

Application Type	Renewal
	Non-
Facility Type	Municipal
Major / Minor	Major

NPDES PERMIT FACT SHEET INDIVIDUAL SEWAGE

Application No.	PA0060097
APS ID	618006
Authorization ID	1369189

Applicant and Facility Information

Applicant Name	PA Am	erican Water Co.	Facility Name	Pocono Country Place WWTP
Applicant Address	895 We	sley Drive	Facility Address	1 Lakeview Access Road
	Mechar	iicsburg, PA 17055		Tobyhanna, PA 18466-3094
Applicant Contact	Jennifer Milakeve		Facility Contact	David Altmiller
Applicant Phone	(610) 233-6553		Facility Phone	(570) 242-3274
Client ID	87712		Site ID	262345
Ch 94 Load Status	Not Ove	erloaded	Municipality	Coolbaugh Township
Connection Status	-		County	Monroe
Date Application Receiv	ved	September 14, 2021	EPA Waived?	No
Date Application Accep	ted	September 28, 2021	If No, Reason	Major Facility
Purpose of Application		RENEWAL OF EXISTING NP	DES PERMIT.	

Summary of Review

This is a renewal of the 1.25 MGD Non-Municipal NPDES Permit discharge to Dresser Run (HQ-CWF; Stream code # 4478) from the Pocono Country Place WWTP, that services the Pocono Country Place Development (said to have 3,000 homes per application).

- ADF flows were 0.67 MGD (2020), 0.62 MGD (2019), and 0.85 MGD (2018), with highest monthly average flow of 0.942 MGD (December) and 6.59 MGD max daily flow (December 2020).
- No industrial users or hauled-in wastewater.
- Estimated 10,158 population in service area.
- NPDES Permit-related On-Base Submittals:
 - Original Submittal: On-Base Reference No. 35236 (10/26/2021)
 - Response to Technical Deficiency Letter: On-Base Reference No. 62515 (7/9/2022), with Application SSO page and Compliance document separately e-mailed.
 - 2022 WET Test: On-Base Reference No. 75968 (11/11/2022)

<u>Sludge use and disposal description and location(s)</u>: 159.06 tons disposed at Keystone Sanitary Landfill in 2020.

Part C Special Conditions: Changes bolded.

- <u>Parts C.I.A, B, C, & D</u>: Standard conditions (stormwater prohibition; necessary property rights; proper management of residuals; and Planning) per template.
- <u>Part C.I.E</u>: **Updated** chlorine minimization condition (with updated EDMR reporting requirements)
- <u>Part C.I.F</u>: New SBR discharge condition due to high peak batch discharge flows (6.48 MGD) to HQ receiving stream. Facility was indicated to be unable to measure peak instantaneous flow per Application form.

Approve	Deny	Signatures	Date
x		James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	December 2, 2022
x		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Environmental Engineer Manager	11-6-22

Summary of Review

- <u>Part C.I.G</u>: New Notification of Responsible Operator condition due to unclarity about site chain of command during emergencies per the PPC Plan.
- <u>Part C.I.H</u>: New High Flow Management Plan (HFMP) due to high flows and pattern of prohibited SSOs documented in the Inspection Reports and 2019 NOV. <u>NOTE</u>: The PAWC SOP "Protocol for managing peak flows to prevent Sanitary Sewer Overflows" only addresses notification requirements and SSO related activities (contacting Vac truck service for SSOs not due to heavy rain; checking manholes downstream for blockages during heavy rains; checking out lift stations E or H If SSO is on gravity line being fed from either (to see if pumped flow can be reduced); remediation afterward.
- Part C.I.I: Existing changes in discharge/stream condition
- <u>Part C.II</u>: New 3-year Schedule of Compliance (CBOD5 and Ammonia-N) due to new limits required due to water quality modeling.
- Part C.III: New standard Solids Management conditions.
- <u>Part C.IV</u>: New WQBEL for Toxic Pollutants (Selenium) due to Reasonable Potential Analysis (3 year compliance schedule).
- Part C.V: Updated WET conditions
- <u>Part C.VI</u>: **Updated** Stormwater conditions (with language to clarify IW Stormwater Annual Report submittal requirement and retaining existing sheet flow area requirements) for this discharge to a HQ watershed.

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.

6 (Stormwater) 5" (001)	Design Flow (MGD)	1.25 (001) <u>0 (002 and 003)</u> -75° 22' 19.35" (001) -75° 22' 18.25" (002)
	Longitude	-75° 22' 18.25" (002)
Falls	Quad Code	0943 (4.22.1)
Sewage Effluent (001) Stormwater Sheet Flow A	reas (002 and 003)	
ser Run (HQ-CWF, MF)	Stream Code	4478
0.477	RMI	0.5900 (001) 0.6300 (002 and 003)
	Yield (cfs/mi ²)	0.1414 USGS PA Streamstats
26	Q7-10 Basis	using LFY point downstream of facility.
		-
		HQ-CWF, MF
	Executions to Critoria	-
Attaining Use(s)		
-		
Final	Name Lehigh Rive	r TMDL (metals, pH)
-	Data Source No upstream stream sampling	g data available via E-maps.
	- NDDES Pormit Popowal Appl	ication
<u>40 mg/i</u>		
	Hazleton City Authority (ID# 1 Flow at Intake (cfs) Distance from Outfall (mi)	01801-040)
	Stormwater Sheet Flow A ser Run (HQ-CWF, MF) 0477 26 73 (001) Attaining Use(s) -	a (Stormwater) Design Flow (MGD) 5" (001) Usign Flow (MGD) 5" (003) Longitude Falls Quad Code Sewage Effluent (001) Stormwater Sheet Flow Areas (002 and 003) Stormwater Sheet Flow Areas (002 and 003) Stream Code 0477 RMI 9" (001) Yield (cfs/mi²) 26 Q7-10 Basis 73 (001) Slope (ft/ft) Chapter 93 Class. Existing Use Qualifier Exceptions to Criteria Attaining Use(s) - - - - Final Name Lehigh Rive - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - - -

Changes Since Last Permit Issuance: None known.

Other Comments:

- The discharge point is located downstream of Lake Carobeth a.k.a. Dresser Run Lake (and the upstream) Dresser Lake. No associated dams identified by DEP E-maps.
- This is a (6.6:1) effluent-dominated stream (1.25 MGD: 1.933 CFS)/0.2915 CFS Q7-10 Flow.
- Dresser Run flows through wetlands area (per USGS Topography) and downstream lake before flowing in the East Branch Tobyhanna Creek (HQ-CWF; Stream Code No. 4474).
- Stormwater Sheet flow areas (on opposite banks of Dresser Run). No available sampling points for stormwater sheet flow drainage area per applicant.
 - Outfall #002 (East side Dresser Run) receives flow from an 11.9-acre area including the main treatment plant's SBRs and holding tank.

• Outfall #003 (Western side Dresser Run) receives flow from 8.4-acre area, including old inactive lagoon (filled in and closed per application), but in which other industrial activities might occur.

