

Application Type  
 Facility Type  
 Major / Minor

Renewal  
Sewage  
Minor
**NPDES PERMIT FACT SHEET  
ADDENDUM**

 Application No. PA0030406  
 APS ID 914413  
 Authorization ID 1389423
**Applicant and Facility Information**
**PA Department of Correctional Laurel  
Highlands State Correctional  
Institution**

Applicant Name	<u>PA Department of Correctional Laurel Highlands State Correctional Institution</u>	Facility Name	<u>Sci Laurel Highlands</u>
Applicant Address	<u>5706 Glades Pike PO Box 631</u>	Facility Address	<u>PO Box 631 5706 Glades Pike</u>
	<u>Somerset, PA 15501-8302</u>		<u>Somerset, PA 15501-0631</u>
Applicant Contact	<u>Melissa Hainsworth</u>	Facility Contact	<u>David Ponczek</u>
Applicant Phone	<u>(814) 445-6501</u>	Facility Phone	<u>(814) 445-6501</u>
Client ID	<u>132681</u>	Site ID	<u>241506</u>
SIC Code	<u>4952</u>	Municipality	<u>Somerset Township</u>
SIC Description	<u>Trans. &amp; Utilities - Sewerage Systems</u>	County	<u>Somerset</u>
Date Published in PA Bulletin	<u>April 20, 2024</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>May 19, 2024</u>	If No, Reason	<u>Discharge to a TMDL waters</u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>		

**Internal Review and Recommendations**

The first draft permit was sent on 4/3/2024. The public notice was published in the PA Bulletin on 4/20/2024. The following comments were received on 5/2/2024 from EPA (see page 11) during the comment period which ended on 5/19/2024. The following EPA comments were shared with the applicant via email on May 21, 2024. The applicant responded back with a phone call on May 30, 2024.

**EPA Comment 1:** A typo on page 17 of the fact sheet for Phenol has a value of 0.15. The permit has the correct value of 0.015 for a monthly average.

**DEP Response:** The comment is acknowledged. No changes are needed to the permit effluent limitations as a result of this comment.

**EPA Comment 2:** Since the STP receives a significant amount of landfill leachate, the fact sheet notes it considered the Landfills ELG to evaluate TBELs for the STP discharge. What was the basis for PADEP not considering technology-based limits for zinc? The basis for the case-by-case TBELs should be fully documented in the fact sheet.

**DEP Response:** The Mostoller landfill is an Industrial User of SCI Laurel Highlands, and therefore, is subject to national standards of the pretreatment program under 40 CFR Part 403. Case-by-case TBELs were developed for alpha-terpineol, benzoic acid, p-cresol, and phenol during the previous permit term based on the landfill point source category per 40 CFR Part 445. Total Zinc limit or monitoring was not imposed during the previous permit term. During the renewal permit evaluation, discharge concentrations for alpha-terpineol, benzoic acid, p-cresol, phenol, and total zinc were evaluated for

Approve	Return	Deny	Signatures	Date
X			 Hazim Aldalli / Environmental Engineering Specialist	November 22, 2024
X			 Mahbuba Iasmin, Ph.D. P.E. / Environmental Engineering Manager	December 16, 2024

reasonable potential to exceed Water Quality Standards (WQSSs) using PADEP's Toxicity Management Spreadsheet (TMS). No limitation and/or reporting requirements were recommended for all of these parameters based on the maximum reported discharge concentrations in the permit renewal application. TBELs for alpha-terpineol, benzoic acid, p-cresol, and phenol have been carried over to the renewed permit. Because the permittee had limit exceedances for alpha-terpineol, benzoic acid, p-cresol, and phenol at least once during the last permit term, the TBEL for Total Zinc will also be applied at Outfall 001 as the most stringent limitation between TBEL and WQBEL. The TBELs for Total Zinc include an AML of 0.11 mg/L and an IMAX of 0.2 mg/L adopted from 40 CFR Part 445. Since the permittee has three years to comply with a number of other new or more stringent toxic parameters, the Department will allow the permittee a three years of compliance schedule for Total Zinc new limit.

