

Application Type Renewal
Facility Type Municipal
Major / Minor Major

**NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE**

Application No. PA0026085
APS ID 1101452
Authorization ID 1462817

Applicant and Facility Information

Applicant Name	<u>Upper Merion Sanitary and Stormwater Authority</u>	Facility Name	<u>U Merion-Matsunk STP</u>
Applicant Address	<u>175 W Valley Forge Road</u> <u>King of Prussia, PA 19406-1851</u>	Facility Address	<u>600 McCoys Lane</u> <u>Swedeland, PA 19406</u>
Applicant Contact	<u>Anthony Hamaday</u>	Facility Contact	<u>Geoff Hickman</u>
Applicant Phone	<u></u>	Facility Phone	<u>(610) 275-0688</u>
Client ID	<u>72994</u>	Site ID	<u>449536</u>
Ch 94 Load Status	<u>Not Overloaded</u>	Municipality	<u>Upper Merion Township</u>
Connection Status	<u>No Limitations</u>	County	<u>Montgomery</u>
Date Application Received	<u>November 27, 2023</u>	EPA Waived?	<u>No</u>
Date Application Accepted	<u>November 27, 2023</u>	If No, Reason	<u>Major Sewage, Pretreatment</u>
Purpose of Application	<u>DEP initiated renewal to resolve appeal.</u>		


Summary of Review

The PA Department of Environmental Protection (PADEP/Department) received an NPDES permit renewal application from Upper Merion Sanitary and Stormwater Authority (permittee/UMSSA) for permittee's Matsunk STP (facility) on December 20, 2017. The final NPDES permit was issued on November 4, 2021 with an effective date of December 1, 2021 and expiration date of November 30, 2026. The final permit was appealed on December 2, 2021. As a tool of the appeal settlement, PADEP has initiated this renewal process to address some concerns raised in the appeal. The following are the notable changes in this DEP-initiated renewal compared to the issued final permit:

1. The interim period to meet the final WQBEL for Total Copper is changed from 3 years to 59 months
2. The permit will be renewed with a full 5-year permit term to afford the permittee sufficient time to meet the final WQBEL for Total Copper, as needed per Part C.IV.D
3. The following paragraph is added in Part C.IV.D.3.f:
 - f. *Given recent changes to 25 Pa. Code § 93.8d that specify the use of the Biotic Ligand Model (BLM) for developing site-specific criteria for copper. If the permittee wishes to request a SSCS for Copper, it may do so pursuant to 25 Pa. Code § 93.8d(d) no later than year 3 of the permit.*

DEP recommends the following procedure:

1. *Begin the BLM SSCS within 12 months of the work plan approval.*
2. *Submit quarterly progress reports throughout the term of the BLM SSCS.*
3. *Submit a completed SSCS Report within 3 months of the BLM SSC study completion.*
4. The following special condition is added in the draft permit Part C.I.H which was mentioned in footnote on Page 5 of the final permit, was part of first draft, but inadvertently omitted from subsequent drafts and final permit:

Approve	Deny	Signatures	Date
√		Reza H. Chowdhury, E.I.T. / Project Manager 	November 27, 2023
X		Pravin Patel Pravin C. Patel, P.E. / Environmental Engineer Manager	11/28/2023

Summary of Review

H. The seasonal effluent limitations for fecal coliform are based on Chapter 92a (§ 92a.47(a)(4)) of DEP's regulations and Delaware River Basin Commission's (DRBC's) Water Quality Regulations at § 4.30.4.A. DEP's regulations govern the summer limits for fecal coliform while the winter limits are based on DRBC's regulations. The DRBC regulations state that during winter season from October through April, the instantaneous maximum concentration of fecal coliform organisms shall not be greater than 1,000 per 100 milliliters in more than 10 percent of the samples tested.

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

Outfall 002, Effective Period: Permit Effective Date through End of Interim Period 1 (59 months from permit effective date).

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
Total Copper	Report	Report Daily Max	XXX	Report	Report Daily Max	XXX	1/week	24-Hr Composite

Compliance Sampling Location: At outfall 002

Other Comments: None

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

Outfall 002, Effective Period: End of Interim Period 1 (Beginning of 60th month from permit effective date) through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
Total Copper	2.05	2.71 Daily Max	XXX	0.045	0.059 Daily Max	0.112	1/week	24-Hr Composite

Compliance Sampling Location: At outfall 002

Other Comments: None

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the “NPDES Permit Writer’s Manual” (386-0400-001), SOPs and/or BPJ.

Outfall 002, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Recorded
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	5.0 Inst Min	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	0.5	XXX	1.2	1/day	Grab
CBOD5 Nov 1 - Apr 30	1434	2180	XXX	25.0	38.0 Wkly Avg	50	1/day	24-Hr Composite
CBOD5 May 1 - Oct 31	1033	1549	XXX	18.0	27.0 Wkly Avg	36	1/day	24-Hr Composite
BOD5 Raw Sewage Influent	Report	XXX	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS Raw Sewage Influent	Report	XXX	XXX	Report	XXX	XXX	1/day	24-Hr Composite
TSS	1721	2582	XXX	30.0	45.0 Wkly Avg	60	1/day	24-Hr Composite
Total Dissolved Solids	Report Avg Qrtly	XXX	XXX	1000.0 Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	1/day	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	1/day	Grab
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/month	Grab

Outfall 002, Continued (from Permit Effective Date through Permit Expiration Date)

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Nitrogen	Report	XXX	XXX	Report	XXX	XXX	1/month	24-Hr Composite
Ammonia Nov 1 - Apr 30	1033	XXX	XXX	18.0	XXX	36	1/day	24-Hr Composite
Ammonia May 1 - Oct 31	344	XXX	XXX	6.0	XXX	12	1/day	24-Hr Composite
Total Phosphorus	Report	XXX	XXX	Report	XXX	XXX	1/month	24-Hr Composite
PCBs (Dry Weather) (pg/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	24-Hr Composite
PCBs (Wet Weather) (pg/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	24-Hr Composite
Chronic WET - Ceriodaphnia Survival (TUc)	XXX	XXX	XXX	XXX	Report	XXX	See Permit	24-Hr Composite
Chronic WET - Ceriodaphnia Reproduction (TUc)	XXX	XXX	XXX	XXX	Report	XXX	See Permit	24-Hr Composite
Chronic WET - Pimephales Survival (TUc)	XXX	XXX	XXX	XXX	Report	XXX	See Permit	24-Hr Composite
Chronic WET - Pimephales Growth (TUc)	XXX	XXX	XXX	XXX	Report	XXX	See Permit	24-Hr Composite

Compliance Sampling Location: Outfall 002

Other Comments: None

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

Outfall 003, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Annual Average	Maximum	Instant. Maximum		
pH (S.U.)	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
CBOD5	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
COD	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
TSS	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Oil and Grease	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
TKN	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Total Phosphorus	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab
Dissolved Iron	XXX	XXX	XXX	Report	XXX	XXX	1/year	Grab

Compliance Sampling Location: At Outfall 003

Other Comments: None