pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office
CLEAN WATER PROGRAM

NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE

Application Type	**Renewal**	Application No.	**PA0034614**
Facility Type	**Non-Municipal**	APS ID	**1005078**
Major / Minor	**Minor**	Authorization ID	**1294367**

Applicant and Facility Information

Applicant Name	**DP 116, LLC**	Facility Name	**Mountain Pines RV Resorts**
Applicant Address	333 North Bedford Road, Suite 145	Facility Address	1662 Indian Creek Valley Road
	Mount Kisco, NY 10549		Champion, PA 15622-3057
Applicant Contact	James Diamond	Facility Contact	Jeffrey Rober
Applicant Phone	(724) 455-7411	Facility Phone	724-779-4777
Client ID	353389	Site ID	336171
Ch 94 Load Status	Not Overloaded	Municipality	Saltlick Township
Connection Status		County	Fayette
Date Application Received	June 20, 2019	EPA Waived?	Yes
Date Application Accepted	November 1, 2019 (1)	If No, Reason	

(1) The application was not accepted until a later date because there were administrative issues that needed to be resolved.

Purpose of Application: Renew and transfer NPDES Permit.

Summary of Review

The permittee has applied for a renewal of NPDES Permit No. PA0034614. NPDES Permit No. PA0034614 was previously issued by the PA Department of Environmental Protection (DEP) on December 11, 2014. That permit expires on December 31, 2019. The renewal application was received on June 21, 2019; however, DEP realized the permit application was not submitted by the correct owner. A transfer application was requested and accepted on November 1, 2019. The permit is therefore being renewed and transferred simultaneously.

NPDES Permit PA0034614 was previously issued to Morgan RV Resorts. The permit is being renewed and transferred to DP 116, LLC. The name of the facility will remain Mountain Pines RV Resort STP. WQM Permit No. 2673408 A-1 T-1 is also being transferred to DP 116, LLC and the permit number will be 2673408 A-1 T-2.

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Approve	Deny	Signatures	Date
x		David R. Ponchione / Project Manager	November 12, 2019
x		Donald J. Leone, P.E. / Environmental Engineer Manager	

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	001	Design Flow (MGD)	0.035
Latitude	40º 3' 42"	Longitude	-79º 21' 42"
Quad Name	Seven Springs	Quad Code	1811
Wastewater Description:	Sewage Effluent		
Receiving Waters	Indian Creek (HQ-CWF)	Stream Code	38325
NHD Com ID	69915897	RMI	18.5
Drainage Area	32.5	Yield (cfs/mi^2)	0.046
Q_{7-10} Flow (cfs)	1.48	Q_{7-10} Basis	Bulletin 12, Station 03082100
Elevation (ft)		Slope (ft/ft)	0.005
Watershed No.	19-E	Chapter 93 Class.	HQ-CWF
Exceptions to Use	None	Exceptions to Criteria	None
Assessment Status	Attaining Use(s)		

Changes Since Last Permit Issuance: None

Other Comments:

During preparation of this pollution report, this writer questioned why secondary limits were imposed in the most recent and prior NPDES permits for a stream previously and currently classified in PA Code 25, Chapter 93 as a High-Quality Cold-Water Fishery (HQ-CWF). This writer explored eMaps which shows the stream is considered high-quality waters and that Indian Creek at the discharge location is attaining its use. Color printouts of the stream reflect this information and are included in the pollution report.

This writer uncovered a memorandum prepared by former DEP Aquatic Biologist Russell Stutzman dated April 4, 1997 in the 1997 NPDES permit file in response to former permit writer Karen Crowley's request for him to survey the stream. He felt the stream should not have been classified as a HQ stream because it was impacted by mine drainage. DEP subsequently developed permit limits to protect a cold-water fishery designation in lieu of a HQ-CWF designation.

This writer reached out to current DEP Aquatic Biologist Richard Spear to get his professional guidance whether the stream should be considered a HQ stream. He confirmed per his enclosed November 7, 2019 email that the stream must be considered a HQ-CWF. He explained that Mr. Stutzman erred in recommending the stream be re-classified to a CWF and that the NPDES permit limits should have been developed based on the stream being classified as HQ all along. He explained the Sanitary Water Board established the protected designated uses through public hearings. This was pre-Department (Department of Environmental Resources at that time) and pre-Clean Water Act. Because the Department does not have data on Indian Creek before November 28, 1975 (Clean Water Act requirement) that shows that the HQ designation was never attained the designation cannot be changed. The designated use is the instream water quality goal and it does not have to be attained at the time of designation but needs to be an attainable use.

