pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

NPDES PERMIT FACT SHEET

Application Type	**Renewal**	Application No.	**PA0012637**
Facility Type	**Industrial**	APS ID	**1092916**
Major / Minor	**Major**	Authorization ID	**1447468**

Applicant and Facility Information

Applicant Name	**Monroe Energy LLC**	Facility Name	**Trainer Refinery**
Applicant Address	Trainer Refinery, 4101 Post Road	Facility Address	4101 Post Road
	Trainer, PA 19061-5052		Trainer, PA 19061
Applicant Contact	Mark Schuck	Facility Contact	Elizabeth Clapp
Applicant Phone	(610) 364-8082	Facility Phone	(610) 364-8395
Client ID	296139	Site ID	270501
SIC Code	2911	Municipality	Trainer Borough
SIC Description	Manufacturing - Petroleum Refining	County	Delaware
Date Application Received	June 2, 2023	EPA Waived?	No
Date Application Accepted		If No, Reason	Major Facility

Purpose of Application: Permit Renewal

Approve	Return	Deny	Signatures	Date
X			*Sara Abraham* Sara Reji Abraham, E.I.T. / Project Manager	January 28, 2025
X			*Pravin Patel* Pravin C. Patel, P.E. / Environmental Engineer Manager	01/28/2025

Summary of Review

Draft permit was issued on February 14, 2024.

The following comments were received from EPA:

Hi Sara,

Thank you for granting EPA a 15-day extension to review and provide comments on the Monroe Energy permit. I am sending these comments on behalf of Jennifer Fulton who is out of the office. Please let me know if you have any questions.

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Monroe Energy, LLC
NPDES Number: PA0012637
EPA Received: February 8, 2024
30-day Due Date: March 17, 2024, however, PADEP granted a 15-day extension to April 1, 2024.

This is a major industrial permit discharging to Marcus Hook Creek, Stoney Creek, and the Delaware River and is affected by the Delaware River PCB TMDL. EPA has chosen to perform a limited review based on the assumptions and requirements of the TMDL, 316(b) requirements, and the applicable ELGs.

1. The permit includes TBELs at IMP 201 that are based on the ELGs at 40 CFR Part 419. The fact sheet identifies the basis for these TBELs but does not document how these TBELs were calculated. The fact sheet should include an explanation of how the ELGs were calculated including what flows or production values used in deriving the TBELs.
2. The permit includes net limits for TSS at IMP 101; however, it is unclear whether the TSS limits are TBELs or WQBELs. Pollutant credits in the form of net limits may be applied to TBELs in accordance with 122.45(g). Please clarify whether the TSS limits at IMP 101 are WQBELs or TBELs.

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary.

Thanks,
Carissa

DEP Responses were sent to EPA via email on June 14, 2024.

The TBELs for IMP 201 in the first draft permit were carried over from the previous permit, however we were not able to locate the previous TBELs calculations. Therefore, based on the ELGs listed in 40 CFR Part 419, Petroleum Refining Point Source Category, the effluent limitations for IMP 201 discharge are re-developed as follows:

Summary of Review

EFFLUENT PARAMETER	TECHNOLOGY BASED LIMITS								
	BPT				BAT				
	MONTHLY AVERAGE		DAILY MAXIMUM		MONTHLY AVERAGE		DAILY MAXIMUM		
	CONC. (MG/L)	LOAD (LBS/DAY)	CONC. (MG/L)	LOAD (LBS/DAY)	CONC. (MG/L)	LOAD (LBS/DAY)	CONC. (MG/L)	LOAD (LBS/DAY)	BASIS FOR LIMIT
BOD5		2770		4986					40 CFR 419.24 (a)
TSS		2216		3475					40 CFR 419.24 (a)
Oil and Grease		806		1511					40 CFR 419.24 (a)
COD*						19341		37271	40 CFR 419.23 (a)
Ammonia as N						1511		3324	40 CFR 419.23 (a)
Sulfide						14.6		32.7	40 CFR 419.23 (a)
Phenolics		18.1		37.3		13		53.7	40 CFR 419.22 (a) and 419.23(c)(1)(i)
Total Chromium		44.3		75.5		15.2		43.7	40 CFR 419.22(a) and 419.23 (c)(1)(i)
Hexavalent Chromium		2.8		6.0		1.2		2.8	40 CFR 419.22 (a) and 419.23(c)(1)(i)

Current calculations are based on a rate of 189,000 barrels per calendar day. This is the maximum average annual production rate during the last 5 years. According to 40 CFR 419, the size factor and process factor are determined by the facility capacity in 1,000 bbl of feedstock per stream day. Monroe's stream day capacity is 208,000 barrels per day as reported to US Energy Information Administration (EIA).