WQM Permit No.	Issuance Date		Scope						
4599402	10/8/1999	WWTP Expansion/upgrade to 1.25 MGD, replacing previous STP and outfall.							
4517403	11/21/2017	Upgrade and automation of the existing headworks at PCP's Sewage Treatment Plant: one (1) auto screening and compaction unit capable of 6.7 MGD with a perforation size of 3/16". The existing comminutor will replace the pass manual bar screen in the bypass channel. A new heated and ventilated 10.5' x 16' fiberglass building will house the headworks with trigas monitoring and a confined space ventilation system. The upgraded bar screen's new control panel will automatically control the process and be connected to the existing SCADA system for monitoring by personnel. Ultrasonic level transmitters installed upstream and downstream will be installed to detect plugging and it will also have a redundant backup high-level float switch. Construction certification received 8/21/2019.							
4514403	12/11/2014	The replacement of Lift Sta duplex wet well-mounted va capacity (335 GPM @ 56'	acuum primed pumps of th						
	Degree of			Avg Annual					
Waste Type	Treatment	Process Type	Disinfection	Flow (MGD)					
0	0	Sequencing Batch		1.25 (NPDES					
	Secondary	Reactor*	Ultraviolet	Permit Basis flow					
Sewage									
¥	Organia Conceitu			Piocolida					
Sewage Hydraulic Capacity (MGD)	Organic Capacity (Ibs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposa					

*Non-continuous SBR batch discharge with 4500 GPM decant rate (6.48 MGD) without post-equalization. Estimated 15 decant cycles/day with 7.5 minute decant cycle length.

**Wet weather hydraulic capacity.

Changes Since Last Permit Issuance:

- See above WQM Permit for site changes.
- Previous Renewal Application indicated no chlorine back-up for UV Disinfection. This application indicates chlorine equipment is now available onsite for emergency disinfection (but not installed). No design information provided.

Other Comments:

- <u>DRBC Docket description</u>: Comminutor/channel monster, three parallel SBR units, two UV disinfection units, aerobic digester and belt filter press for sludge dewatering. Application indicated 200,000-gallon aerobic digester/holding tank.
- <u>Application Description</u>: Traveling bar screen with comminutor/channel monster back-up; three (3) SBRs in parallel, with 200,000-gallon aerobic digester/holding tank. (Narrative omitted reference to UV disinfection system). PPC Plan noted two UV banks in a channel.
 - Wastewater Treatment Chemicals: Magnesium hydroxide is used for alkalinity adjustment. Alum is used for phosphorus removal.
 - Process Flow diagram also shows reaeration after UV disinfection.

Compliance History

DEC-21 SEP-22 AUG-22 JUL-22 JUN-22 **MAY-22** APR-22 Parameter **MAR-22 FEB-22** JAN-22 NOV-21 Flow (MGD) Average Monthly 0.670 0.486 0.473 0.754 0.765 1.115 0.707 0.785 0.47 0.503 0.799 Flow (MGD) Daily Maximum 2.497 1.134 0.642 2.433 2.035 3.813 1.048 2.803 0.901 0.619 2.155 pH (S.U.) Minimum 6.63 6.65 6.64 6.6 6.49 6.4 6.33 6.51 6.61 6.68 6.48 pH (S.U.) Instantaneous Maximum 6.97 7.03 7.12 7.0 6.82 6.81 6.84 6.85 6.88 6.87 6.99 DO (mg/L) Minimum 7.2 7.1 7.4 7.5 7.62 8.01 8.2 7.88 7.85 7.4 7.69 CBOD5 (lbs/day) Average Monthly 15 11.61 12.1 16.7 23.3 49.7 29.7 32.5 12.2 9.8 13.9 CBOD5 (mg/L) Average Monthly 2.41 2.77 3.09 3.35 4.29 6.45 5.35 6.69 3.3 2.4 2.5 CBOD5 (mg/L) Influent
 Average Monthly 110.2 326.8 223 121.9 157 244 173 314.5 201 146 221.4 CBOD5 (mg/L) Daily Maximum 3.10 6.30 5.45 6.57 6.61 11.9 8.72 9.8 6.1 3.5 5.1 TSS (lbs/day) Average Monthly 18 11 9.0 < 15.4 16.3 33.4 40.7 35.2 27.3 19.4 13.5 TSS (mg/L) Average Monthly 2.6 2.9 2.5 < 3.1 3.1 4.4 6.8 8.2 7.4 4.8 2.2 TSS (mg/L) Daily Maximum 5.8 5.2 6.0 6.0 4.2 6.2 11 14.2 12.2 10.2 6.4 Total Dissolved Solids (ma/L) Average Monthly 365 383 225 311 Fecal Coliform (CFU/100 ml) Geometric Mean < 10 < 10.0 < 10.0 < 10 < 10 < 10 < 10 < 10 < 10 < 10 < 10 Fecal Coliform (CFU/100 ml) Instantaneous Maximum < 10 10.0 < 10 < 10 < 10 < 10 < 10 10 < 10 < 10 < 10.0

DMR Data for Outfall 001 (from October 1, 2021 to September 30, 2022)

Nitrate-Nitrite (lbs/day)											
Average Monthly	< 9.29	< 10.13	< 11.7	< 12.1	< 12.9	< 20.3	10.5	10.4	8.0	< 10.8	< 10.3
Nitrate-Nitrite (mg/L)	3 0120	4 10.110		3 1211	1210	120.0	1010	10.1	0.0	1010	4 1010
Average Monthly	< 2.25	< 2.52	< 3.17	< 2.4	< 2.41	< 2.59	1.95	2.36	2.18	< 2.6	< 1.9
Total Nitrogen	< 2.20	< 2.02	V 0.17	× 2.1	\$ 2.11	\$ 2.00	1.00	2.00	2.10	× 2.0	\$ 1.0
(lbs/day)											
Average Monthly	14	14.0	< 15	< 18.0	< 19	< 42	19	23	13	< 16	< 16.0
Total Nitrogen (mg/L)		1.110									
Average Monthly	< 3.30	< 3.57	< 4.27	< 3.61	< 3.63	< 5.17	3.58	4.95	3.53	< 3.71	< 2.91
Ammonia (lbs/day)											
Average Monthly	< 0.434	< 0.411	< 0.5	< 0.6	< 0.5	4.1	< 2.3	< 7.1	< 0.4	< 0.4	< 0.7
Ammonia (mg/L)											
Average Monthly	< 0.1	< 0.10	< 0.162	< 0.11	< 0.1	0.41	< 0.489	< 1.264	< 0.11	< 0.1	< 0.1
TKN (lbs/day)											
Average Monthly	< 4	< 4.0	< 4	< 6.0	7.0	< 21	8.0	13	5	< 5.0	< 6.0
TKN (mg/L)											
Average Monthly	< 1.1	< 1.0	< 1.11	< 1.21	1.23	< 2.58	1.63	2.58	1.35	1.15	< 1.05
Total Phosphorus											
(lbs/day)											
Average Monthly	< 2.0	< 2.0	< 0.8	< 1.8	< 2.7	< 4.0	< 2.7	< 2.2	< 1.8	< 2.1	< 2.8
Total Phosphorus											
(mg/L)											
Average Monthly	< 0.5	< 0.6	< 0.3	< 0.3	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
Total Aluminum											
(lbs/day)											
Average Monthly	< 0.52	0.42	0.6	0.9	0.6	1.0	2	1	0.9	0.6	< 0.6
Total Aluminum											
(mg/L)											. (
Average Monthly	< 0.1	0.12	0.105	0.139	0.111	0.169	0.291	0.401	0.203	0.121	< 0.1
Total Copper (lbs/day)	0.04	0.04	0.04	0.00	0.00	0.00	0.00	0.00		0.04	0.04
Average Monthly	0.01	0.01	0.01	0.02	0.03	0.03	0.02	0.02	0.02	0.01	0.01
Total Copper (mg/L)	0.0000	0.0005	0 00005	0.0000	0.005.40	0.00440	0.00400	0.00570	0.00400	0 00075	0.0000
Average Monthly	0.0023	0.0025	0.00305	0.0039	0.00543	0.00412	0.00463	0.00573	0.00426	0.00275	0.0022
Total Copper (mg/L)	0.0033	0.0029	0.0048	0.0045	0.0083	0.00449	0.0052	0.00623	0.00508	0.00365	0.00261
Daily Maximum Total Iron (mg/L)	0.0033	0.0029	0.0048	0.0045	0.0083	0.00449	0.0052	0.00023	0.00508	0.00305	0.00261
Average Monthly										< 0.021	
Total Manganese										< 0.021	
(mg/L)											
Average Monthly										0.166	
Total Zinc (lbs/day)										0.100	
Average Monthly	0.05	0.14	0.3	0.3	0.4	0.3	0.3	0.3	0.3	0.3	0.2
Total Zinc (mg/L)	0.00	0.14	0.0	0.0	0.4	0.0	0.0	0.0	0.0	0.0	0.2
Average Monthly	0.0093	0.0419	0.0486	0.0398	0.078	0.0417	0.056	0.0783	0.0707	0.0595	0.0392
, tronago montiny	0.0000	0.0110	3.0100	0.0000	0.070	0.0117	0.000	5.07.00	5.0101	5.0000	0.0002

