

Application Type Renewal  
Facility Type Sewage  
Major / Minor Major

**NPDES PERMIT FACT SHEET  
ADDENDUM**

Application No. PA0022292  
APS ID 782535  
Authorization ID 1382891

**Applicant and Facility Information**

Applicant Name	<u>Ebensburg Borough Municipal Authority</u>	Facility Name	<u>Ebensburg Borough Municipal Authority WWTP</u>
Applicant Address	<u>300 West High Street</u> <u>Ebensburg, PA 15931-1582</u>	Facility Address	<u>291 Trout Lane</u> <u>Ebensburg, PA 15931-3815</u>
Applicant Contact	<u>Kelly Cook</u>	Facility Contact	<u>Michael Montgomery</u>
Applicant Phone	<u>814-472-8780</u>	Facility Phone	<u>814-254-6124</u>
Client ID	<u>62965</u>	Site ID	<u>246026</u>
SIC Code	<u>4952</u>	Municipality	<u>Cambria Township</u>
SIC Description	<u>Trans. &amp; Utilities - Sewerage Systems</u>	County	<u>Cambria</u>
Date Published in PA Bulletin	<u>September 11, 2021</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>October 11, 2021</u>	If No, Reason	<u>Major Facility</u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated sewage</u>		

**Internal Review and Recommendations**

The Department of Environmental Protection (DEP) published notice of draft Authorization to Discharge under the National Pollutant Discharge Elimination System (NPDES) discharge requirements for treated sewage for Ebensburg Borough Municipal Authority in the *Pennsylvania Bulletin* on September 11, 2021 [51 Pa.B. 5834]. A 30-day comment period was provided during which interested parties were directed to submit comments to DEP. The comment Period ended on October 11, 2021. Comments were received from the EPA. Due to the timeline of the original Draft Permit issuance and changes needed, a redraft is being issued. The purpose of this fact sheet addendum is to present the comments received, present DEP's official response to them, explain how they were considered in redrafting the NPDES permit when applicable, and to address all concerns.

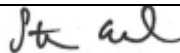

The draft permit contained an incorrect monitoring frequency for Total Nitrogen of 1/quarter. The frequency has been changed to 2/week, which is consistent with the previous permit.

Pursuant to EPA's approval of Pennsylvania's 2017 Triennial Review of Water Quality Standards and corresponding regulatory changes published in the *Pennsylvania Bulletin* on July 11, 2020, sewage discharges will include monitoring, at a minimum for *E. coli*, in new and reissued permits, with a monitoring frequency of 1/month for design flows  $\geq$  1 MGD.

On September 22, 2021, US EPA Region III made the following statement:

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

**Ebensburg Borough Municipal Authority**  
**NPDES Number: PA0022292**  
**EPA Received: August 26, 2021**  
**30-day response due date: September 25, 2021**

X				May 26, 2022
			Stephanie Conrad / Environmental Engineering Specialist	
X				May 26, 2022
			Christopher Kriley, P.E. / Program Manager	

Internal Review and Recommendations

This is a major permit that discharges to Howells Run, and is being revised to remove the CSO outfalls and conditions in the draft permit. Therefore, EPA has performed a limited review of the draft permit based on the proposed changes related to CSO requirements. EPA has completed its review and offers the following comments:

1. The fact sheet states that the sewers have been completely separated, and CSO outfalls 002 and 003 and related requirements are removed from the revised draft permit. It further states that any discharges from Outfalls 002 and 003 will need to meet the reporting requirements in Part A.III.C.4. (Unanticipated Noncompliance or Potential Pollution Reporting) and Part B.I.G.2-4 (Bypassing) of the permit. While the noncompliance/pollution reporting seems appropriate (as these would no longer be permitted discharge points), we do not think that a discharge from these outfalls would be considered a bypass and this reference should probably be removed from the fact sheet. Please let us know if you think this needs further discussion.

**DEP's Response:** The Department acknowledges that Part B.I.G.2-4 of the permit is not applicable to outfalls 002 and 003, however edits will not be made to the Draft Fact Sheet Addendum as it has already been issued.

2. It was noted that Part A.III.D. of the permit still classifies this facility as a Major Facility with CSO, which appears to be an error and is likely a remnant of the previous permit's status as a combined sewer system. If not, please clarify.

**DEP's Response:** The classification has been changed to "Major Sewage Facility  $\geq 1$  and  $< 5$ ."

The proposed effluent limitations and monitoring requirements in the current Redraft are shown below.

**Proposed Effluent Limitations and Monitoring Requirements**

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

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

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Daily Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Recorded
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	6.0 Inst Min	XXX	XXX	XXX	1/day	Grab
CBOD5	417	626	XXX	25	37.5	50	2/week	24-Hr Composite
BOD5 Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	2/week	24-Hr Composite
TSS Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	2/week	24-Hr Composite
TSS	501	751	XXX	30	45	60	2/week	24-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	2/week	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	2/week	Grab
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/month	Grab
UV Intensity (µw/cm <sup>2</sup> )	XXX	XXX	Report	XXX	XXX	XXX	1/day	Measured
Total Nitrogen	XXX	XXX	XXX	Report	Report	XXX	2/week	24-Hr Composite
Ammonia Nov 1 - Apr 30	58	88	XXX	3.5	5.3	7	2/week	24-Hr Composite
Ammonia May 1 - Oct 31	33	50	XXX	2.0	3.0	4	2/week	24-Hr Composite

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

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Daily Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Total Phosphorus	25	38	XXX	1.5	2.3	3	2/week	24-Hr Composite

Compliance Sampling Location: Outfall 001

Other Comments: None