The size factor (1.41) and process factor (1.89) for the refinery are determined as shown below*:

(The past calculations were conducted based on a 195,000 barrels/stream day and this was the design production capacity reported in the original permit application).

Summary of Review
For BOD5 and TSS, the existing DRBC based limits are more stringent and stay the same. For Oil and Grease, the existing Chapt. 95.2 based limits are more stringent and stay the same. For Ammonia, the proposed limits based on BAT in the in the first draft permit (2/14/2024) are more stringent and stay the same. The calculated ELG based limits for COD, Sulfide, Phenolics, Total Chromium and Hexavalent Chromium are less stringent compared to the existing ELG based limits. These are incorporated into this second draft permit. This is justified by the anti-backsliding prohibition exception as stated in 40 CFR 122.44(l)(2)(i)(B)(1). *See the below attached calculations:

Summary of Review

Throughput	189	1,000 bbls/day	
Size Factor	1.41		
Process Factor	1.89		

CALCULATED DISCHARGE LIMITS

EFFLUENT PARAMETER	EPA Effluent Limitations lbs/1000 bbl						Calculated Discharge Limits			
	BPT 419.22(a)		BAT 419.23(a),(c)		BCT 419.24(a)		BPT, LBS/DAY		BAT, LBS/DAY	
	average	maximum	average	maximum	average	maximum	average	maximum	average	maximum
BOD5	5.5	9.9			5.5	9.9	2770	4986		
TSS	4.4	6.9			4.4	6.9	2216	3475		
Oil and Grease	1.6	3			1.6	3	806	1511		
COD	38.4	74	38.4	74					19341	37271
Ammonia as N	3	6.6	3	6.6					1511	3324
Sulfide	0.029	0.065	0.029	0.065					14.6	32.7
Phenolics	0.036	0.074	*See process specific factors below.*				18.1	**37.3**	**13.0**	53.7
Total Chromium	0.088	0.15					44.3	75.5	**15.2**	**43.7**
Hexavalent Chromium	0.0056	0.012					2.8	6.0	**1.2**	**2.8**

Summary of Review

		Pounds per 1,000 bbls of feedstock	
Phenolics		**average**	**maximum**
	Crude	0.003	0.013
	Cracking and Coking	0.036	0.147
	Asphalt	0.019	0.079
	Lube	0.090	0.369
	Reforming and Alkylation	0.032	0.132
Total Chromium			
	Crude	0.004	0.011
	Cracking and Coking	0.041	0.119
	Asphalt	0.022	0.064
	Lube	0.104	0.299
	Reforming and Alkylation	0.037	0.107
Hexavalent Chromium			
	Crude	0.0003	0.0007
	Cracking and Coking	0.0034	0.0076
	Asphalt	0.0019	0.0041
	Lube	0.0087	0.0192
	Reforming and Alkylation	0.0031	0.0069

Summary of Review

SIZE FACTOR

1,000 BBLs Feedstock/Stream-Day[1]	208
Size Factor	1.41

PROCESS CONFIGURATION - 2023

Category	Type	Capacity, 1,000 bbls/stream-day[2]	Capacity Relative to Throughput	Weighting Factor	Processing Configuration
Crude	Atm crude distillation	208	1.00		
	Vacuum crude distillation	73	0.35		
	Desalting	208	1.00		
		Total	2.35	1	2.35
Cracking and Coking	Fluid Cat Cracking	53	0.25		
	Vis-breaking		0.00		
	Thermal cracking		0.00		
	Moving Bed Cat Cracking		0.00		
	Hydrocracking	23	0.11		
	Fluid Coking		0.00		
	Delayed Coking		0.00		
	Hydrotreating	190.6	0.92		
		Total	1.28	6	7.69
Lube		0	0.00		
		Total	0.00	13	0.00
Asphalt		0	0.00		
		Total	0.00	12	0.00
			Refining Process Configuration		**10.04**
			PROCESS FACTOR		**1.89**

Reforming, 1000 bbls/stream-day	50
Alkylation, 1000 bbls/stream-day	12

Notes:

[1] *1,000 BBLs Feedstock/Stream-Day* is defined as "The maximum number of barrels of input that a distillation facility can process within a 24-hour period when running at full capacity under optimal crude and product slate conditions with no allowance or downtime" - U.S Energy Information Administration

[2] Monroe provides unit capacity information to the U.S Energy Information Administration

40 CFR Part 419 (up to date as of 3/29/2024)
Petroleum Refining Point Source Category

40 CFR 419.22(b)(1)

(1) Size factor.

