pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

SOUTHWEST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0021148**
Facility Type	**Sewage**	APS ID	**1064579**
Major / Minor	**Major**	Authorization ID	**1398267**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**Municipal Authority of Westmoreland County (MAWC)**	Facility Name	**Mt Pleasant Borough STP**
Applicant Address	124 Park & Pool Road New Stanton, PA 15672	Facility Address	360 Clay Avenue Mount Pleasant, PA 15666-1910
Applicant Contact	Norman Stout	Facility Contact	Same as Applicant
Applicant Phone	(724) 640-7403	Facility Phone	Same as Applicant
Client ID	64197	Site ID	271476
SIC Code	4952	Municipality	Mount Pleasant Borough
SIC Description	Trans. & Utilities - Sewerage Systems	County	Westmoreland
Date Published in PA Bulletin	December 23, 2023 (Attachment A)	EPA Waived?	No
Comment Period End Date	January 22, 2024	If No, Reason	Major STP

Purpose of Application: Application for a renewal of an NPDES permit for discharge of treated Sewage

Internal Review and Recommendations

The Department of Environmental Protection (DEP) published notice of draft Authorization to Discharge under the National Discharge Elimination System (NPDES) discharge requirements for treated sewage for Mt Pleasant Borough STP in the *Pennsylvania Bulletin* on December 23, 2023 [53 Pa.B. 7940]. A 30-day comment period was provided during which interested parties were directed to submit comments to DEP.

The purpose of this fact sheet is to document the comments received and DEP's formal response to said comments.

Comments were received from Katelyn Warheit with MAWC and the United States Environmental Protection Agency (EPA). As a result of these comments, the reporting requirement for Influent BOD5 and TSS has been changed from reporting average monthly to reporting daily maximum and an additional condition was added to Part C. II.6.

In addition to the changes made as a result of comments, PFAS annual PFAS monitoring has also been added to Part A.I.E. of the permit. Since monitoring for new parameters has been introduced, the Department has chosen to issue a re-draft of the permit.

Per-and Polyfluoroalkyl Substances (PFAS)

In February 2024, DEP implanted a new PFAS monitoring initiative consistent with EPA's memorandum that provides guidance for addressing PFAS in treated effluent discharges permitted under the NPDES program. PFAS are a family of synthetic, organic chemicals containing a chain of strong carbon-fluorine bonds. PFAS are generally highly stable and water- and oil-resistant and are useful in a variety of consumer products and industrial processes. PFAS are resistant to biodegradation, photooxidation, direct photolysis, and hydrolysis. Because PFAS do not readily degrade by natural processes, it accumulates over time. According to the United States Department of Health and Human Services' Agency for

Approve	Return	Deny	Signatures	Date
X			Stephanie Conrad / Environmental Engineering Specialist	January 30, 2025
X			Mahbuba Iasmin, Ph.D., P.E. / Environmental Engineering Manager	January 31, 2025

Internal Review and Recommendations

Toxic Substances and Disease Registry (ATSDR). The environmental persistence and mobility of PFAS combined with decades of widespread use have resulted in surface water, groundwater, drinking water, rainwater, soil, sediment, ice caps, outdoor and indoor air, plants, animal tissue, and human blood serum across the globe. ATSDR also reports that exposure to certain PFAS can lead to adverse human health impacts. Due to their durability, toxicity, persistence, and pervasiveness, PFAS have emerged as a potentially significant pollutant of concern for sewage treatment plants.

In accordance with Section II.G, of DEP's SOP for Establishing Effluent Limitations for Individual Sewage Permits [BCQ-PMT-033] and under the authority of 25 Pa. Code § 92.a.61, DEP is imposing monitoring for a subset of common/well-studied PFAS to help understand the extend of PFAS contamination throughout the Commonwealth and the extent to which point source discharges under the NPDES program contribute. These PFAS include Perfluorooctanoic Acid (PFOA), Perfluoroctanesulfonic Acid (PFOS), Perfluorobutanesulfonic acid (PFBS), and Hexafluoropropylene Oxide Dimer Acid (HFPO-DA).

Mount Pleasant Borough STP submitted their NPDES Permit renewal application prior to August 5, 2024 and were therefore not required to sample for PFOA, PFOS, PFBS, and HFPO-DA as part of the renewal sampling. Mt Pleasant Borough STP has one industrial user, Allegheny Restoration, which is a masonry business. Allegheny Restoration is not a categorical user and therefore, EPA does not anticipate them to be a source of PFAS. Annual monitoring will therefore be imposed for PFOA, PFOS, PFBS. And HFPO-DA. In accordance with Section II.G.3. of DEP's SOP for *Establishing Effluent Limitations for Individual Sewage Permits* [BCQ-PMT-033], a footnote has been added to the permit stating "The permittee may discontinue monitoring for PFOA, PFOS, HFPO-DA, and PFBS if the results in four consecutive monitoring periods indicate non-detect results at or below Quantitation Limits of 4.0 ng/L for PFOA, 3.7 ng/L for PFOS, 3.5 ng/L for PFBS, and 6.4 ng/L for HFPO-DA. When monitoring is discontinued, permittees must enter a No Discharge Indicator (NODI) Code of "GG" on eDMRs.

In response to the third draft permit, Katelyn Warheit with MAWC, sent a formal letter dated January 18, 2024 (Attachment B). The letter contained comments regarding

1.It is MAWC's position that Bis(2-Ethylhexyl)Phthalate and Indeno(1,2,3-cd)Pyrene need to be removed from the effluent limitations because the sample results with B qualifiers cannot be considered valid and therefore must be discarded.

DEP's Response: The Department is in agreement that the Bis(2-Ethylhexyl)Phthalate and Indeno(1,2,3-cd)Pyrene detections in the samples taken March 9 through March 23, 2022 were all qualified as B. The lab report provided in Attachment C documents that this means "The target analyte was detected in the Method, Dilution Water, Instrument, or Extraction Blank or Sterility Check at or above the method reporting limit or applicable method, client, or regulatory requirement". The Department agrees that a qualification of B suggests that there is likely laboratory error, however, the percentage of results qualified in the initial sampling is concerning (100% and 66%, respectively). The ten additional samples being non-detect are beneficial, but the Department is asking for a wider time range of data to be satisfied that there is no reasonable potential for the effluent to cause or contribute to impairment for Bis(2-Ethylhexyl)Phthalate and Indeno(1,2,3-cd)Pyrene. No changes are being made to the redraft permit, however, Part XI.A of this permit allows the authority to apply for an amendment to remove the monitoring requirement and limits if after two years, all of the monitoring results are non-detect.

2. It is MAWC's position that Benzo(k)Fluoranthene needs to be removed from the effluent limitations because a single sample result out of thirteen showed a possible detection, but it was qualified because it was below the laboratory's method reporting limit, meaning it was an estimated value.

DEP's Response: Benzo(k)Fluoranthene was detected in the sample taken on March 23, 2022 at a concentration greater than the method detection limit for method EPA 625.1. The laboratory qualifies the sample as J. According to the lab report (Attachment C), this qualification documents that "the analyte was detected above the method detection limit but below the method reporting limit; the reported result is an estimated value." The department considers a result above the detection level as a detection regardless of its relation to the reporting limit. There will be no changes in the redraft permit regarding Benzo(k)Fluoranthene.

In accordance with Section I.B. of the Department's SOP for *Establishing WQBELs and Permit Conditions for Toxic Pollutants in NPDES Permits* [SOP No. BCW-PMT-037], when an outlier is suspected in data sets greater than 10, then the median value should be used to evaluate reasonable potential rather than the AMEC. Using a median value of 0.225 µg/L for Benzo(k)Fluoranthene has no effect on proposed effluent limitations.

Internal Review and Recommendations

Please note that the Department did not complete the tests recommended in EPA's *Guidance for Data Quality Assessment* (Data Quality Guidance) [EPA QA/G-9 QA00 Version] to confirm that outliers exist for this dataset. The Department's willingness to evaluate what the limits would be if outliers exist in the data sets should not be misconstrued in any way as confirmation that an outlier exists in the data set for Benzo(k)Fluoranthene.

3. The average monthly effluent limitation for Dichlorobromomethane and Chloroform is listed in the draft permit as 5.78 µg/L. Pennsylvania's Safe Drinking Water regulations regulate Total Trithalomethanes (TTHMs), which are the sum of Dichlorobromomethane, Chloroform, Bromoform, and Chlorodibromomethane, a Maximum Contaminant Level (MCL) of 80 µg/L. What is the logic behind assigning a limit for wastewater that is a fraction of the limit for drinking water.

DEP's Response: 25 PA Code §93.6 stipulates that "Water may not contain substances attributable to point or nonpoint source discharges in concentration or amounts sufficient to be inimical or harmful to the water uses to be protected or to human, animal, plant or aquatic life." Because of this, the receiving stream, Shupe Run, is required to meet the most stringent of four water criteria: Criteria Maximum Concentration (also called acute fish criteria of AFC), Criteria Continuous Concentration (also called chronic fish criteria or CFC), Threshold Human Health Criteria (THH), and Cancer Risk Level criteria(CRL). Table 5 of 25 PA Code §93.8c.(b) defines Pennsylvania's water quality criteria. Dichlorobromomethane's most restrictive criteria is the CRL criteria of 0.95 µg/L. Chloroform's most restrictive criteria is the THH criteria of 5.7 µg/L. TMS calculated limits for both pollutants based on Shupe Run meeting both of these criteria.

