pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

**NORTHEAST REGIONAL OFFICE**
**CLEAN WATER PROGRAM**

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| Application Type | **Renewal** | Application No. | **PA0023558** |
| Facility Type | **Sewage** | APS ID | **548745** |
| Major / Minor | **Major** | Authorization ID | **1157776** |

# NPDES PERMIT FACT SHEET ADDENDUM

## Applicant and Facility Information

| | | | |
|---|---|---|---|
| Applicant Name | **Ashland Borough Columbia & Schuylkill County** | Facility Name | **Ashland Borough WWTP** |
| Applicant Address | 401 S 18th Street<br>Ashland, PA 17921-1748 | Facility Address | 400 Oak Street<br>Ashland, PA 17921 |
| Applicant Contact | Ray Jones | Facility Contact | Randy Fetterolf |
| Applicant Phone | (570) 875-2411 | Facility Phone | (570) 875-1881 |
| Client ID | 59755 | Site ID | 257450 |
| SIC Code | 4952 | Municipality | Ashland Borough |
| SIC Description | Trans. & Utilities - Sewerage Systems | County | Schuylkill |
| Date Published in PA Bulletin | July 10, 2021; Redraft: TBD | EPA Waived? | No |
| Comment Period End Date | August 26, 2021; Redraft: TBD | If No, Reason | Major POTW; CSOs; discharge to AMD TMDL stream |
| Purpose of Application | Application for a renewal of an NPDES permit for discharge of treated Sewage | | |

## Internal Review and Recommendations

This Fact Sheet Addendum is for a **Redraft NPDES Permit** for the Ashland Borough POTW (WWTP with CSOs) to address received public comments.

**Changes to Redraft NPDES Permit**:

- Signature Page: Clarified permit to explicitly reference CSOs in collection system.
- Updated NPDES Permit Template: See Part A.III.D for revised annual fee requirements.
- Part C.II (Schedule of Compliance/Ammonia-N, TRC, and Dissolved Oxygen), Part C.III (CSO Implementation of LTCP Schedule), and Part C.V (WQBELs for Toxic Pollutants Schedule of Compliance): Modified in response to Ashland Borough public comments requesting >5-year compliance schedules with additional interim compliance milestones.
    - Part C.II and C.V have been modified for a 54-month Schedule of Compliance (to allow completion within Chapter 92a.51 requirements for completion within the 5-year NPDES permit term).
    - Part C.III has been modified to address applicable interim compliance milestones within 54-months (coinciding with the next NPDES Permit Renewal Application) with provisions for CSO LTCP Updates that can incorporate additional milestones as needed.
    - See Public Comments Responses (below) for more details.
- Part C.III (CSO Conditions): Minor editing to address EPA public comments and to clarify interim compliance milestone requirements. See Public Comments Responses (below) for more details.
- New Part C.IX.G (Quarterly WET Testing for First Year of NPDES Permit Term): This condition had been accidentally omitted in the Draft NPDES Permit, and now has been added back into the NPDES Permit. See below for more details.

| Approve | Return | Deny | Signatures | Date |
|---|---|---|---|---|
| **X** | | | James D. Berger (signed)<br>James D. Berger, P.E. / Environmental Engineer | April 11, 2022 |
| **X** | | | Amy M. Bellanca (signed)<br>Amy M. Bellanca, P.E. / Environmental Engineer Manager | 4-13-22 |
| **NA** | | | NA – not needed for Redraft NPDES Permit<br>Bharat Patel, P.E. / Environmental Program Manager | NA |

**Internal Review and Recommendations**

- New Part C.IX.H (Responsible Operator) Condition: The 4/5/2022 Sewage Inspection Report indicated a violation for failing to employ an operator (collection system and WWTP) with a valid, appropriate Chapter 302 operator's certificate. Therefore, this condition has been added to require identification of the responsible operator throughout the NPDES Permit Term.
- Other: Corrections of typos in Draft NPDES Permit and other minor clarifications.

**Internal Comment**: The 2021 Chapter 94 Report (On-Base No. 52009) included the following updated information with relevant information/comments:

- General Information Section: Randy Fetterolf was identified as the "plant operator", but no e-mail address given. April 2022 Inspection Reports indicated Mr. Fetterolf did not have a "valid, appropriate operators certificate" (Chapter 302). The Inspection Reports indicated a contractor Licensed Operator (Dean Miller of Miller Environmental) was subsequently hired.
- Form Items 1, 2, 3 and 9 (Hydraulic and Organic Loadings) & Attachments A and B: No existing or projected overloading. **However, the existing as-built/as-operated WWTP capacities might be less than the 1.3 MGD Hydraulic Design Capacity and 1,400 lb BOD5/day organic design capacity due to age and condition of plant. Frackville Area Municipal Authority graphs were provided instead of Ashland graphs for flows/loadings in the 2021 Chapter 94 Report.** The Authority has committed to POTW capacity evaluation by the Authority's consultant within the NPDES Permit Term. The CSO LTCP Plan might also require further maximization of flows directed to the POTW for treatment, increasing future POTW loadings. Provided 2021 information
    - ADF Flow: 0.8368 MGD
    - Max 3-Mo Average Flow: 0.9163 MGD
    - Highest Monthly Flow: 1.043 MGD (September)
    - Persons/EDU: 3.5
    - Existing EDUs: 1,267
    - Load/EDU: 0.277 lb BOD5/day
    - Load/Capita: 0.079 lb BOD5/day
    - Flow/EDU: 660.5 GPD
    - Flow/Capita: 188.7 GPD (indicating CSS flow loadings)
    - Projected Growth: Zero EDUs/Year
- Form Item 4 (Sewer Extensions) & Attachment C: None in 2021. No mention if any others were approved or anticipated. Attachment C description of sewer system omitted reference to separated sewer system areas.
- Item 5 (Sewer System Monitoring, Maintenance, Repair and Rehabilitation) & Attachment D: "Routine maintenance was performed throughout 2021. Typical maintenance" included Routine cleaning of tanks, blower maintenance, influent pump wet well cleaning, flow meter calibration. "Repairs are made on an as needed basis". "There were no repairs and upgrades made in the collection system or the Wastewater Treatment Plant in 2021". "Most of the collection system existed before construction of the WWTP and is in satisfactory condition". **No mention of unused Fluidized Bed Reactor system or unused grit removal system. 3/10/2020 Inspection Report-listed WWTP issues (wide-spread corrosion issues, inoperative grit screw in unused grit removal system) and application-raised need for engineering evaluation of treatment plant capacities were not addressed by this Report. The 3/30/2022 Inspection Report noted corrosion issues (major corrosion in Clarifier No. 1; corrosion in the headworks, aeration tank support beam and handrails, sludge holding tanks, sludge return pumps and piping, chlorine contact tanks) with no improvements schedule. Inspection Report noted need for railings to address safety hazards.**
- Item 6 (Sewer System capacity-related bypassing, SSOs or surcharging): CSO Discharge Monitoring Reports and Attachment E were referenced, but no information on non-CSO SSOs, bypassing, or surcharges provided. Attachment E lacked the referenced "list of CSO events" and the monthly CSO supplemental reports. **No information on the separated sewer system areas (20% of service area) or internal plant bypassing provided.**
- Item 7 (Pump Stations) & Attachment F): One existing pump station servicing 13 homes. Pump station rated for 0.073 MGD and utilizes two (2) 5-HP pumps. Estimated present flows at 7,180 GPD.
- Item 8 (IW wastewater): **Item left blank. No attachment referenced**. There is at least one (1) identified IU (for ~5,000 gallon semi-annual quench tank discharge) per CSO LTCP. Therefore, this section should have been completed. Part B.I.C.4 (IU with Pretreatment ELG) reporting requirements might apply.
- Item 10 (Sewage Sludge Management Inventory) & Attachment I: Item left blank. Attachment I indicated no liquid sludge was hauled offsite for disposal in 2021. The Redraft NPDES Permit will require a Sewage Sludge Management Inventory every year.

