Pennsylvania Department of Environmental Protection

Northeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0008885**
Facility Type	**Industrial**	APS ID	**547599**
Major / Minor	**Major**	Authorization ID	**1386762**

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

Applicant and Facility Information

Applicant Name	**The Procter & Gamble Paper Products Company**	Facility Name	**The Procter & Gamble Paper Products Company WWTP**
Applicant Address	PO Box 32 Mehoopany, PA 18629-0032	Facility Address	5188 Route 87 Mehoopany, PA 18629
Applicant Contact	Bill Shaw	Facility Contact	Bill Shaw
Applicant Phone	(570) 240-0395	Facility Phone	(570) 240-0395
Client ID	113580	Site ID	237269
SIC Code	2621,2676	Municipality	Washington Township
SIC Description	Manufacturing - Paper Mills, Manufacturing - Sanitary Paper Products	County	Wyoming
Date Application Received	February 24, 2022	EPA Waived?	No
Date Application Accepted	February 24, 2022	If No, Reason	Major Facility, Significant CB Discharge
Purpose of Application	Renewal of NPDES permit.		

Summary of Review

The applicant is requesting renewal of an NPDES permit to discharge treated industrial wastewater and stormwater to the Susquehanna River, a Warm Water & Migratory Fish (WWF, MF) receiving water in State Water Plan Basin 04-G (Mehoopany-Bowman Creeks). Stormwater is also discharged to an unnamed tributary to the Susquehanna River which is classified as a Cold Water & Migratory Fish (CWF, MF) receiving water. As per the Department's current existing use list, the receiving streams do not have existing use classifications that are more protective than the designated uses. The discharge is not expected to affect public water supplies. The 2024 Integrated Water Quality Report indicates this segment of the Susquehanna River is supporting aquatic life and also impaired for fish consumption from unknown source(s) of polychlorinated biphenyls (PCBs) and mercury.

The facility falls under the following industrial classifications: SIC 2621 – Paper Mills and SIC 2676 – Sanitary Paper Products. The discharge is subject to Effluent Limitations Guidelines (ELG) for the “Pulp, Paper and Paperboard” Industrial Category (40 CFR Part 430), Subpart L – Tissue, Filter, Non-Woven, and Paperboard from Purchased Pulp Subcategory.

Outfall 001

For Outfall 001, effluent limitations are based on an effluent discharge of 8.47 MGD, which is the average flow during production. The industrial wastewater consists of process wastewater, non-contact cooling water, sanitary wastewater, and groundwater from the closed sanitary landfill.

The BPT limits for $CBOD_5$ and TSS were calculated using the production-based ELG for the facility (Subpart L). The more stringent mass-based limitations from the previous renewal were calculated using a slightly lower production rate and are carried over in this renewal. The limitations calculated during this renewal utilize confidential production information and are not attached to this fact sheet. The calculations will be filed separately in DEP’s systems. $CBOD_5$ will continue to be used in the permit as an equivalent for BOD_5 which is used in the ELG. The existing pH limits of 6.0 - 9.0 S.U. are technology-based

Approve	Deny	Signatures	Date
X		Brian Burden, E.I.T. / Project Manager	March 13, 2025
X		Edward Dudick, P.E. / Environmental Engineer Manager	March 17, 2025

Summary of Review

requirements per Chapter 95, which are more stringent than the ELG-based requirements of 5.0 to 9.0. The TRC limits are facility-specific BAT limits developed during a previous renewal and carried over in this permit.

