

Application Type Renewal  
Facility Type Sewage  
Major / Minor Major

**NPDES PERMIT FACT SHEET  
ADDENDUM**

Application No. PA0027430  
APS ID 930459  
Authorization ID 1164427

**Applicant and Facility Information**

Applicant Name	<u>Municipal Authority of Westmoreland County</u>	Facility Name	<u>Jeannette STP</u>
Applicant Address	<u>PO Box 730</u> <u>Greensburg, PA 15601-0730</u>	Facility Address	<u>1000 S Railroad Street</u> <u>Penn, PA 15675</u>
Applicant Contact	<u>Norman Stout</u>	Facility Contact	<u>Katelyn Warheit</u>
Applicant Phone	<u>(724) 755-5912</u>	Facility Phone	<u>724-454-0233</u>
Client ID	<u>64197</u>	Site ID	<u>738018</u>
SIC Code	<u>4952</u>	Municipality	<u>Penn Borough</u>
SIC Description	<u>Trans. &amp; Utilities - Sewerage Systems</u>	County	<u>Westmoreland</u>
Date Published in PA Bulletin	<u>August 12, 2023 (Attachment A)</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>September 11, 2023</u>	If No, Reason	<u>Major Facility</u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>		

**Internal Review and Recommendations**

The Department of Environmental Protection (DEP) published notice of draft Authorization to discharge under the National Discharge Elimination System (NPDES) discharge requirements for treated sewage for Jeanette STP in the *Pennsylvania Bulletin* on August 12, 2023 [54 PA.B. 5009]. A 30-day comment period was provided during which interested parties were directed to submit comments to DEP.

The purpose of this fact sheet is to document the comments received, the Department's formal response to said comments, and where applicable, the changes made to the draft permit.

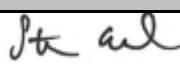
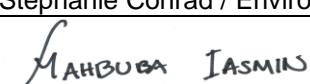
Comments were received from the Environmental Protection Agency (EPA) as well as from the Municipal Authority of Westmoreland County (MAWC). As a result of the comments received from MAWC, the permit is being amended in two ways:

- The percent capture performance standard in Part C. II. C. 2. of the permit is changing from 94% to 85%.
- The LTCP implementation schedule in Part C. II. C. 3. of the permit is being extended.

Additionally, DEP has implemented a new PFAS monitoring initiative. As a result, annual PFAS monitoring at the treated sewage discharge outfall and PFAS requirements for the pretreatment program have been added to the permit. As a result of the comments received and the changes performed in the permit, the Department has decided to redraft the permit to offer a public comment period.

The comments received during the Draft Period comment period and DEP's responses are summarized below:

In response to the draft permit, US EPA Region III sent the email provided in Attachment B on August 8, 2023 and made the following statement:

Approve	Return	Deny	Signatures	Date
X			 Stephanie Conrad / Environmental Engineering Specialist	October 24, 2023
X			 Mahbuba Iasmin, Ph.D., P.E. / Environmental Engineering Manager	July 8, 2024

### Internal Review and Recommendations

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:

Jeanette Municipal Authority  
Municipal Authority of Westmoreland County (MAWC)  
NPDES Number: PA0027430  
EPA Received Revised Draft: 7/27/2023  
30-day response date: 8/28/2023

This is a major permit that discharges to Brush Creek and is affected by the Brush Creek (Westmoreland) and Turtle Creek Watershed TMDLs for Acid Mine Drainage Affected Segments. This permit is being revised to incorporate the applicable CSO performance standard and the fact sheet incorporates a comprehensive timeline of CSO-related actions as an attachment. EPA has chosen to perform a limited review of the CSO performance Standard and CSO compliance schedule requirements and fact sheet discussion. EPA has completed its review and has no comments.

In response to the draft permit, Katelyn Warheit with the MAWC sent a formal letter dated August 15, 2023 which contained a comment regarding the percent capture performance standard in Part C. II. C. 2. of the draft permit. The complete comment letter is included in Attachment C.

1. The percent capture requirement was changed based on comments received from the EPA. MAWC believes that EPA is misinterpreting the meaning of the 94% value in the LTCP.

