

Southwest Regional Office CLEAN WATER PROGRAM

Application Type

Facility Type

Major / Minor

Minor

NPDES PERMIT FACT SHEET INDIVIDUAL SEWAGE

 Application No.
 PA0090981

 APS ID
 843888

 Authorization ID
 1283211

Applicant Name	German Township	Facility Name	Footedale STP	
Applicant Address	2 Long Street	Facility Address	SR 3023 Lambert Footedale Road	
	McClellandtown, PA 15458-0287		German Twp., PA 15458	
Applicant Contact	Floyd Gladman	Facility Contact	Kerry Bell (consulting engineer)	
Applicant Phone	(724) 737-0213	Facility Phone	724-626-1909	
Client ID	110668	Site ID	241516	
Ch 94 Load Status	Not Overloaded	Municipality	German Township	
Connection Status	No Limitations	County	Fayette	
Date Application Rece	ived August 5, 2019	EPA Waived?	Yes	
Date Application Acce	pted August 8, 2019	If No, Reason		

Summary of Review

The permittee has applied for a renewal of NPDES Permit No. PA0090981. NPDES Permit No. PA0090981 was previously issued by the PA Department of Environmental Protection (DEP) on January 20, 2015. That permit expired on January 31, 2020.

This draft permit is approved during the Coronavirus pandemic requiring DEP employees to telework. Electronic signatures are considered appropriate for the draft permit documents. An electronic copy of the communication that transmitted approval of the draft permit documents has been saved and is included with the file. The permit cover letter asks the permittee for permission to send the final permit documents electronically should the office still be closed.

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.

Approve	Deny	Signatures	Date
x		David R. Ponchione	
^		David R. Ponchione / Project Manager	July 17, 2020
		Christopher Kriley	
х		Christopher Kriley, P.E. / Program Manager for Donald J. Leone,	
		P.E. / Environmental Engineer Manager	July 20, 2020

Discharge, Receiving	Waters and Water Supply Informat	ion						
Outfall No. 001		Design Flow (MGD)	0.085					
Latitude 39° 54	4' 40"	Longitude	-79° 50' 42"					
Quad Name Nev	w Salem	Quad Code	1907					
Wastewater Descrip	Wastewater Description: Sewage Effluent							
	Unnamed Tributary of Dunlap							
Receiving Waters	Creek (WWF)	Stream Code	40140					
NHD Com ID	99414582	RMI	0.85					
Drainage Area	1.12	Yield (cfs/mi ²)	0.30					
Q ₇₋₁₀ Flow (cfs)	0.336	Q ₇₋₁₀ Basis	PA Bul 12, Sta. #03074000					
Elevation (ft)		Slope (ft/ft)	0.02					
Watershed No.	19-C	Chapter 93 Class.	WWF					
Exceptions to Use	None	Exceptions to Criteria	None					
Assessment Status	Attaining Use(s)							

Changes Since Last Permit Issuance: None

	Treatment Facility Summary								
Treatment Facility Nar	ne: Footedale STP								
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)					
Sewage	Secondary With Ammonia Reduction	Extended Aeration	Chlorine With Dechlorination	0.03 (year 2018)					
Hydraulic Capacity	Organic Capacity			Biosolids					
(MGD)	(lbs/day)	Load Status	Biosolids Treatment	Use/Disposal					
0.085	110	Not Overloaded	Dewatering	Landfill					

The treatment process consists of two parallel extended aeration plants followed by final clarification, rapid sand filtration, chlorination and de-chlorination. Refer to Development of Effluent Limitations for information regarding the hydraulic capacity.

