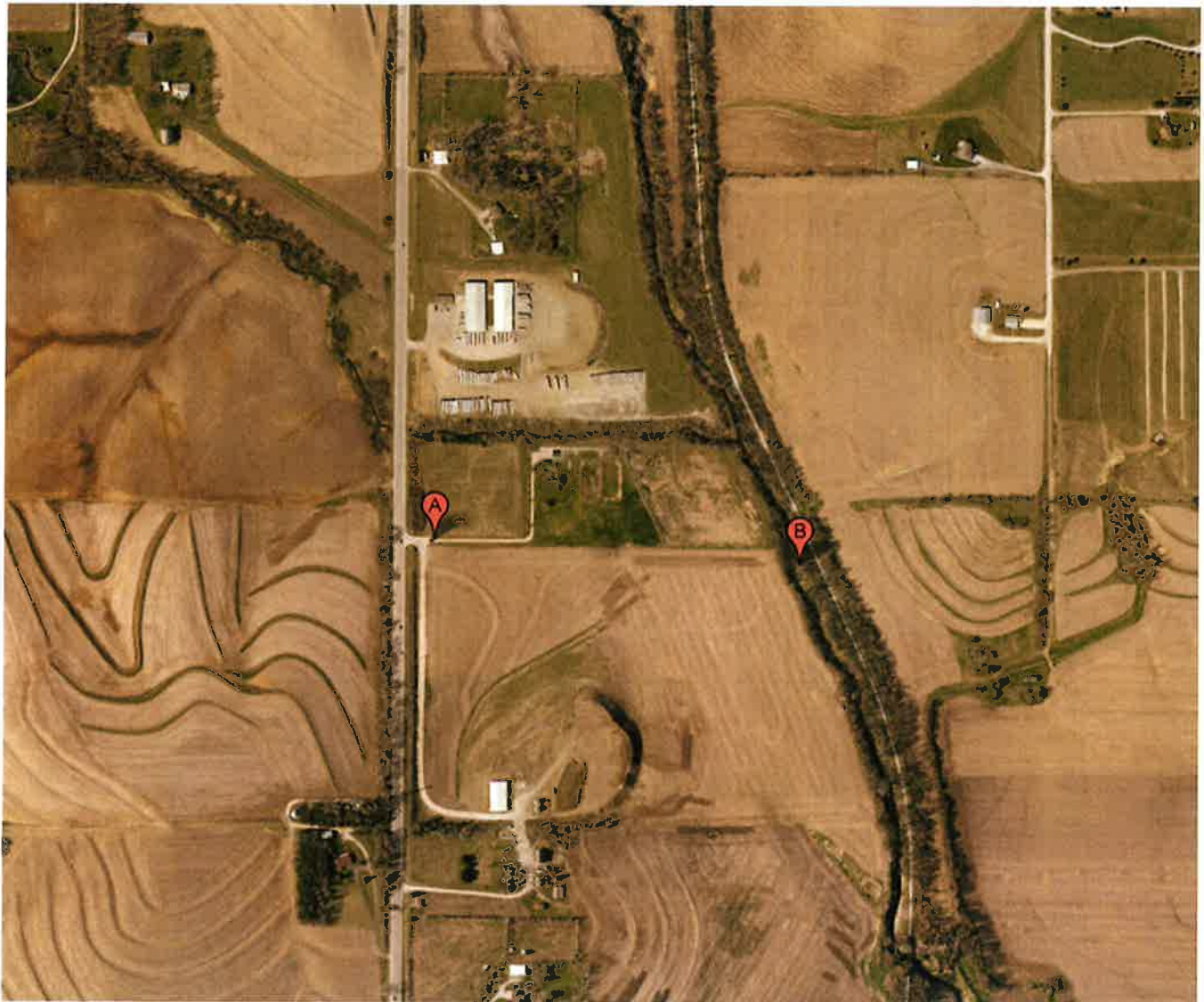


Attachment 1 – Site Maps

Map 2 – Aerial Photograph

A – Springfield Creek Cooling Water Blowdown (CWB) System

B – Outfall 001





Attachment 2 – WLA Spreadsheets

Total Residual Chlorine

Facility	Springfield Creek CWB System	Spring			Summer			Winter		
		1q10 cfs	7q10 cfs	30q5 cfs	Chronic NH3 background mg/L	Acute NH3 background mg/L	Other Chronic background mg/L	Other Acute background mg/L	Effluent Median MGD	Effluent Median cfs
Program ID	NE013981	0.1	1.0	1.0				0.1	0.1	0.1
Receiving Water	Springfield Creek	1.0	1.0	1.0				1.0	1.0	1.0
Segment	LP1-10900	1.0	1.0	1.0				1.0	1.0	1.0
Stream Flow Source	Default									
Confidence	Low									
Background pollutant source	LP1-10000									
Confidence	Medium									
Effluent data source	Facility	0.07	0.07	0.07				0.07	0.07	0.07
Confidence	Medium	0.11	0.11	0.11				0.11	0.11	0.11

Receiving Stream Characteristics	Spring			Summer			Winter		
	Known Stream Flow (cfs)	Known Average Velocity (ft/s)	Known Average Depth (ft)	Known Average Width (ft)	Stream Slope (ft/mile)	Ls/Lv	Chronic Mixing Zone to 5000 Ft?		
Chronic NH3 Criteria	0.00	0.011	0.11	100.00	0.011	0.11	100.00		
Acute NH3 Criteria	#DIV/0!	%Stream	%Stream	%Stream	Other Acute Criteria	Acute WLA	%Stream		
Other Chronic Criteria	0.00	0.011	0.11	100.00	0.011	0.11	100.00		
Other Acute Criteria	0.03	0.019	0.03	50.00	0.019	0.03	50.00		