**DEP's Response:** Section IV.B.2.c of the EPA's *Combined Sewer Overflow (CSO) Control Policy Notice* [Federal Register Vol. 59 No. 75 18688-18698] (CSO Policy) documents that a permit requires compliance with the numeric performance standards for the selected controls by specifying one of three conditions for the presumptive approach. Section IV.B.2.c.ii. offers the condition of a minimum percent capture of combined sewage by volume for treatment under specified design conditions consistent with Section II.C.4.a.ii. Section II.C.4.a.ii specifies a percent capture of no less than 85%.

Section 4.6.2 of EPA's *CSO Guidance for Permit Writers* [EPA 832-B-95-008] documents that the performance standard for the presumptive approach should come directly from what is specified in the CSO Policy. Appendix A further clarifies by providing the example sample language, "The permittee shall eliminate or capture for treatment, or storage and subsequent treatment, at least 85 percent of the system-wide combined sewage volume collected in the combined sewer system..."

Additionally, as examples, the EPA Region Two Permits NY0031429 and NY00222403 specify 85 percent as the numeric performance standard for Presumption Approach.

For these reasons, the performance standard in Part C. II. C. 2. of the permit is changing from 94 percent to 85 percent.

Katelyn Warheit with MAWC sent a letter dated September 28, 2023 requesting an extension to the LTCP schedule in Part C. II. C. 3. of the draft permit. The complete letter is included in Attachment D.

1. MAWC would like to request that Jeanette LTCP Implementation Schedule deadlines be extended.

**DEP's Response:**

The LTCP schedule in Part C.II.C.3 of the permit is changing to:

Milestone	Completion Date
<b>Begin Construction of Option 4a/9a as authorized by the WQM Part II Permit</b>	<b>January 1, 2025</b>

**Internal Review and Recommendations**

<b>Complete Construction of Option 4a/9a as authorized by the WQM Part II Permit</b>	<b>May 1, 2026</b>
<b>Begin Construction of Remaining Projects as authorized by the WQM Part II Permit</b>	<b>January 1, 2025</b>
<b>Complete Construction of Remaining Projects as authorized by the WQM Part II Permit</b>	<b>May 1, 2026</b>
<b>Submit a complete and accurate Post-Construction Compliance Monitoring Plan (PCCMP)</b>	<b>October 31, 2026</b>
<b>Begin PCCMP Implementation</b>	<b>Within 90 days of the Department's approval of the PCCMP</b>
<b>Complete PCCMP Implementation</b>	<b>Within 365 days of commencement of the Department-approved PCCMP</b>
<b>Submission of PCCMP report for Department Review</b>	<b>Within 90 days of completion of PCCMP implementation</b>
<b>Compliance with LTCP and CSO Performance Standard</b>	<b>Within 90 days of completion of PCCMP implementation</b>

The existing COA with MAWC is also being amended to reflect this change.

Part C.III “Combined Sewer Overflows” of the 2012 Permit failed to include both a CSO performance standard and a final compliance date for LTCP Implementation. All LTCP milestones identified in the permit were therefore interim milestones and extending the compliance schedule does not constitute backslicing. Updating the LTCP Implementation schedule in the fourth draft of this NPDES permit does not require an anti-backsliding analysis.

Please note that once this permit is issued in final, then the schedule will become legally binding. MAWC will need to prove that any requested extensions are subject to one of the backslicing provisions defined in 40 CFR 122.44 (l).

**Per-and Polyfluoroalkyl Substances (PFAS)**

In February 2024, DEP implemented a new PFAS monitoring initiative consistent with EPA's memorandum that provides guidance for addressing PFAS in treated effluent discharges permitted under the NPDES program. PFAS are a family of synthetic, organic chemicals containing a chain of strong carbon-fluorine bonds. PFAS are generally highly stable and water- and oil-resistant and are useful in a variety of consumer products and industrial processes. PFAS are resistant to biodegradation, photooxidation, direct photolysis, and hydrolysis. Because PFAS does not readily degrade by natural processes, it accumulates over time. According to the United States Department of Health and Human Services' Agency for Toxic Substances and Disease Registry (ATSDR), the environmental persistence and mobility of PFAS, combined with decades of widespread use, have resulted in surface water, groundwater, drinking water, rainwater, solid, sediment, ice caps, outdoor and indoor air, plants, animal tissue, and human blood serum contamination across the globe. ATSDR also reports that exposure to certain PFAS can lead to adverse human health impacts. Due to their durability, toxicity, persistence, and pervasiveness, PFAS have emerged as a potentially significant pollutant of concern for sewage treatment plants.