*EPA Comment 3:* In the fact sheet the Summary of Review for Mostoller Landfill concludes with "this facility has EPA waiver for pretreatment." Can DEP please clarify what it means by waiver? EPA generally does not waive a pretreatment program. However, EPA has the authority to not require a program if it is not found to be necessary at the time of the evaluation. Please provide some clarification on what is meant by this statement.

*DEP Response:* The sentence was incorrectly added to the Fact Sheet, and therefore, will be considered removed.

*EPA Comment 4:* In the application the permittee has incorrectly checked the "Non-Significant Categorical Industrial User" box and checked the box "yes" indicating that the permittee has an EPA Approved Pretreatment Program. This is incorrect. There are no categorical pretreatment standards for landfills and the POTW is not designated as having an approved pretreatment program defined in 40 CFR Part 403.

*DEP Response:* DEP acknowledges the comment and has shared with the applicant to ensure application accuracy.

*EPA Comment 5:* Page 3 of the fact sheet states EPA's pretreatment program can help with the effort of having this STP back in compliance with the NPDES requirements. This discussion implies that the landfill, an indirect discharger, is causing pass-through at the POTW. If so, EPA may need to require this facility to develop a pretreatment program in accordance with 40 CFR § 403.8(a); however, EPA would like to have a discussion with PADEP to determine the appropriate next steps. It is noted that the fact sheet contains 9 pages outlining 195 violations, including violations for parameters found in 40 CFR Part 445, Subpart B -RCRA Subtitle D Non-Hazardous Waste Landfill, pollutants of concern discharged by landfills.

*DEP Response:* EPA decided not to impose a requirement to develop a pretreatment program to SCI-Laurel Highlands facility and notified DEP via email on November 5, 2024.

*EPA Comment 6:* The EPA offers the following recommendation based on EPA's Memorandum for Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs (Memo) published in December 2022, see attached. Because landfills were identified as a category expected or suspected of PFAS dischargers and may likely contain more extensive PFAS contamination, EPA recommends that the draft permit include monitoring for PFAS and require the implementation of BMPs, where applicable as described in the Memo. If it is determined that this facility needs to develop a pretreatment program, EPA has developed language that would need to be imposed in the permit regarding monitoring for PFAS parameters. It will probably be necessary to determine the status of the pretreatment program prior to determining the PFAS monitoring requirements for this permit and any necessary updates to the fact sheet rationale.

*DEP Response:* EPA decided not to impose a requirement to develop a pretreatment program to the SCI-Laurel Highlands facility. The landfill continues to send its leachate to the STP which is considered a potential source of PFAS. In accordance with PADEP's SOP No. BCW-PMT-033 revised February 5, 2024, monitoring for four PFAS parameters (PFOA, PFOS, PFBS and HPFO-DA) has been included in Part A of the Re-Draft Permit. The permittee shall conduct monitoring at its treatment plant that includes annual effluent analysis for the 4 PFAS parameters detectable by EPA Method 1633. Monitoring data for any analytes listed in EPA Method 1633 shall be summarized and submitted as part of the Annual Report. Additionally, Part B.D.4 has been added to the Re-Draft Permit under General Pretreatment Requirements.

As a result of the changes made to the permit, the Department has decided to issue a redraft. Issuance of the Re-Draft permit is recommended.

**Proposed Effluent Limitations and Monitoring Requirements**

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (362-0400-001), SOPs and/or BPJ.