4. The effluent limitations for TRC were changed from 0.03 mg/L to 0.011 mg/L (Average Monthly) and from 0.10 mg/L to 0.035 mg/L (Instantaneous Maximum). The DEP SOP for *Establishing Effluent Limitations for Individual Sewage Permits* [SOP No. BCW-PMT-033) states "For existing discharges, where the existing TRC limit is at or below 0.1 mg/L the existing limit may remain in the reissued permit (no modeling required)." DEP indicated in the Fact Sheet that even though the SOP states that the existing limits may remain and that no modeling is required, the application manger has the discretion to choose to remodel the TRC effluent limitations anyway. When TRC was remodeled, the "Chlorine Demand of Stream" was changed from 0.8 mg/L to 0.3 mg/L and the "Q_{stream}" was changed from 0.1287 cfs to 0.0319 cfs. What rationale did the previous manager provide for using an in-stream chlorine demand of 0.8 mg/L in the previous TRC Model? What is the reason for changing the flow of the stream to ¼ of its previous value?

DEP's Response: There was no justification provided to validate an instream value of 0.8 mg/L in the previous fact sheets. Without site-specific justification, Section II.C.2. of DEP's SOP for *Establishing Effluent Limitations for Individual Sewage Permits* [SOP No. BCW-PMT-033] stipulates that an instream chlorine demand of 0.3 mg/L be used. Therefore, an instream value of 0.8 mg/L cannot continue to be used for modeling TRC for this facility.

As stated on page 4 of the fact sheet, the stream flow rate was generated using USGS Stream stats, which is the accepted practice within DEP at this time.

Please note that Part C.VIII.D.1. of the permit provides MAWC with the opportunity to conduct a Chlorine Demand Study in accordance with DEP's *Implementation Guidance Total Residual Chlorine (TRC) Regulation* [DEP ID 391-2000-015] if they believe that a site-specific in-stream chlorine demand is appropriate. Additionally, the Department allows for any permittee to conduct site-specific studies for any model input they question the validity of.

5. MAWC requests that influent BOD and influent TSS monitoring requirements be changed from "Report Weekly Average" to "Report Daily Max" for consistency purposes. All other major sewage plants operated by MAWC have reporting requirements that require "Report Daily Max" for influent BOD and influent TSS: New Stanton (PA0026581), Jeanette WWTP(PA 0027430), Scottdale STP (PA0026581), and Darragh STP (PA0096211). The fact sheet reference than an SOP states "influent BOD and TSS monitoring will be imposed in the permit at a frequency equivalent to that imposed for the effluent parameters." The sampling frequency will still be equivalent to that imposed for effluent parameters: 2/week.

DEP's Response: For the purpose of renewing this permit, DEP will impose influent BOD and TSS monitoring requirements as Report Daily Max at the request of the permittee. Please note, however, that EPA prefers traditional pollutants to be reported as weekly and monthly averages. The intent of this preference is so that the influent reporting aligns with the effluent reporting basis. DEP reserves the right during subsequent renewals to adjust any permit to be in line with EPA's preference.

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6. It is MAWC's position that Bis(2-Ethylhexly)Phthalate, Indeno(1,2,3-cd)Pyrene, and Benzo(k)Fluoranthene need to be removed from the WQBELs table and TRE requirement. See discussion under "Pages 3,4" above.

DEP's Response: DEP has evaluated the complete data sets for each of these parameters in accordance with the Department's SOP for *Establishing WQBELs and Permit Conditions for Toxic Pollutants in NPDES Permits* [SOP No. BCW-PMT-037] and has justified why these parameters are assigned limits.

Section III.5.a of DEP's *SOP for Establishing WQBELs and Permit Conditions for Toxic Pollutants in NPDES Permits* [SOP No. BCW-PMT-037] states that if the permittee documents in the pre-draft survey that the source of the toxic pollutants of concern are unknown or suspected to be unknown, then the permittee will be required to conduct a TRE to investigate and control the source(s) of the pollutants subject to final WQBELs.

MAWC documented in their pre-draft survey response (Attachment D) that they are not aware of the sources for Benzo(k)Fluoranthene, Bis(2-Ethylhexyl)Phthalate, and Indeno(1,2,3-cd)Pyrene. Additionally, all three parameters of concern are subject to final WQBELs in Part A.I.C. of the permit. Benzo(k)Fluoranthene, Bis(2-Ethylhexyl)Phthalate, and Indeno(1,2,3-cd)Pyrene are therefore all subject to the requirement to conduct a TRE for these parameters

On December 14, 2023, US EPA Region III sent an email (Attachment E) making the following comment:

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

Mt Pleasant Borough STP
Municipal Authority of Westmoreland County (MAWC)
NPDES Number: PA0021148
EPA Received Revised Draft: 12/7/2023
30-day response date: 1/6/24

Mount Pleasant STP NPDES permit is a major facility that discharges to Shupe Run and this is the third draft permit EPA has received. PADEP had chosen to incorporate the minimum CSO performance standard requirement of 85% capture, listed in the 1994 CSO policy, into the NPDES Permit rather than including the 94% capture performance standard value from MAWC's LTCP for Mount Pleasant STP. EPA does not concur with this approach based on our technical evaluation of the COS Policy as previously stated during correspondence on the Jeanette STP NPDES permit, PA0027430. Our office is currently drafting a formal response to further explain our position on the overall matter, which will be sent to PADEP once it is finalized.

Should you have any questions, please feel free to reach out to Ryan Shuart, copied on this email. If there are any additional changes to the permit documents, please be sure to reach out to EPA as additional review may be necessary.

DEP's Response: The Department acknowledges this comment in addition to the July 23, 2024 letter (Attachment F) in augmentation of this comment. Section IV.B.2.c of the EPA CSO Policy specifies what numeric performance standards should be in the Phase II permits to meet the water quality-based effluent limits under 40 CFR 122.44(d)(1) and 122.44(k). The Policy has listed four (i, ii, iii, and iv) numeric performance standards:

i. A *maximum* number of overflow events per year for specified design conditions consistent with II.C.4.a.i;
ii. A *minimum* percentage capture of combined sewage by volume for treatment under specified design conditions consistent with II.C.4.a.ii;
iii. A *minimum* removal of the mass of pollutants discharged for specified design conditions consistent with II.C.4.a.iii;
iv. Performance standards and requirements that are consistent with II.C.4.b of the Policy.

The standards specified in i-iii are consistent with the three criteria of the Presumption Approach while the standards specified in iv are consistent with the requirements of the Demonstration Approach.

Exhibit 4-4 of EPA's CSO Guidance for Permit Writers (EPA 832-B-95-008, September 1995) shows an example of the sample permit language for Presumption Approach providing additional clarification that the minimum percent capture (i.e., at least 85 percent) as identified in Section IV.B.2.c of the EPA CSO Policy should be in the permit

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when a permittee adopts Presumption Approach. The example does not provide an option to modify the percent capture in the sample permit language like other options for appropriate number of overflows or mass pollutant removal.

Page 2 of the July 23, 2024 letter states, “If, based on the LTCP, the permitting authority determines that the presumption approach minimum criteria included in the CSO Polity do not “provide an adequate level of control to meet the water quality-based requirements of the CWA”, the permitting authority must establish more stringent requirements necessary to meet water quality standards”. Based on the CSO Policy and EPA’s guidance documents, it is PADEP’s understanding that the permitting authority’s responsibility to establish more stringent requirements for Presumption Approach falls under the responsibility during post-Phase II CSO permitting.

Additionally, use of the presumption approach does not shield a permittee from the possibility that additional controls might eventually be necessary in order to attain water quality objectives. In light of this understanding, PADEP SWRO has started including post-Phase II CSO requirements in the Phase II CSO permits, i.e., submission of a Phase III Plan in the LTCP compliance schedule, which it believes satisfies the permitting authority’s responsibility as well as the permittee’s requirement to comply with the CSO Policy. The following language has been added to the LTCP Implementation Schedule in Part C.II.C.3 of the redraft permit:

“If the findings of the Post-Construction Compliance Monitoring Plan indicate that Phase I and Phase II are not sufficient to meet the Presumption Approach requirements of the CSO Control Policy and the Department’s compliance criteria, submit a Phase III plan to the Department designed to achieve ultimate compliance with the CSO Control Policy and all Water Quality Standards with an implementation schedule to complete Phase III in the fastest time reasonably practicable.”

Additionally, as examples, the EPA Region Two Permits NY0031429 and NY00222403 specify 85 percent as the numeric performance standard for Presumption Approach.

For these reasons, the performance standard in Part C. II. C. 2. of the permit is not changing from 85 percent.

ATTACHMENT A

Third Draft Permit PA Bulletin Notice

NOTICES

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Applications, Actions and Special Notices

APPLICATIONS

[53 Pa.B. 7940]
[Saturday, December 23, 2023]

THE PENNSYLVANIA CLEAN STREAMS LAW AND THE FEDERAL CLEAN WATER ACT

APPLICATIONS FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMITS AND WATER QUALITY MANAGEMENT (WQM) PERMITS UNDER THE CLEAN STREAMS LAW AND FEDERAL CLEAN WATER ACT

This notice provides information about persons who have applied to the Department of Environmental Protection (DEP) for a new, renewed, or amended NPDES or WQM permit, or a permit waiver for certain stormwater discharges, or have submitted a Notice of Intent (NOI) for coverage under a General Permit. The applications and NOIs concern, but are not limited to, effluent discharges from sewage treatment facilities and industrial facilities to surface waters or groundwater; stormwater discharges associated with industrial activity (industrial stormwater), construction activity (construction stormwater), and municipal separate storm sewer systems (MS4s); the application of pesticides; the operation of Concentrated Animal Feeding Operations (CAFOs); and the construction of sewage, industrial waste, and manure storage, collection and treatment facilities. This notice is provided in accordance with 25 Pa. Code Chapters 91 and 92a and 40 CFR Part 122, implementing The Clean Streams Law (35 P.S. §§ 691.1—691.1001) and the Federal Clean Water Act (33 U.S.C.A. §§ 1251—1376). More information on the types of NPDES and WQM permits that are available can be found on DEP's website (visit www.dep.pa.gov and select Businesses, Water, Bureau of Clean Water, Wastewater Management, and NPDES and WQM Permitting Programs).