1,000 bbl of feedstock per stream day	Size factor
Less than 24.9	0.91
25.0 to 49.9	0.95
50.0 to 74.9	1.04
75.0 to 99.9	1.13
100.0 to 124.9	1.23
125.0 to 149.9	1.35
150.0 or greater	1.41

(2) Process factor.

Process configuration	Process factor
Less than 2.49	0.58
2.5 to 3.49	0.63
3.5 to 4.49	0.74
4.5 to 5.49	0.88
5.5 to 5.99	1.00
6.0 to 6.49	1.09
6.5 to 6.99	1.19
7.0 to 7.49	1.29
7.5 to 7.99	1.41
8.0 to 8.49	1.53
8.5 to 8.99	1.67
9.0 to 9.49	1.82
9.5 or greater	1.89

Discharge limits are calculated based on refinery size and process factors. Based on the processing steps conducted at the facility, the Cracking Subcategory is applicable to Monroe's direct discharge (40 CFR 419.20 through 419.24).

Summary of Review

Most of the effluent limitations are a product of the listed effluent limitation factor, the size factor, and the process factor. However, the BAT effluent limitations for Phenolic compounds, Total Chromium, and Hexavalent Chromium are a summation of the product of a process throughput and process specific effluent limitation factor for the process types in operation at the facility.

The size factor is straight forward and pulled from the 40 CFR Part 419.22(b)(1) table.

The process factor is calculated based on refinery process configuration, specific design throughput for each process, and weighting factors. Once the process configuration is determined, a process factor is pulled from the 40 CFR Part 419.22(b)(2) table.

Following comments were received from permittee on March 27, 2024, and a meeting was held with the permittee on April 17, 2024, to discuss the comments and concerns:

Good Afternoon Sara,

Monroe Energy, LLC is providing the following comments to the Draft NPDES Permit No. PA0012637 that was advertised in the Pennsylvania Bulletin on 2 March 2024.

Part A – Effluent Limitations, Monitoring, Recordkeeping, and Reporting Requirements

I.O. for Monitoring Point 201

Quarterly 24-hour composite monitoring requirements for PFOA (ng/L), PFOS (ng/L), HFPO-DA (ng/L), and PFBS (ng/L) have been added to the Draft Permit. Sampling PFAS compounds was not included in the pre-Draft that was reviewed by Monroe. Due to the evolving guidance regarding Per- and Polyfluorinated Substances (PFAS), Monroe requests to have the sampling for these compounds moved from Section A to Section C as part of a PFAS study. Monroe would like to prepare and present a Sampling Plan to PADEP for review and approval. This plan would provide details on sampling protocols to include wastewater and source water samples, field blanks, field reagent blanks, and appropriate sampling equipment and personnel PPE. Samples would be taken from IMP 201 (tertiary effluent), City Water supply, and Delaware River Intake, along with field and equipment blanks as appropriate. Monroe proposes to submit results of the quarterly sampling events to PADEP in an annual report.

Dissolved Oxygen Limit for Monitoring Point 201

Monroe requests the Dissolved Oxygen (D.O.) limit for IMP 201 should be based on DRBC water quality data for Zone 4 and not Chapter 93 as stated in the Fact Sheet. Based on the DRBC data, the minimum for D.O should be a 4.0 and not a 5.0 as presented in the draft permit.

