

Application Type Renewal
Facility Type Sewage
Major / Minor Major

NPDES PERMIT FACT SHEET ADDENDUM

Application No. PA0027197
APS ID 276152
Authorization ID 1032943

Applicant and Facility Information

Applicant Name	<u>Capital Region Water</u>	Facility Name	<u>Harrisburg Advanced Wastewater Treatment Facility</u>
Applicant Address	<u>3003 N Front Street</u> <u>Harrisburg, PA 17110-1224</u>	Facility Address	<u>N 18th And Helen Street</u> <u>Harrisburg, PA 17110</u>
Applicant Contact	<u>Jeffrey Bowra</u>	Facility Contact	<u>Matt Chisnell</u>
Applicant Phone	<u>(717) 216-5255</u>	Facility Phone	<u>(717) 216-5311</u>
Client ID	<u>43333</u>	Site ID	<u>454377</u>
SIC Code	<u>4952</u>	Municipality	<u>Harrisburg City</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Dauphin</u>
Date Published in PA Bulletin	<u>May 18, 2024</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>June 18, 2024</u>	If No, Reason	<u></u>
Purpose of Application	<u>NPDES Permit Renewal.</u>		

Internal Review and Recommendations

A revised draft permit was prepared on May 2, 2024 in response to comments received from US EPA and permittee (see the fact sheet addendum prepared on April 25, 2024 for more information). This May 2, 2024 revised draft permit was published in the *Pennsylvania Bulletin* on May 18, 2024 for another 30-day public comment period. During this public comment period, a number of comments were received from US EPA and permittee. All comment letters and correspondence received during the 30-day public comment period are attached to this fact sheet addendum. Several meetings were held with US EPA and the permittee to discuss these comments. Based on the comments and discussion, DEP has decided to modify the Total Residual Chlorine (TRC) conditions proposed in the May 2, 2024 revised draft permit.

DEP previously conducted a TRC reasonable potential (RP) analysis using a partial mixing factor generated from Toxics Management Spreadsheet (TMS). During the meeting with the permittee, DEP agreed that the TRC RP analysis needs to be conducted based on actual site-specific conditions. As a result, DEP has decided not to implement the results from the TRC RP analysis conducted previously but will re-conduct the TRC RP analysis based the results from a new site-specific study. Consequently, the existing TRC average monthly effluent limit (0.5 mg/L) will remain in effect and DEP will re-conduct the TRC RP analysis once the permittee provides the site-specific study results. DEP will re-open the permit if the TRC RP analysis based on the site specific study shows that the more stringent effluent limit is needed for water quality protection. The May 2, 2024 revised draft permit will be revised once again to include following revised Part C TRC conditions:

REQUIREMENTS FOR TOTAL RESIDUAL CHLORINE (TRC)

A. The permittee shall conduct a site-specific dilution study in accordance with the following schedule:

- | | |
|---|---|
| a) Submit a Site-Specific Study plan | <u>Within 2 months from the permit effective date</u> |
| b) Conduct a Site-Specific Study | <u>Upon the study plan approval from DEP</u> |
| c) Submit a Site-Specific Study Results | <u>Within 18 months of the study plan approval date</u> |
| d) Submit Progress Reports | <u>First day of each month</u> |

Approve	Return	Deny	Signatures	Date
X			Jinsu Kim Jinsu Kim / Environmental Engineering Specialist	September 11, 2024
X			Maria D. Bebenek for Daniel W. Martin, P.E. / Environmental Engineer Manager	September 11, 2024
X			Maria D. Bebenek Maria D. Bebenek, P.E. / Program Manager	September 11, 2024

Internal Review and Recommendations

B. No later than 14 calendar days following a date identified in the above schedule, the permittee shall submit to DEP a written notice of non-compliance with the specific schedule requirement. Each notice of non-compliance shall include the following information:

- 1. A short description of the non-compliance.*
- 2. A description of any actions taken or proposed by the permittee to comply with the elapsed schedule requirement.*
- 3. A description of any factors which tend to explain or mitigate the non-compliance.*
- 4. An estimate of the date that compliance with the elapsed schedule requirement will be achieved and an assessment of the probability that the next scheduled requirement will be met on time.*

C. The Department will reopen this permit if the reasonable potential (RP) analysis using information obtained from the above study shows that Total Residual Chlorine effluent limitations specified in Part A of this permit need to be modified.

