

Application Type Renewal  
Facility Type Sewage  
Major / Minor Minor

**NPDES PERMIT FACT SHEET  
ADDENDUM**

Application No. PA0024490  
APS ID 814317  
Authorization ID 1257359

**Applicant and Facility Information**

Applicant Name	<u>Rockwood Borough Municipal Authority Somerset County</u>	Facility Name	<u>Rockwood Borough STP</u>
Applicant Address	<u>410 Market Street</u> <u>Rockwood, PA 15557-1127</u>	Facility Address	<u>163 River Road</u> <u>Rockwood, PA 15557</u>
Applicant Contact	<u>Cary Phillippi</u>	Facility Contact	<u>Chet Cyga</u>
Applicant Phone	<u>(814) 926-2975</u>	Facility Phone	<u>(814) 279-5224</u>
Client ID	<u>64637</u>	Site ID	<u>238610</u>
SIC Code	<u>4952</u>	Municipality	<u>Rockwood Borough</u>
SIC Description	<u>Trans. &amp; Utilities - Sewerage Systems</u>	County	<u>Somerset</u>
Date Published in PA Bulletin	<u>January 27, 2024</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>February 26, 2024</u>	If No, Reason	<u>Minor CSO</u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>		

**Internal Review and Recommendations**

The first draft permit was sent on 1/11/2024. The public notice was published in the PA Bulletin on 1/27/2024. The following comments were received on 2/1/2024 and 2/14/2024 from EPA (see page 4) during the comment period which ended on 2/26/2024. The following EPA comments and PADEP responses were shared with the applicant via email on February 29, 2024. The applicant responded back on March 6 and 15, 2024 (see page 11).



**EPA Comment 1:** Regarding Draft Permit Part C.II.C. Implementation of Long-Term Control Plan

a. Part C.II.C.1. states, "The permittee's Post-Construction Compliance Monitoring (PCCM) Plan, which is part of the LTCP and is designed to verify compliance with water quality standards and the effectiveness of LTCP implementation, is hereby approved. The permittee shall implement the PCCM Plan during the term of this permit, including any period of administrative extension."

To be consistent with the CSO Policy, NPDES Permits need to include a requirement to implement a PCCM plan with an established schedule in NPDES permits once a facility begins to implement its approved plan. Part C. II.C.1 includes the requirement to implement the plan. As indicated in the February 1, 2024 email correspondence, EPA recommends PADEP include within the permit elements of the approved PCCM schedule, including the date by which the PCCM is expected to be completed.

**DEP Response:**

The table below showing the revised LTCP implementation schedule based on your comment. Since introducing new tasks to this schedule will need the applicant review and comments, DEP will re-issue the draft permit as a second draft, and this factsheet addendum is servicing this purpose.

Approve	Return	Deny	Signatures	Date
X			 Hazim Aldalli / Environmental Engineering Specialist	June 3, 2024
X			 Mahbuba Iasmin, Ph.D. P.E. / Environmental Engineering Manager	June 7, 2024

**Internal Review and Recommendations**

Schedule Activity Description	Compliance Due Date
Continue Implementation of the NMCs	Permit effective date
Submit DMR Supplemental Reports for CSOs	Within 28 days of the end of a month
Start PCCMP Implementation	Within 90 days of the Department approved PCCMP
Complete PCCMP Implementation	Five years from the permit effective date
Submit Annual CSO Status Report to Department with Chapter 94 Report that shall include PCCMP progress reports	March 31 of each year
Submit a report of the findings of Post-Construction Compliance Monitoring to the Department	Within 120 days of completion of PCCMP implementation
Comply with LTCP and CSO (Phase 2) Performance Standard	Within 120 days of completion of PCCMP implementation
Submit CSO Phase 3 proposal to achieve water quality standards, if applicable	Within 120 days of completion of the PCCMP implementation

The applicant sent a revised PCCMP schedule that adhere to DEP’s schedule and will effectively cover the required tasks under the permit’s LTCP implementation schedule.