Second Tier Flow Rate for Monitoring Point 101

Summary of Review

The First Tier of discharge limits for IMP101 are based on a 34 MGD seasonally high monthly average (Design Flow, (MGD) in fact sheet) which includes stormwater. Monroe is requesting a 17 MGD flow at IMP 101 for the second tier permit (Effective Jan 1, 2029) which includes seasonally high monthly average discharges including stormwater and was described in the permit application Narrative. [Note: The CORMIX model is based on average annual discharge flows and the receiving stream $Q_{7\text{-}10}$. The CORMIX flows are not representative of seasonally high flows.] Please correct the Design Flow in the NPDES Permit Fact Sheet pages 26 and 27 from 2.6 MGD to 17 MGD after the installation of all three cooling towers (in the header on page 26 and the last paragraph on page 27). This 17 MGD flow is an estimate which is supported by updated calculations performed by Monroe's process engineers, but may change as IMP 101 monitoring data are collected during operation of the FCC Cooling Tower and based on advancement of the Alky Cooling Tower Design.

Correction for Total Residual Chlorine (TRC) table

Monroe requests a correction in the table of Part A for IMP 101. In the second tier table (Effective Jan 1, 2029 to Permit Expiration Date) there is a missing * next to Total Residual Chlorine (TRC). Monroe requests this typo is corrected as the "Sample must be collected during use of sodium hypochlorite in the river water intake and fire water system" note is applicable.

Part C

V. Requirements Applicable to Stormwater Outfalls, G Corrective Action Plan

Monroe requests clarification in the text of Part C, V. Requirements Applicable to Stormwater Outfalls, G – Corrective Action Plan that two or more exceedances pertains to two or more exceedances at the same outfall. The language in the draft permit has changed to eliminate the words "at the same outfall" and Monroe requests a revision to the draft which clarifies that consecutive exceedances occurring at the same outfall trigger the requirement to submit a Corrective Action Plan.

I. Other Requirements, I & K

Monroe appreciates the opportunity to submit a new CORMIX modeling study for the Monitoring Point 101 discharge once all three cooling towers are operating. The 2016 CORMIX Study used an anticipated discharge from IMP 101 of 3.89 MGD after implementation of three cooling towers to eliminate most once-through cooling at the refinery. Flow data reflecting implementation of the third cooling tower will not be available until it becomes operational (scheduled completion by 31 December 2028). Based on a lack of observed discharge data at the suggested CORMIX submission date of March 2028, Monroe requests the discharge effluent limitations for IMP 101 remain constant from permit effective date to permit expiration date. Monroe will plan to conduct and submit a new CORMIX modeling study and permit amendment application once adequate flow data are available and the study can be completed (estimated to be within eighteen months after start-up of the last cooling tower).

Additionally, Monroe requests that Condition I be removed from the permit until after the new CORMIX model is complete.

Please let me know if you have any questions regarding our comments above. Thank you for your time.

Regards,
Larissa Moretti (Elder)
Environmental Scientist - Water Compliance
Larissa.Elder@monroe-energy.com
Office: 610-364-8461
Mobile: 610-764-2579

Monroe Energy, LLC
4101 Post Road
Trainer, PA 19061
610-364-8011

Monroe Energy

The following changes are made to the draft permit based on the comments and the discussion at the meeting:

(i) Sampling point for PFOA, PFOS, HFPO-DA and PFBS is changed to Outfall 001 which includes the combined discharge from IMP 201 and IMP 101. By sampling at Outfall 001, representative samples of the facility's industrial wastewater effluent, stormwater and once-through cooling water would be achieved. Required sample type for these parameters is changed to Grab in the permit (according to our guidance, required sample type is grab).
(ii) The DO limit for IMP 201 is changed to an Inst. Minimum of 4.0 mg/l similar to the limit in the existing permit.
(iii) The missing notation * is placed next to Total Residual Chlorine in the second tier Effluent Limitations table for IMP 101 in Part A of the permit.
(iv) The Part C I. Other Requirement K. is revised to incorporate a submission date for the CORMIX modeling study report which is after the implementation of the third cooling tower. This change in date is appropriate since the flow data reflecting implementation of the third cooling tower will not be available until it becomes operational.

Permittee also requested to change the sample collection method for PCBs at stormwater outfalls 006, 007, and 008 to grab by email dated September 16, 2024. Grab samples for stormwater are most representative given the intermittent nature of rainfall. This change is appropriate and incorporated into this second draft permit.

Public comments were received from Natural Resources Defense Council and the Clean Air Council on March 27, 2024 submitted by their attorney and again from Clean Air Council on April 3, 2024.