Section	Category
I	Individual and General WQM Permit Applications/NOIs Received, General NPDES Permit NOIs Received, and All Transfer and Minor Amendment Applications/NOIs Received
II	Individual NPDES Permits—New, Renewal, and Major Amendment Applications and Draft Permits for Discharges Relating to Sewage, Industrial Waste, Industrial Stormwater, MS4s, Pesticides and CAFOs
III	Individual NPDES Permit Applications for Discharges of Stormwater Associated with Construction Activity

Section I identifies the following applications and NOIs that have been received by DEP:

- Individual and General WQM Permit Applications Received—DEP provides a 15-day public comment period for Individual WQM Permit Applications for new and reissued permits. There is no public comment period for General WQM Permit NOIs.

- General Chapter 92a NPDES Permit NOIs Received—There is no public comment period for General NPDES NOIs received.

- All Transfer and Minor Amendment Applications/NOIs Received—Transfer and Minor Amendment Applications/NOIs received for Individual and General WQM Permits and Individual and General NPDES Permits, excluding PAG-01 and PAG-02, are identified but do not have public comment periods. DEP provides a 15-day public comment period for Individual WQM Permit Applications for amendments.

Additional information on these applications and NOIs may be reviewed by generating the "Applications and NOIs without Comment Periods Report" or, for Individual WQM Permit Applications, the "Applications Received with Comment Periods Report" on DEP's website at www.dep.pa.gov/CWPublicNotice.

PA0021148, Sewage, SIC Code 4952, **Municipal Authority of Westmoreland County**, 124 Park and Pool Road, New Stanton, PA 15672. Facility Name: Mt Pleasant Borough STP. This existing facility is located in Mount Pleasant Borough, **Westmoreland County**.

Description of Existing Activity: The application is for a renewal of an NPDES permit for an existing discharge of treated sewage.

The receiving stream(s), Shupe Run (WWF), is located in State Water Plan watershed 19-D and is classified for Warm Water Fishes, aquatic life, water supply and recreation. The discharge is not expected to affect public water supplies.

The proposed effluent limits for Outfall 001 are based on a design flow of 1.5 MGD.—Interim Limits.

	Mass Units (lbs/day)			Concentrations (mg/L)		
Parameters	Average Monthly	Daily Maximum	Minimum	Average Monthly	Daily Maximum	IMAX
Copper, Total (ug/L)	Report	Report	XXX	Report	Report	XXX
Cyanide, Free (ug/L)	Report	Report	XXX	Report	Report	XXX
Benzo(k)Fluoranthene (ug/L)	Report	Report	XXX	Report	Report	XXX
Dichlorobromomethane (ug/L)	Report	Report	XXX	Report	Report	XXX
Bis(2-Ethylhexyl)Phthalate (ug/L)	Report	Report	XXX	Report	Report	XXX
Chloroform (ug/L)	Report	Report	XXX	Report	Report	XXX
Indeno(1,2,3-cd)Pyrene (ug/L)	Report	Report	XXX	Report	Report	XXX

The proposed effluent limits for Outfall 001 are based on a design flow of 1.5 MGD.—Interim Limits.

	Mass Units (lbs/day)			Concentrations (mg/L)		
Parameters	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	IMAX
Total Residual Chlorine (TRC)	XXX	XXX	XXX	0.03	XXX	0.10

The proposed effluent limits for Outfall 001 are based on a design flow of 1.5 MGD.—Final Limits.

	Mass Units (lbs/day)			Concentrations (mg/L)		
Parameters	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	IMAX
Total Residual Chlorine (TRC)	XXX	XXX	XXX	0.011	XXX	0.035

The proposed effluent limits for Outfall 001 are based on a design flow of 1.5 MGD.—Final Limits.

	Mass Units (lbs/day)			Concentrations (mg/L)		
Parameters	**Average Monthly**	**Daily Maximum**	**Minimum**	**Average Monthly**	**Daily Maximum**	**IMAX**
Copper, Total (ug/L)	0.12	0.18	XXX	9.46	14.2	14.2
Cyanide, Free (ug/L)	0.051	0.079	XXX	4.06	6.33	10.1
Benzo(k)Fluoranthene (ug/L)	0.0001	0.0002	XXX	0.012	0.018	0.029
Dichlorobromomethane (ug/L)	0.014	0.021	XXX	5.78	9.02	14.4
Bis(2-Ethylhexyl)Phthalate (ug/L)	0.005	0.007	XXX	0.37	0.58	0.93
Chloroform (ug/L)	0.072	0.11	XXX	5.78	9.02	14.4
Indeno(1,2,3-cd)Pyrene (ug/L)	0.00001	0.00002	XXX	0.001	0.002	0.003

The proposed effluent limits for Outfall 001 are based on a design flow of 1.5 MGD.—Limits.

	Mass Units (lbs/day)		Concentrations (mg/L)			
Parameters	**Average Monthly**	**Weekly Average**	**Minimum**	**Average Monthly**	**Weekly Average**	**IMAX**
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX
pH (S.U.)	XXX	XXX	6.0 Daily Min	XXX	9.0 Daily Max	XXX
Dissolved Oxygen	XXX	XXX	5.0 Daily Min	XXX	XXX	XXX
Carbonaceous Biochemical Oxygen Demand ($CBOD_5$)	220.0	335.0	XXX	17.0	27.0	36
Nov 1 - Apr 30						
May 1 - Oct 31	125.0	185.0	XXX	10.0	15.0	20
Biochemical Oxygen Demand (BOD_5)	Report	Report	XXX	Report	XXX	XXX
Raw Sewage Influent						
Total Suspended Solids	310.0	475.0	XXX	25.0	38.0	50
Total Suspended Solids	Report	Report	XXX	Report	XXX	XXX
Raw Sewage Influent						
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	2,000 Geo Mean	XXX	10,000
Oct 1 - Apr 30						
May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1,000
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report
Ammonia-Nitrogen	40.0	XXX	XXX	3.2	4.8	6.4
Nov 1 - Apr 30						
May 1 - Oct 31	23.9	XXX	XXX	1.91	3.82	XXX
Iron, Dissolved (ug/L)	Report	Report Daily Max	XXX	Report	Report Daily Max	XXX
Zinc, Total (ug/L)	Report	Report Daily Max	XXX	Report	Report Daily Max	XXX
Total Nitrogen	XXX	XXX	XXX	XXX	Report Daily Max	XXX
Total Phosphorus	XXX	XXX	XXX	XXX	Report Daily Max	XXX

Following major conditions have been added to the permit:

• A compliance schedule for total residual chlorine in Part C.VIII.A

• A compliance schedule for total copper, free cyanide, chloroform, dichlorobromomethane, benzo(k) fluoranthene, bis(2-Ethylhexyl) phthalate, and indeno(1,2,3-cd) pyrene in Part C. V.C

You may make an appointment to review the DEP files on this case by calling the File Review Coordinator at 412-442-4000.

The EPA Waiver is not in effect.

Southwest Regional Office

ATTACHMENT B

MAWC Comment Letter

An Equal Opportunity Employer 124 Park and Pool Road
New Stanton, PA 15672
Phone: 724.755.5800
1.800.442.6829

"Regional Water ♦ Wastewater Service"

Mailing Address
P.O. Box 730
Greensburg, PA 15601

www.mawc.org
mawc@mawc.org

January 18, 2024

Stephanie Conrad
PA DEP Clean Water Program
400 Waterfront Drive
Pittsburgh, PA 15222

Re: Mt. Pleasant Borough STP (PA0021148)
Third Draft NPDES Permit Comments

Dear Ms. Conrad:

MAWC has reviewed the third draft NDPES permit for Mt. Pleasant Borough STP and would like to provide the following comments:

Pages 3, 4

- It is MAWC's position that Bis(2-Ethylhexyl)Phthalate and Indeno(1,2,3-cd)Pyrene need to be removed from the effluent limitations because the sample results with B qualifiers cannot be considered valid data and therefore must be discarded. The B qualifier means that the laboratory's equipment erroneously detected these parameters in deionized water, where it is known that they are not present. The ten sample results that do not have B qualifiers are the only data points that can be accepted as valid. All ten of those sample results were non-detect.

- It is MAWC's position that Benzo(k)Fluoranthene needs to be removed from the effluent limitations because a single sample result out of thirteen showed a possible detection, but it was qualified because it was below the laboratory's method reporting limit, meaning that it was an estimated value. (Please note that a revised report was issued to add the J qualifier approximately one year after the original report because that is when the error was discovered. The omission of the J qualifier on the original report went unnoticed until an investigation of the sample data was undertaken in response to the inclusion of this parameter in the draft NPDES permit. The length of time between the original report and the revision bears no relevance upon the fact that it is accurate to have the J qualifier listed for Benzo(k)Fluoranthene.) Please see attached email from Suburban Testing Labs regarding the interpretation of this data.

- The average monthly effluent limitation for Dichlorobromomethane and Chloroform is listed in the draft permit as 5.78 ug/L. Pennsylvania's Safe Drinking Water regulations regulate Total Trihalomethanes (TTHMs), which are the sum of Dichlorobromomethane, Chloroform, Bromoform, and Chlorodibromomethane, at a Maximum Contaminant Level (MCL) of 80 ug/L. What is the logic behind assigning a limit for wastewater that is a fraction of the limit for drinking water?