Compliance History

DMR Data for Outfall 001 (from June 1, 2019 to May 31, 2020)

Parameter	MAY-20	APR-20	MAR-20	FEB-20	JAN-20	DEC-19	NOV-19	OCT-19	SEP-19	AUG-19	JUL-19	JUN-19
Flow (MGD)												
Average Monthly	0.0205	0.030	0.0302	0.0315	0.026	0.0230	0.0154	0.0113	0.0134	0.0141	0.0144	0.0105
Flow (MGD)												
Daily Maximum	0.0487	0.063	0.0810	0.0864	0.0613	0.0810	0.0285	0.0412	0.0378	0.0231	0.0345	0.0285
pH (S.U.)												
Minimum	6.9	6.9	6.9	6.8	6.9	6.6	6.9	6.8	6.8	6.8	6.9	6.9
pH (S.U.)												
Maximum	7.0	7.1	7.0	7.1	7.1	7.1	7.1	7.0	7.1	7.0	7.1	7.1
DO (mg/L)												
Minimum	5.9	6.2	6.2	6.4	6.2	6.3	5.7	5.4	5.4	6.0	5.6	6.0
TRC (mg/L)												
Average Monthly	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.48	0.5
TRC (mg/L)												
Instantaneous												
Maximum	0.5	0.5	0.5	0.5	0.5	0.5	0.5	0.6	0.5	0.6	0.66	0.6
CBOD5 (lbs/day)												
Average Monthly	< 0.4	0.7	0.9	< 0.5	< 0.4	< 0.6	0.4	0.7	< 0.2	< 0.4	< 0.6	< 0.2
CBOD5 (mg/L)	_			_		_	_	_	_	_	_	_
Average Monthly	< 3	4	4	< 3	< 4	< 3	5	6	< 3	< 3	< 5	< 3
CBOD5 (mg/L)												
Instantaneous		_	_		_		_				_	
Maximum	3	5	5	3	5	< 3	5	8	< 3	4	7	< 3
BOD5 (mg/L)												
Raw Sewage Influent												
<pre> About blue </pre>	202.5	224 5	405.0	447	450	. 005.4	470.5	. 007	044.5	220 5	400 F	440.5
Monthly	202.5	221.5	125.9	417	156	< 225.4	172.5	< 267	211.5	220.5	189.5	142.5
TSS (lbs/day) Average Monthly	< 0.6	< 0.9	< 1.0	< 0.9	< 0.5	< 1.1	< 0.4	0.6	< 0.4	< 0.7	< 0.5	< 0.3
TSS (mg/L)	< 0.6	< 0.9	< 1.0	< 0.9	< 0.5	< 1.1	< 0.4	0.6	< 0.4	< 0.7	< 0.5	< 0.3
Average Monthly	< 5	< 5	< 5	< 5	< 5	< 6	< 5	< 6	< 5	< 6	< 5	< 5
TSS (mg/L)		_ \	_ \					_ \ 0	_ \	_ \ 0	7 5	_ \
Raw Sewage Influent												
<pre> Average</pre>												
Monthly	112	139	95	149	200	166	115	125	96	179	267	131
TSS (mg/L)	112	100	33	170	200	100	110	120	30	175	201	101
Instantaneous												
Maximum	< 5	< 5	< 5	< 5	< 5	6	< 5	7	< 5	6	< 5	< 5
Maximum	_ ` `	``	_ ` `	` `	_ ` `	U	` 0		` ' '		` '	` 0

NPDES Permit Fact Sheet Footedale STP

NPDES Permit No. PA0090981

Fecal Coliform (CFU/100 ml) Geometric Mean	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 2	< 1	32	12	< 1
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	1	< 1	< 1	< 1	< 1	< 1	< 1	3	< 1	125	19	2
Total Nitrogen (mg/L) Daily Maximum						2.81		-		-	-	
Ammonia (mg/L) Average Monthly	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8
Ammonia (mg/L) Instantaneous Maximum	< 0.8	< 0.8	< 0.8	< 0.80	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8	< 0.8
Total Phosphorus (mg/L) Daily Maximum						9.4						

Compliance History

Operations Compliance Check Summary Report

Facility: Footedale_STP

NPDES Permit No.: PA0090981

Compliance Review Period: 07/08/2015 - 07/08/2020

Open Violations by Client Summary

None.