**Internal Review and Recommendations**

- Item 11 (Annual CSO Status Report) & Attachments E and G: **No Annual CSO Status Report was provided per existing NPDES Permit Part C.V.D.2.** Attachments included:
  - Attachment E (Combined Sewer Overflow): "The Borough had one hundred twenty-nine (129) rain induced events in 2021 in which CSOs were active". The Attachment referenced the monthly CSO Supplemental Reports, but did not summarize their information or provide attached copies.
  - Attachment G (CSO Report): Listed the existing CSOs. Stated: "The Borough of Ashland will continue to perform routine inspections and maintenance of all CSO's. Per their NPDES permit, the WWTP will report cause, frequency, duration, and quantity of each discharge along with daily precipitation on the monthly DMR's that are submitted to PADEP".
- Item 12 (Flow Calibration Reports) & Attachment H: Influent flow meter calibrated 1/27/2022. No effluent flow meter calibration.

**Public Comments Responses**: Responses are bolded.

**Ashland Borough Public Comments (9/1/2021 and 10/29/2021)**:

- On 8/31/2021, Ashland Borough requested a conference call to discuss EPA public comments (previously forwarded to them on 8/24/2021 for informational purposes). The conference call took place on 9/1/2021 with Amy Bellanca (DEP Permits Chief) representing the Department. Entech (Ashland's consultant) represented Ashland and subsequently provided a meeting summary by 9/7/2021 E-mail (Robert Kerns, Entech). The Conference Call is summarized below to address Ashland's questions as received public comments/responses (with update Notes):
  - Why was quarterly WET Testing requested? Related cost being of concern. Ashland asked if additional time would be granted to comment on this requirement.
    - **See Draft NPDES Permit Fact Sheet WET Test section for the requirement. NOTE: See NPDES Permit Part C.I.G (Quarterly WET Testing during First Year of Permit) condition. The quarterly testing can incorporate the standard annual WET Test requirement as one of the reported quarters.**
    - **Ashland can submit additional public comments despite previous end of public comment period (from September 1 conference call to identified date to submit all comments). The Department understanding was that any Ashland public comments would be submitted by November 1, 2021 (allowing time for September Ashland Borough meeting to authorize comments). NOTE: 10/29/2021 Public Comments summarized below.**
    - **Ashland noted that it would check into its Act 47 status (municipality financial distress status) and inform the Department. Such financially distressed municipality are identified by the Department of Community and Economic Development (DCED) under the Municipalities Financial Recovery Act (53 P.S. §§ 11701.101—11701.712). NOTE: No information on municipality status subsequently received to date. DEP identified EPA technical assistance contacts in a 9/22/2021 DEP (Berger) e-mail.**
  - Does the draft NPDES Permit include DEP CSO program commitments to the US EPA?: **PADEP CW Program commitments addressed in the Draft NPDES Permit.**
  - Did the Draft NPDES Permit include the template language agreed upon by the Department and EPA: **The template language was included the Draft NPDES Permit. NOTE: EPA public comments noted that future planned regulatory changes (Chapter 92a.51, etc.) might require future permit updating in the next NPDES Permit Renewal or amendment.**
  - Does the Draft NPDES Permit include a CSO Compliance schedule and final compliance date for LTCP implementation as agreed upon between DEP and EPA: Ashland consultant would recommend the CSO LTCP Goal be changed to a Presumptive Goal from Demonstrative Goal. Ashland noted it needed to propose a new CSO Schedule of Compliance since it was starting over on the CSO LTCP Goal to address funding steps, etc. Ashland thought that more time might be needed to revise the LTCP in the CSO Schedule of Compliance. Ashland noted that it would provide additional public comments by a certain date, but that the date would be discussed in the September Borough Meeting. Ashland indicated it thought the Draft NPDES Permit would be issued by 10/1/2021. Ashland also thought it might need more time to meet the CSO Schedule of Compliance 12/31/2021 milestones for assorted submittals (update on NMCs; engineering report regarding CSO discharge flow estimation methodology; CSO Flow monitoring plan; WWTP capacity report; High Flow Management Plan; etc. Ashland noted that it was considering selling the system. Ashland also asked if a Redraft NPDES Permit to address additional public comment time is needed due to public comments.