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- The effluent limitations for TRC were changed from 0.03 mg/L to 0.011 mg/L (Average Monthly) and from 0.10 mg/L to 0.035 mg/L (Instantaneous Maximum). The DEP SOP for Establishing Effluent Limitations for Individual Sewage Permits (BCW-PMT-033) states that "For existing discharges, where the existing TRC limit is at or below 0.1 mg/L, the existing limit may remain in the reissued permit (no modeling required)." DEP indicated in the Fact Sheet that even though the SOP states that the existing limits may remain and that no modeling is required, the application manager has the discretion to choose to remodel the TRC effluent limitations anyway. When TRC was remodeled, the "Chlorine Demand of Stream" was changed from 0.8 mg/L to 0.3 mg/L and the "Q_{stream}" was changed from 0.1287 cfs to 0.0319 cfs. What rationale did the previous application manager provide for using an in-stream chlorine demand of 0.8 mg/L in the previous TRC model? What is the reason for changing the flow of the stream to ¼ of its previous value?

Page 6

- MAWC requests that influent BOD and influent TSS monitoring requirements be changed from "Report Weekly Average" to "Report Daily Max" for consistency purposes. All other major sewage treatment plants operated by MAWC have reporting requirements that require "Report Daily Max" for influent BOD and influent TSS: New Stanton STP (PA0038181), Jeannette WWTP (PA0027430), Scottdale STP (PA0026581), and Darragh STP (PA0096211). The fact sheet references an SOP that states "…influent BOD and TSS monitoring will be imposed in the permit at a frequency equivalent to that imposed for the effluent parameters." The sampling frequency will still be equivalent to that imposed for effluent parameters: 2/week.

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- It is MAWC's position that Bis(2-Ethylhexyl)Phthalate, Indeno(1,2,3-cd)Pyrene, and Benzo(k)Fluoranthene need to be removed from the WQBELs table and TRE requirement. See discussion under "Pages 3, 4" above.

MAWC would like to request a conference call to discuss these comments prior to issuance of the final NPDES permit. Please contact me at kwarheit@mawc.org or 724-454-0233 to discuss this request.

Sincerely,

Katelyn Warheit

Katelyn Warheit
Environmental Compliance Superintendent
Municipal Authority of Westmoreland County

cc: Dom Garofola, Gibson-Thomas Engineering

Katelyn Warheit

From: Frank Medora <fmedora@suburbantestinglabs.com>
Sent: Friday, December 29, 2023 4:46 PM
To: Katelyn Warheit; Rich Stump III
Subject: RE: Follow Up Discussion on Your Presentation at IPP Conference on 4-13-23

Hi Katelyn,

J values are estimated results since they are below the laboratory's MRL, the lowest calibration standard where results are quantifiable and reliable. Therefore, J-qualified results, the range between the MDL and the MRL, should not be used as the basis to require monitoring in an NPDES permit. If the laboratory had reported the original sample results to the MRL, the results would have been non-detect for these analytes except for two of the Bis(2-Ethylhexyl)Phthalate (also known as BEHP or DEHP). BEHP is frequently found in commonly used plastic products and is known to be a prevalent contaminant. It is our experience as a commercial laboratory, that when a sample registers J and B flags due to the presence of BEHP, the resulting values are not only estimated, but also raise concerns about the authenticity of the detected origin.

We recommend that you have a conference call with the NPDES permitting staff from your local DEP office and the Division of NPDES Permitting from Harrisburg (Sean Furjanic and Maria Schumack: (717) 787-5017) to get everyone on the same page.

Frank Medora
Client Experience Liaison
Office: 610-375-8378 x294
Direct: 484-544-4703
Cell: 484-995-6958
fmedora@suburbantestinglabs.com

SUBURBAN TESTING LABS

Our offices will be closed on Monday, December 25th in observance of Christmas Day, and Monday, January 1st for the New Year. Please contact our office in advance if you need to make alternative arrangements for your sampling. Thank you.

ATTACHMENT C
Revision Four of the Laboratory Report for Effluent Samples Collected March 23, 2022

SUBURBAN TESTING LABS

Amended Results Report

Order ID: 2C05004

Environmental Service Laboratories, Inc.
1803 Philadelphia Street
Indiana, PA 15701

Project: NPDES Permit Renewals

Attn: Rebecca Erwin

Regulatory ID:

Sample Number: 2C05004-01 Site: 2032021-01 Sample ID: 2032021
Collector: Client Collect Date: 03/23/2022 7:00 am Sample Type: Composite

Department / Test / Parameter	Result		Units	Method	R.L.	DF	Prep Date	By	Analysis Date	By
Inorganics										
Chromium (VI)	< 0.10		µg/L	EPA 218.6	0.10	1	04/04/22	DSM	04/04/22 13:10	ZJH
Metals										
Antimony	< 0.2		µg/L	EPA 200.8	0.2	1	04/01/22	MKR	04/04/22 11:35	MKR
Arsenic	< 0.4		µg/L	EPA 200.8	0.4	1	04/01/22	MKR	04/04/22 11:35	MKR
Cadmium	< 0.1		µg/L	EPA 200.8	0.1	1	04/01/22	MKR	04/04/22 11:35	MKR
Cobalt	< 0.2		µg/L	EPA 200.8	0.2	1	04/01/22	RPV	04/04/22 11:35	RPV
Lead	< 0.3		µg/L	EPA 200.8	0.3	1	04/01/22	MKR	04/04/22 11:35	MKR
Selenium	< 0.5		µg/L	EPA 200.8	0.5	1	04/01/22	MKR	04/04/22 11:35	MKR
Silver	< 0.2		µg/L	EPA 200.8	0.2	1	04/01/22	MKR	04/04/22 11:35	MKR
Thallium	< 0.05		µg/L	EPA 200.8	0.05	1	04/01/22	MKR	04/04/22 11:35	MKR
Zinc	28		µg/L	EPA 200.8	4	1	04/01/22	MKR	04/04/22 11:35	MKR
Semivolatiles										
SVOA, 625, PPL										
Acenaphthene	< 0.0990	L1	µg/L	EPA 625.1	0.0990	1	03/29/22	AMAA	03/31/22 3:21	MAG
Acenaphthylene	< 0.0894		µg/L	EPA 625.1	0.0894	1	03/29/22	AMAA	03/31/22 3:21	MAG
Anthracene	< 0.0875		µg/L	EPA 625.1	0.0875	1	03/29/22	AMAA	03/31/22 3:21	MAG
Benzidine	< 4.81		µg/L	EPA 625.1	4.81	1	03/29/22	AMAA	03/31/22 3:21	MAG
Benzo(a)anthracene	< 0.0596		µg/L	EPA 625.1	0.0596	1	03/29/22	AMAA	03/31/22 3:21	MAG
Benzo(a)pyrene	< 0.0692		µg/L	EPA 625.1	0.0692	1	03/29/22	AMAA	03/31/22 3:21	MAG
Benzo(b)fluoranthene	< 0.0433		µg/L	EPA 625.1	0.0433	1	03/29/22	AMAA	03/31/22 3:21	MAG
Benzo(g,h,i)perylene	< 0.0788	B3	µg/L	EPA 625.1	0.0788	1	03/29/22	AMAA	03/31/22 3:21	MAG
Benzo(k)fluoranthene	0.135	J	µg/L	EPA 625.1	0.0798	1	03/29/22	AMAA	03/31/22 3:21	MAG
4-Bromophenyl phenyl ether	< 0.104	L1	µg/L	EPA 625.1	0.104	1	03/29/22	AMAA	03/31/22 3:21	MAG
Butyl benzyl phthalate	< 0.0635		µg/L	EPA 625.1	0.0635	1	03/29/22	AMAA	03/31/22 3:21	MAG
4-Chloro-3-methylphenol	< 0.0952		µg/L	EPA 625.1	0.0952	1	03/29/22	AMAA	03/31/22 3:21	MAG
bis(2-Chloroethoxy) methane	< 0.0817		µg/L	EPA 625.1	0.0817	1	03/29/22	AMAA	03/31/22 3:21	MAG
bis(2-Chloroethyl) ether	< 0.0750		µg/L	EPA 625.1	0.0750	1	03/29/22	AMAA	03/31/22 3:21	MAG
bis(2-Chloroisopropyl) ether	< 0.0656	L1	µg/L	EPA 625.1	0.0656	1	03/29/22	AMAA	03/31/22 3:21	MAG
2-Chloronaphthalene	< 0.0875	L1	µg/L	EPA 625.1	0.0875	1	03/29/22	AMAA	03/31/22 3:21	MAG
2-Chlorophenol	< 0.0875		µg/L	EPA 625.1	0.0875	1	03/29/22	AMAA	03/31/22 3:21	MAG
4-Chlorophenyl phenyl ether	< 0.0913		µg/L	EPA 625.1	0.0913	1	03/29/22	AMAA	03/31/22 3:21	MAG
Chrysene	< 0.0702		µg/L	EPA 625.1	0.0702	1	03/29/22	AMAA	03/31/22 3:21	MAG
Dibenz(a,h)anthracene	< 0.0510		µg/L	EPA 625.1	0.0510	1	03/29/22	AMAA	03/31/22 3:21	MAG

Report Generated On: 03/13/2023 11:28 am 2C05004
STL_Results Revision #2.1 Effective: 09/01/2022

SUBURBAN TESTING LABS
1037F MacArthur Road, Reading, PA 19605 Phone: 610-375-TEST Fax: 610-375-4090 suburbantestinglabs.com
PA DEP # 06-00208
NJDEP# PA081

SUBURBAN TESTING LABS

Sample Number: 2C05004-01	Site: 2032021-01	Sample ID: 2032021
Collector: Client	Collect Date: 03/23/2022 7:00 am	Sample Type: Composite