Total Zinc (mg/L)											
Daily Maximum	0.0093	0.0439	0.0486	0.0398	0.078	0.0417	0.065	0.087	0.0707	0.0595	0.0522

DMR Data for Outfall 001 (from August 1, 2020 to December 31, 2021) DMR Data for Outfall 001

Parameter	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21	MAR-21	FEB-21	JAN-21
Flow (MGD)												
Average Monthly	0.503	0.799	1.012	1.034	0.882	0.5	0.474	0.622	0.663	1.064	0.468	0.563
Flow (MGD)												
Daily Maximum	0.619	2.155	3.982	4.177	5.235	0.784	0.604	1.146	1.232	3.203	0.633	0.765
pH (S.U.)												
Minimum	6.68	6.48	6.56	6.4	6.5	6.69	6.63	6.6	6.62	6.56	6.59	6.55
pH (S.U.)												
Instantaneous												
Maximum	6.87	6.99	7.09	6.98	6.88	7.19	6.98	7.01	6.99	6.99	7.01	6.96
DO (mg/L)												
Minimum	7.88	7.85	7.38	7.39	7.37	7.5	7.38	7.65	8.2	7.87	8.47	9.02
CBOD5 (lbs/day)												
Average Monthly	9.8	13.9	23.3	16.7	8.7	7.4	< 8.5	16.0	17.2	25.2	14.1	18.4
CBOD5 (mg/L)												
Average Monthly	2.4	2.5	2.5	1.4	1.8	1.8	< 2.1	3.2	2.8	3.7	3.6	3.8
CBOD5 (mg/L)												
Influent Average												
Monthly	146	221.4	152.4	168.6	336.6	308.6	241.7	119.7	237	209	344.4	374.3
CBOD5 (mg/L)												
Daily Maximum	3.5	5.1	4.91	2.82	2.52	3.0	4.34	4.88	4	4.9	7.79	6.56
TSS (lbs/day)												
Average Monthly	19.4	13.5	< 13.3	< 17.9	< 13.7	13.6	< 8.1	23.2	13.1	33.5	15.6	16.7
TSS (mg/L)												
Average Monthly	4.8	2.2	< 1.4	< 1.6	< 3.2	3.2	< 2.0	4.9	2.4	4.8	4.2	3.6
TSS (mg/L)												
Daily Maximum	10.2	6.4	2.8	< 2.9	6.8	6.6	4.4	10.2	3.8	8.8	5.6	5.0
Total Dissolved Solids												
(mg/L)							o (=					
Average Monthly	225			368			347			329		
Fecal Coliform												
(CFU/100 ml)		10.0									1000	
Geometric Mean	< 10	< 10.0	< 10	< 8	< 6	< 10	< 6.0	< 6.0	< 1.0	< 1	1603	> 49

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Fecal Coliform (CFU/100 ml)												
Instantaneous												
Maximum	< 10	< 10.0	< 10	< 10	< 10	< 10	7.1	< 5.5	2.0	1	2419.2	> 2419.2
Nitrate-Nitrite (lbs/day)												
Average Monthly	< 10.8	< 10.3	< 16.1	< 26.4	< 8.6	< 7.9	< 8.4	< 11.7	< 12.6	< 14.2	10.5	< 8.9
Nitrate-Nitrite (mg/L)												
Average Monthly	< 2.6	< 1.9	< 2.6	< 2.4	< 2.1	< 2.1	< 2.1	< 2.5	< 2.4	< 2.2	2.8	< 2.0
Total Nitrogen												
(lbs/day)												
Average Monthly	< 16	< 16.0	< 24	< 42	< 14	< 13	< 14.0	< 16	< 19	< 25	< 24	< 20
Total Nitrogen (mg/L)												
Average Monthly	< 3.71	< 2.91	< 3.81	< 3.71	< 3.36	< 3.34	< 3.55	< 3.63	< 3.64	< 3.87	< 6.32	< 4.639
Ammonia (lbs/day)												
Average Monthly	< 0.4	< 0.7	< 1.1	< 2.6	< 0.4	< 0.4	< 2.3	< 0.5	< 1.4	< 3.4	9.5	< 2.7
Ammonia (mg/L)												
Average Monthly	< 0.1	< 0.1	< 0.1	< 0.3	< 0.1	< 0.1	< 0.5	< 0.1	< 0.3	< 0.5	2.4	< 0.6
TKN (lbs/day)												
Average Monthly	< 5.0	< 6.0	< 8.0	< 13	< 5	< 5	6.0	6	6	11	< 13	< 11
TKN (mg/L)												
Average Monthly	1.15	< 1.05	< 1.16	< 1.25	< 1.26	< 1.26	1.46	1.36	1.2	1.68	< 3.51	< 2.6
Total Phosphorus												
(lbs/day)												
Average Monthly	< 2.1	< 2.8	< 3.2	< 4.3	< 1.5	< 1.9	< 2.0	< 2.3	< 2.6	< 3.2	< 1.8	< 2.2
Total Phosphorus												
(mg/L)												
Average Monthly	< 0.5	< 0.5	0.5	< 0.5	< 0.4	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5	< 0.5
Total Aluminum												
(lbs/day)				4.0								0.5
Average Monthly	0.6	< 0.6	< 0.6	< 1.0	< 0.3	< 0.4	0.6	1	0.6	2	0.8	< 0.5
Total Aluminum												
(mg/L)	0.404	0.4	0.4	0.000	0.00	0.4	0.4.47	0.000	0.445	0.040	0.007	0.4
Average Monthly	0.121	< 0.1	< 0.1	< 0.083	< 0.08	< 0.1	0.147	0.203	0.115	0.219	0.227	< 0.1
Total Copper (lbs/day)	0.04	0.04	0.00	0.00	0.04	0.000	0.007	0.00	0.00	0.00	0.00	0.00
Average Monthly	0.01	0.01	0.02	0.02	0.01	0.008	0.007	0.02	0.02	0.03	0.02	0.02
Total Copper (mg/L)	0 00075	0.0000	0.00004	0.00004	0.000	0.00045	0.00470	0.00000	0.00000	0.00405	0.00000	0.00400
Average Monthly	0.00275	0.0022	0.00321	0.00201	0.002	0.00215	0.00178	0.00383	0.00368	0.00405	0.00629	0.00439
Total Copper (mg/L)	0.00005	0.00261	0.00470	0.00248	0.003	0.00251	0.0022	0.0044	0.00368	0.00488	0.00809	0.00500
Daily Maximum	0.00365	0.00261	0.00473	0.00248	0.003	0.00251	0.0022	0.0044	0.00368	0.00488	0.00809	0.00506
Total Iron (mg/L)	< 0.021											
Average Monthly	< 0.021											
Total Manganese												
(mg/L)	0.166											
Average Monthly	0.100					1		1	1	l		