In accordance with Section II.G. of DEP's SOP for *Establishing Effluent Limitations for Individual Sewage Permits* [BCQ-PMT-033] and under the authority of 25 Pa. Code § 92.a.61, DEP is imposing monitoring for a subset of common/well-studied PFAS to help understand the extent of PFAS contamination throughout the Commonwealth and the extent to which point source dischargers under the NPDES program contribute. These PFAS include Perfluorooctanoic Acid (PFOA), Perfluorooctanesulfonic Acid (PFOS), Perfluorobutanesulfonic acid (PFBS), and Hexafluoropropylene Oxide Dimer Acid (HFPO-DA).

MAWC submitted their NPDES Permit renewal application prior to August 5, 2024 and are therefore not required to sample for PFOA, PFOS, PFBS, and HFPO-DA as part of the renewal sampling. Jeanette STP does not have any categorical users and therefore does not have any industrial waste generators that EPA believes may be a source of PFAS. Annual monitoring for PFOA, PFOS, PFBS, and HFPO-DA is therefore being added to this permit. In accordance with Section II.G.3. of DEP's SOP for *Establishing Effluent Limitations for Individual Sewage Permits* [BCQ-PMT-033], a footnote has been added to the permit stating “The permittee may discontinue monitoring for PFOA, PFOS, HFPO-DA, and PFBS of the results in four

**Internal Review and Recommendations**

consecutive monitoring period indicate non-detect results at or below Quantitation Limits of 4.0 ng/L for PFOA, 3.7 ng/L 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.

Draft Permit issuance is recommended.

## ATTACHMENT A

### PA Bulletin Notice

## NOTICES

### DEPARTMENT OF ENVIRONMENTAL PROTECTION

#### Applications, Actions and Special Notices

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#### APPLICATIONS

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[53 Pa.B. 5009]  
[Saturday, August 12, 2023]

### THE PENNSYLVANIA CLEAN STREAMS LAW AND THE FEDERAL CLEAN WATER ACT

### APPLICATIONS FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMITS AND WATER QUALITY MANAGEMENT (WQM) PERMITS UNDER THE CLEAN STREAMS LAW AND FEDERAL CLEAN WATER ACT

This notice provides information about persons who have applied to the Department of Environmental Protection (DEP) for a new, renewed, or amended NPDES or WQM permit, or a permit waiver for certain stormwater discharges, or have submitted a Notice of Intent (NOI) for coverage under a General Permit. The applications and NOIs concern, but are not limited to, effluent discharges from sewage treatment facilities and industrial facilities to surface waters or groundwater; stormwater discharges associated with industrial activity (industrial stormwater), construction activity (construction stormwater), and municipal separate storm sewer systems (MS4s); the application of pesticides; the operation of Concentrated Animal Feeding Operations (CAFOs); and the construction of sewage, industrial waste, and manure storage, collection and treatment facilities. This notice is provided in accordance with 25 Pa. Code Chapters 91 and 92a and 40 CFR Part 122, implementing The Clean Streams Law (35 P.S. §§ 691.1—691.1001) and the Federal Clean Water Act (33 U.S.C.A. §§ 1251—1376). More information on the types of NPDES and WQM permits that are available can be found on DEP's website (visit [www.dep.pa.gov](http://www.dep.pa.gov) and select Businesses, Water, Bureau of Clean Water, Wastewater Management, and NPDES and WQM Permitting Programs).

**PA0027430**, Sewage, SIC Code 4952, **Westmoreland County Municipal Authority**, P.O. Box 730, Greensburg, PA 15601-0730. Facility Name: Jeannette STP. This existing facility is located in Penn Borough, **Westmoreland County**.

**Description of Existing Activity:** The application is for a renewal of an NPDES permit for an existing discharge of treated sewage.

The receiving stream(s), Brush Creek (TSF), is located in State Water Plan watershed 19-A and is classified for Trout Stocking, aquatic life, water supply and recreation. The discharge is not expected to affect public water supplies.