**Internal Review and Recommendations**

- **The Draft NPDES Permit included a CSO Schedule of Compliance (with interim and final compliance milestone dates) and EPA commented upon it (as discussed below). The CSO Schedule of Compliance included assorted previous commitments by Ashland and other required interim compliance milestones to address CSO-related requirements. NOTE: The 10/29/2021 Public Comment requested changes to the Schedule of Compliance. See public comment/response below.**
- **The DEP noted that Ashland could propose a CSO LTCP Presumptive Goal upfront in public comments. NOTE: See 10/29/2021 Public comments below. At present, Ashland has not decided on a specific LTCP Goal.**
- **Ashland can propose additional interim compliance milestone dates (funding or other) as part of a proposed CSO Schedule of Compliance in its public comments (expected by November 1). The final 2041 compliance date should not change. Funding issues are not an acceptable reason for not meeting NPDES Permit requirements.**
    - **The Draft NPDES Permit CSO Schedule of Compliance already included time to revise the LTCP.**
    - **The tentative October final permit action date (noted in a previous DEP E-mail) was in the absence of any Ashland public comments or other public comments requiring significant changes to the Draft Permit.**
        - **Received EPA public comments only concerned need for accidentally omitted quarterly WET Testing requirement (discussed in Draft NPDES Permit Fact Sheet) and minor permit clarifications involving minor editing changes to the Draft NPDES Permit. Given timing of September conference call, an NPDES Permit is not likely to be issued by October 1.**
        - **If additional public comments require significant changes to the Draft NPDES Permit, the Department would issue a Redraft NPDES Permit which would be subject to its own public comment period.**
    - **The 12/31/2021 CSO Schedule of Compliance Interim Milestone submittal requirements was based upon previous Ashland commitments for submittals by this date, required verification of compliance with existing NPDES Permit requirements, and basic CSO-related requirements needed upfront (i.e. explanation of the CSO discharge flow estimation methodology and its accuracy). See Draft NPDES Permit Fact Sheet (including communication log) for details. Other CSO Schedule of Compliance Milestones were proposed due to basic CSO-related requirements and in the absence of any previous Ashland-proposed schedule of compliance milestones.**
    - **The Department noted that Ashland can pursue free assistance from US EPA Region III in terms of LTCP assistance. US EPA Region III should be directly contacted regarding this option.**
    - **The Department noted that it is okay with the mentioned Ashland option of selling its system and that it could provide the buyer with a Consent Order & Agreement (CO&A) to accommodate permit requirements.**

  **NOTE: See 10/29/2021 Public comment/responses below.**
- Ashland thought the EPA comments that noted the need for CSO level of controls to comply with Water Quality Standards are moot. **Not necessarily. NOTE: The level of CSO control will depend upon what CSO LTCP Goal is proposed and the future in-stream water quality monitoring data and analysis.**
    - **The CSO LTCP Goals are enforceable narrative Water Quality-Based Effluent Limits (WQBELs).**
    - **The CSO LTCP Presumption Goal options include specified CSOs level of control (4 – 6 CSO events/year; 85% elimination or capture for treatment annually on a system-wide basis). Achieving a Demonstration Goal might require a more stringent level of CSO control than the LTCP Presumption Goals.**
    - **When the receiving stream (Mahanoy Creek) is known to be impaired by constituents known to be in the CSO discharges (pathogens which include fecal coliform and E Coli); AMD metals; pH; and nutrients as part of the Chesapeake Bay watershed at the CSO outfalls), the burden falls on the permittee to show the CSO discharges are not contributing to the existing Mahanoy Creek stream impairments. Part of the CSO**

**Internal Review and Recommendations**

**Schedule of Compliance involves development of an in-stream Water Quality Monitoring Plan/PCCM able to make this determination. Higher levels of CSO controls might be required.**

- Does the Draft NPDES Permit include electronic reporting of Sewer Overflow/Bypass events as agreed upon by EPA and DEP: **The Draft NPDES Permit requires electronic reporting. NOTE: To amplify, minimum current reporting is via EDMR comment section and/or EDMR Supplemental Reports (CSO Supplemental Reports and Noncompliance Reports for unauthorized Separated Sewer System overflows/bypassing). See Bypassing and CSO-related permit conditions for what is authorized by the NPDES Permit and existing reporting requirements. Should reporting requirements be updated in the future to otherwise require reporting of bypassing/Overflow events, Ashland would be notified of the requirements.**
- Does the Draft NPDES Permit include E Coli monitoring consistent with CSO post-construction compliance monitoring (PCCM) as agreed upon between PADEP and US EPA: **DEP noted E Coli monitoring is now a 1/month Outfall No. 001 monitoring requirement. NOTE: The Part C CSO conditions will also require E Coli monitoring in the CSO Schedule of Compliance-required PCCM Plan and In-Stream Water Quality Monitoring Plan. Both CSO discharge sampling and in-stream monitoring E Coli monitoring requirements will pertain.**
- Inactive CSO Outfalls Nos. 004 and 005 (inactive since 2012 and 2012 respectively): Ashland Borough considers these Outfalls to be temporarily closed and will await final decision on permanent closure pending its evaluation of the CSO System. **Removing CSO outfalls from an NPDES Permit requires a NPDES Permit amendment if not done at time of permit renewal. To date, Ashland has not submitted documentation that these outfalls have been permanently closed and/or schedule for doing so.**
- **Last 2016 Draft LTCP Update:** EPA indicated it would not require an electronic copy of this now obsolete draft document at this time. **Noted. A hard copy had been mailed to the EPA by the DEP Regional Office.**

**October 29, 2021 Ashland Public Comments:** Ashland Borough sent in additional public comments on the Draft NPDES Permit:

- **Part A.I.A (Interim Limits) and A.I.B (Final Limits effective in 5th Year of Permit):** Request for removal of three constituents (4,6-dinitro-o-cresol; 3,4-Benzofluoranthene; Bis (2-Ethylhexyl) Phthalate) on the basis that the Quantitation Limits (QLs) are not obtainable based on testing laboratory letter. **The Department could not grant this request because the Reasonable Potential Analysis indicated potential for exceedances of the applicable Water Quality Criteria. The DEP Target Quantitation Limits are achievable per the DEP Bureau of Laboratories (BOL). See the BOL Webpage for a means to determine what other laboratories can analyze for these constituents at the DEP Target Quantitation Limits.**
- **Part A.I.B (Final Limits effective in 5th Year of Permit)**: Request the current TRC average monthly limit (1.0 mg/l) be retained instead of the new 0.50 mg/l monthly average limit**. The Department could not grant this request, because the new Water Quality-Based Effluent Limits were derived from the TRC Spreadsheet water quality modeling, which superseded the old regional Technology-Based Effluent Limits.**
- **Part A Supplemental Information Item (1):** Ashland state the peak design flow is 2.1 MGD. Annual average flow should be 1.3 MGD, but hydraulic capacity is 2.1 MGD. **The Department took the comment as a request to modify the Part A figure. The Department could not grant this request which is based upon confusion between the Chapter 94-defined Hydraulic Design Capacity (previously determined by a ~1980 rerating versus peak wet weather design flow. The NPDES Permit Part A-identified figure is meant to identify the facility hydraulic design capacity triggering potential Chapter 94.21-22 (existing and projected overloading) requirements in event of overload conditions (not peak wet weather design capacity issues associated with short-term wet weather events). To further clarify:**
  - **Chapter 94 "Hydraulic design capacity" definition —The maximum monthly design flow, expressed in millions of gallons per day, at which a plant is expected to consistently provide the required treatment or at which a conveyance structure, device or pipe is expected to properly function without creating a backup, surcharge or overflow. This capacity is specified in the water quality management permit (Part II permit issued under Chapter 91) (relating to general provisions). (Underlining added)**
  - **Chapter 94 "Hydraulic overload" definition —The condition that occurs when the monthly average flow entering a plant exceeds the hydraulic design capacity for 3-consecutive months out of the**

