

Application Type Renewal
Facility Type Sewage
Major / Minor Major

**NPDES PERMIT FACT SHEET
ADDENDUM**

Application No. PA0026310
APS ID 781029
Authorization ID 927225

Applicant and Facility Information

Applicant Name	<u>Clearfield Municipal Authority</u>	Facility Name	<u>CMA WWTP</u>
Applicant Address	<u>107 E Market Street</u> <u>Clearfield, PA 16830-2405</u>	Facility Address	<u>729 Beauty Lane</u> <u>Clearfield, PA 16830</u>
Applicant Contact	<u>John Williams</u>	Facility Contact	<u>John Williams</u>
Applicant Phone	<u>(814) 765-9609</u>	Facility Phone	<u>(814) 765-9609</u>
Client ID	<u>87622</u>	Site ID	<u>458719</u>
SIC Code	<u>4952</u>	Municipality	<u>Lawrence Township</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Clearfield</u>
Date Published in PA Bulletin	<u>Not yet published</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>n/a</u>	If No, Reason	<u></u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>		

Internal Review and Recommendations

On August 15, 2022, the Department sent the above permittee a proposed draft NPDES permit. Comments of the draft permit were received from the EPA, the permittee, and internally from DEP. Below is a summary of the comments and the Departments response.

EPA

On 9/13/2022, EPA submitted comments on the draft permit via email. These comments are attached. The Department will include the CSO outfall table in Part A of the re-draft permit. EPA also requested clarification on the status of the LTCP implementation. The Department considers CMA to be meeting the presumptive approach with 85% capture on CSOs during precipitation events even though the LTCP is not fully implemented. Several LTCP future target dates remain. Full implementation of the LTCP is currently proposed for December 31, 2030. Part C.II.C of the draft permit provides for updates to the LTCP implementation status and specific target dates that should be met within the proposed permit term.

EPA requests the Department provide additional information as it relates to the TMDL for the West Branch Susquehanna River. The TMDL states that Acid Mine Drainage (AMD) is considered the cause of the impairment with total aluminum, total iron, total manganese, and pH being the parameters causing the impairment. The TMDL proposes that CMA have waste load allocations (WLAs) for these parameters since it accepted oil and gas wastewaters and was considered an industrial wastewater treatment plant at the time of the TMDL development. However, the TMDL was completed in 2009. CMA no longer accepts oil and gas wastewaters, nor does it have any significant industrial users. Therefore, the Department will require 1/quarter sampling for total aluminum, total iron, and total manganese in the draft permit to better characterize the levels of these pollutants and their contribution to the impairment.

EPA also commented on the Whole Effluent Toxicity (WET) testing frequency in the draft permit. The fact sheet states that quarterly WET tests will be required within the first year of issuance. However, Part C.III of the draft permit only required 1/year WET testing. This condition will be amended to require 1/quarter WET tests as described in the fact sheet.

Approve	Return	Deny	Signatures	Date
X			<i>Chad A. Fabian</i> Chad A. Fabian / Project Manager	December 15, 2022
X			<i>Nicholas W. Hartranft, P.E.</i> Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	December 19, 2022

Internal Review and Recommendations

Clearfield Municipal Authority (CMA)

CMA had comments (see attached) regarding the draft permit. CMA requests that UV monitoring be changed from transmittance (%) to intensity (mW/cm²). This change will be made in the new draft permit. CMA also provided the Department with the 2018 Chapter 94 Report. The remaining comments were related to typographical errors (facility mailing address, etc) made within the fact sheet. The original fact sheet is considered final and none of the typographical errors impacted any effluent limitation or the draft permit. See CMA's comments for more clarification of the typographical errors.

DEP Internal Comments

An internal review by DEP resulted in comments (see attached). In accordance with the Department's SOP for establishing effluent limitations for sewage permits, e. coli will be monitored 1/month, as in the draft permit. The fact sheet incorrectly listed e. coli as a 1/day parameter. The fact sheet was a typographical error, but the draft permit was correct at 1/month per the Department's SOP.

Similar to EPA comments on WET testing, the Department recommended 1/quarter for the first year of the permit cycle as described in the fact sheet. This will be corrected within this re-drafted permit.

The Department requested clarification on reporting of the semi-annual stormwater inspections requirements of Part C.IV.D. As the condition describes, these inspections are not required to be reported but records that they were completed should be provided to the Department upon request. However, the permittee is required to continue to submit the Annual Stormwater Inspection Form to the Department.

Also, the Department noted that the nitrogen offsets (5,738 lbs) approved by the Department via letter on 11/3/2011. As per the Department's Chesapeake Bay Phase 3 WIP Supplement, the permittee may also generate 3 pounds of nitrogen offsets per 1000 gallons of hauled in septage received. The previously approved offsets will be noted in a footnote in Part A of the re-drafted permit.

In summary, the Department recommends re-drafting the permit with the above noted changes. The re-draft will be published in the PA Bulletin for public comment.