Receiving Stream Characteristics	Spring			Summer			Winter		
	Chronic NH3 WLA	Acute NH3 WLA	Other Chronic WLA	Chronic NH3 WLA	Acute NH3 WLA	Other Chronic WLA	Chronic NH3 WLA	Acute NH3 WLA	Other Chronic WLA
Chronic NH3 Criteria	0.00	#DIV/0!	%Stream	0.00	#DIV/0!	%Stream	0.00	#DIV/0!	%Stream
Acute NH3 Criteria	Acute NH3 WLA	%Stream	%Stream	Acute NH3 WLA	%Stream	%Stream	Acute NH3 WLA	%Stream	%Stream
Other Chronic Criteria	Chronic WLA	%Stream	%Stream	Chronic WLA	%Stream	%Stream	Chronic WLA	%Stream	%Stream
Other Acute Criteria	0.11	100.00	%Stream	0.11	100.00	%Stream	0.11	100.00	%Stream
0.019	0.03	50.00	%Stream	0.03	50.00	%Stream	0.03	50.00	%Stream

General Data	
Facility Name:	Springfield Creek CWB System
Permit Number:	NE0139891
Date:	7-Dec-22
Permit Writer:	kib
Receiving Stream:	Springfield Creek
Title 117 ID:	LP1-10900
Aquatic Use:	WWB
Pollutant of Concern:	TRC
Coefficient of Variation (CV):	
Spring	0.6
Summer	0.6
Winter	0.6
Samples/Month (N):	4
Chronic (N) day average:	4

Data from WLA Worksheet			
	Spring	Summer	Winter
Effluent Flow in cfs:	0.11	0.11	0.11
1q10 Stream Flow in cfs:	0.1	0.1	0.1
7q10 Stream Flow in cfs:	1	1	1
30q5 Stream Flow in cfs:	1	1	1
% 1q10 used for mixing:	50.00	50.00	50.00
% 7q10 used for mixing:	100.00	100.00	100.00
% 30q5 used for mixing:	100.00	100.00	100.00
Acute WLA:	0.03	0.03	0.03
Chronic WLA:	0.11	0.11	0.11