Inspection Summary

INSP ID	INSPECTED DATE	INSP TYPE	AGENCY	INSPECTION RESULT DESC	# OF VIOLATIONS
2679182	10/11/2017	Chapter 94 Inspection	PA Dept of Environmental Protection	No Violations Noted	0

Violation Summary: No violations in eFACTs.

Enforcement Summary: No enforcement actions.

DMR Violation Summary: Current eDMR user. Effluent limit violation summary 7/8/2018 - 7/8/2020:

No violations in eDMR.

Compliance Status: Facility has no current compliance issues and is due for a CEI by Operations soon.

Completed by: David Roote

Completed date: 7/8/2020

Permit No. PA0090981

Development of Effluent Limitations								
Outfall No.	001		Design Flow (MGD)	.06				
Latitude	39° 54' 40.0	00"	Longitude	-79° 50' 42.00"				
Wastewater D	escription:	Sewage Effluent						

The discharge was previously modeled using WQM 6.3 to evaluate the CBOD₅, Ammonia Nitrogen and Dissolved Oxygen parameters. Because there have been no changes to the receiving stream, the modeling results for those parameters are based on a previously approved pollution report which is attached to this fact sheet. It was unnecessary to remodel those three parameters using the current WQM 7.0 model because the same effluent results would be computed. The Buffington STP is located approximately 10,000 feet (1.89 miles) downstream of the Footedale STP and was included in the evaluation. The modeling results show technology based effluent limitations for CBOD₅ are appropriate and that a Dissolved Oxygen limit is not necessary to meet water quality criteria. The model determined an Ammonia-Nitrogen limit is necessary. The pollution report is attached as a pdf file.



Footedale STP Pollution Report

The discharge flow used in the modeling evaluation for the Footedale STP is 0.085 mgd which has historically been considered the average flow capacity of the STP and used as the average monthly flow value in previous NPDES permits, except for the last permit issued on January 20, 2015.

The previous NPDES permit application, as well as the most recent NPDES permit application, list the annual average design flow as 0.06 mgd and the hydraulic design capacity as 0.15 mgd. The application manager that prepared the 2015 NPDES permit apparently did not question the altered flow. The effluent limitations contained in the 2015 NPDES permit were still based on a flow of 0.085 mgd, but the average monthly flow in Part A of the permit was changed to 0.06 mgd. Also, Part A Supplemental Information language in the previous permit was structured as follows:

- (1) The hydraulic design capacity of 0.06 million gallons per day for the treatment facility is used to prepare the annual Municipal Wasteload Management Report to help determine whether a "hydraulic overload" situation exists, as defined in Title 25 Pa. Code Chapter 94.
- (2) The effluent limitations for Outfall 001 were determined using an effluent discharge rate of 0.085 MGD.
- (3) The organic design capacity of 17.7 lbs BOD₅ per day for the treatment facility is used to prepare the annual Municipal Wasteload Management Report to determine whether an "organic overload" condition exists, as defined in 25 Pa. Code Chapter 94.

Item (3) is not correct as 17.7 lbs. BOD_5 per day is an effluent mass loading limit and not the plant's organic design capacity. The permit application lists the organic design capacity as 110 lbs./day which will be used for this renewal permit. Assuming a BOD_5 influent concentration of 220 mg/l multiplied by 0.06 mgd and 8.345 = 100.14 lbs./day, which supports a design flow of 0.06 mgd, but this value will be questioned in the draft cover letter. If the design flow is 0.085 mgd, and a typical organic influent concentration of 200 mg/l is assumed, the design organic loading may be as high as 142 lbs./day.

Part C. I.E of the previous permit included the following language

• When the instantaneous flow at the treatment facility exceeds 0.17 MGD (the Chapter 94 hydraulic design capacity of the facility multiplied by a peaking factor of two), and for 24 hours following exceedance of this threshold.

