

Application Type Renewal
Facility Type Sewage
Major / Minor Major

**NPDES PERMIT FACT SHEET
ADDENDUM**

Application No. PA0026166
APS ID 1021177
Authorization ID 1322891

Applicant and Facility Information

Applicant Name	<u>Warminster Municipal Authority Bucks County</u>	Facility Name	<u>Warminster Township STP & Sewer System</u>
Applicant Address	<u>415 Gibson Avenue PO Box 2279 Warminster, PA 18974-4163</u>	Facility Address	<u>1050 Log College Drive Warminster, PA 18974-1825</u>
Applicant Contact	<u>Timothy Hagey</u>	Facility Contact	<u>George Pfeiffer</u>
Applicant Phone	<u>(215) 675-3301</u>	Facility Phone	<u>(215) 675-6113</u>
Client ID	<u>64798</u>	Site ID	<u>446058</u>
SIC Code	<u>4952</u>	Municipality	<u>Warminster Township</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Bucks</u>
Date Published in PA Bulletin	<u>12/26/2020</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>1/26/2021</u>	If No, Reason	<u>Major</u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>		

Internal Review and Recommendations

The PA Department of Environmental Protection (PADEP) had received a NPDES renewal applications from CKS Engineers, Inc. on behalf of Warminster Municipal Authority Bucks County to discharge 8.18 mgd of treated sewage from Warminster Township STP & Sewer System. The draft permit was published in the PA Bulletin on December 26, 2020 for public comment for a comment period of 30 days. The comment period was over on January 26, 2021 without any comments from the public or the facility. The permit is being re-drafted based on the revised Standard Operating Procedure (SOP) for Clean Water Program Establishing Water Quality-Based Effluent Limitations (WQBELs) and Permit Conditions for Toxic Pollutants in NPDES Permits for Existing Dischargers SOP No. BCW-PMT-037.

The requirements for copper is revised in the second draft permit based on the revised SOP. The revised SOP clarifies the language for Site-Specific Criteria Study (SSC) and it is added in the Part C.V of the permit. For this permit renewal, the WQBEL for Total Copper is carried over from the previous permit and the limit is based on the SSC using a Water Effects Ratio (WER) study conducted in 1999. This WER-based criterion will not be used to develop WQBELs in subsequent permits. If the permittee wishes to pursue use of an SSC for subsequent permit renewals the permittee must complete a SSCS using the Biotic Ligand Model (BLM) as stated in the Permit. If the permittee chooses not to proceed with a BLM SSCS per the schedule in the permit, WQBELs for Total Copper will be developed based on statewide Copper criteria and discharge and surface water characteristics for the subsequent reissuance of this permit.

E.Coli report only requirement has been added in the permit as per the revised SOP for Clean Water Program Establishing Effluent Limitations for Individual Sewage Permits SOP No. BCW-PMT-033.

Other permit conditions and limits remain unchanged from the previously published draft.

Approve	Return	Deny	Signatures	Date
x			<i>Vasantha</i> Vasantha Palakurti / Environmental Engineering Specialist	June 9, 2021
X			<i>Pravin Patel</i> Pravin C. Patel, P.E. / Environmental Engineer Manager	06/09/2021

Internal Review and Recommendations

Following are the comments from EPA on the initial draft permit:

1. EPA Comment:

The copper compliance schedule is only a schedule to conduct a site specific BLM study. This is not an appropriate compliance schedule since it does not include any actions to meet the calculated WQBEL. It was discussed that the schedule to conduct a BLM study would be a separate permit condition, and that the copper compliance schedule would be developed to justify the length of time to comply in accordance with 40 CFR 122.47. PADEP indicated it would also correct the inconsistencies between the fact sheet and permit regarding when the copper limits come into effect.

DEP Response: The permit is being re-drafted based on the revised SOP for Clean Water Program Establishing Water Quality-Based Effluent Limitations (WQBELs) and Permit Conditions for Toxic Pollutants in NPDES Permits for Existing Dischargers SOP No. BCW-PMT-037.

2. EPA Comment:

EPA reviewed the WET Analysis Spreadsheets and it appears that in the 9/17/2018 test failed at the TIWCc of 88%, but passed at the next higher dilution (94%). If the Ceriodaphnia endpoints failed at the TIWCc, EPA's position is that this would be considered a failed WET test (demonstrating RP), and unless a retest was conducted on a new sample, it seems that continued WET limits would be warranted for Ceriodaphnia (40 CFR 122.44(d)(1)(iv)). PADEP indicated it was going to maintain the current WET limits in the permit.

DEP Response: The current WET limits for Ceriodaphnia and Pimephales are continued for this permit renewal.

3. EPA Comment:

It is recommended that more discussion be included in the fact sheet to explain how outfall 002 operates and how the proposed limits were evaluated.

DEP Response: Draft fact sheet has been revised to include further clarification on outfall 002. Samples for 001 & 002 are collected before the meters and reported for both outfalls. For DMRs, the same concentrations are reported for both outfalls. After U.V disinfection and sampling location, 0.75 MGD of the treated effluent from the treatment plant is diverted to Five Ponds Golf Course for irrigation via Outfall 002.

There are no other changes to the parameters or limits in the permit.