**Internal Review and Recommendations**

**preceding 12 months or when the flow in a portion of the sewer system exceeds its hydraulic carrying capacity. (Underlining added)**

- **In practical terms, the permittee has committed to evaluating total plant and individual unit hydraulic capacities as part of the CSO Schedule of Compliance due to the age and uncertain condition of the plant (which was last rerated circa 1980 to 1.3 MGD from 0.70 MGD). Once the as-built/as-operated plant's capacity has been determined by engineering analysis, the permittee can pursue rerating.**

- **Part C.II (Schedule of Compliance (Ammonia-N, Dissolved Oxygen, and Total Residual Chlorine)):** Ashland requested for modified Schedule of Compliance milestone and end-date of compliance beyond the 5-year permit term (see below). **The Department could not grant the Ashland-requested schedule of compliance milestones (below) due to Chapter 92a.51 requirements, but has modified the schedule to incorporate Ashland-proposed interim milestones for an overall 54-month Schedule:**
  - **Chapter 92a.51 Requirements:**
    - **"Any schedule of compliance specified in the permit must require compliance with final enforceable effluent limitations as soon as practicable, but in no case longer than 5 years, unless a court of competent jurisdiction issues an order allowing a longer time for compliance". No such order exists to allow the compliance schedule to exceed the 5-year permit term. Please note this regulatory requirement cannot be addressed by a Consent Order & Agreement (CO&A).**
    - **"The time between interim dates may not exceed 1 year". The first proposed Ashland compliance milestone is 36 months from PED.**
    - **"For each NPDES permit schedule of compliance, interim dates and the final date for compliance must, to the extent practicable, fall on the last day of the months of March, June, September and December". The Final NPDES permit compliance dates will be adjusted to the appropriate Chapter 92a.51 calendar dates as needed.**
  - **Revised Part C.II Schedule of Compliance (Ammonia: Please note the milestone dates are the latest acceptable date of compliance.**

| Draft NPDES Permit Milestone | Ashland Proposed Schedule | Revised Schedule and Comment in Parentheses |
|---|---|---|
| Submit WWTP/Unit Capacity Report:<br><br>Due: 12/31/2021 (per Part C.III (CSO Schedule)) | 36 months after PED | **12 months after PED (1 year)**<br><br>**(The Department has incorporated this proposed CSO-related interim milestone per Ashland request and to avoid redundant costs in event of other potential CSO-related plant upgrade requirements. See Draft NPDES Permit Fact Sheet communications log for previous Ashland Borough submittal commitments.)** |
| Quarterly Progress Report Submittal:<br><br>Due: 24 months after PED (2 years) | 66 months after PED (5.5 years) | **12 months after PED (1 year)**<br><br>**(The beginning of quarterly reporting has been moved to 12 months of PED to improve communications between Ashland and the DEP.)** |
| Feasibility Study Submittal:<br><br>Due: 12 months after PED (1 year) | 48 months after PED | **24 months after PED (2 years)**<br><br>**(This milestone is for identification of feasible options for coming into compliance with the proposed WQBELs.)** |
| Final Plan Submittal:<br><br>Due: 24 months after PED (2 years) | 60 months after PED (5 years) | **36 months after PED (3 years)**<br><br>**(This milestone is for selection of the feasible method to comply with the final WQBELs.)** |
| Obtain WQM permitting and financing: | 54 months after PED | **45 months after PED (3 years, 9 months)** |

**Internal Review and Recommendations**

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| Due: 36 months after PED (3 years) | (4.5 years) | **(The Department Permit Decision Guarantee Program allows for permit action within 90 days of submittal of a complete and technically adequate Part II WQM permit application.)** |
| Start Construction:<br><br>Due: 39 months after PED (3.25 years) | 66 months after PED (5.5 years) | **48 months after PED (4 years)** |
| End Construction:<br><br>Due: 45 months after PED (3.75 years) | 72 months after PED (6 years) | **52 months after PED (4 years, 4 months)** |
| Compliance with Final Effluent Limits:<br><br>Due: 48 months after PED (4 years) | 72 months after PED (6 years) | **54 months after PED (4 years, 6 months)**<br><br>**(The facility must be able to demonstrate its ability to consistently meet the effective limits prior to the end of the 5-year permit term).** |
| Submit Notice of Noncompliance with Milestones:<br><br>Due: Within 14 days of above milestones | TBD | **Within 14 days of above milestones**<br><br>**(The Part B.I.A reporting requirement is a regulatory requirement will not be changed. If compliant, no additional reporting is required. If non-compliant, the burden falls on the permittee to provide the required information within the specified time-frame.)** |

- **Part C.III (Combined Sewer Overflow):**
  - **Part C.III.C.1 (Incorporation of LTCP into NPDES Permit):** The Ashland Table requested the LTCP not be incorporated into the NPDES Permit for 48 months of PED. **The Department could not grant this request because the LTCP submittal (except as superseded by regulatory requirements & permit conditions) is an existing essential part of this NPDES Permit. The future CSO LTCP Update(s) (required per the CSO LTCP Schedule of Implementation) will be incorporated by reference upon DEP approval.**
  - **Part C.III.C.2 (CSO Water Quality-Based Effluent Limit):** Request to remove 4,6-Dinitro-o-cresol, 3-4-Benzofluoranthene, and Bis(2-ethylhexyl) Phthlalate from permit; DEP Target Quantitation Limits (QLs) are not obtainable. **See separate Part C.V (WQBELs for Toxic Pollutants) comments below. These constituents were not addressed in the CSO-related Part C.III (which would only apply to these constituent WQBELs if the identified source was the CSS-flows).**
  - **Part C.III.C.2 (Combined Sewer Overflows: Implementation of Long-Term Control Plan):**
    - Concurrence with EPA comment to strike out reference to "dry weather events". **Noted.**
    - Question: "With E Coli monitoring, are other options required":
      - **Site-specific stream data (in addition to new E Coli Effluent monitoring) is required to show whether the LTCP is adequately protective of the waters of the Commonwealth in terms of compliance with the Chapter 93 Water Quality Standards (Chapter 93 Water Quality Criteria (including E Coli and Fecal Coliform) and protected water uses). The burden will fall on Ashland to makes an adequate technical case that its treated effluent and CSO discharges are not contributing to ongoing pathogen impairment.**
      - **New or changed water quality standards or treatment requirements: The Department is gathering information from all sewage discharges statewide in terms of treated effluent E Coli concentrations and stream conditions. Chapter 92a.12(d, e) provisions apply in event new Water Quality Criteria require action on the part of permittees (regardless of separate CSO-related requirements).**