Additional Modifications:

1. The following footnote will be included in the permit for PFAS monitoring requirement. This is consistent with DEP's SOP.

The permittee may discontinue monitoring for PFOA, PFOS, HFPO-DA, and PFBS if the results in 4 consecutive monitoring periods indicate non-detect results at or below Quantitation Limits of 4.0 ng/L for PFOA, 3.7 ng/L for PFOS, 3.5 ng/L for PFBS and 6.4 ng/L for HFPO-DA. When monitoring is discontinued, permittees must enter a No Discharge Indicator (NODI) Code of "GG" on DMRs.

2. The ammonia-nitrogen effluent limits will be included in the permit. These effluent limits are existing effluent limits specified in the current permit but were accidentally omitted from all previous draft permits. The fact sheet developed for the original draft permit dated June 28, 2023 confirms that these existing limits should still be included in the permit.

Given that this is a major change being made to the May 2, 2024 revised draft permit, DEP will issue another draft permit to provide another 30-day commenting period.

Kim, Jin Su

From: Kim, Jin Su
Sent: Wednesday, June 12, 2024 10:32 AM
To: Fulton, Jennifer
Cc: Schumack, Maria; Martin, Daniel; Bebenek, Maria; Furjanic, Sean; Moncavage, Carissa (she/her/hers); Shuart, Ryan; Hales, Dana
Subject: RE: [External] PA0027197 Harrisburg Advanced Wastewater Treatment Facility
Attachments: TRC PART C CONDITION (HARRISBURG).pdf

Hello

Please see DEP's response to your comments in red:

1. As discussed, PADEP is going to update the fact sheet to include documentation that the CSO related bypass receives the minimum treatment required under the CSO Policy and as required by Pennsylvania regulations. - **Fact Sheet Addendum for the final permit will address this statement.**
2. EPA makes a minor note that the last four digits of EPA's zip code is incorrect for the Pretreatment address in Section C.III.H of the permit. 19103-2029 should be changed to 19103-2852. -**The final permit will include the correct mailing address.**
3. The draft permit proposes a TRC schedule at Part C.VII. of the permit, which provides time for the facility to conduct a site-specific study. As discussed, the compliance schedule needs to be based on actions to meet the final TRC WQBEL and site-specific studies can occur concurrently. EPA requested that PADEP add milestones to the schedule that address actions to comply with the TRC limit that was calculated for the permit, including submission of a plan/report that includes an evaluation of technologies, a date by which installation of the selected technology should begin and the date by which the permittee must comply with the final limits. Part A.I.B. of the permit (pg. 4) will also need to clearly indicate when the final limits are effective (referencing Part C.VII. of the permit is not sufficient). Part C.VII., paragraph C of the TRC condition will need to be modified for clarity and to more generally acknowledge that PADEP may reopen the permit based on the results of the site-specific study. Unless the permit is modified, the final TRC limits will become effective upon the date that will be indicated in the permit. -**DEP agreed based on a phone conversation with EPA that the schedule needs to be adjusted. Attached is the modified Part C condition that would address EPA's concerns.**

Please let me know if you have any questions,

Thanks,

Jinsu

Jinsu Kim | Permits Section
Department of Environmental Protection | Clean Water Program
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From: Fulton, Jennifer <Fulton.Jennifer@epa.gov>
Sent: Thursday, June 6, 2024 1:05 PM
To: Kim, Jin Su <jikim@pa.gov>

Cc: Schumack, Maria <maschumack@pa.gov>; Martin, Daniel <daniemarti@pa.gov>; Bebenek, Maria <mbebenek@pa.gov>; Furjanic, Sean <sefurjanic@pa.gov>; Moncavage, Carissa (she/her/hers) <Moncavage.Carissa@epa.gov>; Shuart, Ryan <shuart.ryan@epa.gov>; Hales, Dana <Hales.Dana@epa.gov>
Subject: [External] PA0027197 Harrisburg Advanced Wastewater Treatment Facility

