pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTHCENTRAL REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0027375**
Facility Type	**Sewage**	APS ID	**1002905**
Major / Minor	**Major**	Authorization ID	**1290508**

NPDES PERMIT FACT SHEET ADDENDUM No. 2

Applicant and Facility Information

Applicant Name	**City of DuBois**	Facility Name	**City of DuBois WWTP**
Applicant Address	16 W Scribner Avenue PO Box 408	Facility Address	96 Guy Avenue
	DuBois, PA 15801-2210		DuBois, PA 15801
Applicant Contact	John Suplizio	Facility Contact	Scott Farrell
Applicant Phone	(814) 371-2002	Facility Phone	(814) 371-4508
Client ID	75158	Site ID	258005
SIC Code	4952	Municipality	DuBois City
SIC Description	Trans. & Utilities - Sewerage Systems	County	Clearfield
Date Published in PA Bulletin	August 15, 2020	EPA Waived?	No
Comment Period End Date	September 14, 2020	If No, Reason	Major Discharge, TMDL
Purpose of Application	Application for a renewal of an NPDES permit for discharge of treated sewage.		

Internal Review and Recommendations

DEP is in receipt of comments from the City of DuBois, dated September 9, 2020. The comments and DEP's responses are as follows:

1. **Comment:** PADEP requested clarification as to the location of the effluent sampling point and stated that the proposed sampling protocol of deactivating the stormwater sump pump when obtaining grab samples for chlorine and fecal coliform is not adequate to ensure that the samples are fully representative of plant effluent. In response, the City proposes to take these grab samples just after the chlorine contact tank and prior to the confluence of the effluent and the stormwater pipes.

   Response: DEP does not object to the proposed sampling protocol.

2. **Comment:** As discussed on a Monday, June 8, 2020 conference call between PADEP and representatives of the City, HRG and EnviroScience, additional sampling was performed for free cyanide, Bis (2-ethylhexyl) phthalate and mercury. Eight additional samples of each parameter were obtained and analyzed. These data are presented in Table 1 for your consideration. Analytical reports are presented in Attachment A. The City requests that DEP reevaluate proposed limits and monitoring frequency requirements based on these new data.

   The City also notes that for mercury, free cyanide, and Bis (2-ethylhexyl) phthalate, the effluent limitations in Table A.I.A.2 of the permit (interim limits) are identical to the final limits listed in Table A.I.B.2 (final limits). Since DEP agreed to a compliance schedule for these parameters, the City requests that the limits for these parameters are removed from the interim table.

   Response: The additional sampling data for free cyanide, Bis (2-ethylhexyl) phthalate, and mercury was entered

Approve	Return	Deny	Signatures	Date
X			*Derek S. Garner* Derek S. Garner / Project Manager	September 30, 2020
X			*Nicholas W. Hartranft* Nicholas W. Hartranft, P.E. / Environmental Engineer Manager	September 30, 2020

Internal Review and Recommendations

into the Toxics Management Spreadsheet to evaluate the applicability of monitoring requirements or effluent limits at Outfall 001. Based on the output results (attached), the previously proposed limits for free cyanide and Bis (2-ethylhexyl) phthalate are still appropriate. Monitoring requirements or effluent limits for total mercury are no longer recommended since the concentrations are below 10% of the governing water quality-based effluent limit. Part A of the permit has been modified accordingly.

The interim monitoring requirements and effluent limits table in Part A has been corrected.

DEP is also in receipt of comments from U.S. EPA, dated September 2, 2020. The comment and DEP's response is as follows:

1. **Comment**: The fact sheet documents that assimilative capacity exists for aluminum, and further states that the previously calculated WQBELs are appropriate. We would recommend that the fact sheet address whether any of the available aluminum data can be used as background data in the PENTOXSD modeling. The original modeling used zero background for aluminum, but it would appear that some background data exists. A new aluminum WQBEL may be appropriate considering the background, unless justification can be provided for not using the data.

   Response: DEP agrees that the available upstream aluminum data should be incorporated into the Toxics Management Spreadsheet (attached). The in-stream sample result of 67.5 µg/l, taken from the nearest sampling location in the 2019 study, was used as the background concentration at Outfall 001. Based on the output results, more stringent total aluminum effluent limits (2.18 µg/l AML vs. 2.23 µg/l AML) are appropriate. Part A of the permit has been modified accordingly.

An internal review of the permit did not yield any comments. No comments were received from the public.

Due to the changes made to the permit based on the permittee's and EPA's comments, DEP recommends that the permit is redrafted and published in the PA Bulletin for an additional thirty-day commenting period.

TMS