**Internal Review and Recommendations**

- **The Department recommends that the Part C.II (TRC) Feasibility Study include looking at the effectiveness of the existing/proposed treatment plant disinfection system(s) in terms of E Coli reduction.**
- **If any statewide regulatory change is proposed, such as a new E Coli Technology-Based Effluent Limit (similar to the Chapter 92a.47 Fecal Coliform limit), Ashland would be free to comment per the regulatory change process.**

▪ More data is needed to select best of the CSO Long Term Control Plan Options: **Noted. The CSO Schedule of Compliance provides additional time to gather data.**

- **Part C.III.C.3 (LTCP Schedule of Implementation)**: Ashland proposed alternative Schedule milestones. **The Department could only grant the Ashland request in part. The Department is in the process of modifying Chapter 92a.51 (in terms of CSO-related schedules of compliance (to allow final compliance dates beyond the 5-year NPDES Permit Term without a Consent Decree from a court of competent jurisdiction allowing a longer time for compliance), but the critical need is to develop an adequate LTCP (with interim milestones) within the 5-year NPDES Permit Term to meet both existing and future NPDES Permit requirements. In terms of specific Ashland proposed changes:**

| Draft NPDES Permit Milestone | Ashland Proposed Schedule | Revised Schedule and Comment (in parentheses) |
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| Continued Implementation of approved 2003 CSO LTCP except as superseded by NPDES Permit conditions, regulations, and applicable DEP/EPA policies/technical guidance.<br><br>Due: Upon PED | Upon PED but not incorporated into NPDES Permit. | **Upon PED**<br><br>**(The LTCP is an integral part of the NPDES Permit.)** |
| Submittal of updated Nine Minimum Controls (NMC) Implementation Report with proof of adequate method to monitor and report all dry weather CSO discharges at all CSO outfalls not permanently blocked; proof of adequate CSO controls for solids and floatables being discharged to the water of the Commonwealth at all CSO outfalls not permanently blocked (and/or schedule for implementation of any additional required controls as needed); updated GPS-verified regulator and CSO Outfall coordinates; and demonstrating compliance with all NMC-related permit conditions and requirements. Documentation verifying permanently blocked of inactive CSO outfalls to be included.<br><br>Due: December 31, 2021 | 48 months from PED | **12 months of PED (1 year)**<br><br>**(Compliance with the Nine Minimum Controls (NMCs), which are existing permit narrative Technology-Based Effluent Limits (TBELs) and part of the existing LTCP, is an ongoing requirement. The old NMC Implementation Report and previously submitted LTCP Update did not verify compliance with the existing NMC requirements due to missing or conflicting data. The Department is granting additional time (12 months) in this revised schedule per Ashland request. The NMC Implementation Report would require a schedule if further actions are determined to be needed to comply with permit requirements.)** |
| Submittal of WWTP Total and individual WWTP Unit Capacities Report and CSS Interceptor/Regulator/Outfall Hydraulic Capacities Evaluation Report (including CSO Outfall No. 002 Tunnel)<br><br>Due: 12/31/2021 | 36 months after PED | **12 months after PED (1 year)**<br><br>**(CSO discharges are only authorized when hydraulic capacities are exceeded per existing NPDES permit. In practical terms, the facility has to identify as-built/as-operated unit capacities, total plant treatment capacities (including achievable peak wet weather design flows) that the as-built/as-operated treatment plant can treat** |

**Internal Review and Recommendations**

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| | | **per existing/future NPDES Permit CSO requirements (in addition to the CSO regulator capacities). The Department is granting additional time (12 months) by this revised schedule per Ashland request. This submittal is also required per the concurrent Part C.II Schedules of Compliance Interim Milestone.)** |
| Submittal of PA Professional Engineer-signed and sealed engineering report verifying the Borough's methodology of estimating CSO discharge frequency, duration, volume, and intensity at all CSO Outfalls not permanently blocked or schedule for implementing a CSO Flow Monitoring Plan to develop such a methodology or a schedule for installation of CSO Flow Meters at all CSO discharges not permanently blocked.<br><br>Due: 12/31/2021 | 36 months after PED | **12 months after PED**<br><br>**(Accurate monitoring and reporting of CSO discharge frequency, duration, volume and intensity is an existing permit requirement and a prerequisite for any CSO LTCP Update. The Department is granting additional time (12 months) by this revised schedule per Ashland request. The Engineering Report would be required to include a schedule if further actions are determined to be needed to comply with the existing NPDES Permit requirements for accurate monitoring and reporting of CSO Discharge frequency, duration, volume, and intensity. See also potential CSO Flow Monitoring Study-relate milestones in the revised Schedule.)** |
| Submittal of High Flow Management Plan (HFMP) and Site-specific PPC Plan meeting all IW Stormwater NPDES permit conditions.<br><br>Due: 12/31/2021 | 42 months after PED | **18 months after PED**<br><br>**(A HFMP is required to ensure meeting existing CSO requirements to maximize treatment of peak wet weather influent flows. 6 months after WWTP capacity evaluation allows adequate time to develop an updated HFMP/wet weather SOP. The Department is likewise deferring the requirement for submittal of an updated PPC Plan (addressing all Final NPDES Permit requirements) per Ashland request. The NPDES Permit Part C.VIII.B (stormwater PPC Plan requirements) are effective on the PED. The HFMP and PPC Plan are living documents that can be updated without permitting, and will be effective upon development except as superseded by permit conditions and regulatory requirements.)** |
| Submittal of revised CSO LTCP Update explicitly addressing all CSO-related NPDES Permit requirements (including Part C.III.C.4 and Part C.III.C.5) and Department CSO-related feedback set forth in the February 3, 2016 DEP LTCP Update Letter; the March 24, 2016 DEP LTCP Update Letter; the April 12, 2020 DEP Technical Deficiency Letter. | 48 months after PED. | **24 months after PED (2 years)**<br><br>**(The Department previously provided extensive feedback on LTCP requirements, with a previous Ashland commitment to submit an LTCP Update by December 31, 2021. A decision in term of the proposed LTCP Goal must be identified the CSO LTCP Update to allow development of an adequate In-Stream WQ Monitoring Plan and Post-** |

