Pennsylvania Department of Environmental Protection

NORTHEAST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0020940**
Facility Type	**Sewage**	APS ID	**598462**
Major / Minor	**Minor**	Authorization ID	**1464225**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**Tunkhannock Borough Municipal Authority**	Facility Name	**Tunkhannock Borough Municipal Authority**
Applicant Address	201 W. Tioga Street Tunkhannock, PA 18657-6655	Facility Address	26 McCord Street Tunkhannock, PA 18657
Applicant Contact	Roger E. Hadsall, Manager	Facility Contact	Roger E. Hadsall, Manager
Applicant Phone	(570) 836-3493	Facility Phone	(570) 836-3493
Client ID	73970	Site ID	256620
SIC Code	4952	Municipality	Tunkhannock Borough
SIC Description	Trans. & Utilities - Sewerage Systems	County	Wyoming
Date Published in PA Bulletin	October 25, 2025	EPA Waived?	Yes
Comment Period End Date	November 25, 2025	If No, Reason	-

Purpose of Application: Renewal of NPDES permit for discharge of treated sewage.

Internal Review and Recommendations

The first draft of this NPDES Permit was issued on October 9, 2025 and appeared in the PA Bulletin on October 25, 2025.

Comments were received by the permittee via email on November 14, 2025.

Comment # 1 **–** *"The draft permit introduces new ammonia-nitrogen limits for the summer season (May 1 - October 31), including a monthly average concentration limit of 25.0 mg/Land an instantaneous maximum of 50.0 mg/L, effective three years after the permit's effective date. As of the effective date of the Permit and for the fust three years sampling and reporting for ammonia-nitrogen is required. These limits are not present in the current permit and represent a significant change that may require costly upgrades to our treatment facility. The existing Treatment Facility is not designed for nor capable of removing ammonia-nitrogen. Modifications to the Treatment process, or potentially complete replacement, would be required to meet the new limits likely costing millions of dollars and imposing a significant hardship on the user base. The proposed limits and timing of implementation also impose an impossible compliance schedule to meet. Should the required testing, within the first three years, determine treatment modifications or replacement are necessary, design, permitting and construction could not be accomplished prior to the effective date of the new limits. If the numeric requirements are not modified as discussed below, we respectfully request that DEP provide an opportunity for a phased or alternative compliance schedule that accounts for the realistic duration required for design, permitting, financing, and construction, should upgrades prove unavoidable. "*

Response – Per the "Standard Operating Procedure (SOP) for Clean Water Program – Establishing Effluent Limitations for Individual Sewage Permits" (SOP No. BCW-PMT-033), the Ammonia- Nitrogen monitoring/reporting and limitations are the state-wide default technology based BPJ requirements for all minor NPDES wastewater treatment plants across the state. The summertime 25.0 mg/L monthly average limitation and 50.0 mg/L IMAX limitation are the least stringent limitations that a facility can have. Since this is an existing facility and water quality modeling did not recommend stricter water-quality based-limitations, the Department can remove the limitations for Ammonia-Nitrogen for this permit cycle and add in a year-round

Approve	Return	Deny	Signatures	Date
X			Allison Seyfried Zukosky Allison Seyfried Zukosky / Project Manager	December 17, 2025
X			Edward Dudick, P.E. / Environmental Engineer Manager	December 19, 2025

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monitoring/ reporting requirement for Ammonia-Nitrogen. The permittee is encouraged to use the collected sampling data to learn what the facility is able to treat and determine what upgrades to the facility may be necessary to meet those limitations in the future. Forthcoming permits may require the state-wide limitations to be added again.

Comment # 2 **–** *"We respectfully request clarification of an apparent discrepancy between the summary of parameters on page 4 of the draft permit, which appears to only require reporting for ammonia nitrogen, and the detailed effluent limit table on pages 2-3, which imposes numerical limits effective three years after the permit effective date. We would appreciate clarification as to whether this apparent discrepancy is intentional or if a correction to either the summary table or the detailed effluent limitations is anticipated."*

Response – The table on page 4 of the first draft NPDES Permit included monitoring/reporting requirements for wintertime Ammonia-Nitrogen which is from November 1 through April 30. The tables on page 2 and 3 of the draft NPDES Permit included the limitations for summertime Ammonia-Nitrogen which is from May 1 through October 31. These dates were included in the tables and the different requirements for summertime and wintertime were explained in the first fact sheet. Please refer to the above response for comment #1 where it is explained the limitations have been removed and a year-round monitoring/reporting for Ammonia-Nitrogen has been added in the second draft.