**Outfall 001, Effective Period: Permit Effective Date through End of Thirty-Sixth (36<sup>th</sup>) Month Following Permit Issuance.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (µg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Antimony	Report	XXX	XXX	Report	Report	XXX	1/week	24-Hr Composite
Total Arsenic	Report	XXX	XXX	Report	Report	XXX	1/week	24-Hr Composite
Total Boron (mg/L)	Report	XXX	XXX	Report	Report	XXX	1/week	24-Hr Composite
Total Cadmium	Report	XXX	XXX	Report	Report	XXX	1/week	24-Hr Composite
Total Zinc (mg/L)	XXX	XXX	XXX	Report	Report	Report	1/week	24-Hr Composite
Dissolved Iron	Report	XXX	XXX	Report	Report	XXX	1/week	24-Hr Composite
Total Thallium	Report	XXX	XXX	6.0	9.0	15	1/week	24-Hr Composite

Compliance Sampling Location: Outfall 001.

Other Comments: None.

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The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (362-0400-001), SOPs and/or BPJ.

**Outfall 001, Effective Period: Beginning of Thirty Seventh (37<sup>th</sup>) Month Following Permit Issuance through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (µg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Total Antimony	0.024	XXX	XXX	5.65	8.81	XXX	1/week	24-Hr Composite
Total Arsenic	0.042	XXX	XXX	10.1	15.7	XXX	1/week	24-Hr Composite
Total Boron (mg/L)	6.73	XXX	XXX	1.614	2.519	XXX	1/week	24-Hr Composite
Total Cadmium	0.002	XXX	XXX	0.52	0.82	XXX	1/week	24-Hr Composite
Total Zinc (mg/L)	XXX	XXX	XXX	0.11	Report	0.2	1/week	24-Hr Composite
Dissolved Iron	1.26	XXX	XXX	303	472	XXX	1/week	24-Hr Composite
Total Thallium	0.001	XXX	XXX	0.24	0.38	XXX	1/week	24-Hr Composite

Compliance Sampling Location: Outfall 001.

Other Comments: None.

**Proposed Effluent Limitations and Monitoring Requirements**

The limitations and monitoring requirements specified below are proposed for the draft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (362-0400-001), SOPs and/or BPJ.

**Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.**

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	0.50	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Recorded
pH (S.U.)	XXX	XXX	6.0	XXX	9.0 Max	XXX	1/day	Grab
DO	XXX	XXX	6.0	XXX	XXX	XXX	1/day	Grab
UV Transmittance (%)	XXX	XXX	Report	XXX	XXX	XXX	1/day	Measured
CBOD5	104.2	158.4	XXX	25	38 Wkly Avg	50	1/week	24-Hr Composite
TSS	125.2	187.8	XXX	30	45 Wkly Avg	60	1/week	24-Hr Composite
BOD5 Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	1/week	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	1/week	Grab
Ammonia-Nitrogen Nov 1 - Apr 30	10.8	16.2	XXX	2.6	3.9 Wkly Avg	5.2	1/week	24-Hr Composite
Ammonia-Nitrogen May 1 - Oct 31	7.9	12.09	XXX	1.9	2.9 Wkly Avg	3.8	1/week	24-Hr Composite
Phenol	XXX	XXX	XXX	0.015	0.026 Wkly Avg	0.037	2/month	24-Hr Composite
a-Terpineol	XXX	XXX	XXX	0.016	0.033 Wkly Avg	0.04	2/month	24-Hr Composite
Benzoic Acid	XXX	XXX	XXX	0.071	0.120 Wkly Avg	0.15	2/month	24-Hr Composite