**EPA Comment 2: Regarding Draft Fact Sheet**

As was indicated in the February 1, 2024 correspondence from my staff, the Fact Sheet would benefit from clarifications to the line items pertaining to the PCCM of the implementation schedule in Part C. II. C.3.

**DEP Response:**

The Part C.II.C.3 of the NPDES permit (“LTCP Implementation Schedule”) has been revised as shown in DEP Response for EPA Comment 1. A PCCMP approval letter was sent to the Permittee on May 17, 2024. The permittee is required to start implementation of the approved PCCMP within 90 days of the approval letter date. The Permittee proposed a five-year data collection plan as part of the demonstration for achieving water quality standards. This permit cycle will allow the permittee to implement the PCCMP. The Permittee is required to submit PCCMP progress reports with the submission of their Annual CSO Report and Chapter 94 Report during March 31 of each year. Once PCCMP implementation is complete, the Permittee is required to submit a report and a follow-up plan (i.e., Phase 3 Proposal) if the Permittee is unable to demonstrate compliance with the CSO Performance Standards as part of the current approved LTCP.

Permit issuance is recommended.

Internal Review and Recommendations

Volume 54 Issue 4 • 54 Pa.B. 391 • Applications, Actions and Special Notices

NOTICES

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Applications, Actions and Special Notices

[54 Pa.B. 391]  
[Saturday, January 27, 2024]

APPLICATIONS

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](http://www.dep.pa.gov) and select Businesses, Water, Bureau of Clean Water, Wastewater Management, and NPDES and WQM Permitting Programs).

- |                |                                                                                                                                                                                                  |
|----------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Section</b> | <b>Category</b>                                                                                                                                                                                  |
| 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](http://www.dep.pa.gov/CWPublicNotice).

Southwest Regional Office

**PA0024490**, Sewage, SIC Code 4952, **Rockwood Borough Municipal Authority, Somerset County**, 410 Market Street, Rockwood, PA 15557-1127. Facility Name: Rockwood Borough STP. This existing facility is located in Rockwood Borough, **Somerset 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), Coxes Creek (WWF) and Casselman River (WWF), is located in State Water Plan watershed 19-F 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 0.30 MGD—Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)		Weekly	
	Average Monthly	Average	Minimum Average	Monthly Average	Average	IMAX
Flow (MGD)	Report	Report	XXX	XXX	XXX	XXX
	Daily Max					
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9
	Inst Min					
Total Residual Chlorine (TRC)	XXX	XXX	XXX	0.5	XXX	1.6
Dissolved Oxygen	XXX	XXX	4.0	XXX	XXX	XXX
Carbonaceous Biochemical Oxygen Demand (CBOD <sub>5</sub> )	62	95	XXX	25.0	38.0	50
Biochemical Oxygen Demand (BOD <sub>5</sub> )	Report	Report	XXX	Report	XXX	XXX
Raw Sewage Influent	Daily Max					
Total Suspended Solids	75	112	XXX	30.0	45.0	60
Total Suspended Solids	Report	Report	XXX	Report	XXX	XXX
Raw Sewage Influent	Daily Max					
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	2,000	XXX	10,000
Oct 1 - Apr 30	Geo Mean					
May 1 - Sep 30	XXX	XXX	XXX	200	XXX	1,000
	Geo Mean					
Ammonia-Nitrogen	XXX	XXX	XXX	25.0	XXX	50

The proposed effluent limits for Outfall 001 are based on a design flow of 0.30 MGD—Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)		Weekly	
	Average Monthly	Average	Minimum Average	Monthly Average	Average	IMAX
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report
	Daily Max					
	Report					

The proposed effluent limits for Outfall 001 are based on a design flow of 0.30 MGD—Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)		Weekly	
	Average Monthly	Average	Minimum Average	Monthly Average	Average	IMAX
Total Nitrogen	XXX	XXX	XXX	XXX	Report	XXX
	Daily Max					
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX
	Daily Max					

In addition, the permit contains the following major special conditions:

- The Authority is permitted to discharge through CSO Outfalls 002 and 005 but must mark 85% capture and treatment of combined flow prior to any discharge.