Department / Test / Parameter	Result		Units	Method	R.L.	DF	Prep Date	By	Analysis Date	By
Semivolatiles (Continued)										
SVOA, 625, PPL (Continued)										
Di-n-butyl phthalate	0.423	B, J	µg/L	EPA 625.1	0.0817	1	03/29/22	AMAA	03/31/22 3:21	MAG
1,3-Dichlorobenzene	< 0.0750		µg/L	EPA 625.1	0.0750	1	03/29/22	AMAA	03/31/22 3:21	MAG
1,4-Dichlorobenzene	< 0.0846		µg/L	EPA 625.1	0.0846	1	03/29/22	AMAA	03/31/22 3:21	MAG
1,2-Dichlorobenzene	< 0.0875		µg/L	EPA 625.1	0.0875	1	03/29/22	AMAA	03/31/22 3:21	MAG
3,3'-Dichlorobenzidine	< 0.134		µg/L	EPA 625.1	0.134	1	03/29/22	AMAA	03/31/22 3:21	MAG
2,4-Dichlorophenol	< 0.0788	L1	µg/L	EPA 625.1	0.0788	1	03/29/22	AMAA	03/31/22 3:21	MAG
Diethyl phthalate	0.500	B, J	µg/L	EPA 625.1	0.112	1	03/29/22	AMAA	03/31/22 3:21	MAG
2,4-Dimethylphenol	< 0.420		µg/L	EPA 625.1	0.420	1	03/29/22	AMAA	03/31/22 3:21	MAG
Dimethyl phthalate	< 0.0875		µg/L	EPA 625.1	0.0875	1	03/29/22	AMAA	03/31/22 3:21	MAG
4,6-Dinitro-2-methylphenol	< 0.113	C4	µg/L	EPA 625.1	0.113	1	03/29/22	AMAA	03/31/22 3:21	MAG
2,4-Dinitrophenol	< 2.88	C4	µg/L	EPA 625.1	2.88	1	03/29/22	AMAA	03/31/22 3:21	MAG
2,6-Dinitrotoluene	< 0.106	L1	µg/L	EPA 625.1	0.106	1	03/29/22	AMAA	03/31/22 3:21	MAG
2,4-Dinitrotoluene	< 0.0808		µg/L	EPA 625.1	0.0808	1	03/29/22	AMAA	03/31/22 3:21	MAG
Di-n-octyl phthalate	< 0.0731		µg/L	EPA 625.1	0.0731	1	03/29/22	AMAA	03/31/22 3:21	MAG
1,2-Diphenylhydrazine	< 0.113		µg/L	EPA 625.1	0.113	1	03/29/22	AMAA	03/31/22 3:21	MAG
bis(2-Ethylhexyl) phthalate	2.70	B, J	µg/L	EPA 625.1	0.178	1	03/29/22	AMAA	03/31/22 3:21	MAG
Fluoranthene	< 0.0856	B3	µg/L	EPA 625.1	0.0856	1	03/29/22	AMAA	03/31/22 3:21	MAG
Fluorene	< 0.104	B3, L1	µg/L	EPA 625.1	0.104	1	03/29/22	AMAA	03/31/22 3:21	MAG
Hexachlorobenzene	< 0.0846		µg/L	EPA 625.1	0.0846	1	03/29/22	AMAA	03/31/22 3:21	MAG
Hexachlorobutadiene	< 0.0788		µg/L	EPA 625.1	0.0788	1	03/29/22	AMAA	03/31/22 3:21	MAG
Hexachlorocyclopentadiene	< 0.0433		µg/L	EPA 625.1	0.0433	1	03/29/22	AMAA	03/31/22 3:21	MAG
Hexachloroethane	< 0.0663	L1	µg/L	EPA 625.1	0.0663	1	03/29/22	AMAA	03/31/22 3:21	MAG
Indeno(1,2,3-cd)pyrene	0.125	B, J	µg/L	EPA 625.1	0.0558	1	03/29/22	AMAA	03/31/22 3:21	MAG
Isophorone	< 0.0942		µg/L	EPA 625.1	0.0942	1	03/29/22	AMAA	03/31/22 3:21	MAG
Naphthalene	< 0.0615		µg/L	EPA 625.1	0.0615	1	03/29/22	AMAA	03/31/22 3:21	MAG
Nitrobenzene	< 0.0596	L1	µg/L	EPA 625.1	0.0596	1	03/29/22	AMAA	03/31/22 3:21	MAG
4-Nitrophenol	< 0.0394		µg/L	EPA 625.1	0.0394	1	03/29/22	AMAA	03/31/22 3:21	MAG
2-Nitrophenol	< 0.0490		µg/L	EPA 625.1	0.0490	1	03/29/22	AMAA	03/31/22 3:21	MAG
N-Nitrosodimethylamine	< 0.0635		µg/L	EPA 625.1	0.0635	1	03/29/22	AMAA	03/31/22 3:21	MAG
n-Nitrosodiphenylamine	< 0.202		µg/L	EPA 625.1	0.202	1	03/29/22	AMAA	03/31/22 3:21	MAG
N-Nitrosodi-n-propylamine	< 0.0885		µg/L	EPA 625.1	0.0885	1	03/29/22	AMAA	03/31/22 3:21	MAG
Pentachlorophenol	< 0.100		µg/L	EPA 625.1	0.100	1	03/29/22	AMAA	03/31/22 3:21	MAG
Phenanthrene	< 0.0952	L1	µg/L	EPA 625.1	0.0952	1	03/29/22	AMAA	03/31/22 3:21	MAG
Phenol	< 0.0433		µg/L	EPA 625.1	0.0433	1	03/29/22	AMAA	03/31/22 3:21	MAG
Pyrene	0.250	B, L1, J	µg/L	EPA 625.1	0.0885	1	03/29/22	AMAA	03/31/22 3:21	MAG
1,2,4-Trichlorobenzene	< 0.0894	L1	µg/L	EPA 625.1	0.0894	1	03/29/22	AMAA	03/31/22 3:21	MAG
2,4,6-Trichlorophenol	< 0.0952		µg/L	EPA 625.1	0.0952	1	03/29/22	AMAA	03/31/22 3:21	MAG

Surrogate Recoveries	*Results*	*Units*	*Method*	*%Recovery*	*DF*	*Limits (%Recovery)*	*Analysis Date*
Surrogate: 2-Fluorophenol	79.7	µg/L	EPA 625.1	41%	1	10-79	03/31/22 3:21
Surrogate: Phenol-d6	54.6	µg/L	EPA 625.1	28%	1	10-57	03/31/22 3:21
Surrogate: Nitrobenzene-d5	64.6	µg/L	EPA 625.1	67%	1	24-119	03/31/22 3:21
Surrogate: 2-Fluorobiphenyl	60.9	µg/L	EPA 625.1	63%	1	29-115	03/31/22 3:21

Report Generated On: 03/13/2023 11:28 am 2C05004
STL_Results Revision #2.1 Effective: 09/01/2022

SUBURBAN TESTING LABS

Sample Number: 2C05004-01	Site: 2032021-01	Sample ID: 2032021
Collector: Client	Collect Date: 03/23/2022 7:00 am	Sample Type: Composite

Department / Test / Parameter	Result	Units	Method	R.L.	DF	Prep Date	By	Analysis Date	By

Semivolatiles (Continued)

SVOA, 625, PPL (Continued)

Surrogate Recoveries (Continued)	*Results*	*Units*	*Method*	*%Recovery*	*DF*	*Limits (%Recovery)*	*Analysis Date*
Surrogate: 2,4,6-Tribromophenol	152	µg/L	EPA 625.1	79%	1	10-141	03/31/22 3:21
Surrogate: p-Terphenyl-d14	67.7	µg/L	EPA 625.1	70%	1	44-124	03/31/22 3:21

SVOA, 8270 SIM

1,4-Dioxane, SIM	< 0.1	µg/L	SW846 3510C/8270E	0.1	1	03/29/22	MAG	03/31/22 3:21	MAG

Surrogate Recoveries	*Results*	*Units*	*Method*	*%Recovery*	*DF*	*Limits (%Recovery)*	*Analysis Date*
Surrogate: 2-Fluorophenol	79.7	µg/L	SW846 3510C/8270E	41%	1	10-79	03/31/22 3:21
Surrogate: Phenol-d6	54.6	µg/L	SW846 3510C/8270E	28%	1	10-57	03/31/22 3:21
Surrogate: Nitrobenzene-d5	64.6	µg/L	SW846 3510C/8270E	67%	1	24-119	03/31/22 3:21
Surrogate: 2-Fluorobiphenyl	60.9	µg/L	SW846 3510C/8270E	63%	1	29-115	03/31/22 3:21
Surrogate: 2,4,6-Tribromophenol	152	µg/L	SW846 3510C/8270E	79%	1	10-141	03/31/22 3:21
Surrogate: p-Terphenyl-d14	67.7	µg/L	SW846 3510C/8270E	70%	1	44-124	03/31/22 3:21

SUBURBAN TESTING LABS

Sample Number: 2C05004-02	Site: 2032021-02	Sample ID: 2032021
Collector: Client	Collect Date: 03/23/2022 10:15 am	Sample Type: Grab