The discharge was modeled using DEP's Toxics Management Spreadsheet (TMS) with the Pollutant Group sampling data from the permit renewal application. For modeling inputs, the drainage areas were delineated using USGS's StreamStats interactive map, RMIs were obtained from DEP's eMapPA historic stream layer and "measure" tool, and elevations were obtained from the elevation profile tool of StreamStats (see Watershed Information attachment). The low-flow yield for the Susquehanna River was obtained from nearby stream gage 01533400 (Susquehanna River at Meshoppen, PA). Stream and discharge hardness values were obtained from the permit renewal application. Background concentrations were not input since both upstream WQN station 304 (near Laceyville) and downstream station 323 (near Falls) are both inactive. The TMS made the following recommendations:

- Total Copper: The maximum reported concentration in the Pollutant Group sampling was 5 µg/L. Since the governing WQBEL is 20.4 µg/L, monitoring & reporting requirements were recommended. Quarterly monitoring & reporting requirements are added to this renewal.

- Total Zinc: The maximum reported concentration in the Pollutant Group sampling was 45 µg/L. Since the governing WQBEL is 178 µg/L, monitoring & reporting requirements were recommended. Quarterly monitoring & reporting requirements are added to this renewal.

Data collected for Total Copper and Total Zinc can be used to model the long-term average (instead of the maximum reported concentration) during the next renewal to help determine if monitoring requirements need to continue.

Acrylamide was not modeled with the TMS since all sample results were non-detect and DEP doesn't currently have target QLs for this pollutant.

The public water supply-sensitive pollutants were not modeled at the nearest downstream public water supply intake location due to the large distance (~92 stream miles) and available dilution.

Hexavalent chromium was monitored yearly as recommended by the Toxics Analysis 2.3 during the previous renewal. The maximum reported concentration for hexavalent chromium that was detected in the discharge since the previous permit effective date (9/1/2017) was 0.28 µg/L. After modeling that concentration with the TMS, no requirements were recommended. Therefore, the yearly monitoring & reporting requirements for hexavalent chromium are removed from this renewal.

In accordance with the Department's "Policy and Procedure for NPDES Permitting of Discharges of Total Dissolved Solids (TDS) – 25 Pa. Code §95.10" (Document No. 385-2100-002, November 12, 2011), this is an existing discharge with TDS loadings authorized prior to August 21, 2010. The reported maximum TDS concentration in the application for Outfall 001 is 348 mg/l. The discharge would be classified as "unaffected" per Section VI. of the guidance, and has no reasonable potential to challenge the TDS concentration of 2,000 mg/l contained in §95.10(c). Therefore, no limit or monitoring is needed based on the policy.

To quantify nutrient reduction needs, maximum nutrient loads (cap loads) for each major watershed tributary to the Chesapeake Bay were established. This included allocation of cap loads for Total Nitrogen (TN) and Total Phosphorus (TP) in Pennsylvania for the Potomac and Susquehanna watersheds. The allocations assigned for TN and TP for this facility are 100,360 lbs/yr and 5,441 lbs/yr, respectively (see PA DEP's *Phase 3 Watershed Implementation Plan Wastewater Supplement*, revised 9/13/2021). Twice per week monitoring requirements for Total Kjeldahl Nitrogen, Nitrate+Nitrite-Nitrogen, and Total Phosphorus are continued in this renewal along with monthly and annual mass load reporting requirements.

Summary of Review

Table 7: Significant IW Facilities That Have Received Final Cap Loads.

NPDES Permit No.	Facility	Latest Permit Issuance Date	Permit Expiration Date	Cap Load Compliance Start Date	TN Cap Load (lbs/yr)	TP Cap Load (lbs/yr)	TN Delivery Ratio	TP Delivery Ratio
PA0008885	Proctor & Gamble Paper Products	8/25/17	8/31/22	10/1/11	100,360	5,441	0.733	0.436

A Total Maximum Daily Load (TMDL) applies to the main stem of the Susquehanna River downstream of the facility from the PA Route 92 bridge at Falls (River Mile 208.8) to the confluence with the West Branch Susquehanna River (River Mile 125.5) near Water Quality Network (WQN) station 323. There are no waste load allocations (WLAs) for this facility.