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Total Zinc (lbs/day)												
Average Monthly	0.3	0.2	0.2	0.9	0.2	0.2	0.2	0.3	0.2	0.3	0.2	0.3
Total Zinc (mg/L)												
Average Monthly	0.0595	0.0392	0.0338	0.0428	0.051	0.0547	0.0485	0.0563	0.0464	0.0454	0.0704	0.0511
Total Zinc (mg/L)												
Daily Maximum	0.0595	0.0522	0.0338	0.0438	0.069	0.0547	0.0556	0.0563	0.0464	0.0454	0.0704	0.0511

Parameter	DEC-20	NOV-20	OCT-20	SEP-20	AUG-20
Flow (MGD)					
Average Monthly	0.942	0.607	0.53	0.494	0.697
Flow (MGD)					
Daily Maximum	6.404	1.943	1.643	1.066	3.403
pH (S.U.)					
Minimum	6.54	6.5	6.52	6.62	6.76
pH (S.U.)					
Instantaneous					
Maximum	6.98	7.3	7.05	7.13	7.23
DO (mg/L)					
Minimum	8.48	8.58	8.17	7.98	7.05
CBOD5 (lbs/day)					
Average Monthly	< 13.5	< 7.8	6.3	8.9	5.5
CBOD5 (mg/L)					
Average Monthly	< 2.6	< 1.8	1.6	2.3	1.2
CBOD5 (mg/L)					
Influent Average					
Monthly	185.4	297.0	346.3	77	114.4
CBOD5 (mg/L)					
Daily Maximum	< 6.0	7.11	3.29	4.16	2.88
TSS (lbs/day)					
Average Monthly	< 16.1	< 3.7	< 6.6	10.9	< 10.0
TSS (mg/L)					
Average Monthly	< 3.0	< 1.0	< 2.0	3.0	< 2.0
TSS (mg/L)					
Daily Maximum	5.4	1.4	5.8	5.6	4.2
Total Dissolved Solids					
(mg/L)				004	
Average Monthly	338.0			384	
Fecal Coliform					
(CFU/100 ml)	1.0	1.0	1.0		4.0
Geometric Mean	< 1.0	< 1.0	< 1.0	< 2.0	< 4.0

Fecal Coliform					
(CFU/100 ml)					
Instantaneous					
Maximum	3.0	3.1	1.0	12.0	135.5
Nitrate-Nitrite (lbs/day)					
Average Monthly	< 10.0	< 9.4	< 13.3	20.9	16.3
Nitrate-Nitrite (mg/L)					
Average Monthly	< 1.8	< 2.1	< 3.6	5.3	3.4
Total Nitrogen					
(lbs/day)					
Average Monthly	< 16	< 14.0	< 19.0	< 29.0	29
Total Nitrogen (mg/L)					
Average Monthly	< 2.93	< 3.13	< 4.97	< 7.3	6.08
Ammonia (lbs/day)					
Average Monthly	< 1.3	< 0.8	< 0.4	2.1	< 2.6
Ammonia (mg/L)					
Average Monthly	< 0.3	< 0.2	< 0.1	0.5	< 0.6
TKN (lbs/day)					
Average Monthly	< 6.0	5.0	< 5.0	< 8.0	12.0
TKN (mg/L)					
Average Monthly	< 1.18	1.06	< 1.41	< 2.03	2.66
Total Phosphorus					
(lbs/day)					
Average Monthly	< 2.3	< 2.3	1.9	< 2.5	< 2.4
Total Phosphorus					
(mg/L)					
Average Monthly	< 0.4	0.5	0.5	< 0.6	< 0.5
Total Aluminum					
(lbs/day)					
Average Monthly	< 0.6	< 0.4	< 0.4	0.6	0.6
Total Aluminum					
(mg/L)					
Average Monthly	< 0.1	< 0.1	< 0.1	0.157	0.122
Total Copper (lbs/day)					
Average Monthly	0.02	0.009	0.01	0.03	0.02
Total Copper (mg/L)					
Average Monthly	0.00306	0.00206	0.00386	0.00729	0.00387
Total Copper (mg/L)					
Daily Maximum	0.00429	0.00262	0.008	0.00879	0.00515
Total Iron (mg/L)					
Average Monthly	< 0.02				
Total Manganese					
(mg/L)	0.00				
Average Monthly	< 0.02				

Total Zinc (lbs/day)					
Average Monthly	0.2	0.2	0.2	0.2	0.3
Total Zinc (mg/L)					
Average Monthly	0.0441	0.0421	0.0581	0.0611	0.062
Total Zinc (mg/L)					
Daily Maximum	0.0561	0.0421	0.0581	0.0611	0.062

Compliance History

Effluent Violations for Outfall 001, from: March 1, 2021 To: September 30, 2022

Parameter	Date	SBC	DMR Value	Units	Limit Value	Units
Total Zinc	08/31/21	Avg Mo	1.0	lbs/day	.9	lbs/day
Total Zinc	08/31/21	Avg Mo	0.3263	mg/L	.088	mg/L

Summary of Inspections:

FACILITY NAME	INSP PROGRAM	INSP ID	INSPECTED DATE	INSP TYPE	INSPECTION RESULT DESC	INSPECTOR ID	# OF VIOLATIONS
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>2999620</u>	01/25/2022	Compliance Evaluation	No Violations Noted	00615077	0
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	2787634	01/13/2022	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3014347</u>	10/26/2021	Administrative/File Review	No Violations Noted	00615077	0
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3129063</u>	09/23/2021	Administrative/File Review	Violation(s) Noted	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3262333</u>	09/01/2021	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3310945</u>	08/27/2021	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>

PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3313562</u>	06/10/2021	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3207407</u>	01/05/2021	Compliance Evaluation	No Violations Noted	00615077	0
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3262619</u>	04/14/2020	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>2872976</u>	03/25/2020	Compliance Evaluation	No Violations Noted	00615077	0
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>2974784</u>	03/18/2020	Administrative/File Review	Violation(s) Noted	00615077	<u>4</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3262325</u>	02/20/2020	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	1
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3274620</u>	12/23/2019	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	2751030	11/01/2019	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	2749166	04/23/2019	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	3025341	02/28/2019	Administrative/File Review	Violation(s) Noted	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	2967227	09/18/2018	Administrative/File Review	Violation(s) Noted	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	2722145	06/24/2018	Compliance Evaluation	No Violations Noted	00615077	0
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	2848485	06/22/2018	Administrative/File Review	Violation(s) Noted	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	2594967	05/29/2018	Compliance Evaluation	No Violations Noted	00615077	0
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	2751025	04/19/2018	Administrative/File Review	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>

PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	2643942	10/04/2017	Follow-up Inspection	Viol(s) Noted & Immediately Corrected	00615077	<u>1</u>
PA AMER WATER POCONO COUNTRY PLACE WWTP	WPCNP	<u>3021218</u>	05/11/2017	Administrative/File Review	No Violations Noted	00615077	0

Other Comments:

- <u>Late Application</u>: Complete and technically adequate application was due April 3, 2021. 9/28/2021 Administrative Extension Letter issued. Permit otherwise would have expired 9/30/2021.
- NOV: 12/23/2019 NOV issued due to WET Test issue resulting in an invalid WET Test. Effluent violations for Nitrate-Nitrite, TSS, Fecal Coliforms. SSOs.
- <u>Recurrent SSOs</u>: Application noted PAWC implements an I&I identification and elimination program, but no specific project was identified to prevent these recurrent SSOs. Potential hydraulic restrictions might be contributing to recurrent SSOs.
 - Recurrent SSOs (all blamed on excessive rainfall) occurred at:
 - MH 295 and MH-479 in 2018, 2019, and 2021.
 - MH-457 and MH-479A in 2021.
 - Nature Drive and Boardwalk Drive each experienced several SSOs in 2020.
 - Other SSOs were blamed on grease blockages, wipes & paper towels, and pipeline leakage.