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 in effect.

**Aldalli, Hazim**

---

**From:** Aldalli, Hazim  
**Sent:** Monday, February 12, 2024 8:55 AM  
**To:** Crane, Rebecca (she/her/hers)  
**Cc:** lasmin, Mahbuba; Hales, Dana  
**Subject:** RE: [External] PA0024490 Rockwood Borough: Draft NPDES Permit

Good morning Rebecca,

Yes, DEP will re-draft this permit after getting all the comments and discuss the new changes to the LTCP compliance schedule with the applicant.

Thanks,

Hazim Aldalli| Environmental Engineer  
Department of Environmental Protection | Clean Water  
South West Regional Office Building  
400 Waterfront Drive | Pittsburgh, PA 15222  
Phone: (412) 442-4117

*DEP accepts permit and authorization applications, as well as other documents and correspondence, electronically through ePermitting and Public Upload with Electronic Payment.*

*Please use the link below to view the webpage, get instructions, and submit documents:*

<https://www.dep.pa.gov/DataandTools/ElectronicSubmissions/Pages/default.aspx>

**PRIVILEGED AND CONFIDENTIAL COMMUNICATION**

*The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.*

---

**From:** Crane, Rebecca (she/her/hers) <crane.rebecca@epa.gov>  
**Sent:** Monday, February 12, 2024 8:44 AM  
**To:** Aldalli, Hazim <haldalli@pa.gov>  
**Cc:** lasmin, Mahbuba <moiasmin@pa.gov>; Hales, Dana <Hales.Dana@epa.gov>  
**Subject:** RE: [External] PA0024490 Rockwood Borough: Draft NPDES Permit

Good morning Hazim,

Thank you for your message in response to my questions. For clarity, my message on February 1 does not represent the Region's final comments on our review of the permit. You can expect those by February 15<sup>th</sup>.

Also, could you clarify what you mean below that you will re-issue the permit after the applicant reviews and comments? Does that mean PADEP will re-public notice the redraft of the permit?

Thanks for your time!

Kindly,  
Rebecca

Rebecca K Crane (she/her)  
US EPA Region III  
Water Division  
NPDES Permit Section

Telephone: 215-814-2389  
Email: [crane.rebecca@epa.gov](mailto:crane.rebecca@epa.gov)

Four Penn Center, 1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2852.

---

From: Aldalli, Hazim <[haldalli@pa.gov](mailto:haldalli@pa.gov)>  
Sent: Tuesday, February 06, 2024 11:43 AM  
To: Crane, Rebecca (she/her/hers) <[crane.rebecca@epa.gov](mailto:crane.rebecca@epa.gov)>  
Cc: [moiasmin@pa.gov](mailto:moiasmin@pa.gov); Hales, Dana <[Hales.Dana@epa.gov](mailto:Hales.Dana@epa.gov)>  
Subject: RE: [External] PA0024490 Rockwood Borough: Draft NPDES Permit

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Hi Rebecca,

Thank you for your comments, the table below showing the revised LTCP implementation schedule based on your comments. Since introducing new tasks to this schedule will need the applicant review and comments, DEP will re-issue the draft permit. The factsheet addendum that will accompany the permit documents will have the required clarifications that you asked for and DEP's responses to all the received comments.