Calculated WLA Multipliers			
	Spring	Summer	Winter
acute WLA multiplier:	0.321	0.321	0.321
chronic WLA multiplier:	0.527	0.527	0.527
MDL LTA multiplier:	3.11	3.11	3.11
AML LTA multiplier:	1.55	1.55	1.55

Water Quality Based Permit Limit Calculations for:			
TRC			
	Spring	Summer	Winter
Acute WLA	0.03	0.03	0.03
Chronic WLA	0.11	0.11	0.11
Acute LTA	0.01	0.01	0.01
Chronic LTA	0.06	0.06	0.06
Concentration Based Permit Limits:			
Maximum Daily (mg/L)	0.028	0.028	0.028
Average Monthly (mg/L)	0.014	0.014	0.014
Mass Based Permit Limits:			
Maximum Daily (kg/day)	0.01	0.01	0.01
Average Monthly (kg/day)	0.00	0.00	0.00

Whole Effluent Toxicity Limits			
**Based on CV of 0.6			
	Spring	Summer	Winter
Acute WLA	0.44	0.44	0.44
Chronic WLA	10.23	10.23	10.23
Acute LTA	0.14	0.14	0.14
Chronic LTA	5.40	5.40	5.40
Acute Toxicity (TUa)	0.44	0.44	0.44
Chronic Toxicity (TUc)	16.81	16.81	16.81
Permit Limits:			
Acute Toxicity (TUa)	1.00	1.00	1.00

Iron and Manganese

		All Seasons				
Facility	Springfield Creek CWB System					
Program ID	NE013981	1q10 cfs			0.1	
Receiving Water	Springfield Creek	7q10 cfs			1.0	
Segment	LP1-10900	30q5 cfs			1.0	
Stream Flow Source	Default	Chronic NH3 background mg/L				
Confidence	Low	Acute NH3 background mg/L				
Background pollutant source	LP1-10000	Other Chronic background mg/L				
Confidence	Medium	Other Acute background mg/L				
Effluent data source	Facility	Effluent Median MGD			0.07	
Confidence	Medium	Effluent Median cfs			0.11	

		All Seasons					
Receiving Stream Characteristics		Known Average Velocity (ft/s)	Known Average Depth (ft)	Known Average Width (ft)	Stream Slope (ft/mile)	Ls/Lv	Chronic Mixing Zone to 5000 Ft?

		All Seasons					
Chronic NH3 Criteria	Chronic NH3 WLA	% Stream	Chronic NH3 WLA	% Stream	Chronic NH3 Criteria	Chronic NH3 WLA	% Stream
Acute NH3 Criteria	Acute NH3 WLA	%Stream	Acute NH3 WLA	% Stream	Acute NH3 WLA	Acute NH3 WLA	%Stream
Other Chronic Criteria	Chronic WLA	% Stream	Chronic WLA	% Stream	Other Chronic Criteria	Chronic WLA	% Stream
		1	10.23	100.00			
Other Acute Criteria	Acute WLA	%Stream	Acute WLA	% Stream	Other Acute Criteria	Acute WLA	%Stream



Facility Name:	Springfield Creek CWB System
Permit Number:	NE0139891
Date:	7-Dec-22
Permit Writer:	kib
Receiving Stream:	Springfield Creek
Title 117 ID:	LP1-10900
Aquatic Use:	WWB
Pollutant of Concern:	Iron and Manganese
Coefficient of Variation (CV):	
Ag Season	0.6
Samples/Month (N):	4
Chronic (N) day average:	4

**Data from WLA Worksheet**

	Ag Seas
Effluent Flow in cfs:	0.11
1q10 Stream Flow in cfs:	0.1
7q10 Stream Flow in cfs:	1
30q5 Stream Flow in cfs:	1
% 1q10 used for mixing:	0.00
% 7q10 used for mixing:	100.00
% 30q5 used for mixing:	100.00
Acute WLA:	0.00
Chronic WLA:	10.23