Department / Test / Parameter	Result		Units	Method	R.L.	DF	Prep Date	By	Analysis Date	By
Inorganics										
Cyanide, Free	5	B	µg/L	OIA 1677-09	0.5	1	04/01/22	CJ	04/01/22 11:37	cj
Phenolics	40	J	µg/L	EPA 420.1	20	1	03/31/22	ZJH	03/31/22 15:44	ZJH
Volatiles										
VOA, 624, PPL										
Acrolein	< 0.9	P	µg/L	EPA 624.1	0.9	1	03/25/22	MWS	03/25/22 18:43	LAS
Acrylonitrile	< 0.3	P	µg/L	EPA 624.1	0.3	1	03/25/22	MWS	03/25/22 18:43	LAS
Benzene	< 0.04		µg/L	EPA 624.1	0.04	1	03/25/22	MWS	03/25/22 18:43	LAS
Bromodichloromethane	2.5		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 18:43	LAS
Bromoform	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS
Bromomethane	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS
Carbon Tetrachloride	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS
Chlorobenzene	< 0.07		µg/L	EPA 624.1	0.07	1	03/25/22	MWS	03/25/22 18:43	LAS
Chloroethane	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 18:43	LAS
2-Chloroethyl vinyl ether	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS
Chloroform	20.7		µg/L	EPA 624.1	0.09	1	03/25/22	MWS	03/25/22 18:43	LAS
Chloromethane	< 0.09		µg/L	EPA 624.1	0.09	1	03/25/22	MWS	03/25/22 18:43	LAS
Dibromochloromethane	0.7		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 18:43	LAS
1,1-Dichloroethane	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 18:43	LAS
1,2-Dichloroethane	< 0.08		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 18:43	LAS
1,1-Dichloroethene	< 0.07		µg/L	EPA 624.1	0.07	1	03/25/22	MWS	03/25/22 18:43	LAS
trans-1,2-Dichloroethene	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS
1,2-Dichloropropane	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS
1,3-Dichloropropene, Total	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 18:43	LAS
Ethyl Benzene	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 18:43	LAS
Methylene Chloride	0.2		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS
1,1,2,2-Tetrachloroethane	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS
Tetrachloroethene	< 0.09		µg/L	EPA 624.1	0.09	1	03/25/22	MWS	03/25/22 18:43	LAS
Toluene	0.1		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 18:43	LAS
1,1,1-Trichloroethane	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 18:43	LAS
1,1,2-Trichloroethane	< 0.08		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 18:43	LAS
Trichloroethene	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS
Vinyl Chloride	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 18:43	LAS

Surrogate Recoveries	*Results*	*Units*	*Method*	*%Recovery*	*DF*	*Limits (%Recovery)*	*Analysis Date*
Surrogate: Dibromofluoromethane	21.4	µg/L	EPA 624.1	107%	1	60-140	03/25/22 18:43
Surrogate: 1,2-Dichloroethane-d4	21.1	µg/L	EPA 624.1	106%	1	60-140	03/25/22 18:43
Surrogate: Toluene-d8	19.6	µg/L	EPA 624.1	98%	1	60-140	03/25/22 18:43
Surrogate: Bromofluorobenzene	18.7	µg/L	EPA 624.1	93%	1	60-140	03/25/22 18:43

Report Generated On: 03/13/2023 11:28 am 2C05004
STL_Results Revision #2.1 Effective: 09/01/2022

SUBURBAN TESTING LABS

Sample Number: 2C05004-03	Site: Trip Blank	Sample ID: 2032021-03
Collector: Client	Collect Date: 03/23/2022 12:00 am	Sample Type: Grab

Department / Test / Parameter	Result		Units	Method	R.L.	DF	Prep Date	By	Analysis Date	By
Volatiles										
VOA, 624, Trip Blank										
Acetone	< 1.2		µg/L	EPA 624.1	1.2	1	03/25/22	MWS	03/25/22 17:48	MWS
Acrolein	< 0.9	P	µg/L	EPA 624.1	0.9	1	03/25/22	MWS	03/25/22 17:48	MWS
Acrylonitrile	< 0.3	P	µg/L	EPA 624.1	0.3	1	03/25/22	MWS	03/25/22 17:48	MWS
Allyl Chloride	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
Benzene	< 0.04		µg/L	EPA 624.1	0.04	1	03/25/22	MWS	03/25/22 17:48	MWS
Bromobenzene	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
Bromochloromethane	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
Bromodichloromethane	< 0.08		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
Bromoform	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
Bromomethane	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
2-butanone (MEK)	< 0.2		µg/L	EPA 624.1	0.2	1	03/25/22	MWS	03/25/22 17:48	MWS
tert-Butylbenzene	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
sec-Butylbenzene	< 0.05		µg/L	EPA 624.1	0.05	1	03/25/22	MWS	03/25/22 17:48	MWS
n-Butylbenzene	< 0.08		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
Carbon Tetrachloride	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
Chlorobenzene	< 0.07		µg/L	EPA 624.1	0.07	1	03/25/22	MWS	03/25/22 17:48	MWS
Chloroethane	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
2-Chloroethyl vinyl ether	< 0.1	P	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
Chloroform	< 0.09		µg/L	EPA 624.1	0.09	1	03/25/22	MWS	03/25/22 17:48	MWS
Chloromethane	< 0.09		µg/L	EPA 624.1	0.09	1	03/25/22	MWS	03/25/22 17:48	MWS
2-Chlorotoluene	< 0.05		µg/L	EPA 624.1	0.05	1	03/25/22	MWS	03/25/22 17:48	MWS
4-Chlorotoluene	< 0.05		µg/L	EPA 624.1	0.05	1	03/25/22	MWS	03/25/22 17:48	MWS
1,2-Dibromo-3-chloropropane (DBCP)	< 0.3		µg/L	EPA 624.1	0.3	1	03/25/22	MWS	03/25/22 17:48	MWS
Dibromochloromethane	< 0.08		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
1,2-Dibromoethane (EDB)	< 0.07		µg/L	EPA 624.1	0.07	1	03/25/22	MWS	03/25/22 17:48	MWS
Dibromomethane	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
1,4-Dichlorobenzene	< 0.08		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
1,3-Dichlorobenzene	< 0.05		µg/L	EPA 624.1	0.05	1	03/25/22	MWS	03/25/22 17:48	MWS
1,2-Dichlorobenzene	< 0.09		µg/L	EPA 624.1	0.09	1	03/25/22	MWS	03/25/22 17:48	MWS
Dichlorodifluoromethane	< 0.08		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
1,1-Dichloroethane	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
1,2-Dichloroethane	< 0.08		µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
1,1-Dichloroethene	< 0.07		µg/L	EPA 624.1	0.07	1	03/25/22	MWS	03/25/22 17:48	MWS
cis-1,2-dichloroethene	< 0.05		µg/L	EPA 624.1	0.05	1	03/25/22	MWS	03/25/22 17:48	MWS
trans-1,2-Dichloroethene	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
1,2-Dichloropropane	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
1,3-Dichloropropane	< 0.07		µg/L	EPA 624.1	0.07	1	03/25/22	MWS	03/25/22 17:48	MWS
2,2-Dichloropropane	< 0.1		µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
trans-1,3-Dichloropropene	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
cis-1,3-Dichloropropene	< 0.06		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
1,1-dichloropropene	< 0.07		µg/L	EPA 624.1	0.07	1	03/25/22	MWS	03/25/22 17:48	MWS
Ethyl Benzene	0.1		µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
Hexachlorobutadiene	< 0.3		µg/L	EPA 624.1	0.3	1	03/25/22	MWS	03/25/22 17:48	MWS

Report Generated On: 03/13/2023 11:28 am 2C05004
STL_Results Revision #2.1 Effective: 09/01/2022

SUBURBAN TESTING LABS

Sample Number: 2C05004-03	Site: Trip Blank	Sample ID: 2032021-03
Collector: Client	Collect Date: 03/23/2022 12:00 am	Sample Type: Grab

Department / Test / Parameter	Result	Units	Method	R.L.	DF	Prep Date	By	Analysis Date	By
Volatiles (Continued)									
VOA, 624, Trip Blank (Continued)									
2-hexanone	< 0.1	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
Isopropylbenzene	< 0.06	µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
4-Isopropyltoluene	< 0.2	µg/L	EPA 624.1	0.2	1	03/25/22	MWS	03/25/22 17:48	MWS
Methylene chloride	< 0.1	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
4-methyl-2-pentanone	< 0.08	µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
Methyl-t-butyl ether (MTBE)	< 0.05	µg/L	EPA 624.1	0.05	1	03/25/22	MWS	03/25/22 17:48	MWS
Naphthalene	< 0.1	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
n-Propylbenzene	< 0.08	µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
Styrene	< 0.05	µg/L	EPA 624.1	0.05	1	03/25/22	MWS	03/25/22 17:48	MWS
1,1,2,2-Tetrachloroethane	< 0.1	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
1,1,1,2-Tetrachloroethane	< 0.1	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
Tetrachloroethene	< 0.09	µg/L	EPA 624.1	0.09	1	03/25/22	MWS	03/25/22 17:48	MWS
Toluene	< 0.06	µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
1,2,4-Trichlorobenzene	< 0.1	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
1,2,3-Trichlorobenzene	< 0.2	µg/L	EPA 624.1	0.2	1	03/25/22	MWS	03/25/22 17:48	MWS
1,1,1-Trichloroethane	< 0.06	µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
1,1,2-Trichloroethane	< 0.08	µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
Trichloroethene	< 0.1	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
Trichlorofluoromethane	< 0.07	µg/L	EPA 624.1	0.07	1	03/25/22	MWS	03/25/22 17:48	MWS
1,2,3-Trichloropropane	< 0.08	µg/L	EPA 624.1	0.08	1	03/25/22	MWS	03/25/22 17:48	MWS
1,3,5-Trimethylbenzene	< 0.06	µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
1,2,4-Trimethylbenzene	0.2	µg/L	EPA 624.1	0.06	1	03/25/22	MWS	03/25/22 17:48	MWS
Vinyl Chloride	< 0.1	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
o-Xylene	0.1	µg/L	EPA 624.1	0.05	1	03/25/22	MWS	03/25/22 17:48	MWS
m,p-xylene	0.1	µg/L	EPA 624.1	0.1	1	03/25/22	MWS	03/25/22 17:48	MWS
Xylenes, Total	< 0.2	µg/L	EPA 624.1	0.2	1	03/25/22	MWS	03/25/22 17:48	MWS