This requirement suggests the capacity of the plant is $0.085 \, \text{mgd}$ ($0.17 \, \text{mgd} \div 2$) which conflicts with the Part A Supplemental Information language. Due to these discrepancies, this writer is electing to prepare this renewal permit using limits based on a flow of $0.085 \, \text{mgd}$ and basing Chapter 94 hydraulic overload situations consistent with that value.

Permit No. PA0090981

An attempt was made to pull the WQM permit file to confirm the plant's actual permitted hydraulic and organic capacities. Due to the Coronavirus pandemic, this writer was not in the office to search the files. Mr. Donald Leone was approved to be in the office on July 16, 2020 and sought for the file to no avail. He even searched previous NPDES permits looking for a clue if the plant was under a different entity when the plant was originally permitted but did not find such information. This writer spoke with consulting engineer Steve Eby on July 14, 2020 to ask him to confirm why 0.06 mgd was listed in the application. After investigating, he admitted that he is unsure, but flow data showed the plant does not exceed an effluent flow of 0.06 mgd. That reason obviously does not warrant the plants hydraulic design capacity to be considered 0.06 mgd. This writer received a follow-up email from consulting engineer Kerry Bell on July 20, 2020 that the 0.06 MGD and 0.15 MGD values were carried over from the previous permit.

Although the WQM permit could not be found, NPDES permits historically have approved flows of 0.085 mgd which suggests that is the actual capacity of the plant. However, the draft permit cover informs the permittee that they can justify 0.06 mgd and if they are able to do so, the final permit can be revised accordingly.

A modeling analysis was performed by this writer using a discharge flow of 0.06 mgd and the same reach characteristics as the previous evaluation. The Buffington STP was included in the evaluation. I was unable to print the pages but cut and pasted the results which are made part of this fact sheet.

The modeling results for a discharge flow of 0.06 mgd reveal technology-based limits are still applicable for CBOD $_5$ and no Dissolved Oxygen limit is necessary to meet WQ criteria. The plant is a municipal plant and thus requires mass loading limits. The CBOD $_5$ and TSS average monthly mass loadings limits for a flow of 0.085 mgd are 17.7 lbs./day and 21.3 lbs./day respectively. They are reduced to 12.5 lbs./day and 15.02 lbs./day for a flow of 0.06 mgd. It is not appropriate that the previous permit allowed the STP to discharge a higher volume of loadings to the stream if the actual discharge volume was considered 0.06 mgd. The NH3-N warm period average monthly effluent concentration is relaxed to 7.4 mg/l. Although the concentration limit is less stringent, it is a water quality-based limit and thus the allowable loading to the stream is essentially the same whether the discharge flow is 0.06 mgd or 0.085 mgd. The computed average monthly NH3-N loadings are: 0.085 mgd x 5.5 mg/l x 8.345 = 3.9 lbs./day; 0.06 mgd x 7.4 mg/l x 8.345 = 3.7 lbs./day. The insignificant difference is most likely due to rounding of values. This writer recommends that anti-backsliding not be used to justify keeping a more stringent limit of 5.5 mg/l if DEP erred by using the wrong flow in previous modeling evaluations.

Mr. Eby mentioned that there are plans to replace the Footedale STP with a pump station to convey flows to the German Township SA WWTP. It's possible, but unlikely, permit applications will be prepared and approved before this NPDES permit expires.