**Calculated WLA Multipliers**

	Ag Seas
acute WLA multiplier:	0.321
chronic WLA multiplier:	0.527
MDL LTA multiplier:	3.11
AML LTA multiplier:	1.55

Iron and Manganese		
	Season	
Acute WLA		
Chronic WLA	10.23	
Acute LTA		
Chronic LTA	5.40	
Concentration Based Permit Limits:		
Maximum Daily (mg/L)		16.810
Average Monthly (mg/L)		8.379
Mass Based Permit Limits:		
Maximum Daily (kg/day)		4.45
Average Monthly (kg/day)		2.22



General Data	
Facility Name:	Springfield Creek CWB System
Permit Number:	NE0139891
Date:	7-Dec-22
Permit Writer:	kib
Receiving Stream:	Springfield Creek
Title 117 ID:	LP1-10900
Aquatic Use:	WWB
Pollutant of Concern:	Conductivity
Coefficient of Variation (CV):	
Ag Season	0.6
Samples/Month (N):	4
Chronic (N) day average:	4

Data from WLA Worksheet	
	Ag Seas
Effluent Flow in cfs:	0.11
1q10 Stream Flow in cfs:	0.1
7q10 Stream Flow in cfs:	1
30q5 Stream Flow in cfs:	1
% 1q10 used for mixing:	0.00
% 7q10 used for mixing:	100.00
% 30q5 used for mixing:	100.00
Acute WLA:	0.00
Chronic WLA:	14991.21

Calculated WLA Multipliers	
	Ag Seas
acute WLA multiplier:	0.321
chronic WLA multiplier:	0.527
MDL LTA multiplier:	3.11
AML LTA multiplier:	1.55

Water Quality Based Permit Limit Calculations for:			
Conductivity			
		Ag Seas	
Acute WLA			
Chronic WLA		14991.21	
Acute LTA			
Chronic LTA		7906.87	
Concentration Based Permit Limits:			
Maximum Daily (mg/L)		24625.596	
Average Monthly (mg/L)		12274.813	
Mass Based Permit Limits:			
Maximum Daily (kg/day)		6524.57	
Average Monthly (kg/day)		3252.22	

# Chloride

Springfield Creek CWB System		Spring			Summer			Winter					
Facility	Springfield Creek CWB System	Known Stream Flow (cfs)	Known Average Depth (ft)	Known Average Width (ft)	Stream Slope (ft/mile)	Ls/Lv	Chronic Mixing Zone to 5000 Ft?	Known Stream Flow (cfs)	Known Average Depth (ft)	Known Average Width (ft)	Stream Slope (ft/mile)	Ls/Lv	Chronic Mixing Zone to 5000 Ft?
Program ID	NE013981	1q10 cfs	0.1		0.1			7q10 cfs	1.0		1.0		
Receiving Water	Springfield Creek	30q5 cfs	1.0		1.0			Chronic NH3 background mg/L					
Segment	LP1-10900							Acute NH3 background mg/L					
Stream Flow Source	Default							Other Chronic background mg/L	16.9		19.85		17.85
Confidence	Low							Other Acute background mg/L	22.68		27.6		31.3
Background pollutant source	LP1-10000							Effluent Median MGD	0.07		0.07		0.07
Confidence	Medium							Effluent Median cfs	0.11		0.11		0.11
Effluent data source	Facility												
Confidence	Medium												