Schedule Activity Description	Compliance Due Date
Continue Implementation of the NMCs	Permit effective date
Submit Annual CSO Status Report to Department with Chapter 94 Report that shall include receiving water quality sampling results	March 31 of each year
Submit DMR Supplemental Reports for CSOs	Within 28 days of the end of a month
PCCMP Monitoring Plan sent to DEP for Final approval.	Within 90 days of the permit effective date
Start PCCMP Implementation	Within 30 days of the PCCMP Final Approval
Compliance with CSO Performance Standard Phase 2	Five years from the permit effective date
Submit Phase 3 proposal to achieve water quality standards, if applicable	Five years from the permit effective date

Thanks,

Hazim Aldalli| Environmental Engineer  
Department of Environmental Protection | Clean Water  
South West Regional Office Building  
400 Waterfront Drive | Pittsburgh, PA 15222  
Phone: (412) 442-4117

*DEP accepts permit and authorization applications, as well as other documents and correspondence, electronically through ePermitting and Public Upload with Electronic Payment.*

*Please use the link below to view the webpage, get instructions, and submit documents:*

<https://www.dep.pa.gov/DataandTools/ElectronicSubmissions/Pages/default.aspx>

**PRIVILEGED AND CONFIDENTIAL COMMUNICATION**

*The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.*

---

From: Crane, Rebecca (she/her/hers) <[crane.rebecca@epa.gov](mailto:crane.rebecca@epa.gov)>  
Sent: Thursday, February 1, 2024 4:48 PM  
To: Aldalli, Hazim <[haldalli@pa.gov](mailto:haldalli@pa.gov)>  
Cc: Iasmin, Mahbuba <[moiasmin@pa.gov](mailto:moiasmin@pa.gov)>; Hales, Dana <[Hales.Dana@epa.gov](mailto:Hales.Dana@epa.gov)>  
Subject: RE: [External] PA0024490 Rockwood Borough: Draft NPDES Permit

Hi Hazim,

Many thanks for sending the current permit.

I do have a few questions I am hoping you can help me with prior to our review deadline.

1. I see the LTCP implementation schedule in Part C. II. Combined Sewer Overflows. C. 3. Could you clarify the compliance due date for line item #5 "PCCMP Plan Implementation"? The Schedule says "12 months". It would be helpful to understand what the permittee is expected to accomplish for this line item in the 12 months. For instance, is the permittee to implement within 12 months from effective date of the permit, or after the effective date? Are they to complete the plan within 12 months? I see the Post Construction Compliance and Monitoring Plan (revised 9/8/2023) (PCCMP) has 5 years of monitoring planned.
2. Additionally, the 6<sup>th</sup> line item of the LTCP implementation schedule states "PCCMP Plan Review" with a Compliance Due Date of "within 5 years". Could you clarify for me what DEP's expectation is of the Permittee for this line item? It isn't clear in the PCCMP that the permittee submitted. Including these clarifications in the Fact Sheet would be helpful.
3. According to the CSO Policy Part IV.B. *NPDES Permit Requirements*. 2. D. Phase II Permits "should contain a requirement to implement, with an established schedule, the approved post-construction water quality assessment program including requirements to monitor and collect sufficient information to demonstrate compliance with the WQS (water quality standards) and protection of designated uses as well as to determine the effectiveness of CSO controls." Are there any schedule elements of the approved PCCMP that you believe could be included in Part C.II.C.3?

Thanks so much for your time. Please let me know if you have any questions.

Kindly,  
Rebecca

Rebecca K Crane (she/her)  
US EPA Region III  
Water Division  
NPDES Permit Section

Telephone: 215-814-2389  
Email: [crane.rebecca@epa.gov](mailto:crane.rebecca@epa.gov)

Four Penn Center, 1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2852.

---

From: Aldalli, Hazim <[haldalli@pa.gov](mailto:haldalli@pa.gov)>  
Sent: Thursday, January 25, 2024 10:37 AM  
To: Crane, Rebecca (she/her/hers) <[crane.rebecca@epa.gov](mailto:crane.rebecca@epa.gov)>  
Cc: [moiasmin@pa.gov](mailto:moiasmin@pa.gov)  
Subject: RE: [External] PA0024490 Rockwood Borough: Draft NPDES Permit

**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good morning Rebecca,

Sure, please see attached the current permit file for your review. Please let me know if you have any question.