Comment # 3 **–** *"The Fact Sheet accompanying the draft permit indicates that these ammonia limits are based on Best Professional Judgment (BPJ) rather than water quality modeling. We respectfully request that DEP provide the technical and policy rationale for imposing these specific numeric limits, especially given that the WQM 7.0 modeling did not recommend stricter water quality-based limits and the receiving stream (Tunkhannock Creek) is not impaired for ammonia. We specifically request the WQM 7.0 modeling report or a detailed explanation underlying DEP's numeric determination."*

Response – The Ammonia-Nitrogen requirements are from the "Standard Operating Procedure (SOP) for Clean Water Program – Establishing Effluent Limitations for Individual Sewage Permits" (SOP No. BCW-PMT-033). Please refer to the above response for comment #1 where it is explained the limitations have been removed and a year-round monitoring/ reporting for Ammonia-Nitrogen has been added in the second draft. The WQM 7.0 modeling will be provided to the permittee as a separate attachment.

Comment # 4 **–** ***"****We also request that DEP consider the unique hydrologic characteristics of our discharge location. The proximity of our outfall to the Susquehanna River and its backflow significantly affects dilution and assimilative capacity. These site-specific hydrologic conditions impact assimilative capacity and we believe warrant recalculation of the ammonia limits or a site specific modeling analysis. We bel1eve the existing discharge location should be modeled as if it were a discharge to the Susquehanna River due to: its proximity to the confluence of Tunkhannock Creek with Susquehanna River; no surface water elevation difference between the Creek and River; and the discharge location essentially being backwaters of the River. In light of the potential significant financial burden of upgrading our facility, we request DEP consideration of the following alternatives:*

1. *Site-Specific WQM 7 .0 Modeling Analysis: Perform a site-specific analysis to better understand the unique hydrologic conditions affecting our discharge.*
2. *Continued Monitoring and Reporting: Consider continued monitoring and reporting rather than imposing numeric limits, which could provide a more flexible and cost-effective approach.*
3. *Relocation of Discharge: Evaluate the feasibility of relocating the discharge to the Susquehanna River, which may offer better dilution and assimilative capacity. We also request DEP provide guidance on how a change in discharge location might affect effluent limitations.*
4. *Phased Compliance with Milestone-Based Review: If numeric limits are retained, we request DEP consider a phased compliance schedule with milestone-based reviews tied to Alternatives 1 and 2 above. This would allow the Authority to evaluate feasibility, secure funding, and implement necessary upgrades in a realistic timeframe."*

Response – The monitoring/reporting and limitations for this facility are all the minimum requirements allowed for minor sewage treatment facilities across the state. Therefore, remodeling will not affect the requirements. Please feel free to submit a formal Preliminary Effluent Limitation (PEL) request for limitations at a potential new outfall location to the Susquehanna River. The PEL request can be emailed to Edward Dudick, Environmental Engineer Manager, at EDUDICK@pa.gov.

Comment # 5 **–** ***"****We also wish to address and question the newly proposed effluent limitation for Dissolved Oxygen (DO). The draft permit introduces a minimum DO limit of 5 .0 mg/L, effective three years after the permit's effective date. Currently, our facility is not subject to a numeric DO requirement, and the Fact Sheet indicates that the limitation is based on Best Professional Judgment (BPJ). We respectfully request that DEP clarify the technical and policy rationale for imposing the DO*

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limit of 5.0 mg/L. The Fact Sheet references a DO 3.0 mg/L standard, yet the permit specifies a DO minimum of 5.0 mg/L. Please clarify whether this discrepancy is based on new policy, site specific modeling, or another rationale, and provide the supporting basis for this more stringent limit. Again, given the location of the discharge point, and its proximity to the confluence of the Creek with the River, shouldn't effluent standards be established using the upstream drainage area of the river rather than the upstream drainage area of the Creek? Implementation concerns are similar as outlined above for the proposed ammonia-nitrogen limits."

Response – The Dissolved Oxygen (DO) limitation is from the "Standard Operating Procedure (SOP) for Clean Water Program – Establishing Effluent Limitations for Individual Sewage Permits" (SOP No. BCW-PMT-033) and Table 3 of the Pennsylvania Code § 93.7. A minimum DO limitation of 5.0 mg/L is required and will be maintained in this permit. The Department has updated the table to allow an extra year of monitoring/reporting before the limitation comes into effect. Therefore, the 5.0 mg/L limitation will come into effect four years after the permit effective date instead of three years. The 3.0 mg/L that the permittee mentions in the comment is from the WQM 7.0 modeling; however, the state-wide requirements in the code and SOP of 5.0 mg/L are stricter and therefore apply.