Receiving Stream Characteristics		Spring			Summer			Winter		
Chronic NH3 Criteria	Chronic NH3 WLA	% Stream	Chronic NH3 WLA	Chronic NH3 Criteria	Chronic NH3 WLA	% Stream	Chronic NH3 WLA	Chronic NH3 Criteria	Chronic NH3 WLA	% Stream
	0.00	#DIV/0!	0.00		0.00	#DIV/0!	0.00		0.00	#DIV/0!
Acute NH3 Criteria	Acute NH3 WLA	% Stream	Acute NH3 WLA	Acute NH3 Criteria	Acute NH3 WLA	% Stream	Acute NH3 WLA	Acute NH3 Criteria	Acute NH3 WLA	% Stream
	0.00	#DIV/0!	0.00		0.00	#DIV/0!	0.00		0.00	#DIV/0!
Other Chronic Criteria	Chronic WLA	% Stream	Chronic WLA	Other Chronic Criteria	Chronic WLA	% Stream	Chronic WLA	Other Chronic Criteria	Chronic WLA	% Stream
230	2197.61	100.00	230	230	2170.37	100.00	230	230	2188.84	100.00
Other Acute Criteria	Acute WLA	% Stream	Other Acute Criteria	Other Acute Criteria	Acute WLA	% Stream	Other Acute Criteria	Other Acute Criteria	Acute WLA	% Stream
860	1246.56	50.00	860	860	1244.29	50.00	860	860	1242.58	50.00

General Data	
Facility Name:	Springfield Creek CWB System
Permit Number:	NE0139891
Date:	7-Dec-22
Permit Writer:	kib
Receiving Stream:	Springfield Creek
Title 117 ID:	LP1-10900
Aquatic Use:	WWB
Pollutant of Concern:	Chloride
Coefficient of Variation (CV):	
Spring	0.6
Summer	0.6
Winter	0.6
Samples/Month (N):	4
Chronic (N) day average:	4

Data from WLA Worksheet			
	Spring	Summer	Winter
Effluent Flow in cfs:	0.11	0.11	0.11
1q10 Stream Flow in cfs:	0.1	0.1	0.1
7q10 Stream Flow in cfs:	1	1	1
30q5 Stream Flow in cfs:	1	1	1
% 1q10 used for mixing:	50.00	50.00	50.00
% 7q10 used for mixing:	100.00	100.00	100.00
% 30q5 used for mixing:	100.00	100.00	100.00
Acute WLA:	1246.56	1244.29	1242.58
Chronic WLA:	2197.61	2170.37	2188.84

Calculated WLA Multipliers			
	Spring	Summer	Winter
acute WLA multiplier:	0.321	0.321	0.321
chronic WLA multiplier:	0.527	0.527	0.527
MDL LTA multiplier:	3.11	3.11	3.11
AML LTA multiplier:	1.55	1.55	1.55

Water Quality Based Permit Limit Calculations for:			
Chloride			
	Spring	Summer	Winter
Acute WLA	1246.56	1244.29	1242.58
Chronic WLA	2197.61	2170.37	2188.84
Acute LTA	400.25	399.52	398.97
Chronic LTA	1159.09	1144.73	1154.47
Concentration Based Permit Limits:			
<b>Maximum Daily (mg/L)</b>	<b>1246.560</b>	<b>1244.289</b>	<b>1242.581</b>
<b>Average Monthly (mg/L)</b>	<b>621.357</b>	<b>620.225</b>	<b>619.374</b>
Mass Based Permit Limits:			
<b>Maximum Daily (kg/day)</b>	<b>330.28</b>	<b>329.68</b>	<b>329.22</b>
<b>Average Monthly (kg/day)</b>	<b>164.63</b>	<b>164.33</b>	<b>164.10</b>

Whole Effluent Toxicity Limits			
**Based on CV of 0.6			
	Spring	Summer	Winter
Acute WLA	0.44	0.44	0.44
Chronic WLA	10.23	10.23	10.23
Acute LTA	0.14	0.14	0.14
Chronic LTA	5.40	5.40	5.40
Acute Toxicity (TUa)	0.44	0.44	0.44
Chronic Toxicity (TUc)	16.81	16.81	16.81
Permit Limits:			
<b>Acute Toxicity (TUa)</b>	<b>1.00</b>	<b>1.00</b>	<b>1.00</b>