Thanks,

Hazim Aldalli | Environmental Engineer  
Department of Environmental Protection | Clean Water  
South West Regional Office Building  
400 Waterfront Drive | Pittsburgh, PA 15222  
Phone: (412) 442-4117

*DEP accepts permit and authorization applications, as well as other documents and correspondence, electronically through ePermitting and Public Upload with Electronic Payment.*

*Please use the link below to view the webpage, get instructions, and submit documents:*

<https://www.dep.pa.gov/DataandTools/ElectronicSubmissions/Pages/default.aspx>

**PRIVILEGED AND CONFIDENTIAL COMMUNICATION**

*The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.*

---

From: Crane, Rebecca (she/her/hers) <[crane.rebecca@epa.gov](mailto:crane.rebecca@epa.gov)>  
Sent: Thursday, January 25, 2024 10:10 AM  
To: Aldalli, Hazim <[haldalli@pa.gov](mailto:haldalli@pa.gov)>  
Subject: [External] PA0024490 Rockwood Borough: Draft NPDES Permit

*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](#).*

Good morning Hazim,

My name is Rebecca Crane and I am reviewing the Rockwood Borough draft NPDES Permit PA0024490.

Would you be able to send me a copy of the current NPDES permit? Many thanks!

Kindly,  
Rebecca

Rebecca K Crane (she/her)  
US EPA Region III  
Water Division  
NPDES Permit Section

Telephone: 215-814-2389  
Email: [crane.rebecca@epa.gov](mailto:crane.rebecca@epa.gov)

Four Penn Center, 1600 John F. Kennedy Boulevard  
Philadelphia, PA 19103-2852.



**Aldalli, Hazim**

---

**From:** Fulton, Jennifer <Fulton.Jennifer@epa.gov>  
**Sent:** Tuesday, February 13, 2024 2:26 PM  
**To:** Aldalli, Hazim  
**Cc:** Moismim@pa.gov; Furjanic, Sean; Schumack, Maria; Moncavage, Carissa (she/her/hers); Hales, Dana  
**Subject:** [External] PA0024490 Rockwood Borough Sewage Treatment Plant  
**Attachments:** CSO\_LETTER\_TO\_EPA\_09June2020\_.pdf; 4 15 POLICY WP Memo to Begin Rulemaking Chapter 92a.pdf

*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](#).*

Hello Hazim,

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

**Rockwood Borough Sewage Treatment Plant**  
**NPDES Number: PA0024490**  
**EPA Received: January 16, 2024**  
**30-day response due date: February 15, 2024**

This is a minor permit that discharges to Casselman River and is affected by the Casselman River Acid Mine Drainage (AMD) Total Maximum Daily Load (TMDL). EPA has chosen to perform a limited review of the draft permit based on the wasteload allocation (WLA) requirements of the approved TMDLs and CSO requirements. Thank you for taking the time to correspond with my staff during the review period. EPA has completed its review and offers the following comments that are in addition to the February 1, 2024 email from my staff:

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, consistent with that understanding, PADEP has committed to making changes to its CSO program as noted in 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.

Consistent with the understanding between EPA and PADEP, PADEP incorporated E. coli monitoring in this draft NPDES permit reissuance and it is required to be included in the 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.

EPA offers the following comments based on the draft permit, supporting documents, and February 6, 2024 email correspondence:

1. Regarding Draft Permit Part C.II.C. Implementation of Long-Term Control Plan

- a. Part C.II.C.1. states, *"The permittee's Post-Construction Compliance Monitoring (PCCM) Plan, which is part of the LTCP and is designed to verify compliance with water quality standards and the effectiveness of LTCP implementation, is hereby approved. The permittee shall implement the PCCM Plan during the term of this permit, including any period of administrative extension."*

To be consistent with the CSO Policy, NPDES Permits need to include a requirement to implement a PCCM plan with an established schedule in NPDES permits once a facility begins to implement its approved plan. Part C. II.C.1 includes the requirement to implement the plan. As indicated in the February 1, 2024 email correspondence, EPA recommends PADEP include within the permit elements of the approved PCCM schedule, including the date by which the PCCM is expected to be completed.