This writer did a further file research to determine why Ms. Crowley requested a stream survey in the first place. During this process, I learned that the original limits were based on Implementation Plan Standards and placed as a condition in Part II Permit No. 2673408. When the first NPDES permit was issued effluent limits were based on the discharge being in a HQ watershed and to an UNT of Indian Creek which was considered a drainage swale. Both sets of limits contained very stringent Ammonia-Nitrogen limits which the plant had trouble achieving. The outfall pipe was subsequently extended from the UNT (drainage swale) to Indian Creek to provide more dilution with the intention of the Ammonia-Nitrogen limits being relaxed. Ms. Crowley performed a more detailed watershed evaluation including three other plants for a discharge directly to Indian Creek basing her analysis on the actual quality of the stream at that time, which according to Mr. Spears was not the correct approach.

A WQM permit application is in-house to replace the existing STP. The design flow is the same. It is expected that the new plant will be completed by May 2020. This writer is recommending that the existing limits be imposed on the existing plant and the more stringent limits (basis described ahead) to go into effect when the new plant is completed since construction is expected to start shortly after the final NPDES permit is issued.

Treatment Facility Summary

Treatment Facility Name: Mountain Pines Campground

WQM Permit No.	Issuance Date
2673408	1973
2673408 A-1 T-2	Expected to be issued simultaneously with the final NPDES Permit PA0034614

Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary	Extended Aeration	Chlorine With Dechlorination	Approx. 0.017 mgd

Hydraulic Capacity (MGD)	Organic Capacity (lbs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposal
0.035	70	Not Overloaded	Dewatering	Other WWTP

Changes Since Last Permit Issuance: None

Other Comments:

The existing STP consists of the following unit processes:

- One flow equalization tank
- One extended aeration tank
- One clarifier tank
- One sludge holding/digestion tank
- A chlorine contact tank equipped with chlorine tablet disinfection. (Inspection reports indicate a de-chlorination unit exists. There is no record of a Part II amendment authorizing installation of the UV unit).
- A backwash sand filter that is not utilized

Due to the age and deterioration of the plant, it is being replaced. A WQM permit application is in-house and as of this writing the application is proposing the following components:

- Manually cleaned bar screens
- Primary and secondary flow equalization tanks
- Extended aeration tanks
- Hopper-style clarifiers equipped with airlift pumps
- Fixed media filters equipped with sludge removal pumps
- Ultraviolet disinfection
- Aerobic sludge holding tank

The permittee application will need to be reviewed to ensure the more stringent NPDES effluent limitations will consistently be achieved.

Compliance History

DMR Data for Outfall 001 (from October 1, 2018 to September 30, 2019)

Parameter	SEP-19	AUG-19	JUL-19	JUN-19	MAY-19	APR-19	MAR-19	FEB-19	JAN-19	DEC-18	NOV-18	OCT-18
Flow (MGD) Average Monthly	0.031	0.033	0.031	0.030	0.025	0.011	0.005	0.003	0.003	0.004	0.010	0.024
pH (S.U.) Minimum	6.9	6.4	6.9	6.9	6.8	6.8	7.0	7.1	6.9	7.0	6.9	6.8
pH (S.U.) Maximum	6.8	6.9	7.1	7.2	7.1	7.1	7.1	7.2	7.1	7.0	7.0	7.0
DO (mg/L) Minimum	5.1	5.3	5.1	5.5	5.8	6.0	5.8	5.5	5.8	5.7	5.9	5.5
TRC (mg/L) Average Monthly	0.3	0.3	0.3	0.3	0.3	0.3	0.2	0.2	0.3	0.3	0.4	0.3
TRC (mg/L) Instantaneous Maximum	0.6	0.4	0.5	0.3	0.5	0.5	0.4	0.4	0.5	0.3	0.8	0.5
CBOD5 (mg/L) Average Monthly	< 5	< 5	5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5
CBOD5 (mg/L) Instantaneous Maximum	< 5	< 5	5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5
TSS (mg/L) Average Monthly	8	< 5	5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5
TSS (mg/L) Instantaneous Maximum	11	< 5	5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5	< 5
Fecal Coliform (CFU/100 ml) Geometric Mean	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1	< 1
Total Nitrogen (mg/L) Daily Maximum										6.9		
Ammonia (mg/L) Average Monthly	1.15	1.15	1.15	1.5	0.05	1.15	0.05	0.05	0.15	0.05	0.05	0.05
Ammonia (mg/L) Instantaneous Maximum	1.15	1.15	1.15	1.5	0.05	1.15	0.05	0.05	0.15	0.05	0.05	0.05

Total Phosphorus (mg/L) Daily Maximum										4.7		

Compliance History

An Operations Compliance Check Summary Report was completed by Operations on November 7, 2019 (attached). There have been compliance issues with the sewage treatment plant in the past. A Notice of Violation is being closed out so that he renewal permit can be issued. A copy of the report is attached to this Fact Sheet.

