pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southeast Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0026131**
Facility Type	**Municipal**	APS ID	**1101451**
Major / Minor	**Major**	Authorization ID	**1462816**

NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE

Applicant and Facility Information

Applicant Name	**Upper Merion Sanitary and Stormwater Authority**	Facility Name	**Upper Merion Municipal Authority Sewer System & STP Trout Run**
Applicant Address	175 W Valley Forge Road	Facility Address	900 Mancill Mill Road
	King of Prussia, PA 19406-1851		King of Prussia, PA 19406-1175
Applicant Contact	Anthony Hamaday	Facility Contact	Anthony Hamaday
Applicant Phone		Facility Phone	(610) 783-0848
Client ID	72994	Site ID	457789
Ch 94 Load Status	Not Overloaded	Municipality	Upper Merion Township
Connection Status	No Limitations	County	Montgomery
Date Application Received	November 27, 2023	EPA Waived?	No
Date Application Accepted	November 27, 2023	If No, Reason	Major Facility, Pretreatment

Purpose of Application: DEP initiated renewal to resolve appeal.

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 Trout Run 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

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
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 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	1251	2000	XXX	25.0	40.0 Wkly Avg	50	1/day	24-Hr Composite
BOD5 Raw Sewage Influent	Report	XXX	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS	1500	2250	XXX	30.0	45.0 Wkly Avg	60	1/day	24-Hr Composite
TSS Raw Sewage Influent	Report	XXX	XXX	Report	XXX	XXX	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
Total Nitrogen	Report	XXX	XXX	Report	XXX	XXX	1/month	24-Hr Composite

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		
Ammonia Nov 1 - Apr 30	1000	XXX	XXX	20.0	XXX	40	1/day	24-Hr Composite
Ammonia May 1 - Oct 31	750	XXX	XXX	15.0	XXX	30	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
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: 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 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	1.33	1.56 Daily Max	XXX	0.0266	0.0312 Daily Max	0.0312	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 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