Surrogate Recoveries	*Results*	*Units*	*Method*	*%Recovery*	*DF*	*Limits (%Recovery)*	*Analysis Date*
Surrogate: Dibromofluoromethane	20.6	µg/L	EPA 624.1	103%	1	60-140	03/25/22 17:48
Surrogate: 1,2-Dichloroethane-d4	21.2	µg/L	EPA 624.1	106%	1	60-140	03/25/22 17:48
Surrogate: Toluene-d8	19.5	µg/L	EPA 624.1	97%	1	60-140	03/25/22 17:48
Surrogate: Bromofluorobenzene	18.8	µg/L	EPA 624.1	94%	1	60-140	03/25/22 17:48

SUBURBAN TESTING LABS
1037F MacArthur Road, Reading, PA 19605 Phone: 610-375-TEST Fax: 610-375-4090 suburbantestinglabs.com
PA DEP # 06-00208
NJDEP# PA081

SUBURBAN TESTING LABS

Data Qualifiers:

B	The target analyte was detected in the Method, Dilution Water, Instrument or Extraction Blank or Sterility Check at or above the method Reporting Limit or applicable method, client, or regulatory requirement.
B3	The target analyte was detected in the Method, Dilution Water, Instrument or Extraction Blank or Sterility Check at or above the MRL or applicable method, client, or regulatory requirement. Possibility of high bias in the sample result, however it is ND.
C4	The CCV for this analyte was above acceptance criteria, however the analyte was not detected in the associated sample. Data may be fully useable under the applicable TNI Standard.
J	The analyte was detected above the method detection limit but below the method reporting limit; the reported result is an estimated value.
L1	The Laboratory Control Sample for the analysis batch associated with this sample was below acceptance criteria. Results may have greater uncertainty.
P	Preservation for this analysis did not meet regulatory or method requirements.

Sample Receipt Conditions:

All samples met the sample receipt requirements for the relevant analyses.

Units P/A = Present/Absent
Units P/F = Pass/Fail

** This report has been Amended (Rev4) and replaces all previous reports for this order ID **

The test *pH, Lab* is performed in the Laboratory as soon as possible. These results are not appropriate for compliance with NPDES, SDWA, or other regulatory programs that require analysis within 15 minutes of sample collection and should be considered for informational purposes only.

**pH, Final* for ASTM leachate is performed by method SM 4500-H-B.

All results meet the requirements of STL's TNI (NELAC) Accredited Quality System unless otherwise noted. If your results contain any data qualifiers or comments, you should evaluate useability relative to your needs.

If collectors initials include "STL", samples have been collected in accordance with STL SOP SL0015.

All results reported on an As Received (Wet Weight) basis unless otherwise noted.

This laboratory report may not be reproduced, except in full, without the written approval of STL.

Results are considered Preliminary unless report is signed by authorized representative of STL.

Reviewed and Released By:
Lauren Ulle
Project Manager I

Report Generated On: 03/13/2023 11:28 am 2C05004
STL_Results Revision #2.1 Effective: 09/01/2022

2C05004
Lisa F. Care

CONTRACT ORDER

ntal Service Laboratories, Inc.

2032021

s@envlabs.com. Contact ESL with any questions.

SENDING LABORATORY:	**RECEIVING LABORATORY:**
Environmental Service Laboratories, Inc.	Suburban Water Testing Labs - Reading
1803 Philadelphia Street	1037F MacArthur Road
Indiana, PA 15701	Reading, PA 19605
Phone: 724-463-8378	Phone :(610) 375-8378
Fax: 724-465-4209	Fax: 1610-375-4090
Project Manager: Kirsten Conoran	State of Origin: PA

Analysis	Due	Expires	Comments
Sample ID: 2032021-01			
Matrix: Water **Sampled: 03/23/2022 07:00** **Sample Type: Composite** **Sampled By: Client**			
Antimony ICP-MS (1) 500mL P w/HNO3, PH<2 3/24/22 MW	04/04/2022 23:00	09/19/2022 07:00	Report to MDL
Arsenic ICP-MS	04/04/2022 23:00	09/19/2022 07:00	Report to MDL
Cadmium ICP-MS (1) 500mL P w/HNO3 MW	04/04/2022 23:00	09/19/2022 07:00	Report to MDL
Hexavalent Cr (1) 250 mL P w/Cr buffer	04/04/2022 23:00	03/24/2022 07:00	Report to MDL
Lead ICP-MS	04/04/2022 23:00	09/19/2022 07:00	Report to MDL
Selenium ICP-MS (3) 1L GA. Total Cl=NP 3/24/22 MW	04/04/2022 23:00	09/19/2022 07:00	Report to MDL
Silver ICP-MS	04/04/2022 23:00	09/19/2022 07:00	Report to MDL
SVOC 625	04/04/2022 23:00	03/30/2022 07:00	Reference profile 542606
Thallium ICP-MS	04/04/2022 23:00	09/19/2022 07:00	Report to MDL
Zinc ICP-MS	04/04/2022 23:00	09/19/2022 07:00	
Containers Supplied:			
Poly 500mL, HNO3 (A) Poly 250mL (C) Amber Glass, 1000mL (F) Amber Glass, 1000mL (G) Amber Glass, 1000mL (H)			
Sample ID: 2032021-02			
Matrix: Water **Sampled: 03/23/2022 10:15** **Sample Type: Grab** **Sampled By: Client**			
Cyanide, Free Subcontract (1) 500mL P w/NaOH, PH>12; Total Cl=NP 3/24/22 MW	04/04/2022 23:00	04/06/2022 10:15	Report to MDL
Total Phenolics (1) 1L G w/H2SO4, PH<2	04/04/2022 23:00	04/20/2022 10:15	EPA 420.1, Target QL 5 ug/l
VOC 624	04/04/2022 23:00	04/06/2022 10:15	Reference profile 542606
Containers Supplied: (3) 40 mL VOA			
Poly 500mL, NaOH (B) Amber Glass, 1000mL, H2SO4 (E) VOA Vial, 40mL (F) VOA Vial, 40mL (G) VOA Vial, 40mL (H)			
Sample ID: 2032021-03			
Matrix: Water **Sampled: 03/23/2022 00:00** **Sample Type: Trip Blank** **Sampled By: Client**			
VOC 624	04/04/2022 23:00	04/06/2022 00:00	Reference profile 542606
Containers Supplied: (2) 40 mL VOA			
VOA Vial, 40mL (A) VOA Vial, 40mL (B)			

Suburban Testing Labs

Lab Date/Time: 3/24/22 1010 Lab Temp: 5.1°C IR

Number of containers/coolers match number on COC? Y/N
Sample labels and COC are free of discrepancies: Y/N
All containers intact? Y/N
Received in lab within acceptable temperature limits? Y/N
40 mL VOA vials free of headspace? Y/N

Relinquished by: Delivery

Received in lab by: MW (1)

Released By SPM Date 3/23/22 Received By

Released By Date Received By

Page 8 of 8

ATTACHMENT D
Pre-Draft Survey Response

pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION
Bureau of Clean Water

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PRE-DRAFT PERMIT SURVEY FOR TOXIC POLLUTANTS

Permittee Name: **Municipal Authority of Westmoreland County** Permit No.: **PA0021148**

Pollutant(s) identified by DEP that may require WQBELs: 8 pollutants

Is the permittee aware of the source(s) of the pollutant(s)? ☐ Yes ☑ No ☐ Suspected

If Yes or Suspected, describe the known or suspected source(s) of pollutant(s) in the effluent.

Has the permittee completed any studies in the past to control or treat the pollutant(s)? ☐ Yes ☑ No

If Yes, describe prior studies and results:

Does the permittee believe it can achieve the proposed WQBELs now? ☐ Yes ☐ No ☑ Uncertain

If No, describe the activities, upgrades or process changes that would be necessary to achieve the WQBELs, if known.

Estimated date by which the permittee could achieve the proposed WQBELs: ☑ Uncertain

Will the permittee conduct additional sampling for the pollutant(s) to supplement the application? ☑ Yes ☐ No

Check the appropriate box(es) below to indicate site-specific data that have been collected by the permittee in the past. If any of these data have not been submitted to DEP, please attach to this survey.

☐	Discharge pollutant concentration coefficient(s) of variability	Year(s) Studied:
☐	Discharge and background Total Hardness concentrations (metals)	Year(s) Studied:
☐	Background / ambient pollutant concentrations	Year(s) Studied:
☐	Chemical translator(s) (metals)	Year(s) Studied:
☐	Slope and width of receiving waters	Year(s) Studied:
☐	Velocity of receiving waters at design conditions	Year(s) Studied:
☐	Acute and/or chronic partial mix factors (mixing at design conditions)	Year(s) Studied:
☐	Volatilization rates (highly volatile organics)	Year(s) Studied:
☐	Site-specific criteria (e.g., Water Effect Ratio or related study)	Year(s) Studied:

Please submit this survey to the DEP regional office that is reviewing the permit application within 30 days of receipt.

