Pennsylvania Department of Environmental Protection

NORTHEAST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0026492**
Facility Type	**Sewage**	APS ID	**920634**
Major / Minor	**Major**	Authorization ID	**1364863**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**Pennsylvania American Water Company**	Facility Name	**Scranton WWTP**
Applicant Address	852 Wesley Drive	Facility Address	Cedar Avenue & Breck Street
	Mechanicsburg, PA 17055		Scranton City, PA 18505
Applicant Contact	Andrew Clarkson	Facility Contact	Jennifer Green
Applicant Phone	(717) 550-1546	Facility Phone	(610) 233-6553
Client ID	87712	Site ID	256598
SIC Code	4952	Municipality	Scranton City
SIC Description	Trans. & Utilities - Sewerage Systems	County	Lackawanna
Date Published in PA Bulletin	February 8, 2025	EPA Waived?	No
Comment Period End Date	March 10, 2025	If No, Reason	Major Facility, Pretreatment, Significant CB Discharge
Purpose of Application	Renewal of NPDES permit.		

Internal Review and Recommendations

Public notification of draft permit issuance was published in the PA Bulletin on February 8, 2025. Comments were received from the permittee in a letter dated March 21, 2025. The comments and DEP responses are below. Due to the changes made to the permit, another draft permit will be issued. Note: E. Coli monitoring / reporting was mistakenly left out of the previous draft permit. Monthly monitoring / reporting requirements are added to the permit for E. Coli as per current guidance.

PAWC Comment 1:

The draft permit contains monitoring requirements as well as a compliance schedule for chloroform. This determination was based on data that submitted prior to the installation of the UV disinfection system. A maximum concentration of 29.48 ug/L from August 2020 when the treatment plant was using chlorine as a disinfectant which has already been determined to be the cause of increased disinfectant byproducts in the effluent. PAWC requests that the modeling to be repeated using the weekly monitoring data for chloroform from the point the UV disinfection system was installed in August of 2023. 83 samples were collected in 2023 and 2024 after the installation of the UV disinfection system and tested for chloroform. As reported in the monthly DMR's, the average concentration was 1.08 ug/L with a maximum concentration of 8.34 ug/L in June of 2024. I have enclosed a copy of DMR data from 9/2023 through 12/31/2024.

If the modeling with the updated data determines monitoring is still required, we request chloroform be treated similarly as the other disinfection byproducts, chlorodibromomethane and dichlorobromomethane.

Response:

eDMR results since August 2023 were reviewed and the maximum reported chloroform concentration (< 5.245 ug/L – February 2025) was used to re-model the discharge. Monitoring / reporting requirements were recommended by the TMS. The highest reported detected result (2.305 ug/L – June 2025) was also modeled with the TMS and monitoring / reporting

Approve	Return	Deny	Signatures	Date
X			Brian Burden, E.I.T. / Project Manager	July 31, 2025
X			Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Program Manager	8-1-25

Internal Review and Recommendations

requirements were not recommended. During this permit term, the minimum measurement frequency is updated from 1/week to 1/quarter since it *appears* chloroform is no longer a pollutant of concern. During this permit term, it's recommended for the permittee to utilize the most sensitive analysis available for measuring chloroform in the effluent to help confirm whether it's a pollutant of concern in the discharge. Chloroform shall also be monitored in the effluent during times when chlorine is utilized for backup disinfection, cleaning, or other purposes, and reported on the Daily Effluent Monitoring supplemental report (see Part IV.D.)

PAWC Comment 2:

The draft permit allowed for the resampling of Hexachlorobutadiene and 1,2,4-trichlorobenze using a more sensitive method. We have collected the 3 additional samples as specified in the fact sheet. To date, results have been received for the first sample collected on 2/27/2025. The concentration of 1,2,4-trichlorobenzene was <0.238 ug/L and the concentration of hexachlorobutadiene was <0.229 ug/L. The results of the remaining samples will be submitted to the Department when available at which time PAWC requests the modeling be updated.

Response:

The results were re-modeled with the TMS and no monitoring / reporting requirements were recommended for 1,2,4-Trichlorobenzene or Hexachlorobutadiene. Those parameters are removed from Part A of the permit.

PAWC Comment 3:

Part A: I. G identifies the combined sewer outfalls in the collection system. The Middle Street Pump Station and Shawnee Avenue Pump Station each have a gravity main outfall and a force main outfall. The outfalls are listed in the application as follows:

- 077 Middle Street Pumping Station
- 077 Middle Street Pumping Station -forced
- 078 Shawnee Avenue Pumping Station
- 078 Shawnee Avenue Pumping Station – forced

We request the list of outfalls be updated to include the force main outfalls.

Response:

The list of outfalls in Part A.I.G. is updated to include the force main outfalls.

PAWC Comment 4:

The fact sheet states that WET testing be conducted annually at dilution factors of 14%, 27%, 54% and 77% with 54% as the TIWC. The draft permit however, requires analysis at the same dilutions however the required TIWC is 40%. We request clarification on the correct dilutions and TIWC which must be met for the WET testing.

Response:

The TIWC is updated to 54%.