NOTE: The PAWC SOP "Protocol for managing peak flows to prevent Sanitary Sewer Overflows" only addresses notification requirements and SSO related activities (contacting Vac truck service for SSOs not due to heavy rain; checking manholes downstream for blockages during heavy rains; checking out lift stations E or H If SSO is on gravity line being fed from either (to see if pumped flow can be reduced); remediation afterward. No proactive steps mentioned such as inspection of areas with recurrent SSOs.

- Inspection Noted Issues: 6/10/2021 Inspection: The Department strongly recommends that an alternative disinfection system be researched and implemented in case the UV light system fails. This could be a second UV light system that could brought online or a chlorine feed system. Such plans should include changes in sampling protocols during this period and SOPs on how to operate under these conditions". Application indicates unidentified chlorine equipment has been brought to the site, but not installed. No design details or SOPs for usage were submitted with the application. No Part II WQM Permit application received to date. No Part A.III.C.1 (Planned changes to Physical Facilities) notification was found in the available DEP files.
- **<u>Compliance History</u>**: 11/29/2022 WMS Open Violations by Client Number query indicated eleven (11) open violations:

FACILITY	INSP PROGRAM	PROGRAM SPECIFIC ID	VIOLATION ID	VIOLATION DATE	VIOLATION	INSP REGION
PA AMERICAN NORRISTOWN	Safe Drinking Water	1460046	941078	10/19/2021	FAILURE TO OPERATE AND MAINTAIN THE WATER SYSTEM	SERO
PAW HOMESITE	Safe Drinking Water	2400072	959333	05/10/2022	CROSS-CONNECTIONS EXIST WITHOUT PROPER BACKFLOW PROTECTION	NERO

PAW HOMESITE	Safe Drinking Water	2400072	959334	05/10/2022	CROSS-CONNECTIONS EXIST WITHOUT PROPER BACKFLOW PROTECTION	NERO
PAW HOMESITE	Safe Drinking Water	2400072	959335	05/10/2022	CROSS-CONNECTIONS EXIST WITHOUT PROPER BACKFLOW PROTECTION	NERO
PAW HOMESITE	Safe Drinking Water	2400072	959336	05/10/2022	FAILURE OF A PUBLIC WATER SYSTEM TO OBTAIN A PERMIT	NERO
BIG RUN PLT	Storage Tanks	33-90380	972435	08/16/2022	Failure to meet containment requirements	NWRO
PAW PHILIPSBURG	Safe Drinking Water	4140087	944426	12/08/2021	FAILURE TO OPERATE AND MAINTAIN THE WATER SYSTEM	NCRO
PA-AMERICAN WATER CO- CONNELLSV	Safe Drinking Water	5260022	959243	06/15/2022	FAILURE TO MEET DESIGN AND CONSTRUCTION STANDARDS	SWRO
PA-AMERICAN WATER CO- CONNELLSV	Safe Drinking Water	5260022	959244	06/15/2022	FAILURE TO MEET DESIGN AND CONSTRUCTION STANDARDS	SWRO
EXETER TWP STP	WPC NPDES	PA0026972	950484	03/30/2022	NPDES - Violation of effluent limits in Part A of permit	SCRO
EXETER TWP STP	WPC NPDES	PA0026972	950486	03/30/2022	CSL - Unauthorized, unpermitted discharge of sewage to waters of the Commonwealth	SCRO

Development of Effluent Limitations

Outfall No.	001	Design Flow (MGD)	1.25
Latitude	41º 11' 26.00"	Longitude	-75º 22' 19.00"
Wastewater D	escription: Sewage Effluent		

Permit Limits and Monitoring Requirements: Changes are bolded. (from previous permit so needs updating)

Parameter	Limit	SBC	Model/Basis
	(mg/l unless		
	otherwise		
CBOD5	specified) 104.2 lbs/d	Monthly Average	NEW WQBEL PER UPDATED MODELING.
(Interim Limits – 3 years)	Report Ibs/d	Daily Max	Existing WQ limits based on 1999 WPC
	10.0	Monthly Average	which used the Special Protection Waters
	15.0	Daily Max	Implementation Handbook methodology of
	20.0	IMAX	combining existing and expansion limits for anti-degradation. Supported by WQ
			modeling. No existing organic enrichment
			issues reported for stream, but facility is
			not discharging at NPDES Permit Basis
			Flow. Significant digit added.
			Application Data: 7.8 mg/l max, 3.8 mg/l Max
			Avg. Monthly Value, and 2.6 mg/l LTA (89
			samples).
CBOD5	74.6 lbs/d	Monthly Average	EDMR Data: 1.4 – 3.8 mg/l monthly average New WQBEL per updated modeling.
(Final Limits – 4 th year)	Report Ibs/d	Daily Max	Application and EDMR data indicated
	7.16	Monthly Average	compliance with new limits, but time is
	14.32	Daily Max	being given to come into compliance with
	14.32	IMAX	the more stringent limits and/or to justify modification of final limits by site-specific
			data.
TSS	208 .5 lbs/d	Monthly Average	Existing TBEL limits. Significant digit
100	Report Ibs/d	Daily Max	added.
	20.0	Monthly Average	Application Data: 10.2 mg/l max, 4.9 mg/l
	30.0	Daily Max	Max Avg. Monthly Value, and <3.0 mg/l LTA
	40.0 6.0 – 9.0 SU	IMAX Inst. Min - IMAX	(89 samples).
рН	6.0 - 9.0 50		Existing Technology limit (Chapter 92a.47) Application Data: 6.5 – 7.3 SU (365 samples)
Fecal Coliform	200/100 ml	Geo Mean	Existing Technology limit, with IMAX added
(5/1 – 9/30)	1,000/100 ml	IMAX	per Chapter 92a.47.
			Application Data: >2419/100 ml max,
			>1603/100 ml max monthly average, and
			>113/100 ml LTA (44 samples). <u>NOTE</u> : All reported ">" values above permit limits are
			considered noncompliance per EPA
			Sufficiently Sensitive Rule.
Fecal Coliform	2,000/100 ml	Geo Mean	See above.
(10/1 - 4/30)	10,000 ml/100 ml	IMAX Inst. Minimum	Now standard requirement Was not in
UV Intensity	Report (mjoules/cm²)	inst. winimum	New standard requirement. Was not in previous permit because Applicant
			reported existing UV disinfection system
			unable to measure UV dosage or intensity