General Data	
Facility Name:	Springfield Creek CWB System
Permit Number:	NE0139891
Date:	6-Jan-23
Permit Writer:	kib
Receiving Stream:	Springfield Creek
Title 117 ID:	LP1-10900
Aquatic Use:	WWB
Pollutant of Concern:	Sulfate
Coefficient of Variation (CV):	
Spring	0.6
Summer	0.6
Winter	0.6
Samples/Month (N):	4
Chronic (N) day average:	4

Data from WLA Worksheet			
	Spring	Summer	Winter
Effluent Flow in cfs:	0.11	0.11	0.11
1q10 Stream Flow in cfs:	0.1	0.1	0.1
7q10 Stream Flow in cfs:	1	1	1
30q5 Stream Flow in cfs:	1	1	1
% 1q10 used for mixing:	100.00	100.00	100.00
% 7q10 used for mixing:	100.00	100.00	100.00
% 30q5 used for mixing:			
Acute WLA:	1753.18	1753.18	1753.18
Chronic WLA:			

Calculated WLA Multipliers			
	Spring	Summer	Winter
acute WLA multiplier:	0.321	0.321	0.321
chronic WLA multiplier:	0.527	0.527	0.527
MDL LTA multiplier:	3.11	3.11	3.11
AML LTA multiplier:	1.55	1.55	1.55

Water Quality Based Permit Limit Calculations for: Sulfate			
	Spring	Summer	Winter
Acute WLA			
Chronic WLA	1753.18	1753.18	1753.18
Acute LTA			
Chronic LTA	924.68	924.68	924.68
<b>Concentration Based Permit Limits:</b>			
Maximum Daily (mg/L)	2879.9	2879.9	2879.9
Average Monthly (mg/L)	1435.5	1435.5	1435.5
<b>Mass Based Permit Limits:</b>			
Maximum Daily (kg/day)	763.0	763.0	763.0
Average Monthly (kg/day)	380.3	380.3	380.3