2. Regarding Draft Fact Sheet

As was indicated in the February 1, 2024 correspondence from my staff, the Fact Sheet would benefit from clarifications to the line items pertaining to the PCCM of the implementation schedule in Part C. II. C.3.

Thank you again your coordination with my staff during this review. We look forward to continued coordination on this review. Please address the above and provide us with any changes to the draft permit and/or fact sheet. Please contact Rebecca Crane on my staff via telephone at 215-814-2389 or via electronic mail at [crane.rebecca@epa.gov](mailto:crane.rebecca@epa.gov).

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](mailto:fulton.jennifer@epa.gov)



**Aldalli, Hazim**

---

**From:** Aldalli, Hazim  
**Sent:** Wednesday, March 6, 2024 3:18 PM  
**To:** Todd Skowron; 'Caryoln Romeberg'  
**Cc:** lasmin, Mahbuba; Joel Yoder; Timothy Rubal; Michael Lear  
**Subject:** RE: [External] RE: PA0024490 Rockwood Borough Sewage Treatment Plant LTCP Email 2 of 2  
**Attachments:** CH94\_2019.pdf; PA0024490.3.Final.11-13-2013\_49826\_v1.docx

Tracking:	Recipient	Delivery
	Todd Skowron	
	'Caryoln Romeberg'	
	lasmin, Mahbuba	Delivered: 3/6/2024 3:19 PM
	Joel Yoder	
	Timothy Rubal	
	Michael Lear	

Todd,

Please check my response below in red, if you have further questions please send those back.

Thanks,

Hazim Aldalli | Environmental Engineer  
Department of Environmental Protection | Clean Water  
South West Regional Office Building  
400 Waterfront Drive | Pittsburgh, PA 15222  
Phone: (412) 442-4117

**DEP accepts permit and authorization applications, as well as other documents and correspondence, electronically through ePermitting and Public Upload with Electronic Payment.**

**Please use the link below to view the webpage, get instructions, and submit documents:**

<https://www.dep.pa.gov/DataandTools/ElectronicSubmissions/Pages/default.aspx>

**PRIVILEGED AND CONFIDENTIAL COMMUNICATION**

*The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.*

---

**From:** Todd Skowron <Tskowron@SomersetEngineering.com>  
**Sent:** Wednesday, March 6, 2024 11:02 AM  
**To:** Aldalli, Hazim <haldalli@pa.gov>; 'Caryoln Romeberg' <caryoln.romesberg@rockwoodborough.org>  
**Cc:** lasmin, Mahbuba <moiasmin@pa.gov>; Joel Yoder <jyoder106@gmail.com>; Timothy Rubal <TRubal@SomersetEngineering.com>; Michael Lear <MLear@SomersetEngineering.com>  
**Subject:** [External] RE: PA0024490 Rockwood Borough Sewage Treatment Plant LTCP Email 2 of 2

**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](#).

Hazim,

After reading the "POST CONSTRUCTION COMPLIANCE AND MONITORING PLAN FOR COMBINED SEWER OVERFLOWS NPDES PERMIT #PA 0024490" put together by Appalachian Engineering Group, here is the synopsis. If anything is incorrect, please advise:

- There are 5 outfalls (If you're referring to Sec 2.2 on page 1 of the PCCMP, those are the Outfalls were managed to separate/sealed within the works performed starting on 2007 as you can check on the 2019 CH94 report on page 10 and as it shows on table 1 on page 2 of the PCCMP. Now the Permit authorizes Rockwood Borough to have CSOs from two Outfalls 002 & 005).
- Need to monitor grit in the interceptor sewer This is a NMC control, meaning that it's a continuous process not just related to PCCMP implementation per your current permit under Part C.II.B
- This plan takes the "Presumptive Approach" instead of the Demonstration Approach
  - Presumptive Approach – verify 85% of water in high water events is treated Should say here "Either" not both are required as stated on Sec 4.1 on page 2 of the PCCMP , and as stated on SEC 5.2.A of the PCCMP
  - Only 4 overflow events per year are allowed
- Discharge Quality Monitoring
  - Sampling of CSOs on quarterly basis on wet weather basis
    - Sampling to take place at Outfall 002 – Bridge Street and Outfall 005 – Market Street
      - The data points to record are pH, CBOD, SS, Fecal, E. Coli and record on the data sheets on the back of the report (though I think he has the water Quality and Discharge Quality sheets mixed up) I don't see that, please demonstrate what you're referring to.
- Water Quality Monitoring
  - Coxes Creek and Casselman River
    - Wet weather and high stream events upstream and downstream of Outfalls 002 and 005
    - Monthly – Fecal and E. Coli
    - Quarterly – pH, CBOD, and SS
    - Monthly - qPCR report is required
- Data Collection
  - May 1<sup>st</sup> to Sept 30<sup>th</sup>
    - Upstream and downstream of each outfall each month
      - Fecal and E. Coli will be recorded
        - 5 samples under normal conditions
        - 5 samples under high flow events
      - Corresponding qPCR samples should also be collected
        - 1 per month
        - Recommend to make more
  - Oct 1<sup>st</sup> to April 30 is the same testing schedule

Also after reading this, the team discussed and came up with a couple questions.

1. There is a requirement for qPCR, what exactly is a qPCR and what type of testing does it entail? The qPCR is a Quantitative Polymerase Chain Reaction Test required by DEP "Monitoring Book, 2021", which you can find under DEP e-library. The description for this test can be checked under pages 43, 196, 198 and 200 of the DEP's guidance.
2. There are 5 outfalls listed for Rockwood, but testing is to only occur at Outfall 002 – Bridge Street and Outfall 005 – Market Street? Correct!

Internal Review and Recommendations

- a. There is a significant amount of testing for these outfalls, is there any possibility to reduce testing frequencies to help alleviate cost to the Borough? **That should be the DEP decision based on the data received and staying in compliance within the process as prescribed on the compliance schedule under the Draft permit Part C.II.3**
- 3. Testing is to occur during high water events. What classifies a high-water event? In a month there could be 20 high water events or 0 high water events. **The designed "typical year" storm embedded in the approved LTCP should trigger such event, but local conditions should determine this especially when you have a CSO or SSO event.**

If I have missed or incorrect about anything please advise.

Thanks,

Todd Skowron, EIT  
SOMERSET ENGINEERING  
814-442-3912

---

From: Aldalli, Hazim <[haldalli@pa.gov](mailto:haldalli@pa.gov)>  
Sent: Tuesday, March 5, 2024 10:53 AM  
To: Todd Skowron <[TSkowron@SomersetEngineering.com](mailto:TSkowron@SomersetEngineering.com)>; 'Caryoln Romeberg' <[caryoln.romesberg@rockwoodborough.org](mailto:caryoln.romesberg@rockwoodborough.org)>  
Cc: lasmin, Mahbuba <[moiasmin@pa.gov](mailto:moiasmin@pa.gov)>  
Subject: PA0024490 Rockwood Borough Sewage Treatment Plant LTCP Email 2 of 2

**External Sender:** This email originated outside of the organization. Exercise caution with Links and/or Attachments.

Todd,

This is the second email on this matter, the PCCMP file attached is the Final version received and it's responding to our deficiency questions within the approval letter (attached). Please let me know if you have any questions.

Thanks,

Hazim Aldalli | Environmental Engineer  
Department of Environmental Protection | Clean Water  
South West Regional Office Building  
400 Waterfront Drive | Pittsburgh, PA 15222  
Phone: (412) 442-4117

*DEP accepts permit and authorization applications, as well as other documents and correspondence, electronically through ePermitting and Public Upload with Electronic Payment.*

*Please use the link below to view the webpage, get instructions, and submit documents:*

