Pennsylvania Department of Environmental Protection

NORTHEAST REGIONAL OFFICE
CLEAN WATER PROGRAM

NPDES PERMIT FACT SHEET
SECOND DRAFT

Application Type	**Renewal**	Application No.	**PA0036081**
Facility Type	**Sewage**	APS ID	**636715**
Major / Minor	**Minor**	Authorization ID	**1424328**

Applicant and Facility Information

Applicant Name	**Lehigh County Authority**	Facility Name	**Wynnewood Wastewater Treatment Plant**
Applicant Address	1053 Spruce Road, PO Box 3348	Facility Address	1143 Wellington Circle
	Allentown, PA 18106-9408		Laurys Station, PA 18069
Applicant Contact	Andrew Moore	Facility Contact	Adam Lynn
Applicant Phone	(610) 597-8100	Facility Phone	(610) 703-7652
Client ID	67774	Site ID	448633
SIC Code	4952	Municipality	North Whitehall Township
SIC Description	Trans. & Utilities - Sewerage Systems	County	Lehigh
Date Published in PA Bulletin	February 10, 2024	EPA Waived?	Yes
Comment Period End Date	March 11, 2024	If No, Reason	-

Purpose of Application: Application for a renewal of an NPDES permit for discharge of treated sewage.

Internal Review and Recommendations

A first draft of this permit appeared in the PA Bulletin on February 10, 2024. The final permit could not be issued due to open violations for this facility. The violations have now been resolved; however, there still are 10 open violations for this client in the Clean Water Program.

A second draft of the NPDES Permit is being issued because 6 months (or 180 days) have elapsed since the first draft has been issued.

Comments were also received by the permittee via email dated February 7, 2024. The comments and response are below:

1. In the Effluent Limitations chart there is a new minimum removal percentage for CBOD of 85%. In the Additional Requirements #2 on page 4 it states, "The monthly average percent removal of BOD 5 or CBOD 5 and TSS must be at least 85% for POTW facilities on a concentration basis except where 25 Pa. Code 92a.47(g) and (h) are applicable to facilities with combined sewer overflows (CSOs) or as otherwise specified in this permit. (25 Pa. Code § 92a.47(a)(3)). Could you clarify if both BOD and CBOD are acceptable for the effluent limitation calculation?

   Response – The 85% CBOD5 minimum removal percentage has been added to the NPDES permit because it is required by the DRBC Docket. Therefore, it will be required to be sampled/calculated so that it can be reported to the DRBC. CBOD5 or BOD5 can be reported to met the NPDES Permit requirement for POTW facilities.

2. Page 4 of the permit states "The hydraulic design capacity of 0.0519 million gallons...." This should state 0.06 million gallons.

   Response – Page 4 has been updated to state 0.06 MGD.

Approve	Return	Deny	Signatures	Date
X			Allison S. Zukosky (signed) Allison S. Zukosky / Project Manager	December 17, 2024
X			Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Acting Engineer Manager	12-23-24

Internal Review and Recommendations

3. Page 4 of the permit states "The organic design of 108 lbs BOD..." This should state 135 lbs BOD

   Response – Page 4 has been updated to state 135 lbs BOD.

4. We have similar facilities that use UV disinfection. At those locations we are only required to monitor total chlorine residual on days where chlorine is used, as is stated in part C of the permit - "Where the permittee does not use chlorine for primary disinfection, but proposes the use of chlorine for backup disinfection, cleaning or other purposes, the permittee shall sample for TRC on each day in which chlorine is used." However, for those permits it also reads "Daily when Discharging" in the Minimum Measurement Frequency column in the Effluent Limitations chart. Is this something that could be added?

   Response – The minimum measurement frequency for Total Residual Chlorine (TRC) has been changed to "Daily when Discharging".

5. This is the first time E. Coli has been placed on one of our permits. Could you point us towards the correct standard method for this analysis?

   Response – According to the EPA Website, 1603.1 - Escherichia coli (E. coli) in Water by Membrane Filtration Using Modified membrane-Thermotolerant Escherichia coli Agar (Modified mTEC) is the approved method for E. Coli. (https://www.epa.gov/cwa-methods/approved-cwa-microbiological-test-methods)