In response to the comments on the draft NPDES Permit PA0012637 received on March 27, 2024, from Kenneth T. Kristl, Esq. on behalf of the Natural Resources Defense Council (NRDC) and from Annie Fox of the Clean Air Council (Council), we are offering the following responses:

Summary of Review

Comment # 1: The Trainer Refinery's PPC Plan does not comply with its current permit or the draft permit.

DEP conducted a review of the most recent version (December 2023) of Monroe's Spill Prevention Control and Countermeasures – Integrated Contingency Plan (SPCC-ICP or Plan). The SPCC-ICP incorporates the Preparedness, Prevention and Contingency (PPC) Plan required by the permit. DEP's review found that the Plan was consistent with state and federal requirements.

The SPCC-ICP Annex 3, Emergency Preparedness Plan (EPP), discussed flood risks and measures taken by Monroe including an evaluation of flooding risks and probable flooding areas at the facility for design storm events for the 100, 500, and 1000-year storms.

The EPP details flood hazards related to vulnerable areas of the site, securing materials, equipment, and other assets.

Monroe has confirmed that checklists and preparatory measures are maintained within their Hurricane Preparedness section of the refinery's Incident Command System.

They have also made us aware that flood elevations at the refinery are controlled by the tidal and riverine flood elevations in the Delaware River and not by riverine flooding in Marcus Hook and Stoney Creeks. The refinery is situated at higher elevations than Stoney and Marcus Hook Creeks and there is no location where run-on from flood elevations in these creeks can access bulk oil storage tank containments or process areas of the refinery.

Monroe manages stormwater runoff from the process areas to an oil water separator then to the wastewater treatment plant, where it undergoes tertiary treatment and discharges through its NPDES permitted outfall. Accumulated stormwater in the bulk storage tank containment dikes is also pumped to the wastewater treatment plant for treatment before discharge.

Monroe Energy has included the required worst-case discharge analysis in the SPCC-ICP as required under 40 CFR 112.20, Appendix D.

Comment # 2: Allegedly Defective Public Notice

The Public Notice of the draft permit, as published in *Pennsylvania Bulletin*, provides the following information consistent with 25 Pa. Code § 92a.82:

- The name and address, including county and municipality, of the applicant (Monroe Energy LLC, Trainer Refinery, 4101 Post Road, Trainer, PA 19061-5052. Facility Name: Trainer Refinery. This existing facility is located in Trainer Borough, Delaware County). *See* 25 Pa. Code § 92a.82(a)(1).

- The permit number and type of permit applied for (PA0012637; the application is for a renewal of an NPDES permit for an existing discharge of treated industrial waste). *See* 25 Pa. Code § 92a.82(a)(2).

Summary of Review

- The stream name of the waterway to which the discharge is proposed (Delaware River (WWF, MF), Stoney Creek (WWF), Marcus Hook Creek (WWF, MF), and Marcus Hook Creek (WWF)). *See* 25 Pa. Code § 92a.82(a)(3).
- The address of the State agency premises at which interested persons may obtain further information, request a copy of the NPDES forms and related documents (This notice provides information about persons who have applied to the Department of Environmental Protection (DEP) for a new, renewed, or amended NPDES or WQM permit, or a permit waiver for certain stormwater discharges, or have submitted a Notice of Intent (NOI) for coverage under a General Permit. More information on the types of NPDES and WQM permits that are available can be found on DEP's website (visit www.dep.pa.gov and select Businesses, Water, Bureau of Clean Water, Wastewater Management, and NPDES and WQM Permitting Programs). Section II identifies individual NPDES permit applications received and draft permits indicating DEP's tentative determination relating to sewage, industrial waste, industrial stormwater, MS4s, pesticides and CAFOs. Additional information, including links to draft permits and fact sheets that explain the basis for DEP's tentative determinations may be reviewed by generating the "Applications Received with Comment Periods Report" on DEP's website at www.dep.pa.gov/CWPublicNotice. DEP Southeast Regional Office (SERO)—2 E. Main Street, Norristown, PA 19401-4915. File Review Coordinator: 484-250-5910. Email: RA-EPNPDES_SERO@pa.gov for permits in Sections I & II). *See* 25 Pa. Code § 92a.82(a)(4).

- A brief description of the applicant's activities or operations that result in the discharge described in the application (Industrial, SIC Code 2911, Monroe Energy LLC, Trainer Refinery; The application is for a renewal of an NPDES permit for an existing discharge of treated industrial waste). *See* 25 Pa. Code § 92a.82(b)(1).