<https://www.dep.pa.gov/DataandTools/ElectronicSubmissions/Pages/default.aspx>

**PRIVILEGED AND CONFIDENTIAL COMMUNICATION**

*The information transmitted is intended only for the person or entity to whom it is addressed and may contain confidential and/or privileged material. Any use of this information other than by the intended recipient is prohibited. If you receive this message in error, please send a reply e-mail to the sender and delete the material from any and all computers. Unintended transmissions shall not constitute waiver of the attorney-client or any other privilege.*

**Somerset Engineering Confidentiality Notice:**

This Somerset Engineering message, and any attachments to it, may contain information that is privileged, confidential, and exempt from disclosure under applicable law. If the reader of this message is not the intended recipient, you are notified that any use, dissemination, distribution, copying, or communication of this message is strictly prohibited. If you have received this message in error, please notify the sender immediately by return e-mail and delete the message and any attachments. Thank you.



## SOMERSET ENGINEERING

222 West Main Street | Suite 100 | Somerset, PA 15501

P: 814.443.1319 | [www.somersetengineering.com](http://www.somersetengineering.com)

March 15, 2024

**Method of Transmission**

*Electronic Mail*

Mr. Hazim Aldalli  
Department of Environmental Protection | Clean Water  
South West Regional Office Building  
400 Waterfront Drive | Pittsburgh, PA 15222  
Phone: (412) 442-4117

*Re: Determination of Dates for Rockwood Post Construction Compliance Monitoring Plan (PCCMP)*

Dear Mr. Aldalli,

In response to the email dated February 29, 2024 and titled "PA0024490 Rockwood Borough Sewage Treatment Plant", dates are to be determined to which the PCCMP must comply. Specifically within Rockwood's Borough's National Pollution Discharge Elimination System (NPDES), section II, C Implementation of Long Term Control Plan, Section 3, dates are to be determined for the PCCMP. After conversations with the team, the schedule below outlines the dates for the PCCMP.

If there are any additional questions or comments, please contact the undersigned below.

Sincerely,

Todd Skowron, Engineer

PCCMP Dates.docx

Internal Review and Recommendations

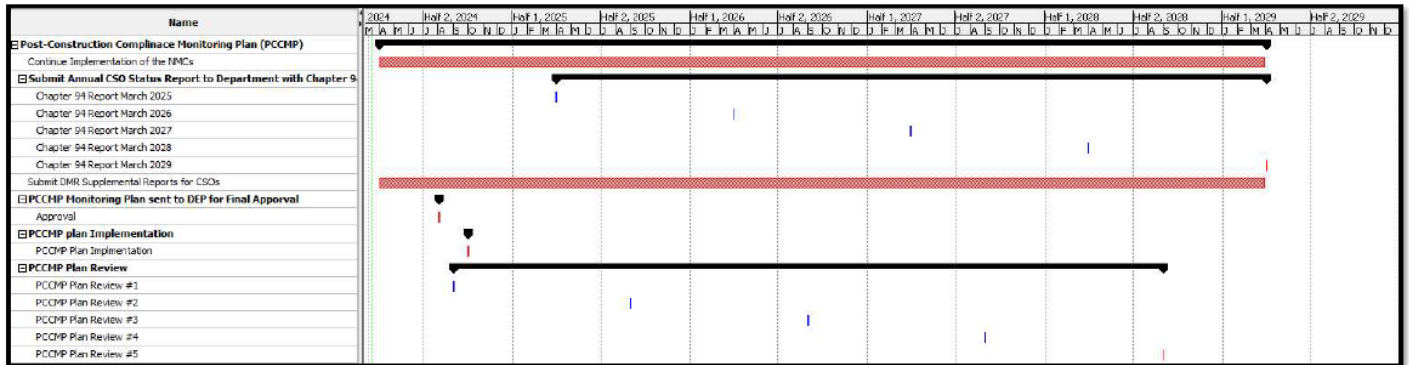


**SOMERSET ENGINEERING**

222 West Main Street | Suite 100 | Somerset, PA 15501

P: 814.443.1319 | www.somersetengineering.com

Figure 1. PCCMP Schedule



**Internal Review and Recommendations**

Empty box for internal review and recommendations.