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) <sup>(1)</sup>		Concentrations (mg/L)				Minimum <sup>(2)</sup> Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
p-Cresol	XXX	XXX	XXX	0.014	0.025 Wkly Avg	0.035	2/month	24-Hr Composite
Total Iron	12.5	XXX	XXX	3.0	4.5	6.0	1/week	24-Hr Composite
Total Manganese	14.6	XXX	XXX	3.5	5.2	7.0	1/week	24-Hr Composite
Total Chromium III	XXX	XXX	XXX	Report	Report	XXX	1/week	24-Hr Composite
Total Cobalt	XXX	XXX	XXX	Report	Report	XXX	1/week	24-Hr Composite
Total Copper	XXX	XXX	XXX	0.04	0.06	0.08	1/week	24-Hr Composite
Total Nickel	XXX	XXX	XXX	Report	Report	XXX	1/week	24-Hr Composite
Total Nitrogen	XXX	XXX	XXX	Report Avg. Qrtly	Report	XXX	1/quarter	24-Hr Composite
Total Phosphorus	XXX	XXX	XXX	Report Avg. Qrtly	Report	XXX	1/quarter	24-Hr Composite
Total Aluminum	XXX	XXX	XXX	Report	Report	XXX	1/week	24-Hr Composite
<i>E. Coli</i> (No./100ml)	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab
PFOA* (ng/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab
PFOS* (ng/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab
HFPO-DA* (ng/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab
PFBS* (ng/L)	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab

\* 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.

Compliance Sampling Location: at Outfall 001.

## NOTICES

### DEPARTMENT OF ENVIRONMENTAL PROTECTION

#### Applications, Actions and Special Notices

##### APPLICATIONS

[54 Pa.B. 2101]  
[Saturday, April 20, 2024]

#### 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).

Section	Category
I	Individual and General WQM Permit Applications/NOIs Received, General NPDES Permit NOIs Received, and All Transfer and Minor Amendment Applications/NOIs Received
II	Individual NPDES Permits—New, Renewal, and Major Amendment Applications and Draft Permits for Discharges Relating to Sewage, Industrial Waste, Industrial Stormwater, MS4s, Pesticides and CAFOs
III	Individual NPDES Permit Applications for Discharges of Stormwater Associated with Construction Activity

Section I identifies the following applications and NOIs that have been received by DEP:

- Individual and General WQM Permit Applications Received—DEP provides a 15-day public comment period for Individual WQM Permit Applications for new and reissued permits. There is no public comment period for General WQM Permit NOIs.
- General Chapter 92a NPDES Permit NOIs Received—There is no public comment period for General NPDES NOIs received.
- All Transfer and Minor Amendment Applications/NOIs Received—Transfer and Minor Amendment Applications/NOIs received for Individual and General WQM Permits and Individual and General NPDES Permits, excluding PAG-01 and PAG-02, are identified but do not have public comment periods. DEP provides a 15-day public comment period for Individual WQM Permit Applications for

*Southwest Regional Office*

**PA0030406**, Sewage, SIC Code 4952, PA Department of Correctional Laurel Highlands State Correctional Institution, 5706 Glades Pike, Somerset, PA 15501-8302. Facility Name: SCI Laurel Highlands STP. This existing facility is located in Somerset Township, Somerset 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), Unnamed Tributary to East Branch Coxes Creek (TSF), is located in State Water Plan watershed 19-F and is classified for Trout Stocking Fishes, 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 0.5 MGD.—Interim Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)		Daily				
	Average	Monthly	Average	Weekly	Minimum	Average	Monthly	Maximum	IMAX
Antimony, Total (ug/L)	Report	XXX	XXX	Report	Report	Report	XXX		
Arsenic, Total (ug/L)	Report	XXX	XXX	Report	Report	Report	XXX		
Boron, Total	Report	XXX	XXX	Report	Report	Report	XXX		
Cadmium, Total (ug/L)	Report	XXX	XXX	Report	Report	Report	XXX		
Iron, Dissolved (ug/L)	Report	XXX	XXX	Report	Report	Report	XXX		
Thallium, Total (ug/L)	Report	XXX	XXX		6.0	9.0	15		