The proposed effluent limits for Outfall 001 are based on a design flow of 3.3 MGD.—Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)					
	Daily		Daily		Daily			
	Average	Monthly	Maximum	Minimum	Average	Monthly	Maximum	IMAX
Flow (MGD)	Report	Report	XXX	XXX	XXX	XXX	XXX	
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	XXX	9.0	
Dissolved Oxygen	XXX	XXX	6.0	XXX	XXX	XXX	XXX	
Carbonaceous Biochemical Oxygen Demand (CBOD <sub>5</sub> )	465.0	700.0	XXX	17.0	25.5	34		
Nov 1 - Apr 30		Wkly Avg			Wkly Avg			
May 1 - Oct 31	340.0	510.0	XXX	12.5	18.7	25		
Wkly Avg					Wkly Avg			
Biochemical Oxygen Demand (BOD <sub>5</sub> )	Report	Report	XXX	Report	Report	XXX		
Raw Sewage Influent								
Total Suspended Solids	825.0	1235.0	XXX	30.0	45.0	60		
Wkly Avg					Wkly Avg			
Total Suspended Solids	Report	Report	XXX	Report	Report	XXX		
Raw Sewage Influent								
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	2,000	XXX	10,000		
Oct 1 - Apr 30				Geo Mean				
May 1 - Sep 30	XXX	XXX	XXX	200	XXX	1,000		
Geo Mean								
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report		
Ultraviolet light transmittance (%)	XXX	XXX	Report	XXX	XXX	XXX		
Ammonia-Nitrogen	81.5	XXX	XXX	2.96	XXX	5.92		
Nov 1 - Apr 30								
May 1 - Oct 31	54.8	XXX	XXX	1.99	XXX	3.98		
Copper, Total (ug/L)	0.37	0.57	XXX	13.3	20.6	20.6		

The proposed effluent limits for Outfall 001 are based on a design flow of 3.3 MGD.—Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)					
			Daily	Daily	Daily			
	Average	Monthly	Maximum	Minimum	Average	Monthly	Maximum	IMAX
Antimony, Total (ug/L)	Report	Report	XXX		Report	Report	XXX	
	Avg Qrtly				Avg Qrtly			
Cyanide, Free (ug/L)	Report	Report	XXX		Report	Report	XXX	
	Avg Qrtly				Avg Qrtly			
Zinc, Total (ug/L)	Report	Report	XXX		Report	Report	XXX	
	Avg Qrtly				Avg Qrtly			
Dichlorobromomethane (ug/L)	Report	Report	XXX		Report	Report	XXX	
	Avg Qrtly				Avg Qrtly			
Chloroform (ug/L)	Report	Report	XXX		Report	Report	XXX	
	Avg Qrtly				Avg Qrtly			

The proposed effluent limits for Outfall 001 are based on a design flow of 3.3 MGD.—Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)					
			Daily	Daily	Daily			
	Average	Monthly	Maximum	Minimum	Average	Monthly	Maximum	IMAX
Total Nitrogen	XXX	XXX	XXX	XXX	XXX	Report		
Total Phosphorus	XXX	XXX	XXX	XXX	XXX	Report		
Aluminum, Total	XXX	Report	XXX	XXX	Report	XXX		
Iron, Total	XXX	Report	XXX	XXX	Report	XXX		
Manganese, Total	XXX	Report	XXX	XXX	Report	XXX		

You may make an appointment to review the DEP files on this case by calling the File Review Coordinator at 412-442-4000.

The EPA Waiver is not in effect.

## ATTACHMENT B

### EPA Comment Email

**Polakoski, Grace**

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**From:** Fulton, Jennifer <Fulton.Jennifer@epa.gov>  
**Sent:** Tuesday, August 8, 2023 4:18 PM  
**To:** Polakoski, Grace  
**Cc:** Iasmin, Mahbuba; Furjanic, Sean; Schumack, Maria; Martinsen, Jessica; Hales, Dana; Shuart, Ryan  
**Subject:** [External] Jeannette Municipal Authority (PA0027430)

**ATTENTION: This email message is from an external sender. Do not open links or attachments from unknown senders. To report suspicious email, use the [Report Phishing button in Outlook](#).**

Grace;

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:

Jeannette Municipal Authority  
Municipal Authority of Westmoreland County (MAWC)  
NPDES Number: PA0027430  
EPA Received Revised Draft: 7/27/2023  
30-day response date: 8/28/2023

This is a major permit that discharges to Brush Creek and is affected by the Brush Creek (Westmoreland) and Turtle Creek Watershed TMDLs for Acid Mine Drainage Affected Segments. This permit is being revised to incorporate the applicable CSO performance standard and the fact sheet incorporates a comprehensive timeline of CSO-related actions as an attachment. EPA has chosen to perform a limited review of the CSO performance Standard and CSO compliance schedule requirements and fact sheet discussion. EPA has completed its review and has no comments.

