



pennsylvania
DEPARTMENT OF ENVIRONMENTAL
PROTECTION

January 11, 2018

Tom Joseph
Epiphany Allegheny LLC
1435 Bedford Avenue
Pittsburgh, PA 15219-3675

Re: Technical Deficiencies
Epiphany Allegheny LLC
Application No. 5317201
Authorization ID No. 1196604
Eulalia Township, Potter County

Dear Mr. Joseph:

The Department of Environmental Protection (DEP) continues its technical review of your application for a Water Quality Management (WQM) permit. We have determined that your application contains technical deficiencies or requires clarifications that must be addressed before DEP may resume its technical review. Please address the following deficiencies within 15 business days from the date of this letter:

- 1) Provisions must be made for metering and sampling both influent flow volumes and parameter concentrations as well as effluent volumes and parameter concentrations.
 - a) Please clarify the proposed influent sampling plan.
 - b) Please clarify the proposed effluent monitoring sampling locations for volumes and parameter concentrations of effluent returned to the industry.
 - c) Please clarify the proposed effluent monitoring sampling locations for volumes and parameter concentrations of effluent discharged to the POTW.
 - i) Will the proposed physical sampling and volumetric monitoring facility be incorporated into CAMA's permit or Epiphany's permit?
- 2) Please clarify or otherwise demonstrate the site stormwater capture and discharge compliance intention.
 - a) For 100% capture within all operating areas, similar to a traditional WMGR123, an NPDES PAG-03 for Industrial Stormwater may be waived.
 - b) For stormwater discharge from an operating area, an NPDES PAG-03 for Industrial Stormwater (or equivalent) is required.
- 3) Please provide site design drawings similar to those provided for E&S purposes to justify the stormwater intent of #2 above.
- 4) Please clarify whether a future site expansion beyond that shown in the WQM should be considered at this time. The application calls for two (2) crystallization units and a maximum treatment capacity of 1,000 barrels (42,000 gallons) per day.

Mr. Tom Joseph

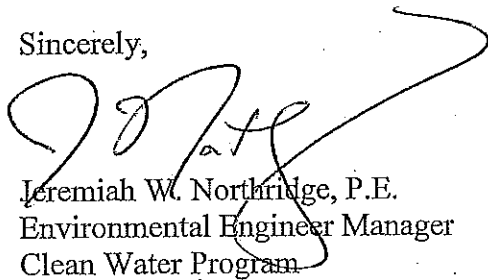
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- 5) Please provide the anticipated submission date of the CAMA NPDES Amendment/Change in Waste Stream information. This information is necessary to prepare appropriate Pre-Treatment Standards for the Epiphany facility.
 - a) Upon approval and implementation of Pre-Treatment Standards, Epiphany may pursue the PBR from the Waste Management program.

If you will require more time to respond to these deficiencies, or to discuss the deficiencies, please me at 570.321.6560. If your application is part of DEP's "Permit Decision Guarantee" Policy, the guarantee is considered void.

Sincerely,

A handwritten signature in black ink, appearing to read "J. Northridge", with a large, sweeping flourish extending to the right.

Jeremiah W. Northridge, P.E.
Environmental Engineer Manager
Clean Water Program

cc: Tetra Tech Inc.

Northridge, Jere (P.E.)

From: Tommy Joseph <tom@epiphanysws.com>
Sent: Thursday, January 11, 2018 3:25 PM
To: Northridge, Jere (P.E.); Michael Broeker
Cc: Kohl, Marcus J; Randis, Thomas
Subject: RE: Epiphany - Site clarifications

Jere:

Thank you for your email.

Brief answers to some of the questions are as follows. We will provide more formal responses asap, but this will provide some direction.

1a) We will monitor influent flow by measuring our storage tank levels before and after each load is accepted and confirming that what we received matches with the bill of lading provided by the shipper. We will provide a copy of our detailed influent quality sampling plan by next week.

1b & c) Effluent water sampling, monitoring, and quality will be the same, regardless of whether it is for re-use or for discharge. We have designed our system to provide triple redundancy on the effluent water measurements to provide 100% assurance of its quality prior to reuse or discharge. We will provide a copy of our detailed effluent quality sampling plan by next week.

2 & 3) We sized our secondary containment area and treatment capacity to allow capture and treatment of 100% of the storm water within operating areas. Those calculations are already included in the application but may not be adequately described. I will get with our team and make sure we provide you with what you need to clarify those intentions.

4) Future site expansion beyond 1000 BBL/Day should not be considered at this time.

Thanks,
Tom Joseph

-----Original Message-----

From: Northridge, Jere (P.E.) [mailto:jnorthridg@pa.gov]
Sent: Thursday, January 11, 2018 2:55 PM
To: Tommy Joseph <tom@epiphanysws.com>; Michael Broeker <mbroeker@epiphanysws.com>
Cc: Kohl, Marcus J <mkohl@pa.gov>; Randis, Thomas <trandis@pa.gov>
Subject: Epiphany - Site clarifications

Gentlemen:

First, the CAMA NPDES Amendment has been received by this office and will be processed in a timely fashion.

Second, attached is a short list of items for clarification at the site. A hardcopy will be leaving the office today, but I wanted to provide an advanced copy with the pending holiday weekend. One question is whether the facility has any intention of producing two (2) variants of effluent quality; one quality for re-sale to the industry and a second variant for discharge to the CAMA facility -- or will all effluent of identical quality be stored in a common tank for dual purposes.

Enjoy the weekend and thank you for getting the NPDES Amendment to us.

- Jere

Jeremiah Northridge | Environmental Engineer Manager Department of Environmental Protection | Clean Water North
Central Regional Office

208 West Third Street Suite 101 | Williamsport PA 17701

Phone: 570.321.6560 | Fax: 570.327.3565

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ata=rjwDAv%2Fd5CX%2BK0Yne%2Fdg7NxrjQpwwF2%2FFWUY%2FZq%2B2Co%3D&reserved=0](https://na01.safelinks.protection.outlook.com/?url=www.dep.pa.gov&data=02%7C01%7Cjnorthridg%40pa.gov%7Cc39bd4d15ae44c0306db08d55931565a%7C418e284101284dd59b6c47fc5a9a1bde%7C1%7C0%7C636512990814153194&sd
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