The TMDL at sampling point WQN323 consists of a load allocation to all the area upstream of this point. The load allocation for this segment of the Susquehanna River was computed using water-quality sample data collected at point WQN323. Table D2 below shows the measured and allowable concentrations and loads at WQN323.

Table D2		Measured		Allowable	
		Concentration	Load	Concentration	Load
		mg/L	lbs/day	mg/L	lbs/day
	Aluminum	0.57	54,091.52	0.09	8,654.64
	Iron	0.78	73,536.28	0.17	16,177.98
	Manganese	0.06	5,916.28	0.06	5,916.28
	Alkalinity	58.18	5,485,167.82		

The permit renewal application included 3 sample results for aluminum, iron, and manganese. The average values reported at Outfall 001 were: aluminum 0.080 mg/L, iron 0.1 mg/L, manganese 0.044 mg/L. These average concentrations are all below the allowable concentrations at WQN323.

Intake monitoring/reporting requirements for flow, Ammonia-N, TKN, NO_2+NO_3-N, TN & TP are carried over from the previous renewal.

The permittee was required to obtain monthly Fecal Coliform samples at the effluent of the biological treatment system. This requirement wasn't included in Part A of previously issued permits (or eDMR). The monthly Fecal Coliform sampling requirement and 200 No./100mL geometric mean limitation is added to Part A of this renewal and eDMR. A note is added under the Part A table that specifies samples shall be obtained at the effluent of the biological treatment system. The Part C special condition regarding the fecal coliform limitation and sampling location (see below) is left in the permit as a reminder of the requirements. Yearly effluent monitoring/reporting requirements for E. Coli are added to this renewal as per current DEP guidance since part of the discharge is treated sewage effluent. E. Coli shall be monitored at the same location as Fecal Coliform.

<u>Outfall 003</u>

Outfall 003 consists of emergency spill basin overflow and process area stormwater and will continue to be monitored for pH and flow when discharging.

<u>Outfalls 002, 004, 006 & 007</u>

The standard PAG-03 Appendix E (Paper and Allied Products) requirements apply to stormwater Outfalls 002, 004, 006 and 007. Semiannual monitoring/reporting is required for pollutants in the table below:

Summary of Review

Pollutant	Monitoring Requirements [1],[2]		Benchmark Values
	Minimum Measurement Frequency	Sample Type	
Total Nitrogen (mg/L) [3]	1 / 6 months	Calculation	XXX
Total Phosphorus (mg/L)	1 / 6 months	Grab	XXX
pH (S.U.)	1 / 6 months	Grab	9.0
Chemical Oxygen Demand (COD) (mg/L)	1 / 6 months	Grab	120
Total Suspended Solids (TSS) (mg/L)	1 / 6 months	Grab	100

The benchmark values above are not effluent limitations, and exceedances do not constitute permit violations. However, if the permittee's sampling demonstrates exceedances of benchmark values for two or more consecutive monitoring periods, the permittee shall take action in accordance with Part C.IV.F.7 of the permit.

Outfalls 002 & 004 discharge directly to the Susquehanna River and Outfalls 006 & 007 discharge to an unnamed tributary to the Susquehanna River (identified as Carney Creek in the renewal application).

Other Permit Requirements

The facility is not subject to 316(b) regulations since the facility uses approximately 3.6% of intake water for cooling purposes (> 25% needed). Approximately 5.27 MGD of water is withdrawn from the Susquehanna River and the two intakes have a design flow of 11.77 MGD. The permit application states: "*P&G Mehoopany has installed a screen meeting the requirements of Section 316(b) of the Clean Water Act on both water intake structures to prevent the impingement or entrainment of organisms in the Susquehanna River. A diving team is contracted annually to inspect and clean the intake structures to maintain them, and repairs are made as needed.*"

All chemical additives used at the facility have been previously approved by DEP.