Development of Effluent Limitations

Outfall No. 001 **Design Flow (MGD)** 0.035 (existing and proposed plant)
Latitude 40º 3' 42.00" **Longitude** -79º 21' 42.00"
Wastewater Description: Sewage Effluent

Technology-Based Limitations for current and proposed plant

The following technology-based limitations apply, subject to water quality analysis and BPJ where applicable:

Pollutant	Limit (mg/l)	SBC	Federal Regulation	State Regulation
pH	6.0 – 9.0 S.U.	Min – Max	133.102(c)	95.2(1)
Fecal Coliform (5/1 – 9/30)	200 / 100 ml	Geo Mean	-	92a.47(a)(4)
Fecal Coliform (5/1 – 9/30)	1,000 / 100 ml	IMAX	-	92a.47(a)(4)
Fecal Coliform (10/1 – 4/30)	2,000 / 100 ml	Geo Mean	-	92a.47(a)(5)
Fecal Coliform (10/1 – 4/30)	10,000 / 100 ml	IMAX	-	92a.47(a)(5)

Comments: The above limits are consistent with the previous NPDES permit.

Technology-Based Limitations for current plant and from permit effective date through April 30, 2020

Pollutant	Limit (mg/l)	SBC	Federal Regulation	State Regulation
$CBOD_5$	25	Average Monthly	133.102(a)(4)(i)	92a.47(a)(1)
	40	Average Weekly	133.102(a)(4)(ii)	92a.47(a)(2)
Total Suspended Solids	30	Average Monthly	133.102(b)(1)	92a.47(a)(1)
	45	Average Weekly	133.102(b)(2)	92a.47(a)(2)
Total Residual Chlorine	0.5	Average Monthly	-	92a.48(b)(2)

Comment: The discharge was previously modeled using WQAM63 to evaluate the $CBOD_5$, Ammonia Nitrogen and Dissolved Oxygen parameters. The modeling results for those parameters are based on a previously approved pollution report dated in year 1997 which is attached to this fact sheet. The modeling results show technology based effluent limitations for $CBOD_5$ were deemed appropriate. The modeling results show that Ammonia-Nitrogen and Dissolved Oxygen limitations were not deemed necessary to meet in-stream water quality criterion. The Total Suspended Solids, pH, Fecal Coliform, or Total Residual Chlorine parameters are not evaluated using WQAM63.

The Average Monthly and Instantaneous Maximum Total Residual Chlorine (TRC) effluent limitations imposed in the previous NPDES permit are 1.4 mg/l and 3.3 mg/l, respectively. At that time, those values were considered BAT limitations per the SWRO's TRC Implementation for Sewage Facilities Planning Section Interim Guidance, dated June 20, 1995 for an existing minor facility having a design flow <= 0.1 mgd permitted before July 1995. An average monthly limitation of 0.5 mg/l for TRC is now a regulatory standard under §§92a.47(a)(8) and 92a.48(b). Reviews of the Discharge Monitoring Reports reveal the plant consistently achieves the proposed average monthly limit of 0.5 mg/l therefore that limit will be imposed without a schedule. The TRC limits are not applicable beginning May 1, 2020 because the new plant will use UV disinfection.

Proposed Effluent Limitations for proposed plant beginning May 1, 2020

Although a new plant will be constructed, it is an existing discharge and the discharge volume is remaining the same (0.035 mgd). A Social or Economic Justification (SEJ) impact analysis is therefore not required as part of a proposed revision or update to the official municipal sewage facilities plan under Chapter 71.

This writer reviewed the water quality analysis performed on June 24, 1997. The Dissolved Oxygen Criteria used in the analysis was 7.0 mg/l. The current specific water quality criteria associated with the Statewide water uses listed in Title

25, Chapter 93, § 93.7, Table 3 is less stringent than 7.0 mg/l. A re-modeling analysis is therefore not necessary for this reason, and because the Ammonia-Nitrogen criteria have not changed.