# Receiving Stream Data

Segment	Station #	DATE	Month	Temp	pH	Conductivity	Ammonia	Chloride
LP1-10000	SLP1PLATT150	03/14/2013	3	1.81	8.37	450	0.18	12.8
LP1-10000	SLP1PLATT150	03/04/2014	3	0.06	8.24	731	0.05	33.6
LP1-10000	SLP1PLATT150	2015-03-03	3	0.1	7.7	651	0.060	18.8
LP1-10000	SLP1PLATT150	2016-03-08	3	8.8	8.5	771	0.063	24.0
LP1-10000	SLP1PLATT150	04/03/2013	4	9.21	8.69	461	0.05	11.9
LP1-10000	SLP1PLATT150	04/07/2014	4	11.84	8.44	518	0.05	14.1
LP1-10000	SLP1PLATT150	2015-04-09	4	10.0	8.7	637	0.050	20.0
LP1-10000	SLP1PLATT150	2016-04-05	4	14.1	8.6	749	0.050	15.0
LP1-10000	SLP1PLATT150	05/01/2013	5	14.33	8.77	509	0.0795	14.7
LP1-10000	SLP1PLATT150	05/07/2014	5	20.66	8.39	516	0.05	17.1
LP1-10000	SLP1PLATT150	2015-05-04	5	13.9	7.9	598	0.050	16.9
LP1-10000	SLP1PLATT150	2015-05-11	5	14.6	8.7	660	0.051	15.9
LP1-10000	SLP1PLATT150	2015-05-20	5	14.4	8.8	700	0.050	20.2
LP1-10000	SLP1PLATT150	2015-05-27	5	21.3	8.5	675	0.050	20.7
LP1-10000	SLP1PLATT150	2016-05-03	5	13.1	8.1	524	0.250	9.0
<b>Spring</b>			<b>Median</b>	<b>13.10</b>	<b>8.50</b>	<b>637.00</b>	<b>0.05</b>	<b>16.90</b>
			<b>Crit 90%</b>	<b>18.24</b>	<b>8.74</b>	<b>741.64</b>	<b>0.14</b>	<b>22.68</b>
<b>Ag Seas</b>			<b>Median</b>			<b>593.00</b>		
LP1-10000	SLP1PLATT150	06/05/2013	6	20.42	8.27	526	0.05	10.5
LP1-10000	SLP1PLATT150	06/03/2014	6	23.39	8.63	556	0.05	14.2
LP1-10000	SLP1PLATT150	2015-06-03	6	19.7	8.5	708	0.050	27.6
LP1-10000	SLP1PLATT150	2015-06-08	6	24.3	8.4	698	0.050	27.6
LP1-10000	SLP1PLATT150	2015-06-15	6	22.7		733	0.076	19.5
LP1-10000	SLP1PLATT150	2015-06-22	6	26.3	8.5	691	0.050	24.4
LP1-10000	SLP1PLATT150	2015-06-29	6	26.0	8.6	701	0.050	27.6
LP1-10000	SLP1PLATT150	2016-06-08	6	23.3	8.4	727	0.073	24.0
LP1-10000	SLP1PLATT150	07/01/2013	7	27.72	8.55	550	0.107	11.6
LP1-10000	SLP1PLATT150	07/08/2014	7	25.74	8.26	617	0.08	13.5
LP1-10000	SLP1PLATT150	2015-07-08	7	25.2	8.5	715	0.050	26.7
LP1-10000	SLP1PLATT150	2015-07-14	7	32.2	8.6	728	0.050	31.9
LP1-10000	SLP1PLATT150	2015-07-22	7	27.4	8.9	714	0.050	26.6
LP1-10000	SLP1PLATT150	2015-07-28	7	28.7	8.8	617	0.050	26.5
LP1-10000	SLP1PLATT150	2016-07-07	7	25.2	8.4	593	0.114	18.2
LP1-10000	SLP1PLATT150	08/07/2013	8	26.36	8.92	367	0.065	9.64
LP1-10000	SLP1PLATT150	08/06/2014	8	24.38	8.55	619	0.05	47.3
LP1-10000	SLP1PLATT150	2015-08-04	8	24.6	8.7	588	0.052	20.6
LP1-10000	SLP1PLATT150	2015-08-10	8	27.8	8.9	531	0.050	25.6
LP1-10000	SLP1PLATT150	2015-08-17	8	25.1	8.8	553	0.054	24.3
LP1-10000	SLP1PLATT150	2015-08-25	8	22.1	8.8	564	0.050	21.7
LP1-10000	SLP1PLATT150	2016-08-04	8	28.0	7.9	397	0.098	9.6
LP1-10000	SLP1PLATT150	09/06/2013	9	23.91	8.82	458	0.05	22.5
