Pennsylvania Department of Environmental Protection

NORTHEAST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0027081**
Facility Type	**Sewage**	APS ID	**827529**
Major / Minor	**Minor**	Authorization ID	**1353511**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**Lackawanna River Basin Sewer Authority**	Facility Name	**LRBSA Clinton Township WWTP**
Applicant Address	PO Box 280	Facility Address	1100 Main Street Browndale
	Olyphant, PA 18447-0280		Clinton Township, PA 18421
Applicant Contact	Mike Matechak, Executive Director	Facility Contact	Glenn Butler, Plant Operator
Applicant Phone	(570) 489-7563	Facility Phone	(570) 785-5671
Client ID	90054	Site ID	262689
SIC Code	4952	Municipality	Clinton Township
SIC Description	Trans. & Utilities - Sewerage Systems	County	Wayne
Date Published in PA Bulletin	June 28, 2025	EPA Waived?	No
Comment Period End Date	July 28, 2025	If No, Reason	Significant CB Discharge

Purpose of Application: Renewal of NPDES permit for discharge of treated sewage.

Internal Review and Recommendations

The first draft of this permit appeared in the PA Bulletin on June 28, 2025.

Comments were received from the permittee and from the EPA. The comments and responses can be seen below.

Lackawanna River Basin Sewer Authority Comments:

1. *The required sampling type for Influent CBOD5 & TSS (1x/Week) and Effluent CBOD5 & TSS (1x/Week) and Ammonia-N (2x/Week) has been changed from 8-Hour composite sampling to 24-Hour composite sampling. The Clinton Township WWTP is a 0.7 MGD capacity facility staffed 8 hours per day/ 7 days per week. The imposition of 24-Hour composite sampling will require the purchase (at several thousand dollars apiece) and installation of two (2) automated, refrigerated composite samplers that will sit idle and be unused for 5 or 6 days per week. Analyses will be limited to only a few parameters (2 influent and 3 effluent). We request that the sampling type for these parameters be retained as 8-Hour composites as per the previous permit.*

Response – The Chesapeake Bay monitoring requirements in Table I.D. of the first draft permit mistakenly listed the "Required Sampling Type" as 8-Hr Composite for Ammonia-N, Kjeldahl—N, Nitrate-Nitrite as N, and Total Phosphorus. The required sampling for these parameters in Table I.D. should be 24-hour composite sampling. This is recommended per standard operating procedures for Significant Chesapeake Bay Sewage dischargers. Therefore, the Table I.D. "Required Sampling Type" has been changed to 24-Hr composite and the parameters in Table I.C. (Influent CBOD5, Influent BOD5, Influent TSS, Ammonia Nitrogen, and TSS) will remain as 24-Hr composite sampling.

2. *Part C.I.c "Nutrient Credits". Since implementation of the Chesapeake Bay Nutrient Requirements, the LRBSA has been able to utilize internal trading between its three (3) treatment plants (Clinton PA0027081 / Throop (PA0027090/ Archbald*

Approve	Return	Deny	Signatures	Date
X			Allison Seyfried Zukosky / Project Manager	August 19, 2025
X			Edward Dudick, P.E. / Environmental Engineer Manager	August 20, 2025

Internal Review and Recommendations

PA0027065) to meet its cap limits consistent with our original compliance approach. We request that the recognition of this internal trading strategy be included in this section.

Response – The requested statement has not been added to Part C of the permit. The standard language in Part C.I.D. of the permit covers/allows the transfer of load between the same entity. Additional information regarding the transfer of credits can be found at the following website - www.dep.pa.gov/npdes-bay, which is also listed in Part C.I.D.6 of the permit.

3. *Part A. "Effluent Limitations.....". Item 3 of Supplemental Information discusses the organic design capacity of the treatment facility. The capacity value is left blank. Please insert the treatment plant's organic design capacity of 1,750 lbs. BOD/Day.*

Response – The treatment plant's organic design capacity of 1,750 lbs. BOD/Day has been added to the Part A – Effluent Limitations, Monitoring, Recordkeeping and Reporting Requirements, Item 3 of Supplemental Information.

EPA Comments:

1. *EPA's Phase 2 e-Reporting rule requires that Sewer Overflow/Bypass Event reports must be submitted electronically by December 21, 2025, unless an alternative compliance deadline is approved by EPA (no extension is allowed beyond December 21, 2028) (40 CFR § 127.16(a), 40 CFR § 127.24(e)). PADEP will need to revise the draft permit language to address these requirements.*

Response – The Part A.III.C.4 Unanticipated Noncompliance or Potential Pollution Reporting standard language has been updated to resolve the concern.