			at that time, with system to be replaced. New system should allow for M&R.
			Application data: None
			New monthly monitoring requirement due to new Chapter 93 E Coli WQS.
E Coli	Report (#/100 ml)	Inst. Min	Application data: None
			NEW WQBEL PER UPDATED MODELING WILL BE MORE STRINGENT. Revised
Ammonia-Nitrogen			Ammonia-N WQS requires more stringent
(May 1 - Oct 31)	24 .0 lbs/d	Monthly Average	limits.
Interim limit – 3 years	Report 2.3	Daily Max Monthly Average	Application Data: 4.79 mg/l max, 2.4 mg/l
	4.6 4.6	Daily Max IMAX	max average monthly, and <0.5 mg/l LTA (44 samples).
	72 .9 lbs/d	Monthly Average	
Ammonia-Nitrogen	Report Ibs/d 7.0	Daily Max Monthly Average	
(Nov 1 - Apr 30) Interim limit – 3 years	14.0	Daily Max	See above
	14.0	IMAX	
Ammonia-Nitrogen (May 1 - Oct 31) Final limit – 4 th year			New WQBEL per updated modeling will be more stringent. Revised Ammonia-N WQS requires more stringent limits. Three-year schedule of compliance since application data indicated previous exceedance of new limit.
T mar mint – 4 year	18.1 lbs/d Report 1.74 3.48 3.48	Monthly Average Daily Max Monthly Average Daily Max IMAX	Application Data: 4.79 mg/l max, 2.4 mg/l max average monthly, and <0.5 mg/l LTA (44 samples). EDMR Data: <0.1 – 2.4 mg/l monthly average
Ammonia-Nitrogen (Nov 1 - Apr 30) Final limit – 4th year	54.4 lbs/d Report lbs/d 5.22 10.44 10.44	Monthly Average Daily Max Monthly Average Daily Max IMAX	See above.
Dissolved Oxygen (DO)	7.0	Inst. Minimum	Existing WQ limit (Chapter 92a.61) based on previous water quality modeling. Supported by WQ modeling. Anti-degradation/anti- backsliding would prohibit any less stringent limit.
			Application Data: 7.4 mg/l minimum (365 samples)
Total Phosphorus	10.4 lbs/d Report lbs/d 1.0 2.0 2.0	Monthly Average Daily Max Monthly Average Daily Max IMAX	Existing WQ limits based on 1999 WPC which used the Special Protection Waters Implementation Handbook methodology of combining existing and expansion limits for anti-degradation.
	2.0		<u>Application Data</u> : 0.82 mg/l max, <0.6 mg/l max monthly average, and <0.5 mg/l LTA (44 samples)
Total Nitrogen	Report lbs/d Report lbs/d	Monthly Average Daily Max	Existing monthly monitoring requirement due to Sewage Effluent SOP (Chapter 92a.61).

	Depart	Monthly Average	Application Data: 10.79 mg/l may
	Report Report	Monthly Average Daily Max	<u>Application Data</u> : 10.78 mg/l max, <7.3 mg/l max average monthly, and 4.26 mg/l LTA (50 samples)
			Existing monitoring requirement due to
			Sewage Effluent SOP (Chapter 92a.61) and
TKN	Report lbs/d	Monthly Average	tied to same frequency as existing Nitrate-
	Report Ibs/d	Daily Max	Nitrite-N monitoring.
	Report	Monthly Average	Application Data: 1.36 mg/l max, 1.36 mg/l
	Report	Daily Max	max average monthly, and <1.70 mg/l LTA
	•		(45 samples)
	114 lbs/d	Monthly Average	Existing WQ Limit based on 1999 WPC which
Nitrate-Nitrite-N	Report Ibs/d	Daily Max	used Chapter 93 criteria of 10 mg/l instream
	11.0	Monthly Average	to develop limit.
	22.0	Daily Max	Application Data: 8.62 mg/l max, 5.3 mg/l
	22.0	IMAX	max average monthly, and <2.63 mg/l LTA
			(50 samples)
Zinc			Updated WQBELs required per
	0.9 (lb/d)	Average Monthly	Reasonable Potential Analysis. See below.
	1.44 (lb/d)	Daily Max	Antibacksliding does not allow for relief
	88.0	Average Monthly	from more stringent existing limits.
	138.0	Daily Max	Application data: 68.5 ug/l max, 45.8 ug/l
	138.0	IMAX	average (3 samples)
			Existing WQBEL (daily max) now
			supplemented by other calculated limits.
Copper			The existing WQBEL daily max limit is
Copper			more stringent than the recalculated
			limits, but antibacksliding applies.
	0.11 (lb/d)	Average Monthly	
	0.16 (lb/d)	Daily Max	Application data: 8.8 ug/l max, 3.7 ug/l
	10.7 ug/l	Average Monthly	average (>50 samples). LTAMEC (>60
	12.0 ug/l	Daily Max	samples) was calculated at 0.0054436 mg/l
	15.6 ug/l	IMAX	(~5.44 ug/l) with daily COV of 0.4802582.
			Existing monitoring requirement due to
Aluminum			Reasonable potential, use of aluminum-
/ ddminam			based treatment chemicals, and need to
	Report (lb/d)	Average Monthly	gather information to update TMDL.
	Report (lb/d)	Daily Max	
	Report	Average Monthly	Application data: 227 ug/l max, <19 ug/l
	Report	Daily Max	average (20 samples)
			Monthly M&R per Reasonable Potential
Manganese	Report (lb/d)	Average Monthly	Analysis.
	Report (lb/d)	Daily Max	Application data: 10 ug/l max and 7.75 ug/l
	Report	Average Monthly	average (3 samples). DMR sample at 166
	Report	Daily Max	ug/l
			No longer needed. Previous annual (AMD
Tatal Inc.			metals) annual monitoring requirement to
Total Iron			gather data for updating the Lehigh River
			TMDL (AMD metals, pH). No WLA in the
			existing TMDL.
			Application data: 2.8 ug/l max and <2.2 ug/l
	-	-	average (8 samples).
			UV is the approved disinfection method.
TRC	0.00		Antidegradation requires ND limit (0.02
	0.02		mg/I TRC per current analytical
	(emergency		limitations) superseding previous limit. No
	disinfection-	IMAX	chlorine disinfection system has been
	related)	1	approved.

CBOD5 Minimum Monthly Average Removal	85%	Minimum Monthly Average	Existing WQBEL from 6/13/2018 DRBC Docket No. D-1999-029 CP-3 Requirement incorporated per Chapter 92a.12.
Total Dissolved Solids	Report Ibs/d Report Ibs/d 1,000.0 2,000.0 2,000.0	Monthly Average Daily Max Monthly Average Daily Max IMAX	Existing 6/13/2018 DRBC Docket No. D- 1999-029 CP-3 Requirement incorporated per Chapter 92a.12. As a monthly average limit, monitoring must be monthly to allow reporting of exceedances as violations.
			Application data: 391 mg/l max and 337 mg/l average (13 samples).
New Limits/Monitoring Requirements per TMS	-	-	-
Antimony, Total	Report (Ib/d) Report (Ib/d) Report Report	Average Monthly Daily Max Average Monthly Daily Max	M&R requirement per Reasonable Potential Analysis <u>Application data</u> : 1.01 ug/l max, <1 ug/l average (3 samples), 2 ND. <u>Resampling data</u> : 4 ND at 1 ug/l
Boron, Total	Report (lb/d) Report (lb/d) Report Report	Average Monthly Daily Max Average Monthly Daily Max	M&R requirement per Reasonable Potential Analysis Application data: 237 ug/l max, 168 ug/l average (3 samples) Resampling data: 158, 174, 182, and 138 mg/l.
Free Cyanide	Report (Ib/d) Report (Ib/d) Report Report	Average Monthly Daily Max Average Monthly Daily Max	M&R requirement per Reasonable Potential Analysis <u>Application data</u> : <7 ug/l max, <7 ug/l average (3 samples ND). Insensitive ND level of 7 ug/l. DEP TQL at 1.0 ug/l. Resampling data: None provided.
Total Selenium (Final limit with interim monitoring)	0.06 (lb/d) 0.093 (lb/d) 5.74 8.96 14.4	Average Monthly Daily Max Average Monthly Daily Max IMAX	WQBEL required per Reasonable Potential Analysis. Application data: 5.81 ug/l max, <5.3 ug/l