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Jinsu,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the revised draft National Pollutant Discharge Elimination System (NPDES) permit for:

Harrisburg Advanced Wastewater Treatment Facility

NPDES Number: PA0027197

EPA Received: May 6, 2024

30-day response due date: June 5, 2024

This is a major permit that discharges to the Susquehanna River, and is significant Chesapeake Bay discharger. EPA has chosen to perform a limited review of the revised draft permit based on the proposed changes. EPA has completed its review and based on that review and a discussion between yourself and EPA on 5/31/24, EPA offers the following comments:

1. As discussed, PADEP is going to update the fact sheet to include documentation that the CSO related bypass receives the minimum treatment required under the CSO Policy and as required by Pennsylvania regulations.
2. EPA makes a minor note that the last four digits of EPA's zip code is incorrect for the Pretreatment address in Section C.III.H of the permit. 19103-2029 should be changed to 19103-2852.
3. The draft permit proposes a TRC schedule at Part C.VII. of the permit, which provides time for the facility to conduct a site-specific study. As discussed, the compliance schedule needs to be based on actions to meet the final TRC WQBEL and site-specific studies can occur concurrently. EPA requested that PADEP add milestones to the schedule that address actions to comply with the TRC limit that was calculated for the permit, including submission of a plan/report that includes an evaluation of technologies, a date by which installation of the selected technology should begin and the date by which the permittee must comply with the final limits. Part A.I.B. of the permit (pg. 4) will also need to clearly indicate when the final limits are effective (referencing Part C.VII. of the permit is not sufficient). Part C.VII., paragraph C of the TRC condition will need to be modified for clarity and to more generally acknowledge that PADEP may reopen the permit based on the results of the site-specific study. Unless the permit is modified, the final TRC limits will become effective upon the date that will be indicated in the permit.

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary. Please contact Dana Hales on my staff via telephone at 215-814-2928 or via electronic mail at hales.dana@epa.gov.

Thank you,
Jen Fulton



Jennifer Fulton (she/her)
Acting Chief, Clean Water Branch
US EPA Mid-Atlantic Region
Phone 304-234-0248
Email fulton.jennifer@epa.gov



Kim, Jin Su

From: Kim, Jin Su
Sent: Friday, June 14, 2024 11:07 AM
To: Jess Rosentel
Cc: Stawiarski, Summer; Claire M; Charlotte Katzenmoyer; Bebenek, Maria
Subject: RE: [External] RE: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)
Attachments: TRC PART C CONDITION (HARRISBURG).pdf

Jess,

Please see attached. Part C condition has been revised as we discussed previously. DEP tends to finalize the permit without reissuing the draft permit. Therefore, DEP would like to provide CRW an opportunity to review this condition and ask CRW to provide any comments related to this change by July 8th. If you need more time to review, please let me know.

Thanks,
Jinsu

Jinsu Kim | Permits Section
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From: Jess Rosentel <Jess.Rosentel@capitalregionwater.com>
Sent: Thursday, June 13, 2024 1:30 PM
To: Kim, Jin Su <jikim@pa.gov>
Cc: Stawiarski, Summer <sustawiars@pa.gov>; Claire M <claire.maulhardt@capitalregionwater.com>; Charlotte Katzenmoyer <Charlotte.Katzenmoyer@capitalregionwater.com>; Bebenek, Maria <mbebenek@pa.gov>
Subject: RE: [External] RE: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)

Jinsu,
While that is the subject matter we are most focused on, we would still like a 15-day extension so that we may review the language EPA provides and determine whether we are going to request revisions in the permit itself based on that language.

Thank you again,

Jess

From: Kim, Jin Su <jikim@pa.gov>
Sent: Wednesday, June 12, 2024 10:19 AM
To: Jess Rosentel <Jess.Rosentel@capitalregionwater.com>
Cc: Stawiarski, Summer <sustawiars@pa.gov>; Claire Maulhardt <claire.maulhardt@capitalregionwater.com>; Charlotte Katzenmoyer <Charlotte.Katzenmoyer@capitalregionwater.com>; Bebenek, Maria <mbebenek@pa.gov>

Subject: RE: [External] RE: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)

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I understand; as mentioned previously, I will share the revised Part C condition lays out the revised schedule with you shortly. Do you have comments or questions regarding other subject on the draft permit that would require 15-day extension of the comment period? I can provide you additional comment period once I share the revised schedule with you.

