

Application Type Renewal  
Facility Type Sewage  
Major / Minor Major

## NPDES PERMIT FACT SHEET ADDENDUM

Application No. PA0023248  
APS ID 1116486  
Authorization ID 1489892

### Applicant and Facility Information

Applicant Name <u>Berwick Area Joint Sewer Authority</u>	Facility Name <u>Berwick Area Joint Sewer Authority</u>
Applicant Address <u>1108 Freas Avenue</u> <u>Berwick, PA 18603-1710</u>	Facility Address <u>383 S Eaton Street</u> <u>Berwick, PA 18603</u>
Applicant Contact <u>Gloria Bobersky</u>	Facility Contact <u>Gloria Bobersky</u>
Applicant Phone <u>(570) 752-8477</u>	Facility Phone <u>(570) 752-8477</u>
Client ID <u>142927</u>	Site ID <u>261505</u>
SIC Code <u>4952</u>	Municipality <u>Berwick Borough</u>
SIC Description <u>Trans. &amp; Utilities - Sewerage Systems</u>	County <u>Columbia</u>
Date Published in PA Bulletin <u>March 22, 2025</u>	EPA Waived? <u>No</u>
Comment Period End Date <u>April 21, 2025</u>	If No, Reason _____
Purpose of Application <u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>	

### Internal Review and Recommendations

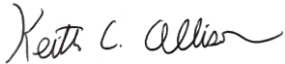

The subject permit was drafted on March 5, 2025.

Comments were submitted on the permittee's behalf by an April 4, 2025 email from Dylan Willow of HRG, Inc. Two comments were provided as repeated below followed by the Department's responses:

Comment 1: *It was determined during the Reasonable Potential Analysis that the draft permit should include twice per month monitoring for alpha-BHC, Chlordane, Heptachlor, and Toxaphene because the application sample results did not meet the Department's TQL. The Department would also consider removing the monitoring/limitation for alpha-BHC, Chlordane, and Toxaphene should BAJSA conduct an additional round of sampling during the draft comment period showing the levels of these pollutants are undetectable at or below the Department's TQL. BAJSA has conducted such sampling, and the results are documented in the attached report and summarized in the table below.*

Pollutant	Sample Result (µg/L)	TQL (µg/L)
Alpha-BHC	<0.005	0.05
Chlordane	<0.129	1
Heptachlor	<0.004	0.05
Toxaphene	<0.492	0.5

*BAJSA requests that the proposed monitoring/limitation for these four (4) pollutants be removed from the NPDES permit.*

Approve	Return	Deny	Signatures	Date
✓			 Keith C. Allison / Project Manager	April 28, 2025
✓			 Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	April 28, 2025

**Internal Review and Recommendations**

Department Response: Because the additional sampling results demonstrate that alpha-BHC, Chlordane, and Toxaphene are not detectable in the effluent at quantitation limits meeting the Department's Target Quantitation Limits (TQLs) monitoring for these has been removed in the enclosed draft permit. Chlordane was also non-detectable at a quantitation limit meeting the Department's TQL. In addition, the permittee has demonstrated that all application samples for Chlordane were below detection levels. Therefore, Chlordane monitoring and the associated compliance schedule have also been removed in the enclosed draft permit.

Comment 2: The Department has also proposed a fifty-nine month compliance schedule in the draft permit due to a detectable result of Heptachlor occurring in the application sampling. In review of the application sampling results, it was determined that of the three reported effluent samples for Heptachlor, one such sample was analyzed with a higher MDL than the others yet still reported as a non-detect. During the processing of the sampling results, this value was erroneously not flagged as a non-detect and consequently transcribed into the application as detectable. BAJSA requests that the proposed compliance schedule be removed from the NPDES permit. In support of this request, we have attached the original sampling results indicating the erroneously transcribed sample result for Heptachlor as a non-detect, and we have provided a courtesy additional sampling result, as reported above, indicating that Heptachlor is undetectable at or below the Department's TQL.

Department Response: See the response above. The Department has removed the limitation and monitoring for Heptachlor as well as the compliance schedule.

Comments were provided by EPA Region III by an April 2, 2025 email from Jennifer Fulton. Two comments were provided as repeated below followed by the Department's responses:

Comment 1: Page 12 of the factsheet indicates that because there is no information available for PFAS, the proposed permit would establish a quarterly monitoring requirement for 4 PFAS analytes (PFOA, PFOS, PFBS, HFPO-DA) along with a footnote which would allow the permittee to cease monitoring if four consecutive monitoring events yields non-detect results. While these PFAS monitoring requirements have been added to the draft permit, it looks like the footnote has been excluded, perhaps by error, from the document.

Department Response: The footnote allowing the permittee to cease the PFAS monitoring if four consecutive monitoring events are below detection at the specified Quantitation Limits has been included in the enclosed draft permit.

Comment 2: The proposed permit language on page 29 indicates that the TIWC required for the next permit issuance cycle is "1%". However, the WET Summary and Evaluation sheet on page 44 of the factsheet indicates that the recommended TIWC was determined to be 2%. Please revise page 29 of the proposed permit to reflect the correct TIWC of "2%".

Department Response: The WET TIWC has been updated to 2 on now page 28 as noted.

No comments were received from the public.

Internal review of the draft permit noted that e. coli had not been included in the draft permit inconsistently with Department policy. Monthly e. coli monitoring will be included in the new draft of the permit consistent with Department policy and recent changes to Chapter 93 of the Department's regulations.

Therefore, it is recommended that NPDES Permit No. PA0023248 be drafted with only the changes noted above.