Because the discharge is to a HQ stream, the more stringent of Antidegradation Best Available Combination of Technologies (ABACT) limits must be compared to limits determined by water quality modeling to protect the stream. Reference is made to Appendix B of the Water Quality Antidegradation Implementation Guidance included in the pollution report. The more stringent limits apply. For a STP rated at 35,000 gpd, ABACT limits are as follows:

Parameter	Average Monthly Limit (mg/l)
$CBOD_5$ (May 1 – Oct 31)	10
$CBOD_5$ (Nov 1 – Apr 30)	20
Suspended Solids	10
NH_3-N (May 1 – Oct 31)	3.0
NH_3-N (Nov 1 – Apr 30)	9.0

Disinfection should be accomplished using a method that leaves no detectable chlorine residual. Disinfection using ultra-violet light or other non-chlorine-based systems must be considered.

The above ABACT limits govern over those determined through water quality modeling efforts and thus will be imposed on the new STP.

Dissolved Oxygen

A Dissolved Oxygen minimum limitation of 4.0 mg/L will be implemented based on the standard in 25 PA Code Chapter 93 and best professional judgment. This is applied for an activated sludge system. This is an additional limit that was not previously imposed on the facility. DEP policy requires this parameter to be monitored daily.

Nutrients

A once per year Monitor and Report requirement for Total N and Total P was incorporated into the previous permit as per Chapter 92.a.61 and will be continued.

Fecal Coliform

The units for Fecal Coliform are now “No./100 ml” in lieu of “CFU/100 ml”.

Mass Loadings and Influent Monitoring

Mass loading limits and influent monitoring are not applicable for non-publicly owned treatment works.

Total Dissolved Solids (TDS) and its Major Constituents

The design flow of the sewage treatment plant is less than 0.1 mgd. Per current policy, Total Dissolved Solids and its major constituents are not a concern at this time for this reason.

Monitoring Frequency Considerations

For pH and Total Residual Chlorine (TRC), a monitoring frequency of “1/day” has been imposed, consistent with the previous NPDES permit. UV disinfection will be used for the new plant. DEP policy requires routine monitoring of UV intensity be at the same monitoring frequency that is used for TRC.

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: May 1, 2020 through Permit Expiration Date.

Parameter	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Average Monthly	Average Monthly	Maximum	Instant. Maximum		
Flow (MGD)	0.035	XXX	XXX	XXX	XXX	XXX	2/month	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	4.0 Inst Min	XXX	XXX	XXX	1/day	Grab
CBOD5 Nov 1 - Apr 30	XXX	XXX	20.0	XXX	XXX	40.0	2/month	Grab
CBOD5 May 1 - Oct 31	XXX	XXX	10.0	XXX	XXX	20.0	2/month	Grab
TSS	XXX	XXX	10.0	XXX	XXX	20.0	2/month	Grab
UV Transmittance (%)	XXX	XXX	Report Daily Min	XXX	XXX	XXX	1/day	Measured
Ammonia Nov 1 - Apr 30	XXX	XXX	9.0	XXX	XXX	18.0	2/month	Grab
Ammonia May 1 - Oct 31	XXX	XXX	3.0	XXX	XXX	6.0	2/month	Grab
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	2/month	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	2/month	Grab

Compliance Sampling Location: Outfall 01

Other Comments: Per the WQM permit application, the outfall location will remain when the new STP is constructed. Also, a UV system is proposed to replace the chlorine/dichlorination system that currently exists.

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 April 30, 2020.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Average Monthly	Average Monthly	Maximum	Instant. Maximum		
Flow (MGD)	0.035	XXX	XXX	XXX	XXX	XXX	2/month	Measured
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	4.0 Inst Min	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	0.5	XXX	XXX	1.6	1/day	Grab
CBOD5	XXX	XXX	25.0	XXX	XXX	50.0	2/month	Grab
TSS	XXX	XXX	30.0	XXX	XXX	60.0	2/month	Grab
Ammonia	XXX	XXX	Report	XXX	XXX	Report	2/month	Grab
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	2/month	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	2/month	Grab

Compliance Sampling Location: Outfall 001

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) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Maximum	Instant. Maximum		
Total Nitrogen	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab
Total Phosphorus	XXX	XXX	XXX	Report Daily Max	XXX	XXX	1/year	Grab

Compliance Sampling Location: Outfall 001

Pol Rep PA0034614