Jinsu

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From: Jess Rosentel <Jess.Rosentel@capitalregionwater.com>

Sent: Wednesday, June 12, 2024 10:12 AM

To: Kim, Jin Su <jjkim@pa.gov>

Cc: Stawiariski, Summer <sustawiaris@pa.gov>; Claire M <claire.maulhardt@capitalregionwater.com>; Charlotte Katzenmoyer <Charlotte.Katzenmoyer@capitalregionwater.com>; Bebenek, Maria <mbebenek@pa.gov>

Subject: RE: [External] RE: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)

Jinsu: Thanks for the additional information about where the TRC issue is heading. Based on your note, we have a few more questions and thoughts.

First, are you saying that the 22-month is only to do the evaluation of compliance options, not to come into compliance? To us, that was not clear in the permit or the fact sheet. So if that is the intention, PADEP should state that clearly in both documents.

So then, if 36 months will be allowed to come into compliance, that would require a change in both the permit and the fact sheet from the draft that you sent us on May 2. But it should be 36 months after we complete the technology evaluation. Obviously, we can't start designing and building something until after we have completed the evaluation of technologies.

Also, it should be stated clearly, in the permit and the fact sheet, that if the dilution study justifies any TRC number other than the interim number of 0.5, that PADEP must do a modification to the permit, including both the new limit and an appropriate compliance schedule. We don't know right now what number will come out of the study, and how long it will take to meet that number. Once the study has been done, we will have a better sense of that, and an appropriate modification to the limit, and an appropriate schedule, can be developed and issued for comment.

This all goes toward the overarching issue of time to comment. This is a major concern, especially when you indicate that we are not going to see the EPA comments until the end of the week – just before the comment period expires. That means that we obviously need at least a 15-day extension. But even more importantly, the permit and fact sheet changes laid out above, which we believe are needed in order for the permit to be clear as to CRW's compliance obligations, are significant enough that this permit should go back out for around round of public notice, with the changes included.

Those are our current thoughts regarding how to address the TRC issues going forward. I'm glad to discuss further at your convenience.

Maria – Please let me know if you would like me to send a separate request for a 15-day extension of the comment period.

Thank you both.

Jess Rosentel | Chief Operations Officer - Wastewater
888-510-0606 | 717-736-9742 (m)



Capital Region Water

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From: Kim, Jin Su <jikim@pa.gov>
Sent: Tuesday, June 11, 2024 2:51 PM
To: Jess Rosentel <Jess.Rosentel@capitalregionwater.com>
Cc: Stawiarski, Summer <sustawiars@pa.gov>; Claire Maulhardt <claire.maulhardt@capitalregionwater.com>; Charlotte Katzenmoyer <Charlotte.Katzenmoyer@capitalregionwater.com>
Subject: RE: [External] RE: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)

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Hi Jess,

June 18th is the last day for the public commenting period. As far as the discussion with EPA, EPA just wanted CRW to explore the option(s) to comply with final limits (i.e., new limits). It does not include the actual designing, bidding, construction, and commissioning of the selected option(s). It is an evaluation of any technology available to meet the new limits. EPA understands that the study could result in different effluent limits or result in not changing the current limits. However, the compliance schedule should be based on the actions to meet the new limits; therefore, such evaluation should occur concurrently with the study. Again this evaluation does not include actual designing. Hopefully this makes sense.

We are also required to include the actual compliance date for the new limits; so I will include +36 months from the permit effective date as the final limits compliance date. This date, again, could change based on the study. DEP and EPA acknowledge that the permit could be reopened to adjust the schedule.

I have received EPA's comments last Thursday. Once I address their comments, I will share them with you. It will most likely be by the end of this week.