**Internal Review and Recommendations**

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| Due: December 31, 2021 | | **Construction Compliance Monitoring Plan. Any other required action (with milestone) must be spelled out in the CSO LTCP Update Scheduling section.** |
| Submittal of 1-Year In-Stream Water Quality Monitoring Plan (including CSO outfall discharge monitoring for all CSO outfalls not permanently blocked) and Post-Construction Compliance Monitoring (PCCM) Plan meeting DEP/EPA technical guidance requirements and addressing all NPDES Permit Part A.I.D parameters/limits and applicable Water Quality Standards.<br><br>Due: 12/31/2022 | 48 months from PED<br><br>Ashland requested that it be allowed to gather up to 3 years (36 months) to assess water quality and to gather CSO discharge data (minimum of 12 CSO discharge events per CSO Outfall with at least 2 events per season). | **24 months after PED (2 years)**<br><br>**(The In-Stream Water Quality Monitoring Plan and PCCM Plan are integral parts of the LTCP and must be submitted with it. To allow for 36 months of actual data collection (Ashland's stated desire), the Monitoring Plans must be submitted by this milestone to allow for 36 months of data collection within the 5-year permit term. After initial 1-Year In-Stream Water Quality Monitoring (one year in duration to characterize current stream conditions), additional monitoring would be addressed in the Post Construction Compliance Monitoring Plan. In practical terms, any Part C.V (WQBELs for Toxic Pollutants) site-specific data collection should be concurrent with CSO-related data collection to avoid redundant costs and to help in permittee decision-making. The Department listed Part C.V.B site-specific metals-only data collection options in event you wish to address AMD metal WQS/loadings from the CSO outfall discharges.)** |
| Submittal of 1-Year CSO Flow Monitoring Study Plan (if needed)<br><br>Due: 12/31/2022 | 54 months of PED | **24 months after PED, if needed (2 years)**<br><br>**(Any CSO Flow Monitoring Plan would be an integral part of the LTCP Update and must be submitted with it. One (1) Year is adequate time to conduct such a study if needed. The Schedule references "if needed" because the facility might install permanent CSO flow meters and/or otherwise demonstrate adequacy of the current Ashland methodology for monitoring/reporting discharging CSO Outfalls in terms of CSO frequency, duration, volume, and intensity by engineering analysis by a PA Professional Engineer-signed & sealed Report.)** |
| Implementation of In-Stream Water Quality Monitoring Plan (including CSO outfall discharge monitoring for all CSO outfalls not permanently blocked) and Post-Construction Compliance Monitoring (PCCM) Plan meeting DEP/EPA technical guidance requirements and addressing all NPDES Permit Part A.I.D parameters/limits and applicable Water Quality Standards. | 60 months from PED (if needed) | **Upon Department approval or approval with conditions.**<br><br>**(The In-stream conditions must be determined to allow for CSO LTCP updating as part of the next NPDES Permit Renewal Application. Any proposed post-permit term milestone or other actions should be identified in the LTCP Update Scheduling section.)** |

**Internal Review and Recommendations**

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| Due: 12/31/2022 | | |
| Implementation of 1-Year CSO Flow Monitoring Study Plan (if needed)<br><br>Due: Upon Department approval or approval with conditions | 60 months after PED if needed | **Upon Department approval or approval with conditions**<br><br>**(See above)** |
| Submit Final LTCP to meet Selected CSO LTCP Goal Performance standards with minimum CSO E-Coli reporting<br><br>Due: 36 months of PED | 96 months of PED | **54 months of PED**<br><br>**(Submittal as part of next NPDES Permit Renewal Application (at least 180 days/6 months prior to NPDES permit expiration date). See above comments. This time-frame allows for completion of additional interim steps if proposed by Ashland as part of the above-listed Reports. Any subsequent required actions interim milestones must be scheduled in the LTCP Update Schedule section for final compliance by 12/31/2041. The Department might incorporate any proposed additional interim milestones into the next NPDES Permit Renewal.)** |
| PA Professional Engineer-Sealed Report on whether additional POTW WWTP/CSS System upgrades are required to achieve compliance with selected CSO LTCP Goal. The Report will identify feasible alternatives and tentative construction schedules (as needed).<br><br>Due: 24 months after PED | 84 months from PED if needed. | **54 months of PED**<br><br>**(Submittal as part of next NPDES Permit Renewal Application's LTCP Update (at least 180 days/6 months prior to NPDES permit expiration date).** |
| Submit Final Post-Construction Compliance Monitoring (PCCM) Plan<br><br>Due: 48 months of PED | 108 months of PED | **54 months of PED**<br><br>**(The PCCM is an integral part of the LTCP Plan. Submittal as part of next NPDES Permit Renewal Application's LTCP Update (due at least 180 days/6 months prior to NPDES permit expiration date)).** |
| Implement Final LTCP and PCCM Plan<br><br>Due: Upon Department approval or approval with conditions | 120 months of PED | **Upon Department approval or approval with conditions** |
| Submit Notice of Noncompliance with Milestones:<br><br>Due: Within 14 days of above milestones | TBD | **Within 14 days of above milestones**<br><br>**(The Part B.I.A reporting requirement is a regulatory requirement that will not be changed. If compliant, no Part B.I.A reporting is required. If non-compliant, the burden falls on the permittee to provide the required information within the specified time-frame.)** |