- The name and existing use protection classification of the receiving surface water under § 93.3 to which each discharge is made and a short description of the location of each discharge on the waterway indicating whether the discharge is a new or an existing discharge (The receiving stream, Delaware River (WWF, MF), Stoney Creek (WWF), Marcus Hook Creek (WWF, MF), and Marcus Hook Creek (WWF) are located in State Water Plan watershed 3-G and are classified for Warm Water Fishes and Migratory Fishes, aquatic life, water supply and recreation. The discharge is not expected to affect public water supplies. The application is for a renewal of an NPDES permit for an existing discharge of treated industrial waste). *See* 25 Pa. Code § 92a.82(b)(2).

- A statement of the tentative determination to issue or deny an NPDES permit for the discharge described in the application (The notice includes proposed effluent limitations for those effluents proposed to be limited, and description of proposed major special conditions, which are consistent with DEP's determination to issue an NPDES permit for the discharge). *See* 25 Pa. Code § 92a.82(b)(3).

- The rate or frequency of the proposed discharge (Design flow rates listed for each outfall). *See* 25 Pa. Code § 92a.82(b)(4).

- A brief description of the procedures for making final determinations, including the 30-day comment period and any other means by which interested persons may influence or comment upon those determinations (Notification of 15-day extensions for comment will be provided in

Summary of Review
the "Applications Received with Comment Periods Report" (Comments column). Applications, NOIs and draft permits, where applicable, may be reviewed at the DEP office that received the application or NOI. Members of the public are encouraged to use DEP's website to obtain additional information as discussed previously. Comments received within the appropriate comment periods for WQM and NPDES permit applications will be retained by DEP and considered in the final determinations regarding the applications. A comment submittal should include the name, address and telephone number of the writer and a concise statement to inform DEP of the exact basis of a comment and the relevant facts upon which it is based. DEP office contact information to review applications and NOIs and to submit comments for those applications, when applicable, is as follows: *DEP Southeast Regional Office (SERO)—2 E. Main Street, Norristown, PA 19401-4915. File Review Coordinator: 484-250-5910. Email: RA-EPNPDES_SERO@pa.gov for permits in Sections I & II.* DEP will also accept requests or petitions for public hearings on applications. The request or petition must indicate the interest of the party filing and the reasons why a hearing is warranted. A hearing will be held if DEP determines that there is a significant public interest. If a hearing is scheduled, a notice of the hearing will be published in the *Pennsylvania Bulletin* and a newspaper of general circulation within the relevant geographical area. DEP will postpone its final determination until after a public hearing is held. Individuals in need of accommodations should contact DEP through the Pennsylvania Hamilton Relay Service at (800) 654-5984 (TDD users) or (800) 654-5988 (voice users). You may make an appointment to review the DEP files on this case by calling the File Review Coordinator at 484-250-5910). *See* 25 Pa. Code § 92a.82(b)(5). II. In response to the comments on the draft NPDES Permit PA0012637 received on April 3, 2024 from Annie Fox on behalf of the Clean Air Council (Council) we are offering the following responses: Based on a reevaluation of the facility's characteristics and the comments raised, sampling point for PFOA, PFOS, HFPO-DA and PFBS is changed from IMP 201 to Outfall 001. By sampling at Outfall 001, representative samples of the facility's industrial wastewater effluent, stormwater and once-through cooling water would be achieved. DEP's current required sample type is grab and this change is also incorporated in the revised draft permit. Monroe has confirmed that no stormwater from the area near the former fire training field is draining to Outfall 007. The area of the former fire training field was reconstructed; soil removed, new foundations constructed, and area capped with concrete or stone. However, PFOA, PFOS, HFPO-DA and PFBS monitoring are included at Outfall 007 on a semi-annual basis. This is to verify that the discharge from Outfall 007 is not PFAS contaminated. Moreover, DEP has decided to include a onetime sampling for PFOA, PFOS, HFPO-DA and PFBS for all remaining outfalls during the first year of the permit term to evaluate. The condition is incorporated in Part C of the permit. Permit amendment will be initiated if the sampling results shows any concern of elevated PFAS in the discharge. Use of EPA method 1633 is also incorporated in the permit for PFAS analyses. Incorporating the above-mentioned changes, this revised draft permit is prepared.