Comments:

- Monitoring updated per EDMR/ICIS requirements (Instantaneous Minimums, corrected fecal coliform units). Significant digits added. Standard minimum frequencies for >1.0 MGD STP included.
- Daily max limits/monitoring requirements set equal to existing IMAX limits. (Any exceedance of the IMAX, of whatever duration, is a permit violation that requires reporting as such.). Reporting otherwise required. No additional sampling is required.
- CBOD5 Influent Monitoring moved to administratively created IMP Outfall No. 101 (headworks). Minimum monthly monitoring required to meet DRBC Docket requirements, concurrent with CBOD5 effluent monitoring.

WQM Model 7.1.1 Output:

	<u>SWP Basin</u> Str 02A	eam Code 4478		Stream Name DRESSER RU	-		
RMI	Name	Permit Number	Disc Flow (mgd)	Parameter	Effl. Limit 30-day Ave. (mg/L)	Effl. Limit Maximum (mg/L)	Effl. Limit Minimum (mg/L)
.940	Pocono Ctry Pl	PA0060097	1.250	CBOD5	7.16		
				NH3-N	1.74	3.48	
				Dissolved Oxygen			7



Reasonable Potential Analysis: See Toxic Management Spreadsheet output below and attachment.

- No hauled in wastewater or industrial users. The site PPC Plan noted that the Property Owner's Association activities includes pools, club houses, ground maintenance, etc.
- Specific Constituents:
 - Aluminum: Effluent concentration was max 227 ug/l and <10 ug/l average (20 samples with 7 ND at 10 0 ug/I QL). Influent data was 820 ug/I (1 sample). Facility flow-chart shows recycle flows to headworks prior to influent sampling (i.e. recycle flows might be primary source).
 - Antimony: Effluent concentration was max 1.01 ug/l and <0.893 ug/l average (7 samples, with 5 Non-0 detects at 1 ug/l QL). Influent data was <1 ug/l (1 sample).
 - Selenium: Effluent concentration was max 5.81 ug/l and <4.138 ug/l average (7 samples, with 4 Non-0 detects at 5 ug/l QL) indicating presence. Influent data was <5 ug/l (1 sample). The Chapter 93 WQS is 4.6 ua/l.
 - Boron: Effluent concentration was 237 mg/l max and 165.29 mg/l average (7 samples, no NDs). Influent data was 154 ug/l (1 sample).
 - Copper: Effluent concentration was 8.8 ug/l with 3.7 ug/l average (50 samples; no NDs at 1 ug/l QL). See 0 TOXCONC-calculated LTAMEC and daily COV (using >60 sample results) below. Influent data was 31.5 ug/I (1 sample). Copper Schedule of Compliance (no TRE) in previous NPDES Permit term. Antibacksliding prohibits any less stringent limits than the existing daily max limit. Given the general compliance with the existing limit and EDMR data, the facility should be able to meet the additional TMSrecommended limits.
 - Manganese: Effluent concentration was 10 ug/l max and 7.75 ug/l average (4 samples with no NDs at 7 0 ug/I QL). Influent data was 271 ug/I max and 268 ug/I average (4 samples). EDMR included 166 ug/I value from annual sampling.
 - Zinc: Effluent concentration was 68.5 ug/l max and 45.8 ug/l average (3 samples, no NDs at 5 ug/l QL). 0 Influent data was 146 ug/l (1 sample). EDMR included 0.078 mg/l reported value. Zinc corrosion control chemical in use. Antibacksliding prohibits any less stringent limits than the existing monthly average limit. Given the general compliance with the existing limit and EDMR data, the facility should be able to meet the additional TMS-recommended limits.
 - Other Pollutants (GC-MS Five Pollutant Peaks): The Application noted that there were "tentatively identified compounds" (TICs) including acetone and carbon disulfide that were tentatively identified during initial screening of samples as required but for which they do not have any QC or analysis records associated with them. The revised NPDES Application Form item was not completed and the submitted lab sheets do not include the TICs or GC-MS "peaks" output (unlike the original submittal). In the absence of any industrial users or known significant commercial sources, these constituents are assumed to be

from spent household commercial products. Therefore, the Department will not require additional effluent sampling & analysis at this time for these additional constituents of interest. In terms of the GC-MS peaks with highest concentrations from the three effluent samples:

- Decane (CAS# 124-18-5): 0.3293 ug/l
- Undecane (CAS# 1120-21-4): 0.4987 ug/l
- Decane, 6-Ethyl-2-Methyl (CAS# 62108-21-8): 0.2719 ug/l
- Benzene, 1-4-difluoro (CAS# 540-36-3): 4.778 ug/l
- Chlorobenzene-d5 (CAS# 3114-55-4): 5.36 ug/l
- (2-Aziridinyl) Amine (CAS# 4625-37-0): 5.91 ug/l
- Methane, bromo- (CAS# 74-83-9): 0.1172 ug/l

TOXCONC Spreadsheet Output:

~		V	U		
		Reviewer/Permit Engineer:	Berger		
Facility:	PAWC Pocono Countr	PAWC Pocono Country Place WWTP			
NPDES #:	PA0060097				
Outfall No:	001				
n (Samples/Month):	4				
Parameter	Distribution Applied	Coefficient of Variation (daily)	Avg. Monthly		
Copper (mg/l)	Delta-Lognormal	0.4802582	0.0054436		
	1				



Toxic Management Spreadsheet Output:

Recommended WQBELs & Monitoring Requirements

No. Samples/Month: 4

	Mass	Mass Limits		Concentration Limits					
Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL	WQBEL Basis	Comments
Total Aluminum	Report	Report	Report	Report	Report	µg/L	750	AFC	Discharge Conc > 10% WQBEL (no RP)
Total Antimony	Report	Report	Report	Report	Report	µg/L	6.45	THH	Discharge Conc > 10% WQBEL (no RP)
Total Boron	Report	Report	Report	Report	Report	µg/L	1,842	CFC	Discharge Conc > 10% WQBEL (no RP)
Total Copper	0.11	0.16	10.7	15.6	15.6	µg/L	10.7	CFC	Discharge Conc ≥ 50% WQBEL (RP)
Free Cyanide	Report	Report	Report	Report	Report	μg/L	4.61	THH	Discharge Conc > 25% WQBEL (no RP)
Total Manganese	Report	Report	Report	Report	Report	µg/L	1,151	THH	Discharge Conc > 10% WQBEL (no RP)
Total Selenium	0.06	0.093	5.74	8.96	14.4	µg/L	5.74	CFC	Discharge Conc ≥ 50% WQBEL (RP)
Total Zinc	1.25	1.44	120	138	138	µg/L	120	AFC	Discharge Conc ≥ 50% WQBEL (RP)



<u>Antidegradation</u>: No additional degradation to the receiving HQ stream expected. There is no new, additional or increased loadings proposed. Updated permit limits and monitoring requirements will help ensure no negative impacts in the future. Updated stormwater conditions will prevent contamination of site stormwater runoff.