Comment # 6* – *"We also request clarification regarding the monitoring parameters and sampling protocols for pollutants such as Total Phosphorus (P), Total Nitrogen (N), and sampling requirements such as the-frequency, sampling methodology (e.g., composite vs. grab), ~d rationale for inclusion."

Response – As stated in the first fact sheet, the facility is a Phase 4 Non-Significant sewage facility in the Chesapeake Bay Watershed. The "Phase 3 Watershed Implementation Plan Wastewater Supplement" requires renewed permits for Phase 4 sewage facilities (average annual design flow of ≥ 0.2 MGD and < 0.4 MGD) to contain monitoring and reporting for TN and TP throughout the permit term at a frequency no less than monthly. The "Standard Operating Procedure (SOP) for Clean Water Program – Establishing Effluent Limitations for Individual Sewage Permits" (SOP No. BCW-PMT-033) also requires monitoring/reporting to Total N and Total P. Total Kjeldahl Nitrogen and Nitrate-Nitrite as N sampling is required because Total Nitrogen is the sum of Total Kjeldahl-N (TKN) plus Nitrite-Nitrate as N (NO2+NO3-N), where TKN and NO2+NO3-N are measured in the same sample. The "Standard Operating Procedure (SOP) for Clean Water Program – New and Reissuance Sewage Individual NPDES Permit Applications (SOP No. BCW-PMT-002) also indicates, "Phase 4 dischargers will monitor nutrients at a minimum frequency of 1/month as 24- hour composites".

Comment # 7* – *"We also wish to comment on the newly proposed Copper monitoring requirement. While the draft permit does not impose a numeric limit, we are concerned that this monitoring may signal future effluent limitations. Our drinking water Lead and Copper Rule sampling has shown Copper levels below the Maximum Contaminant Level (MCL), though these samples are first draw and likely represent higher concentrations than would be observed at other times. We respectfully request DEP clarify the intent behind this monitoring requirement and whether it anticipates future effluent limitations. If so, we request DEP provide the technical basis and policy rationale for such a determination."

Response – The addition of monitoring/reporting for Total Copper does not automatically indicate that limitations will be added in the future. The sample results will provide additional and more realistic data to model during the next permit renewal cycle.

Comment # 8* – *"It is our understanding that DEP generally requires 8-hour composite sampling for minor sewage facilities that do not have around the clock staffing. Can you provide an explanation for the change in composite sampling from 8 hour to 24 hour. The Authority will need to purchase a backup composite sampler if we are required to collect 24-hour composite samples. If we currently have a problem with a sampler, we are able to manually composite a flow proportionate sample during the next day's 8-hour shift."

Response – The "Standard Operating Procedure (SOP) for Clean Water Program – New and Reissuance Sewage Individual NPDES Permit Applications (SOP No. BCW-PMT-002) states that for "existing facilities with effluent violations in the past two years with design flows ≥ 0.1 MGD, 24-hour composite sampling will be used for conventional and toxic pollutants except where grab sampling is appropriate (e.g., TRC, Fecal Coliform, pH, DO, etc.)".

Comment # 9* – *"Please clarify the definition of Calendar Week. The Authority collects composite samples on Wednesday. The laboratory picks up those samples on Thursday morning. The Authority also samples for fecal coliform on Thursday morning due to the maximum 6 hour hold time for analysis. How should samples be collected if a month ends on Wednesday?"

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Response – A *Calendar Week* is defined as the seven consecutive days from Sunday through Saturday, unless the permittee has been given permission by DEP to provide weekly data as Monday through Friday based on showing excellent performance of the facility and a history of compliance. In cases when the week falls in two separate months, the month with the most days in that week shall be the month for reporting.

Comment # 10 – *"Additionally, we respectfully request that DEP remove the reference to the past organic overload from the permit documentation. As noted in the Fact Sheet, the high BODS loadings in January 2019 and May 2022 were temporary and not representative of ongoing conditions. The Authority has properly addressed these issues which was acknowledged by DEP at the time, and there are currently no open violations. Including this resolved issue in the permit may create an inaccurate impression of current compliance status. We request the removal of references to resolved temporary organic overload events from permit documentation, and written confirmation of our current compliance status."*

Response – The first fact sheet cannot be edited; therefore, the documentation of the overload will remain. The first fact sheet does state there are currently no open violations for this facility or client. There remain no open violations for the facility or client.