The proposed effluent limits for Outfall 001 are based on a design flow of 0.5 MGD.—Final Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)		Daily				
	Average	Monthly	Average	Weekly	Minimum	Average	Monthly	Maximum	IMAX
Antimony, Total (ug/L)	0.024	XXX	XXX		5.65	8.81	XXX		
Arsenic, Total (ug/L)	0.042	XXX	XXX		10.1	15.7	XXX		
Boron, Total	6.73	XXX	XXX		1.614	2.519	XXX		
Cadmium, Total (ug/L)	0.002	XXX	XXX		0.52	0.82	XXX		
Iron, Dissolved (ug/L)	1.26	XXX	XXX		303.0	472.0	XXX		
Thallium, Total (ug/L)	0.001	XXX	XXX		0.24	0.38	XXX		

The proposed effluent limits for Outfall 001 are based on a design flow of 0.5 MGD.—Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)		Daily			
	Weekly	Average	Average	Minimum	Average	Monthly	Maximum	IMAX
Flow (MGD)		0.50	Report	XXX	XXX	XXX	XXX	XXX

Daily Max						
pH (S.U.)	XXX	XXX	6.0	XXX	9.0	XXX
Dissolved Oxygen	XXX	XXX	6.0	XXX	XXX	Max
Carbonaceous Biochemical Oxygen Demand (CBOD <sub>5</sub> )	104.2	158.4	XXX	25	38	50
Biochemical Oxygen Demand (BOD <sub>5</sub> ) Raw Sewage Influent	Report	Report	XXX	Report	XXX	Wkly Avg
Total Suspended Solids	125.2	187.8	XXX	30	45	60
Total Suspended Solids Raw Sewage Influent	Report	Report	XXX	Report	XXX	Wkly Avg
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2,000	XXX	10,000
May 1 - Sep 30	XXX	XXX	XXX	200	XXX	1,000
Ultraviolet light transmittance (%)	XXX	XXX	Report	XXX	XXX	XXX
Ammonia-Nitrogen Nov 1 - Apr 30	10.8	16.2	XXX	2.6	3.9	5.2
May 1 - Oct 31	7.9	12.09	XXX	1.9	2.9	3.8
Aluminum, Total	XXX	XXX	XXX	Report	Report	XXX
Chromium III, Total	XXX	XXX	XXX	Report	Report	XXX
Cobalt, Total	XXX	XXX	XXX	Report	Report	XXX
Copper, Total	XXX	XXX	XXX	0.04	0.06	0.08
Iron, Total	12.5	XXX	XXX	3.0	4.5	6
Manganese, Total	14.6	XXX	XXX	3.5	5.2	7
Nickel, Total	XXX	XXX	XXX	Report	Report	XXX
Zinc, Total	XXX	XXX	XXX	Report	Report	XXX
Phenol	XXX	XXX	XXX	0.015	0.026	0.037
<i>a</i> -Terpineol	XXX	XXX	XXX	0.016	0.033	0.04

Benzoic Acid	XXX	XXX	XXX	0.071	0.120	0.15
p-Cresol	XXX	XXX	XXX	0.014	0.025	0.035

The proposed effluent limits for Outfall 001 are based on a design flow of 0.5 MGD.—Limits.

Parameters	Mass Units (lbs/day)			Concentrations (mg/L)		
	Weekly		Daily		Average Monthly	
	Average	Monthly	Average	Monthly	Maximum	IMAX
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report
Total Nitrogen	XXX	XXX	XXX	Report	Report	XXX
				Avg	Qrtly	
Total Phosphorus	XXX	XXX	XXX	Report	Report	XXX
				Avg	Qrtly	

In addition, the permit contains the following major special conditions:

- WQBELs Below Quantitation Limits

The following parameter is subject to water quality-based effluent limits (WQBELs) in Part A of this permit that are necessary to comply with State water quality standards but may be less than quantitation limits (QLs), as defined in 25 Pa. Code § 252.1.

**Parameter Name DEP Quantitation Limit**

Total Thallium 2 ug/L

- Toxics Reduction Evaluation (TRE)

The permittee shall conduct a TRE for the newly developed WQBELs in accordance with DEP's Water Quality Toxics Management Strategy, Appendix C, Permittee Guidance for Conducting a Toxics Reduction Evaluation (TRE) (361-0100-003).