2. Since PADEP's proposed seasonal E. coli water quality standard became effective in March 2021, PADEP has begun to incorporate E. coli monitoring in subsequently reissued NPDES permits. PADEP should ensure it is also included in CSO post-construction compliance monitoring (PCCM) plans to verify compliance with water quality standards and designated uses.

Response – The Department acknowledges the comment. The permittee shall ensure that E. Coli monitoring is included in the CSO PCCM to verify compliance with water quality standards and designated uses.

3. *Permit: Percent Capture Calculation*
Outfall 002 is a treated CSO with vortex separator treatment which operates prior to the headworks of the treatment plant. According to Section 5.3 of the 2017 LTCP Update, the overflow volumes at CSO 002 are not considered part of the annual CSO volume in the percent capture calculation. This will need to be revised as the volumes discharged from a treated CSO should be included in the CSO volume portion of the percent capture calculation. It is our understanding that the percent capture for treatment criterion under the Presumption Approach is to be met at the POTW and means capture for secondary treatment, and collection system flows remaining should receive the minimum level of treatment defined in the CSO Policy. The minimum level of treatment defined in the Policy includes:
   - *Primary clarification;*
   - *Solids and floatables disposal;*
   - *Disinfection of effluent (if necessary to meet water quality standards)*
   - *Removal of disinfection chemical residuals (if necessary)*

   (59 Fed. Reg., 18692 pt. II.C.4.a.ii.).

   This would mean, for example, that 85% capture by volume would need to be met at the POTW and then the remaining collection system flows (i.e., discharges from the collection system) would be expected to get the additional minimum treatment noted in the Policy. Since it is unclear what level of percent capture is achieved at the POTW, EPA recommends that PADEP document and discuss in future fact sheets, the level of percent capture by volume at the POTW to accurately reflect the volume of combined sewage treated at the plant.

Response – The Department acknowledges the comment and will document and review the level of percent capture by volume at the POTW in future fact sheets and permit renewals.

Internal Review and Recommendations

4. *Permit: Final Compliance Date*
Since the permit includes a schedule to comply with the CSO performance standard, PADEP needs to revise the LTCP Implementation schedule in draft permit Part C.II.C.3. to include a compliance date for the CSO performance standard (40 C.F.R. § 122.47(a)(1)). For example:

Milestone	*Completion Date*
Compliance with CSO Performance Standard	*Within XX months of completion of implementation of PCCM Plan*

Should the permittee require more time than what is in the schedule, DEP has the ability to amend the schedule's compliance deadline through a permit modification but should attempt to do so before the compliance date has come into effect. Any extension of the final compliance date after it is in effect would require an anti-backsliding analysis.

Response – The Department added a milestone to the schedule to include a compliance date for the CSO performance standard.

5. *Permit: CSO Performance Standard*
PADEP has chosen to incorporate the minimum CSO performance standard requirement of 85% capture by volume in the NPDES permit. Once the PCCM plan is implemented, PADEP will be evaluating the level of CSO control achieved after LTCP implementation. The next fact sheet for this permit will need to discuss the level of percent capture that has been achieved at the treatment plant (under design conditions) based on implementation of the LTCP. This level of CSO control will be assessed in the PCCM plan to evaluate the impact on receiving water quality and will need to be considered when determining the appropriate performance standard for the next permit. If the water quality-based requirements of the CWA have been met, the level of CSO control assessed in the PCCMP will need to be imposed in the next permit. If the level of capture achieved under design conditions is greater than 85%, the basis of applying only 85% capture as the CSO performance standard in the permit would need to be justified and documented, or the fact sheet would need to document whether a higher level of control is appropriate to address the water quality-based requirements of the CWA and its implementing regulations (40 CFR 122.44(d)(1); 59 Fed. Reg. 18691, pt. II.C.). The fact sheet will need to include a description of the procedures and rationale for reaching any decision for why a particular level of capture has been imposed in the permit (40 CFR 124.56(a)). After full implementation of the LTCP, if the level of CSO control has not addressed the water quality-based requirements of the CWA, more CSO controls may be necessary. In that case, the CSO performance standard for a permit should, at a minimum, be held at the level of CSO control that has been implemented (as identified through the PCCM plan) until that time that a revised LTCP identifies an updated CSO performance standard.

Response – The Department acknowledges the comment.