ATTACHMENT E
EPA's December 14, 2023 Comment Email

From: Fulton, Jennifer <Fulton.Jennifer@epa.gov>
Sent: Thursday, December 14, 2023 9:31 AM
To: Conrad, Stephanie <stepconrad@pa.gov>
Cc: Iasmin, Mahbuba <moiasmin@pa.gov>; Furjanic, Sean <sefurjanic@pa.gov>; Schumack, Maria <maschumack@pa.gov>; Martinsen, Jessica <martinsen.jessica@epa.gov>; Hales, Dana <Hales.Dana@epa.gov>; Shuart, Ryan <shuart.ryan@epa.gov>
Subject: [External] Mt Pleasant Borough STP (PA0021148)

***ATTENTION**: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the Report Phishing button in Outlook.*

Stephanie;

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

Mt Pleasant Borough STP
Muncipal Authority of Westmoreland County (MAWC)
NPDES Number: PA0021148
EPA Received Revised Draft: 12/7/2023
30-day response date: 1/6/24

Mount Pleasant STP NPDES permit is a major facility that discharges to Shupe Run and this is the third draft permit EPA has received. PADEP has chosen to incorporate the minimum CSO performance standard requirement of 85% capture, listed in the 1994 CSO Policy, in the NPDES permit rather than including the 94% capture performance standard value from MAWC's LTCP for Mount Pleasant STP. EPA does not concur with this approach based on our technical evaluation of the CSO Policy as previously stated during correspondence on the Jeanette STP NPDES permit, PA0027430. Our office is currently drafting a formal response to further explain our position on the overall matter, which will be sent to PADEP once it is finalized.

Should you have any questions, please feel free to reach out to Ryan Shuart, copied on this email. If there are any additional changes to the permit documents, please be sure to reach out to EPA as additional review may be necessary.

Thank you,
Jen Fulton

Jennifer Fulton (she/her)
Acting Chief, Clean Water Branch
US EPA Mid-Atlantic Region
Phone 304-234-0248
Email fulton.jennifer@epa.gov

ATTACHMENT F
EPA's July 23, 2024 Letter

REGION 3
PHILADELPHIA, PA 19103

July 23, 2024

Ms. Mahbuba Iasmin
Environmental Engineer Manager
Pennsylvania Department of
Environmental Protection
Southwest Regional Office
400 Waterfront Drive
Pittsburgh, Pennsylvania 15222

Dear Ms. Iasmin:

The Environmental Protection Agency (EPA) received your September 21, 2023 email regarding the Pennsylvania Department of Environmental Protection (PADEP) Southwest Regional Office's (SWRO) position on including Combined Sewer Overflow (CSO) performance standards in National Pollutant Discharge Elimination System (NPDES) permits. The purpose of this letter is to clarify the use of numeric performance standards in NPDES permits consistent with the EPA's 1994 CSO Control Policy (CSO Policy) and Clean Water Act (CWA).

The CSO Policy articulates a pathway for permittees to come into compliance with requirements of the CWA, including NPDES permitting requirements for meeting applicable Water Quality Standards (WQS) (59 Fed. Reg. 18688, 18695, and 18696). In December 2000, the CSO Policy was incorporated into the CWA at Section 402(q) (33 U.S.C. Section 1342).[1]

The CSO Policy contains provisions for CSO permits to include technology-based and water quality-based controls necessary to meet the objectives of the CWA. In the CSO Policy, the nine minimum controls serve as the minimum technology-based effluent limits for all CSO permittees (59 Fed. Reg. at 18691, pt.II.B). The CSO Policy also contains provisions for CSO permits to include any additional technology-based and water quality-based controls to meet water quality-based requirements, including the development and implementation of a Long-Term Control Plan (LTCP) (59 Fed. 18691.II.C). The CSO Policy describes nine elements of an LTCP, including characterization, analysis, and monitoring (59 Fed. Reg. at 18691–94, pts. II.C.1 through 9). The fourth element of an LTCP is the evaluation of alternatives (59 Fed. Reg. at 18691–94, pt. II.C.4).

[1] CWA Section 402(q) states that each permit, order, or decree issued pursuant to the CWA after December 21, 2000 for a discharge from a municipal combined sewer system shall conform to the 1994 CSO Control Policy. This section of the CWA is commonly referred to as the "Wet Weather Water Quality Act of 2000."

When developing an LTCP, a CSO community is expected to evaluate a reasonable range of alternatives that is, among other purposes, sufficient to make a reasonable assessment of cost and performance and help guide the selection of CSO controls (59 Fed. Reg at 18692, pt. II.C.4).[2] The CSO Policy offers two approaches for evaluating alternatives in the development of an LTCP, the presumption approach and demonstration approach (59 Fed. Reg. at 18692–693, pt.II.C.4). Under the presumption approach (59 Fed. Reg. at 18692, pt. II.C.4.a), the CSO Policy includes three *minimum* criteria[3] for consideration in the alternatives analysis. (59 Fed. Reg. at 18692, pt.II.C.4.a.i-iii):[4]

i. No more than an average of 4 overflow events per year (permitting authority may allow up to 2 additional events per year),
ii. Eliminate or capture for treatment, no less than 85% by volume[5] of the combined sewage collected during precipitation events on a system-wide annual average basis, or
iii. The elimination or removal of no less than the mass of pollutants causing water quality impairment for the volumes that would be eliminated or captured for treatment in the second criterion, above.

As the CSO Policy states, data and modeling of wet weather events do not always provide a clear picture of the level of CSO controls necessary to protect water quality standards (59 Fed. Reg. at 18692, pt.II.C.4.a). These criteria are *presumed* to provide an adequate level of control, but only if that presumption is *reasonable* in light of the data and analysis provided in the LTCP.[6] Because the LTCP will become the basis for NPDES permit limits and requirements, the permitting authority is responsible for determining, in light of data and analysis, if the selected CSO controls are sufficient to meet CWA requirements (59 Fed. Reg. at 18692, pt. II.C.4.a). If, based on the LTCP, the permitting authority determines that the presumption approach minimum criteria included in the CSO Policy do not "provide an adequate level of control to meet the water quality-based requirements of the CWA," the permitting authority must establish more stringent requirements necessary to meet water quality standards (CWA section 301(b)(1)(C), 59 Fed. Reg. at 18692, pt. II.C.4). When the permittee provides the permitting authority with an LTCP that includes performance standards more stringent than the minimum performance standards in the CSO Policy, the permitting authority should determine if the

[2] At the discretion of the permitting authority, small systems (i.e., those with populations under 75,000) may not need to complete each of the formal steps identified in II.C.4 (LTCP - Evaluation of Alternatives), however, the permitting authority still needs to evaluate whether the plan includes appropriate CSO controls and includes a monitoring program to evaluate water quality standards (59 Fed. Reg. at18690, pt. I.D). Small systems are still required to comply with the nine minimum controls (II.B), public participation (II.C.2), and sensitive areas (II.C.3) portion of the CSO Policy (59 Fed. Reg. at 18690, pt. I.D).

[3] "**A program that meets any of the criteria listed below** would be presumed to provide an adequate level of control to meet the water quality-based requirements of the CWA" (emphasis added). 59 Fed. Reg. at 18692.II.C.4.a.

[4] For overflows beyond the allowed untreated 4-6 (per criteria II.C.i), and for the portion of the combined sewage not part of the 85% capture receiving full treatment at the publicly owned treatment works (POTW) (per criteria II.C.ii, the following minimum treatment is required: primary clarification (Removal of floatables and settleable solids may be achieved by any combination of treatment technologies or methods that are shown to be equivalent to primary clarification.); Solids and floatables disposal; and Disinfection of effluent, if necessary, to meet WQS, protect designated uses and protect human health, including removal of harmful disinfection chemical residuals, where necessary. 59 Fed. Reg. at 18692–693, pt.II.C.4.a.

[5] Note that percent capture should be measured in the combined portion of the sewer system and that the separated portions of the sewer system are not included in this calculation (59 Fed. Reg. at 18692, pt. II.C.4.a.ii).

[6] "A program that meets any of the criteria listed below would be presumed to provide an adequate level of control to meet the water quality-based requirements of the CWA, provided the permitting authority determines that such presumption is reasonable in light of the data and analysis conducted in the characterization, monitoring, and modeling of the system and the consideration of sensitive areas described above." 59 Fed. Reg. at 18692, pt. II.C.4.a.

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CSO controls identified in the LTCP are adequate to meet the water-quality-based requirements of the CWA. In this case, the identified level of control in the LTCP will serve as the basis for the numeric CSO performance standard in the permit's water-quality-based effluent limits (59 Fed. Reg. at 18696, pt. IV.B.2.c).

After LTCP implementation and post construction compliance monitoring is conducted, if a community discovers that its CSO controls are not achieving the performance standards to which it has committed in its LTCP, the permitting authority should include additional requirements in the next permit reissuance with the terms and conditions necessary to ensure that the performance objectives associated with the LTCP are achieved. When appropriate, an analysis should be provided in the fact sheet to demonstrate compliance with CWA Section 402(o), 303(d)(4), or 40 C.F.R. Section 122.44(l).

To conclude, PADEP stated in its email requesting clarification of the CSO Policy that for any CSO communities who have selected the Presumption Approach, PADEP intends to impose conditions that would only require compliance with the minimum criteria listed in the presumption approach of the CSO Policy even where the numeric performance objectives identified in the LTCP may be necessary to meet water quality standards. This approach described in PADEP's email is not supported by the CSO Policy as discussed above because it does not appear to consider the case specific data and analysis conducted in the characterization, monitoring, and modeling of the system, as reflected in the controls selected in the LTCP, and therefore may be insufficient to address the water quality-based requirements of the CWA.

If you have any questions or concerns, or want to discuss the information above, please contact me or Jennifer Fulton, Chief, Clean Water Branch, at 304-234-0248.

Sincerely,

GillespieMarthaler, Leslie

Digitally signed by GillespieMarthaler, Leslie
Date: 2024.07.25 13:01:16 -04'00'

Leslie L. Gillespie-Marthaler, Ph.D., Acting Director
Water Division

cc: Sean Furjanic, Environmental Program Manager, NPDES Permitting, PADEP
Bevin Buchheister, Deputy Secretary Office of Water Programs, PADEP
Christopher Kloss, Director, Water Permits Division, Office of Wastewater Management, US EPA

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