LP1-10000	SLP1PLATT150	09/08/2014	9	19.83	8.37	618	0.12	14.1
LP1-10000	SLP1PLATT150	2015-09-01	9	23.1	8.2	543	0.050	14.7
LP1-10000	SLP1PLATT150	2015-09-10	9	23.4	8.7	540	0.063	15.0
LP1-10000	SLP1PLATT150	2015-09-16	9	22.6	9.0	518	0.050	18.9
LP1-10000	SLP1PLATT150	2015-09-23	9	21.1	8.4	536	0.058	20.2
LP1-10000	SLP1PLATT150	2015-09-30	9	15.2	8.4	671	0.063	13.6
LP1-10000	SLP1PLATT150	2016-09-05	9	24.9	8.8	570	0.150	27.4
LP1-10000	SLP1PLATT150	10/08/2013	10	13.89	8.34	531	0.0508	19.3
LP1-10000	SLP1PLATT150	10/06/2014	10	13.34	8.28	581	0.05	13.5
LP1-10000	SLP1PLATT150	2015-10-05	10	12.9	8.8	714	0.055	17.7
LP1-10000	SLP1PLATT150	2016-10-11	10	17.1	8.6	694	0.100	15.4
<b>Summer</b>			<b>Median</b>	<b>24.11</b>	<b>8.55</b>	<b>590.50</b>	<b>0.05</b>	<b>19.85</b>
			<b>Crit 90%</b>	<b>27.78</b>	<b>8.88</b>	<b>714.70</b>	<b>0.10</b>	<b>27.60</b>
LP1-10000	SLP1PLATT150	01/16/2013	1	0.02	7.82	543	0.0661	16.6
LP1-10000	SLP1PLATT150	01/08/2014	1	0.04	7.26	643	0.05	20.0
LP1-10000	SLP1PLATT150	2015-01-05	1	0.1	7.6	870	0.100	21.9
LP1-10000	SLP1PLATT150	2016-01-13	1	0.0	8.2	682	0.056	16.6
LP1-10000	SLP1PLATT150	02/06/2013	2	0.25	8.51	482	0.05	13.6
LP1-10000	SLP1PLATT150	02/11/2014	2	0.02	7.61	697	0.05	35.2
LP1-10000	SLP1PLATT150	2015-02-05	2	0.0	7.4	754	0.066	31.8
LP1-10000	SLP1PLATT150	2016-02-08	2	0.2	8.4	654	0.176	18.5
LP1-10000	SLP1PLATT150	11/12/2013	11	1.44	7.01	630	0.05	19.8
LP1-10000	SLP1PLATT150	11/04/2014	11	9.72	7.59	583	0.05	13.8
LP1-10000	SLP1PLATT150	2015-11-02	11	11.9	8.4	632	0.050	16.9
LP1-10000	SLP1PLATT150	2016-11-16	11	9.7	8.3	633	0.050	17.6
LP1-10000	SLP1PLATT150	12/03/2013	12	0.84	7.47	605	0.085	18.1
LP1-10000	SLP1PLATT150	12/08/2014	12	2.01	7.24	626	0.15	17.1
LP1-10000	SLP1PLATT150	2015-12-09	12	4.2	8.6	701	0.052	16.9
LP1-10000	SLP1PLATT150	2016-12-15	12	-0.1	8.6	847	0.071	30.8
<b>Winter</b>			<b>Median</b>	<b>0.23</b>	<b>7.72</b>	<b>637.90</b>	<b>0.05</b>	<b>17.85</b>
			<b>Crit 90%</b>	<b>9.71</b>	<b>8.56</b>	<b>800.50</b>	<b>0.13</b>	<b>31.30</b>

SEGMENT	STATION #	DATE	MONTH	SULFATE
LP1-10000	SLP1PLATT150	2019-10-08	10	91.9
LP1-10000	SLP1PLATT150	2019-11-06	11	
LP1-10000	SLP1PLATT150	2019-12-12	12	87.2
LP1-10000	SLP1PLATT150	2020-01-08	1	89
LP1-10000	SLP1PLATT150	2020-02-12	2	90.1
LP1-10000	SLP1PLATT150	2020-03-03	3	84
LP1-10000	SLP1PLATT150	2020-04-01	4	
LP1-10000	SLP1PLATT150	2020-05-08	5	93.7
LP1-10000	SLP1PLATT150	2020-06-08	6	91.5
LP1-10000	SLP1PLATT150	2020-07-01	7	87.9
LP1-10000	SLP1PLATT150	2020-08-05	8	79.9
LP1-10000	SLP1PLATT150	2020-09-01	9	72.5
LP1-10000	SLP1PLATT150	2020-10-05	10	57.8
LP1-10000	SLP1PLATT150	2020-11-02	11	60
LP1-10000	SLP1PLATT150	2020-12-01	12	67.4
			Median	87.2