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

This permit is a Non EPA Waiver due to discharge to a TMDL stream.

Attachment A  
EPA Correspondence

**Aldalli, Hazim**

---

**From:** Fulton, Jennifer <Fulton.Jennifer@epa.gov>  
**Sent:** Thursday, May 2, 2024 4:13 PM  
**To:** Aldalli, Hazim  
**Cc:** Iasmin, Mahbuba; Furjanic, Sean; Schumack, Maria; Moncavage, Carissa (she/her/hers); Hales, Dana; Shuart, Ryan; Camperson, Joseph  
**Subject:** [External] SCI Laurel Highlands STP, PA0030406

**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](#).

Hazim,

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

**SCI Laurel Highlands STP**

**PA Department of Correctional Laurel Highlands State Correctional Institution**

**NPDES Number: PA0030406**

**EPA Received: April 5, 2024**

**30-day response due date: May 5, 2024**

This is a minor permit that discharges to an Unnamed Tributary of East Branch Coxes Creek. EPA has chosen to perform a limited review of the draft permit based on the and wasteload allocation (WLA) requirements of the approved Coxes Creek Watershed TMDL, TBEL development, RP analysis (or TMS), and PFAS parameters requirements. EPA has completed its review and offers the following comments:

1. A typo on page 17 of the fact sheet for Phenol has a value of 0.15. The permit has the correct value of 0.015 for a monthly average.
2. Since the STP receives a significant amount of landfill leachate, the fact sheet notes it considered the Landfills ELG to evaluate TBELs for the STP discharge. What was the basis for PADEP not considering technology-based limits for zinc? The basis for the case-by-case TBELs should be fully documented in the fact sheet.
3. In the fact sheet the Summary of Review for Mostoller Landfill concludes with "this facility has EPA waiver for pretreatment." Can DEP please clarify what it means by waiver? EPA generally does not waive a pretreatment program. However, EPA has the authority to not require a program if it is not found to be necessary at the time of the evaluation. Please provide some clarification on what is meant by this statement.
4. In the application the permittee has incorrectly checked the "Non-Significant Categorical Industrial User" box and checked the box "yes" indicating that the permittee has an EPA Approved Pretreatment Program. This is incorrect. There are no categorical pretreatment standards for landfills and the POTW is not designated as having an approved pretreatment program defined in 40 CFR Part 403.

5. Page 3 of the fact sheet states EPA's pretreatment program can help with the effort of having this STP back in compliance with the NPDES requirements. This discussion implies that the landfill, an indirect discharger, is causing pass-through at the POTW. If so, EPA may need to require this facility to develop a pretreatment program in accordance with 40 CFR § 403.8(a); however, EPA would like to have a discussion with PADEP to determine the appropriate next steps. It is noted that the fact sheet contains 9 pages outlining 195 violations, including violations for parameters found in 40 CFR Part 445, *Subpart B -RCRA Subtitle D Non-Hazardous Waste Landfill*, pollutants of concern discharged by landfills.
6. The EPA offers the following recommendation based on EPA's Memorandum for Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs (Memo) published in December 2022, see attached. Because landfills were identified as a category expected or suspected of PFAS dischargers and may likely contain more extensive PFAS contamination, EPA recommends that the draft permit include monitoring for PFAS and require the implementation of BMPs, where applicable as described in the Memo. If it is determined that this facility needs to develop a pretreatment program, EPA has developed language that would need to be imposed in the permit regarding monitoring for PFAS parameters. It will probably be necessary to determine the status of the pretreatment program prior to determining the PFAS monitoring requirements for this permit and any necessary updates to the fact sheet rationale.

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary. Please contact Joe Camperson on my staff via telephone at 215-814-5784 or via electronic mail at [camperson.joseph@epa.gov](mailto:camperson.joseph@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](mailto:fulton.jennifer@epa.gov)