**Part C.V (WQBELs for Toxic Pollutants)**:

**Internal Review and Recommendations**

- Request for 120-month (10 year) Schedule of Compliance for Final WQBELs and "TBD" (To Be Determined) for Interim Milestones: **This request could not be granted due to Chapter 92a.51 requirements (per above Part C.II comments). The Deparment has modified the Final WQBELs to be effective in the 54th month after PED.**
  - **10-Year Final WQBELs: Chapter 92a.51 limits the allowable Schedule to the 5-year NPDES Permit Term with a maximum of 12 months/1 year between interim compliance milestones. In the unlikely event that the sole source of these pollutants was shown to be from the combined sewer system (CSS) flows the Department would be willing to address the constituents under the Part C.III CSO schedule of compliance. See the Part C.V conditions and SOP No. BCW-PMT-037 (Establishing Water Quality-Based Effluent Limitations (WQBELs) and Permit Conditions for Toxic Pollutants in NPDES Permits for Existing Dischargers) for options in event it is not feasible to meet the WQBEL compliance date.**
  - **TBD Interim Milestones: The Department will require submittal of the TRE Work Plan (including any proposed site-specific data collection) to improve communications between Ashland and the Department. The Department has added an interim step of WQM permitting consistent with the Part C.II Schedule of Compliance (if needed). Final interim milestone dates will be adjusted to the calendar quarterly reporting month in the Final NPDES Permit.**

| Action | Due Date |
|---|---|
| Complete TRE Work Plan and Submit Work Plan **~~if Requested by DEP~~** | **12 months after PED** |
| Complete TRE and Site-Specific Data Collection | **24 months after PED** |
| Begin Implementing Actions Identified in the TRE to Reduce Pollutant Load (if applicable) | **27 months after PED** |
| Submit Final WQBEL Compliance Report | **36 months after PED** |
| **Obtain WQM permitting and financing (if needed)** | **45 months after PED** |
| Complete Actions Identified in TRE and Comply with Final Permit Limit | **54 months after PED** |

- Request for removal of requirements because Quantitation Limits (QLs are) not obtainable per Laboratory Letter that stated that it would require significant laboratory operation and equipment changes that would result in impractical added costs to the client: **The Department could not grant this request.**
  - **Per the EPA Sufficiently Sensitive Rule, the Department must treat any insensitive Quantitation Limit Non-detect concentration (below the Department Target Quantitation Limit) as the constituent being present at the insensitive ND level.**
    - **Any insensitive non-detect level above the DEP Target QL after the Final WQBEL effective date would be considered noncompliance.**
    - **Insensitive ND levels can also bias or render useless interim monitoring data in terms of any future request for relief from the Final WQBELs under the Part C.V process (prior to the effective date). The Draft Fact Sheet Effluent Section previously noted such biasing. The Department also recommends checking the sampling equipment for potential Bis(2-Ethylhexyl)Phthalate sources as plastic components have resulted in contamination problems elsewhere.**
  - **The Department Target Quantitation Limit (QL) are achievable in Pennsylvania per the PA Bureau of Laboratories. Ashland is not limited to its current laboratory if it cannot achieve the Department QL. See the Bureau of Laboratories webpage for a means to search for other laboratories that can analyze for these constituents.**
  - **Part C.VII (WQBELs Below Quantitation Limits) addresses 3,4-Benzofluoranthene which is the only constituent whose proposed permit limit is below the DEP Target QL.**
  - **Where a laboratory's QL is greater than the Target QL, but the Method Detection Limit (MDL) is at or below the Target QL, DEP will accept estimated values ("J" values) at the Target QL (e.g.,"<0.5 µg/L J") as noted in the Individual IW NPDES Permit Application instructions.**

**Part C.VI.B.1 (Whole Effluent Toxicity (WET)**: Request that WET Tests be conducted annually with sampling in different quarter for each year. **No change in permit condition needed.**

**Internal Review and Recommendations**

- **The existing permit language already requires annual WET Tests at minimum, i.e. annual sampling is already mandated.**
- **In terms of sampling during different calendar quarters, the Annual WET tests must be done during the calendar year (January through December) but at least 6 months apart. Therefore, sampling in different quarters is allowable if the scheduling includes the minimum 6-month separation between WET Tests, i.e. it is only a matter of proper scheduling.**
- **The Part C.IX.G (Quarterly WET Testing condition during first year of permit) is required upfront to address the cumulative and synergistic impacts of the treated effluent on the receiving stream as part of standard NPDES Permit Application requirements for a major Sewage discharger. In practical terms, the Department generally requires a minimum of 4 annual WET tests or 4 quarterly WET tests (single year) to address effluent variability (with or without substantial I&I or CSS flows). See Draft Fact Sheet WET Test Section and EPA comments below for the genesis of the Quarterly WET Testing requirement.**

**Part C.VII (WQBELs below Quantitation Limits):** QL not obtainable for this matrix. **See Part C.V-related comments.**

**Part C.VIII.E.1 (Stormwater Sampling Requirements)**: Request that the minimum stormwater event requiring sampling be changed from 0.1 inch in magnitude to 0.5 inch in magnitude. **No change in permit condition necessary. The minimum 2/year stormwater sampling frequency will pertain regardless of the stormwater rainfall magnitude. Ashland is free to wait for a 0.5-inch magnitude rain event within semi-annual monitoring period to take samples, as long as the minimum sampling frequency is met.**

**Part C.IX.E (High Flow Management Plan):** Request for a 42-month submittal date after PED. **See Part C.III CSO Schedule of Compliance comment/response.**

**US EPA Comments**:

**EPA Request for Extension**: EPA requested a 2-week extension of the minimum 30-day EPA comment period (part of the public comment period) to 8/11/2021 due to mailing issues (COVID Office closures and office moving) delaying their technical staff from receiving the mailed hard copy CSO Long Term Control Plan (LTCP). EPA noted that it might require additional time if it cannot locate the hard copy document (in which case it would request an electronic copy and an additional 2 weeks after receipt of the LTCP). EPA subsequently asked for verification that 8/11/2021 submittal date for EPA comments was granted. **The Department extended the Draft NPDES public comment period 15 days per EPA request (to 8/26/2021, allowing for time to process any received EPA public comments). EPA is free to comment on the Redraft NPDES Permit.**