Thanks,
Jinsu

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From: Jess Rosentel <Jess.Rosentel@capitalregionwater.com>
Sent: Tuesday, June 11, 2024 2:39 PM
To: Kim, Jin Su <jikim@pa.gov>
Cc: Stawiarski, Summer <sustawiars@pa.gov>; Claire M <claire.maulhardt@capitalregionwater.com>; Charlotte Katzenmoyer <Charlotte.Katzenmoyer@capitalregionwater.com>
Subject: RE: [External] RE: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)

Hello again Jinsu,
One final question: can you please confirm the final date that comments will be accepted on this draft permit?

Thanks,

Jess

From: Jess Rosentel
Sent: Tuesday, June 11, 2024 2:32 PM
To: Kim, Jin Su <jikim@pa.gov>
Cc: Stawiarski, Summer <sustawiars@pa.gov>; Claire Maulhardt <Claire.Maulhardt@capitalregionwater.com>; Charlotte Katzenmoyer <Charlotte.Katzenmoyer@capitalregionwater.com>
Subject: RE: [External] RE: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)

Good Afternoon Jinsu,
In looking for some clarification from our 5/31 phone call, I'm wondering if your statement below is what EPA intends to push back on. Are they not supportive of reopening the permit and modifying a compliance schedule if the site-specific dilution study shows a reduced TRC is warranted? As I stated in the initial reply to this thread, we would need much more time for full design, bidding, construction and commissioning of the recommended improvements. We don't want to be considered out of compliance if the study requires improvements that will take significant funding and time to construct.

Again, if you can forward the comments from EPA as soon as they are received it will be a great help for us to formulate our own comments to the draft.

Thanks again,

Jess

From: Kim, Jin Su <jikim@pa.gov>
Sent: Friday, May 17, 2024 10:54 AM
To: Jess Rosentel <Jess.Rosentel@capitalregionwater.com>
Cc: Stawiarski, Summer <sustawiars@pa.gov>; Claire Maulhardt <claire.maulhardt@capitalregionwater.com>; Charlotte

Katzenmoyer <Charlotte.Katzenmoyer@capitalregionwater.com>

Subject: RE: [External] RE: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)

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Hi Jess,

Yes, I believe once we review your results, we would reopen the permit as needed to modify the compliance schedule based on any possible installation of new technology.

Jinsu

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From: Jess Rosentel <Jess.Rosentel@capitalregionwater.com>

Sent: Friday, May 17, 2024 10:33 AM

To: Kim, Jin Su <jjkim@pa.gov>

Cc: Stawiariski, Summer <sustawiariski@pa.gov>; Claire M <claire.maulhardt@capitalregionwater.com>; Charlotte Katzenmoyer <Charlotte.Katzenmoyer@capitalregionwater.com>

Subject: [External] RE: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)

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Jinsu,

We have some concerns with the language in the draft regarding the TRC changes. I appreciate your agreement that 22 months is required for the site-specific dilution study and technology review. However, if the results conclude that TRC limit is something lower than the interim of 0.50 mg/l and WILL require a new technology to achieve adequate fecal kill and comply with the new TRC limit...we will need time for design, bidding, construction and commissioning. I'm hoping we will not be considered out of compliance after the 22 months if a new process is required.

I do note that Part C. ends with the "Department may reopen this permit based on the study results." Would the scenario described above qualify for a reopening to allow us time to complete the necessary improvements? Perhaps with a new compliance schedule?

Last question – when are you planning to publish in the PA Bulletin?

Thanks in advance and I hope you have a great weekend!

Jess

From: Kim, Jin Su <jjkim@pa.gov>

Sent: Thursday, May 2, 2024 11:34 AM

To: Claire Maulhardt <claire.maulhardt@capitalregionwater.com>; Jess Rosentel
<Jess.Rosentel@capitalregionwater.com>
Cc: Stawiarski, Summer <sustawiars@pa.gov>
Subject: Capital Region Water - Harrisburg Advanced Treatment Facility Draft NPDES permit package (PA0027197)

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Good Morning,

Attached is your draft NPDES permit package including a cover letter, draft NPDES permit, fact sheet addendum and public notice.

Please let me know if you have any questions,

Thanks,

Jinsu

Jinsu Kim | Permits Section
Department of Environmental Protection | Clean Water Program
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