

Application Type Renewal
Facility Type Sewage
Major / Minor Major

**NPDES PERMIT FACT SHEET
ADDENDUM**

Application No. PA0020176
APS ID 991946
Authorization ID 1270907

Applicant and Facility Information

Applicant Name	<u>Slatington Joint Client (Slatington Borough and Slatington Borough Authority)</u>	Facility Name	<u>Slatington WWTP</u>
Applicant Address	<u>125 S Walnut Street</u> <u>Slatington, PA 18080-2099</u>	Facility Address	<u>900 Railroad Street (Route 873)</u> <u>Slatington, PA 18080</u>
Applicant Contact	<u>Daniel Stevens</u>	Facility Contact	<u>Duane Szczesny</u>
Applicant Phone	<u>(610) 767-2131</u>	Facility Phone	<u>(610) 767-5871</u>
Client ID	<u>349454</u>	Site ID	<u>449306</u>
SIC Code	<u>4952</u>	Municipality	<u>Slatington Borough</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Lehigh</u>
Date Published in PA Bulletin	<u>September 12, 2020</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>October 12, 2020</u>	If No, Reason	<u>Major</u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>		

Internal Review and Recommendations

Addendum for Redraft NPDES Permit Renewal/Transfer for Slatington WWTP (permit transfer and related Part II WQM permit transfers to co-permittees). Open violations prevented prior permit action on the 8/26/2020 Draft NPDES Permit. This Redraft NPDES Permit has been updated to address current permitting requirements.

Background: See previous Draft NPDES Permit Fact Sheet for details regarding site-specific permit conditions and other site information. Updated information:

- **Facility:** This is a 1.5 MGD POTW discharging to the Lehigh River (TSF; Stream Code# 3335), impaired by AMD (Acid Mine Drainage). The facility uses Trickling Filters.
- **DRBC Docket Requirement:** The facility is also operated under DRBC docket D-2003-015 CP3, effective 09/13/2018, expiring 09/30/2023.
- **The 2021 Chapter 94 Report (Slatington Borough) indicated:**
 - Slatington plans to “cover the trickling filters to preserve latent heat within the next two years” in anticipation of future DRBC Limits (Ammonia-N). The Report indicated the permittee has been in contact with the DRBC, and that design drawings have been completed. The Report noted also a potential removal of an old anaerobic digester floating lid for safety reasons, with potential usage of remaining tankage for sludge storage. **NOTE:** NPDES Permit Part C.I.F will require an application for Part II WQM Permit for the trickling filter project be submitted. The Application can address any other proposed facility changes.
 - One SSO event in 2021. Slatington noted portions of the sewer system underwent rehabilitation (slip lining and trench technology) “over the past several years” to address I&I. LCA was contracted to inspect (CCTV) and reported completed 10,860 LF of mains and 150 LF of laterals. Borough flushed 900 feet.
 - The WWTP reed beds are not in current usage.
- **The 2022 Chapter 94 Report (Slatington Borough) indicated:**
 - The Borough plans to cover the trickling filters to preserve latent heat within the next two years. This is in response to the new DRBC basin-wide ammonia discharge limit. The required DRBC response with plans to

Approve	Return	Deny	Signatures	Date
X			James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	April 27, 2023
X			Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Acting Engineer Manager	5-3-23

Internal Review and Recommendations

meet the basin-wide ammonia limits was authored and submitted by Ebert Engineering. Drawings for the covers are complete. The project is awaiting the next round of H2O Small Systems Grant money to be released by DCED.

- The floating lid of the old anaerobic digester is being removed and should be complete in 2023. The lid was removed for safety reasons. The remaining tankage may be used for sludge storage in the future if needed.
- The reed beds are not used at all due to the need to minimize internal high strength recycle streams, in this case, the reed bed filtrate. The anaerobic digesters were converted to aerobic digesters during 2019 in order to improve removal efficiency and to stabilize the sludge. A total of 707,700 gallons of sludge, 67.19 dry tons, was removed in 2022 by Biros Sanitary Services, and taken to the Greater Hazelton Sewer Authority Plant for further processing.
- **WQM Permit Transfers:** No updating to the (to be transferred with Final NPDES Permit Action) WQM permits needed, so not included with Redraft NPDES Permit.
- **Other NPDES Permit:** Slatington Borough has a separate Municipal Storm Sewer System (MS4) NPDES Permit No. PAG132212 per E-maps.

Changes from 2020 Redraft NPDES Permit:

- **Updated NPDES Permit Template (Parts A, B, and C):** Updated NPDES Permit Template used to regenerate the permit, including updated WQBEL for Toxics Pollutant condition standard language.
- **Part A New Ammonia-N Limit (Final):** Per Chapter 92a.12, the Department is required to incorporate any additional or more stringent DRBC Docket requirements into the NPDES Permit. Per the existing DRBC Docket language (see below), a new Ammonia-N limit will become effective upon the next DRBC Docket renewal to address a watershed Ammonia-N limit. **The new Part A.I.C Ammonia-N limit (20.0 mg/l monthly average: 40.0 mg/l Daily Max and IMAX per standard multipliers) will become effective upon the effective date of the DRBC Docket’s Ammonia-N limit (whether upon DRBC Docket renewal or other time-frame set forth in the DRBC Docket Renewal), superseding the new Part A.I.B Ammonia-N requirements.** The Part A tables include footnotes requiring written notification of DRBC Docket Renewal and DMR reporting to allow for updating the EDMR System for the next reporting month. The existing 9/13/2018 DRBC Docket No D-2003-015 CP-3 (expires on 9/30/2023) Section B (Findings) and Decision Condition C.II.z stated:
 - **Section B:** “Section 4.30.5.D.1 of the Commission’s WQR includes a basin-wide effluent limit for Ammonia as Nitrogen of 20 mg/l as a 30-day average. The docket holder’s current treatment process has demonstrated an inability to meet the Commission’s basin-wide limit; therefore, the Commission staff have determined that the docket holder will monitor and report Ammonia-Nitrogen monthly effluent concentrations and the docket holder will be required to perform concurrent planning for treatment process modifications to satisfy the Commission’s effluent limit. **The docket holder will be required to meet the Commission’s 20 mg/l Ammonia-Nitrogen effluent limit upon the next docket renewal issuance.** The docket holder shall provide the Commission with a progress report on the docket holder’s planning for proposed modifications to provide adequate Ammonia-Nitrogen treatment at the WWTP. The progress report detailing the planning and proposed modifications at the facility is required to be submitted to the Commission by September 30, 2020 (See DECISION Condition C.II.z)”. (Bolding added).
 - **Decision Condition C.II.Z:** “The docket holder shall submit a progress report to the Commission detailing its planning for proposed modifications to the facility to meet the Commission’s 20 mg/l effluent limit for Ammonia-Nitrogen by September 30, 2020”.
- **Part A Copper Limit:** The Department updated the Reasonable Potential Analysis’ water quality modeling via the DEP Toxic Management Spreadsheet which recalculated permit limits (based on previously used data inputs) which are incorporated into this permit. Previous water quality modeling inputs and previously calculated Copper Long Term Average Monthly Effluent Concentration (LTAMEC) and daily Coefficient of Variability (COV) used in updated modeling.
- **Part A Zinc Monitoring:** The updated Reasonable Potential Analysis (TMS spreadsheet) indicated zinc monitoring is required. Zinc monitoring has been added to the permit.
- **Part A:**
 - New monthly E coli monitoring requirement due to Chapter 93 Water Quality Criteria and standard monitoring frequency for a major STP (Chapter 92a.61).
 - Where there was an existing IMAX limit but only reporting for daily maximum value (summer Ammonia-N), the Daily Max limit was set equal to the IMAX limit (because any exceedance of the IMAX limit, of any duration, is a violation of the IMAX limit) to ensure reporting of exceedances.

Internal Review and Recommendations

- **Part C.II.C:** Language has been added to the Annual Sludge Management Inventory requirement to address possible future usage of the existing onsite reed bed, now unused due to concerns of operational impact of recycle flows on the Ammonia-N limits: "If the reed beds are used, the permittee shall monitor and report utilized capacity, available capacity and age of sludge within each reed bed".
- **Part C.V.A:** The stormwater language included an incorrect reference to "or in combination with other wastewaters" for stormwater-only outfalls. No wastewater may be discharged via the permitted stormwater only outfalls. The incorrect language has been deleted.
- **Part C.V.D:** The language has been clarified to explicitly require submittal of the IW Stormwater Annual Report with the DMR (annual reporting).
- **Part C.V.F and Part C.V.G:** Current IW Stormwater TSS benchmark and corrective action requirements (in event of consecutive TSS benchmark exceedances) conditions incorporated into the Redraft NPDES Permit.

TMS Output:

Recommended WQBELs & Monitoring Requirements

No. Samples/Month:

Pollutants	Mass Limits		Concentration Limits				Governing WQBEL	WQBEL Basis	Comments
	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units			
Total Copper	0.54	0.64	43.2	51.4	108	µg/L	43.2	AFC	Discharge Conc ≥ 50% WQBEL (RP)
Total Zinc	Report	Report	Report	Report	Report	µg/L	556	AFC	Discharge Conc > 10% WQBEL (no RP)



SlatingtonTMS1PDF.pdf

Public Comments on 8/26/2020 Draft NPDES Permit:

- **9/21/2020 EPA General Comment on WQBEL For Toxic Pollutants Schedule of Compliance:** It is EPA's position that the schedule, as proposed, does not comply with Clean Water Act or federal regulatory requirements. The CWA defines schedules of compliance as a schedule of remedial measures including an enforceable sequence of actions or operations leading to compliance with an effluent limitation, other limitation, prohibition, or standard. 40 CFR 122.47(a)(1) requires that compliance schedules require compliance "as soon as possible". The TRE includes the actions that are intended to lead to compliance with the final limit, which is to be completed within 24 months. The development and subsequent evaluation of a Final WQBEL compliance report are not actions that lead to compliance, and extends the time for compliance two years beyond completion of the TRE actions. EPA understands that the regional office is implementing the SOP developed by Central Office, which defines this approach and EPA will discuss these concerns with Central Office for resolution. **The Redraft NPDES Permit includes an updated standard Part C.III (WQBELs for Toxic Pollutants) permit condition with language changes agreed upon by EPA to resolve EPA concerns about compliance milestones. See previous Draft NPDES Permit Fact Sheet language for more information regarding the Schedule of Compliance dates and rationale.**
- No Slatington Joint Client or Borough or Authority public comments were received on the previous Draft NPDES permit.

Slatington Compliance History: No open violations per April 27, 2023 WMS query, open violations by client number (Joint Client, Borough, or Authority).

Permit: PA0020176
Client ID: 349454
Client: All

Open Violations: 0
No data was found using the criteria entered. Please revise your choices and try again.