**EPA WET Testing Comment**: The fact sheet recommends quarterly WET testing in the first year of the permit, but the WET condition at Part C.VI.B.1. of the permit only requires annual testing. Please confirm if the permit should require quarterly testing. **This was a permitting oversight, and the quarterly WET Testing condition has been added to the Final NPDES Permit Part C.IX.G. Three previous WET tests were done in the same month (none retesting) as documented below, which might not be representative of effluent quality (especially in a facility subject to CSS flows with likely increased AMD metal loadings). The EPA public comments were forwarded to the applicant on 8/24/2021.**

| | ***Ceriodaphnia* Results (% Effluent)** | | | ***Pimephales* Results (% Effluent)** | | | |
|---|---|---|---|---|---|---|---|
| **Test Date** | **NOEC Survival** | **NOEC Reproduction** | **LC50** | **NOEC Survival** | **NOEC Growth** | **LC50** | **Pass? *** |
| 7/25/2016 | 100 | 100 | >100 | 100 | 100 | >100 | Pass |
| 10/3/2016 | 100 | 100 | >100 | 100 | 100 | >100 | Pass |
| 10/17/2016 | 100 | 100 | >100 | 63 | 63 | >100 | Pass |
| 10/24/2016 | 100 | 100 | >100 | 100 | 100 | >100 | Pass |

**CSO Related EPA Comments**:

We would like to note that EPA's review of the CSO portion of this permit reflects the recent understanding between the EPA Region III Water Director and PADEP Deputy Secretary for Water Programs regarding how to proceed with reissuance of permits with CSOs and LTCPs consistent with Section 402(q) of the CWA and EPA's 1994 CSO Policy. As you know,

**Internal Review and Recommendations**

consistent with that understanding, PADEP has committed to making changes to its CSO program as noted in the its June 9, 2020 letter to EPA and its April 15, 2020 memo (see attached). PADEP's memo documents its commitment to initiate the regulatory revisions process for modifying its compliance schedule regulations at 25 Pa. Code § 92a.51(a), so that schedules for LTCP implementation can be placed in an NPDES permit. PADEP will draft CSO permits using the template language agreed upon by PADEP and EPA. EPA notes that once PADEP's compliance schedule regulations are revised and final, the template language will need to be modified to incorporate a CSO compliance schedule that meets the requirements of 40 CFR 122.47 and includes the final compliance date for LTCP implementation. EPA's Phase 2 e-Reporting rule requires electronic reporting of Sewer Overflow/Bypass Events, and PADEP will need to make modifications to this template that will be necessary to address the requirements of the e-Reporting rule that is effective at the time that the permit is issued. **The General Statewide EPA comments are noted. Any future NPDES Permit amendment or renewal would include any updated standard permit template language available at that time. See above responses to public comments regarding CSO Schedule of Compliance changes.**

In addition, consistent with the understanding between EPA and PADEP, since PADEP's proposed seasonal E. coli became effective in March 2021, PADEP will begin to incorporate E. coli monitoring in subsequently reissued NPDES permits and ensure it is included in CSO post-construction compliance monitoring (PCCM) plans to verify compliance with water quality standards and designated uses. Consistent with the CSO Policy, EPA notes that there will also need to be a requirement added to implement a PCCM plan with an established schedule in NPDES permits once a facility begins to implement its approved plan. **The General Statewide EPA comments are noted. E Coli monitoring requirements are included in this permit. See above responses to public comments regarding CSO Schedule of Compliance changes.**

**CSO Outfall Nos. 004 and 005**: The fact sheet states that CSO outfalls 004 and 005 were closed in 2013 and 2012, respectively, but these outfalls are still authorized in the permit. In Part C.III.C.3. of the permit, PADEP is requiring verification of these outfalls as permanently blocked. Is it a correct assumption that this verification is being required before the outfalls will be considered for removal from a subsequent permit? **Correct.**

**The CSO WQBEL condition at Part C.III.C.2**:

- It seems contradictory for the permit to be written in a way that says the permittee has to comply with the demonstration approach, and then at the same time require that it choose the approach (demonstration or presumption) for the LTCP update. If the permittee is still at a point of confirming its approach, we would recommend that the permit just include language that allows the permittee to comply with either the demonstration or presumption approach for the LTCP. **Ashland has indicated it has not made a final decision. The Part C.III language has been modified accordingly. The CSO Schedule of Compliance includes an interim milestone requiring Ashland to choose a specific LTCP Goal.**
- If the permittee had not previously identified a performance standard, but has selected the demonstration approach for its LTCP update and PADEP agrees with this, then this paragraph could be revised to reflect that (i.e., the permit could solely require compliance with "A planned control program that has been demonstrated to be adequate to meet the water quality-based requirements of the CWA ("demonstration approach")). It should be noted that if this is the approach that is selected, the updated LTCP would need to define, up front, the level of CSO control necessary to demonstrate compliance with WQ standards. That level of control would then need to be included in the subsequent permit as the CSO performance standard. **Ashland has indicated it has not made a final decision regarding the chosen LTCP Goal. The CSO Schedule of Compliance includes interim milestones requiring Ashland to choose a specific LTCP Goal (with the applicable level of control). An adequate Post-Construction Compliance Monitoring (PCCM) Plan is required for any chosen LTCP Goal.**
- Part C.III.C.2. states – "The permittee shall comply with the following (CSO LTCP Demonstration Goal) performance standards that apply during dry and wet weather conditions". The LTCP performance standards should apply during wet, not dry weather conditions, so this language seems inaccurate and should be removed from the permit. **The Department has deleted the reference to dry weather conditions per EPA recommendation. Dry weather CSO events remain prohibited per standard CSO condition. Ashland noted the proposed change in its public comments (above).**

**Long Term Control Plan (LTCP) Update**: EPA was not able to locate the hard copy of the LTCP that was sent to our offices. We acknowledge that this community will be updating its LTCP and EPA looks forward to reviewing that updated plan during the review of subsequent draft permits for Ashland Borough. **An LTCP Update is required concurrent with the**

**Internal Review and Recommendations**

**next NPDES Permit Renewal Application to allow for EPA review and comment. The CSO Schedule of Compliance includes additional interim compliance milestones to ensure development of an adequate LTCP by that time.**

**Compliance History: No open violations per 4/11/2022 WMS query (Open Violations by Client):**

**Permit: PA0023558**
**Client ID: 59755**
**Client: All**

**Open Violations: 0**

**No data was found using the criteria entered. Please revise your choices and try again.**

**Communications Log:**

**9/1/2021:** Conference Call requested by Ashland Borough to discuss EPA public comments, etc.
**9/7/2021:** Ashland (Kerns, Entech) E-mail with his summarization of conference call
**9/22/2021:** DEP (Berger) E-mail reminder about November 1 target date for any Ashland Borough comments on the Draft NPDES Permit, about Ashland promised clarification if it was an Act 47 distressed community, and with EPA contact information pertaining to EPA-offered free LTCP assistance.
**10/29/2021**: Public comments received from Ashland Borough.