Development of Effluent Limitations

Outfall No.	002 and 003	Design Flow (MGD)	0 (stormwater only)
	41º 11' 27.00" (002)		-75º 22' 13.00" (002)
Latitude	41º 11' 29.00" (003)	Longitude	-75° 22' 20.00" (003)
Wastewater D	escription: Stormwater		

Permit Limits/Monitoring: Changes bolded.

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
TSS	Report	IMAX	Existing requirement. 100 mg/l benchmark incorporated into this permit.
TKN	Report	IMAX	Existing requirement.
Total Iron	Report	IMAX	Existing requirement.
pH	6.0 -9.0 SU	Inst. Min - IMAX	New Chapter 95.2 limit
Oil & Grease	30.0	IMAX	New Chapter 95.2 limit

Comments:

- <u>Application-identified BMPs</u>: Sludge management practices; Chemical storage practices; Weed control; Cleaning of equipment and washwater, unpaved infiltration areas; See PPC Plan pages 9 and 10.
- <u>Sheet Flows Areas</u>: Due to sheet flow drainage & no available sampling point, annual stormwater inspections, site BMPs and PPC Plan will have to be implemented for these drainage areas in lieu of actual sampling per Part C.III.E.3.
- <u>Antidegradation</u>: The facility's Stormwater outfalls were necessarily covered by previous SEJ (for the facility) with annual stormwater inspections, stormwater BMPs, and PPC Plan to prevent any additional degradation from stormwater discharges. <u>NOTE</u>: The No Exposure Certification option does not pertain to a HQ watershed in PA, but such forms can be used to document implementation of appropriate measures to prevent degradation of the receiving waters.

Development of Effluent Limitations

Outfall No.	101	
Latitude	41º 11' 26.00)"
Wastewater D	escription:	Raw Sewage Influent

Design Flow (MGD) NA Longitude -75°

-75º 22' 19.00"

Required Monitoring:

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
CBOD5	Report (lb/d)	Monthly Average	Existing DRBC monitoring requirement in
	Report (lb/d)	Daily Max	administratively-separated IMP (Headworks)
	Report	Monthly Average	reporting.
	Report	Daily Max	

Whole Effluent Toxicity (WET)

For Outfall 001, **X Chronic** WET Testing was completed:

X For the permit renewal application (4 tests).

The dilution series used for the tests was: 100%, 94%, 87%, 44%, and 22%. The Target Instream Waste Concentration (TIWC) to be used for analysis of the results is: 87%.

Summary of Four Most Recent Test Results

NOEC/LC50 Data Analysis

	Ceriodaphnia Results (% Effluent)			Pimephale			
	NOEC	NOEC		NOEC	NOEC		
Test Date	Survival	Reproduction	LC50	Survival	Growth	LC50	Pass? *
10/31, 11/2, 11/4/2016	>100	>100	>100 (EC50)	100	100	>100 (EC50)	Pass
10/2, 10/4, 10/6/2017	100	100	>100	100	100	>100	Pass
10/8, 10/10, 10/11/2018	100	100	>100	100	100	>100	Pass
2/17, 2/19 2/20/2020	100	100	>100	100	100	>100	Pass
11/9, 11/2020	100	100	>100	100	100	>100	Pass
9/29, 9/30, 10/1/2021	100	100	>100	100	100	>100	Pass
10/10, 11/2022	100	100	>100	100	100	>100	Pass

* A "passing" result is that which is greater than or equal to the TIWC value.

Is there reasonable potential for an excursion above water quality standards based on the results of these tests? No.

<u>Comments</u>: DEP Biologist indicated: "The chronic WET tests all passed for 2022. I have record that the following years all passed for the Chronic WET tests: 2021, 2020, 2018, 2017, and 2016. The WET tests conducted in 2019 were invalid because of temperature issues with the tests. No valid WET tests were completed in 2019".

Evaluation of Test Type, IWC and Dilution Series for Renewed Permit

Acute Partial Mix Factor (PMFa): 1 Chronic Partial Mix Factor (PMFc): 1

1. Determine IWC – Acute (IWCa):

(Q_d x 1.547) / ((Q₇₋₁₀ x PMFa) + (Q_d x 1.547))

[(1.25 MGD x 1.547) / ((0.2926 cfs x 1) + (1.25 MGD x 1.547))] x 100 = IWCa% = 86.85% (~87%)

Is IWCa < 1%? X NO (Chronic tests required)

If the discharge is to the tidal portion of the Delaware River, indicate how the type of test was determined: NA

Type of Test for Permit Renewal: Chronic

2a. Determine Target IWCa (If Acute Tests Required): NA

2b. Determine Target IWCc (If Chronic Tests Required)

(Q_d x 1.547) / (Q₇₋₁₀ x PMFc) + (Q_d x 1.547)

[(1.25 MGD x 1.547) / ((0.2926 cfs x 1) + (1.25 MGD x 1.547))] x 100 = **TIWCc% = 86.85% (~87%)**

3. Determine Dilution Series

(NOTE – check Attachment C of WET SOP for dilution series based on TIWCa or TIWCc, whichever applies). Dilution Series = 100%, 94%, 87%, 44%, and 22%.

WET Limits

Has reasonable potential been determined? X NO

Will WET limits be established in the permit? X NO

If WET limits will be established, identify the species and the limit values for the permit (TU). NA

If WET limits will not be established, but reasonable potential was determined, indicate the rationale for not establishing WET limits: **NA**

Communications Log:

9/14/2021: NPDES Permit Renewal Application Received.

9/17/2021: PAWC (Jennifer A. Milakeve) E-mail update to NPDES Permit Renewal Application

9/17/2021: PAWC (Milakeve) E-mail with WET Test data

<u>9/20/2021</u>: DEP (Berger) E-mail asking for completed Pollutant Group Tables and updated NPDES Permit Application WET Test section

<u>9/20/2021</u>: PAWC (Milakeve) E-mail indicating she was still waiting for lab data, and thanking the Department for help with the soon-to-be expiring NPDES Permit.

<u>9/24/2021</u>: PAWC (Milakeve) E-mail indicating she had received lab data and was working of updated NPDES permit renewal application.

9/27/2021: PAWC (Milakeve) E-mail with influent sampling data

<u>9/27/2021</u>: PAWC (Milakeve) E-mail indicating she was waiting for the last of the lab result and that she had sent in WET Test data for a number of years, including two 2020 WET Tests (one due to invalidated 2019 WET Test)

9/27/2021: DEP (Berger) E-mail asking for effluent sampling data

9/27/2021: PAWC (Milakeve) E-mail indicating she expected to submit the completed effluent data in October 2021.

9/28/2021: Administrative extension letter for NPDES Permit issued.

9/28/2021: PAWC (Milakeve) E-mail acknowledging receipt of Administrative Extension Letter

10/7/2021: PAWC (Milakeve) E-mail with updated Pollutant Group Tables

10/13/2021: PAWC (Milakeve) E-mail asking for confirmation of receipt of Pollution Group Tables

10/14/2021: DEP (Berger) E-mail confirming receipt of information required for a complete permit application.

10/15/2021: PAWC (Milakeve) E-mail agreeing to resubmit the application via On-Base.

10/26/2021: Reference ID: 35236 On-base submittal of sampling data.

5/10/2022: Technical Deficiency Letter issued

7/9/2022: PAWC On-Base Submittal No. 62515 (Response to Technical Deficiency Letter)

7/11/2022: Additional information received via E-mail (Open Violations document)

7/11/2022: Additional information received via E-mail (SSO information) – redundant to application data.

11/11/2022: 2022 WET Test submitted via On-Base.