Should you have any questions, please feel free to reach out to Ryan Shuart, copied on this email. If there are any additional changes to the permit documents, please be sure to reach out to EPA as additional review may be necessary.

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](mailto:fulton.jennifer@epa.gov)



## ATTACHMENT C

### MAWC Comment Letter

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An Equal Opportunity Employer 124 Park and Pool Road  
New Stanton, PA 15672  
Phone: 724.755.5800  
1.800.442.8829



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Mailing Address  
P.O. Box 730  
Greensburg, PA 15601

[www.mawc.org](http://www.mawc.org)  
[mawc@mawc.org](mailto:mawc@mawc.org)

August 15, 2023

Ms. Grace Polakoski  
PA DEP Clean Water Program  
400 Waterfront Drive  
Pittsburgh, PA 15222

Re: Jeannette WWTP (PA0027430)  
Third Draft NPDES Permit Comments

Dear Ms. Polakoski:

MAWC has reviewed the third draft NPDES permit for Jeannette WWTP and would like to provide the following comments:

Page 23

- The percent capture requirement was changed from 85% to 94% based on comments received from the EPA. MAWC believes that the EPA is misinterpreting the meaning of the 94% value in the LTCP. The correspondence from the EPA, which was included in the Fact Sheet, states "MAWC's 2018 Revised LTCP selected a numeric performance standard of 94% as the percent capture expected to be adequate to meet WQS." This is not correct. The LTCP presented various CSO reconstructions and other system improvements as options to increase the percent capture, and MAWC selected a specific combination of these options as favorable. When the selected combination of options was entered into the hydraulic model, it predicted that the percent capture would be 94%. This predicted number could have been any value above 85% and MAWC would have been satisfied that the criterion had been met. If the model had predicted that the percent capture would be 84% or less, MAWC would have selected a different combination of options. See attached letter from Gibson-Thomas Engineering, who prepared the LTCP, for a more detailed explanation.

If you have any questions or would like to discuss these comments, please contact me at [kwarheit@mawc.org](mailto:kwarheit@mawc.org) or 724-454-0233.

Sincerely,

*Katelyn Warheit*

Katelyn Warheit  
Environmental Compliance Superintendent  
Municipal Authority of Westmoreland County

cc: Dom Garofola, Gibson-Thomas Engineering



August 10, 2023

**Latrobe Corporate Office**  
1004 Ligonier Street, PO Box 853  
Latrobe, PA 15650  
Phone: **724-539-8562**  
Fax: **724-539-3697**  
[www.gibson-thomas.com](http://www.gibson-thomas.com)

[kwarheit@mawc.org](mailto:kwarheit@mawc.org)

Katelyn Warheit  
Municipal Authority of Westmoreland County  
124 Park & Pool Road  
New Stanton PA 15672

Subject: Jeannette WWTP (PA0027430)  
Third Draft NPDES Permit Comments

Dear Katie,

In response to the above noted, it is my recommendation that the Municipal Authority of Westmoreland County should object to the requirement that 94% of the combined sewer flows must be captured. Our objection should be based on the following:

The EPA CSO Control Policy lays out two alternative approaches to evaluate CSO controls: the presumption approach and the demonstration approach. Each approach has an overall objective to meet water quality standards and protect existing and designated uses. MAWC-Jeannette selected the presumption approach in which Jeannette presumed that if they met 85% capture then water quality guidelines were met based on EPA guidance.

The MAWC-Jeannette's LTCP evaluated various Options to fulfill the presumption approach, which requires (as one possible criterion) the elimination, or capture for treatment, of no less than 85% by volume, of the combined sewage collected in the CSS during precipitation events on a system-wide, annual average basis. Based on the developed model, these singular Options did not meet the 85% capture; therefore, MAWC-Jeannette had to combine several Options into various Alternatives. The selected Alternative resulted in the modeling predicting that the percentage capture would be **approximately** 94%, which meets the EPA CSO Control Policy presumptive approach criterion of 85% by volume capture. Please note that the percent capture by volume calculations were done within the developed PCSWMM model. Overall, the model is an estimation based on average rainfall, not actual rainfall.