Technology-Based Limitations

The following technology-based limitations apply, subject to water quality analysis and BPJ where applicable:

Pollutant	Limit (mg/l)	SBC	Federal Regulation	State Regulation
CBOD₅	25	Average Monthly	133.102(a)(4)(i)	92a.47(a)(1)
Total Suspended				
Solids	30	Average Monthly	133.102(b)(1)	92a.47(a)(1)
pН	6.0 – 9.0 S.U.	Min – Max	133.102(c)	95.2(1)
Fecal Coliform				
(5/1 – 9/30)	200 / 100 ml	Geo Mean	-	92a.47(a)(4)
Fecal Coliform				
(5/1 - 9/30)	1,000 / 100 ml	IMAX	-	92a.47(a)(4)
Fecal Coliform				
(10/1 - 4/30)	2,000 / 100 ml	Geo Mean	-	92a.47(a)(5)
Fecal Coliform				
(10/1 - 4/30)	10,000 / 100 ml	IMAX	-	92a.47(a)(5)
Total Residual Chlorine	0.5	Average Monthly	-	92a.48(b)(2)

Comments: The above effluent limitations are consistent with the previous NPDES permit.

Water Quality-Based Limitations

Permit No. PA0090981

The following limitations were determined through water quality modeling (output files attached):

Parameter	Limit (mg/l)	SBC	Model
Ammonia Nitrogen	5.5	Average Monthly	WQM 6.3

Comments: The winter NH3-N model allocation indicates that NH3-N limitations are not necessary for the period 11/1 to 4/30. It is current policy to impose three (3) times the summer effluent limitations if summer limits are required to protect water quality. An average monthly cold period limit of 16.5 mg/l will be re-imposed. The above effluent limitation is consistent with the previous NPDES permit. If the permittee justifies the plant is rated at 0.06 mgd, this multiplier will be applicable to the warm period limit of 7.4 mg/l (say 7.0 mg/l).

Additional Comments:

- The units for Fecal Coliform are now "No./100 ml" in lieu of "CFU/100 ml".
- Effluent limitations for pH and DO are now to be reported as "Instantaneous Minimum" in lieu of "Minimum".
- Monthly average mass loading limits for Ammonia Nitrogen were added.
- Monthly average mass loading reporting requirements were added for BOD₅ and TSS Raw Sewage Influent parameters.
- A once per year Monitor and Report requirement for Total N and Total P was incorporated into the previous permit as per Chapter 92.a.61 and will be continued.
- A Dissolved Oxygen minimum limitation of 4.0 mg/L was previously implemented based on the standard in 25 PA Code Chapter 93 and best professional judgment and will be re-imposed. This limit is considered appropriate for activated sludge plants.

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (362-0400-001), SOPs and/or BPJ.

Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

			Effluent L	imitations			Monitoring Red	quirements
Parameter	Mass Units	(lbs/day) ⁽¹⁾		Concentrat	ions (mg/L)		Minimum ⁽²⁾	Required
Farameter	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum	Measurement Frequency	Sample Type
Flow (MGD)	0.060	Report Daily Max	XXX	XXX	XXX	XXX	1/week	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	4.0 Inst Min	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	0.5	XXX	1.6	1/day	Grab
CBOD5	17.7	XXX	XXX	25.0	XXX	50.0	2/month	Grab
BOD5 Raw Sewage Influent	Report	XXX	XXX	Report	XXX	XXX	2/month	Grab
TSS Raw Sewage Influent	Report	XXX	XXX	Report	XXX	XXX	2/month	Grab
TSS	21.3	XXX	XXX	30.0	XXX	60.0	2/month	Grab
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	2/month	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	2/month	Grab
Total Nitrogen	XXX	XXX	XXX	XXX	Report Daily Max	XXX	1/year	Grab
Ammonia Nov 1 - Apr 30	11.7	XXX	XXX	16.5	XXX	33.0	2/month	Grab
Ammonia May 1 - Oct 31	3.9	XXX	XXX	5.5	XXX	11.0	2/month	Grab

Outfall 001, Continued (from Permit Effective Date through Permit Expiration Date)

		Effluent Limitations						
Parameter	Mass Units (lbs/day) (1)			Concentrat	tions (mg/L)	Minimum ⁽²⁾	Required	
Parameter	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum	Measurement Frequency	Sample Type
	,	,			Report			
Total Phosphorus	XXX	XXX	XXX	XXX	Daily Max	XXX	1/year	Grab

Compliance Sampling Location: Outfall 001





