In addition to the template Part C.II (Other Requirements), the following additional site-specific conditions are carried over without change from the previous permit under Part C.II:

- Unless otherwise specified by the Department, the permittee shall conduct annually a biological river survey under the auspices of a reputable consultant to determine long range effects of the waste discharge until such time as the design discharge wastewater volume and loadings are reached. A report of the survey is to be submitted to the department within ninety (90) days after the study terminates.

- Discharge (001) shall not cause a rise in the stream temperature of more than 5°F above the ambient or a maximum of 87°F, whichever is less; not to be changed by more than 2°F during any one-hour period.

- The limits from Outfall 001 shall include the solids from the water treatment plant backwash.

- The geometric mean of the fecal coliform bacteria values for effluent samples collected during any one calendar month shall not exceed 200 per 100 milliliters. The samples are to be taken at the effluent from the biological treatment system.

- The permittee may utilize an alternate discharge pipe for Outfall 001 when excessive river flows prevent complete release through the river bottom diffusers.

- This facility is subject to Effluent Limitations Guidelines found in 40 CFR 430 Subpart L. Section 430.124 requires that permittees subject to Subpart L that are not using chlorophenolic-containing biocides must certify to the permit-issuing authority that they are not using these biocides. The permittee shall provide certification with each permit renewal application that the chlorophenolic compounds listed in 40 CFR 430.124 (Pentachlorophenol and Trichlorophenol) are not used at this facility.

The following template Part C special conditions are carried over in this renewal:

Summary of Review

- Part C.I – Chesapeake Bay Nutrient Requirements
- Part C.III – Chemical Additives
- Part C.IV – Requirements Applicable to Stormwater Outfalls

This type of facility has been identified by the EPA as being a potential source of PFAS. PFAS monitoring requirements are now included in Part A and described further in Part C.V. The permittee shall monitor for PFOA, PFOS, HFPO-DA and PFBS quarterly at Outfall 001. The permittee may discontinue monitoring for PFOA, PFOS, HFPO-DA, and PFBS if the results in 4 consecutive monitoring periods indicate non-detect results at or below Quantitation Limits of 4.0 ng/L for PFOA, 3.7 ng/L for PFOS, 3.5 ng/L for PFBS and 6.4 ng/L for HFPO-DA. When monitoring is discontinued, permittees must enter a No Discharge Indicator (NODI) Code of "GG" on DMRs.

Part C.VI is added to this renewal to address use of aqueous film forming foam (AFFF). The permittee shall update their Preparedness, Prevention and Contingency (PPC) Plan within 1 year of permit issuance to include measures to reduce PFAS discharges due to the use of AFFF.

Outfall coordinates were updated in eFACTS with the coordinates provided in the permit renewal application.

TMS PA0008885.pdf

Watershed Information.pdf

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	8.47
Latitude	41º 34' 6.80"	Longitude	-76º 2' 9.87"
Quad Name	Meshoppen	Quad Code	0637
Wastewater Description:	IW Process Effluent with ELG		

Receiving Waters	Susquehanna River	Stream Code	6685
NHD Com ID	66406477	RMI	214.2
Drainage Area	8,870 mi^2	Yield (cfs/mi^2)	0.074
Q_{7-10} Flow (cfs)	656	Q_{7-10} Basis	Gage 01533400
Elevation (ft)	601	Slope (ft/ft)	0.0006
Watershed No.	4-G	Chapter 93 Class.	WWF, MF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Impaired		
Cause(s) of Impairment	Mercury, Polychlorinated Biphenyls (PCBs)		
Source(s) of Impairment	Unknown Source(s)		
TMDL Status	-	Name	-

Background/Ambient Data		Data Source
pH (SU)	-	-
Temperature (°F)	-	-
Hardness (mg/L)	-	-
Other:	-	-

Nearest Downstream Public Water Supply Intake	Danville Municipal Water Authority		
PWS Waters	Susquehanna River	Flow at Intake (cfs)	1123
PWS RMI	122.5	Distance from Outfall (mi)	~92