A similar situation occurs with the EPA's secondary treatment rule. The secondary treatment rule says that a plan must provide 85% removal of BOD and TSS on a monthly average basis. It is a condition in every NPDES permit. (In the Jeannette Draft Permit, it is found in Part A, Item 2, Page 5).

A well operated plant can routinely achieve better than 85% removal. Just because a plant can achieve (say 94% removal), that does not mean that the permit requirement revises the removal threshold to 94%. The permit requirement stays at 85% removal in accordance with the secondary treatment rule.

In a previous email correspondence with Grace, during April of 2023, it was asked if MAWC-Jeannette had any calculations that proved a percentage lower than 94% achieved water quality standards. The LTCP did not state that MAWC-Jeannette needed to capture 94% by volume to meet water quality standards (demonstrative approach). The approximate 94% capture predicted by the model was strictly based on flow volumes and was not based on any stream sampling data evaluated with respect to meeting Water Quality Standards. Specifically, MAWC-Jeannette selected the presumptive approach plan in which it is presumed that if they met 85% by volume capture rate then

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water quality guidelines were met based on EPA guidance. The developed model predicted MAWC-Jeannette could capture 94% by volume which is greater than or equal to EPA guidance of 85% capture by volume; hence, fulfilling the presumption approach. This plan meets the "no less than 85%" criterion. In summary, based on the new draft amendment, it seems that the EPA and DEP are raising the percent based on the demonstrative approach. Furthermore, LTCP improvements include the removal of inflow/infiltration within areas of Jeannette. Determining/predicting the level of success of I/I removal is a gray area (in which fluctuations occur, hence "approximately"). As a result, the permit should not utilize a threshold/requirement of 94%; it should be "no less than 85%" as required by PA DEP/DEP.

Please contact me should you have any questions or require any additional information.

Very truly yours,

GIBSON-TOMAS ENGINEERING CO., INC.



Daniel F. Schmitt, P.E.

DFS/dld

Cc: Municipal Authority of Westmoreland County – Mike Kukura  
Municipal Authority of Westmoreland County – Norm Stout

## ATTACHMENT D

### MAWC Request for Extended LTCP Schedule

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An Equal Opportunity Employer 124 Park and Pool Road  
New Stanton, PA 15672  
Phone: 724.755.5800  
1.800.442.6829



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Mailing Address  
P.O. Box 730  
Greensburg, PA 15601

[www.mawc.org](http://www.mawc.org)  
[mawc@mawc.org](mailto:mawc@mawc.org)

Regional Water ▲ Wastewater Services

September 28, 2023

Ms. Stephanie Conrad  
PA DEP Clean Water Program  
400 Waterfront Drive  
Pittsburgh, PA 15222

Re: Jeannette WWTP (PA0027430)  
Third Draft NPDES Permit Comments  
LTCP Implementation Schedule Extension Request

Dear Ms. Conrad:

MAWC would like to request that the Jeannette LTCP Implementation Schedule deadlines be extended as follows:

Milestone	Completion Date
Begin construction of Option 4a/9a as authorized by the WQM Part II Permit	January 1, 2025
Complete construction of Option 4a/9a as authorized by the WQM Part II Permit	May 1, 2026
Begin construction of remaining projects as authorized by the WQM Part II Permit	January 1, 2025
Complete construction of remaining projects as authorized by the WQM Part II Permit	May 1, 2026
Submit to the Department a complete and accurate Post-Construction Compliance Monitoring Plan (PCCMP)	October 31, 2026

The deadlines currently listed in the draft NPDES permit were originally proposed by MAWC in March 2023, but unfortunately the approval process for RUS funding has not progressed as far as MAWC had expected by this point.

If you have any questions or would like to discuss this request, please contact me at [kwarheit@mawc.org](mailto:kwarheit@mawc.org) or 724-454-0233.

Sincerely,

*Katelyn Warheit*

Katelyn Warheit  
Environmental Compliance Superintendent  
Municipal Authority of Westmoreland County