Pennsylvania Department of Environmental Protection

SOUTHWEST REGIONAL OFFICE
CLEAN WATER PROGRAM

NPDES PERMIT FACT SHEET

Application Type	**Renewal**	Application No.	**PA0036293**
Facility Type	**Sewage**	APS ID	**1092845**
Major / Minor	**Major**	Authorization ID	**1447332**

Applicant and Facility Information

Applicant Name	**Municipal Authority of the Township of**	Facility Name	**Robinson Township WTP**
Applicant Address	4200 Campbells Run Road	Facility Address	4192 Campbells Run Road
	Pittsburgh, PA 15205-1306		Pittsburgh, PA 15205-1304
Applicant Contact	Neil Klingman	Facility Contact	
Applicant Phone	(412) 923-2333	Facility Phone	
Client ID	74269	Site ID	263698
SIC Code	4952	Municipality	Robinson Township
SIC Description	Trans. & Utilities - Sewerage Systems	County	Allegheny
Date Published in PA Bulletin	May 3, 2025	EPA Waived?	No
Comment Period End Date	Jun 3, 2025	If No, Reason	

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

Internal Review and Recommendations

The draft permit was published to PA Bulletin on May 3, 2025. Comments were received from applicant and from EPA prior to the expiration of the comment period. No other comments were received.

The response to these comments will include changes to the implementation of effluent limitations that necessitate publication of a draft permit. The remainder of this fact sheet contains the changes to proposed effluent limitations and the comments with DEP responses. With the review of comments detailed below, issuance of the draft permit is recommended.

Comments by EPA

One EPA Comment was received for the NPDES Major Sewage draft permit.

EPA Comment

Page 21 of the fact sheet indicates that the WET TIWCc is 98% with the respective dilution series, while the permit includes a TIWC of 94% and the related dilution series. Since the fact sheet calculations appear correct, it seems that the TIWCc and dilution series in the permit are most likely a typographical error.

Approve	Return	Deny	Signatures	Date
x			John Price Jack Price / Environmental Engineering Specialist	November 20, 2025
x			Mahbuba Iasmin Mahbuba Iasmin, Ph.D., P.E./Environmental Engineer Manager	November 21, 2025

Internal Review and Recommendations

DEP Response

The fact sheet contains the correct TIWC and dilution series. The permit document has been corrected to match the intended calculated value.

Comments by Applicant

Applicant Comments will be followed by the response.

Applicant Comment 1: Receiving Waters Point of First Use

The Draft Permit changed the point of first use for Outfall 001 from Chartiers Creek to Campbells Run and due to this change, the Draft Permit includes more stringent effluent limitations due to the lower assimilative capacity of Campbells Run. We have several concerns with this change.

First, the first page (the cover page) of the Draft Permit states that MATR is authorized to discharge to an "Unnamed Tributary to Chartiers Creek." The first page of the current permit issued on January 24, 2019, states that MATR is authorized to discharge to "Campbells Run." Did the Department use an unnamed tributary to Chartiers Creek rather than Campbells Run to develop effluent limits? If so, there is no indication in the Fact Sheet of an unnamed tributary to Chartiers Creek or of one having a point of first use; any such tributary would have very little assimilative capacity and would result in stringent effluent limits. If not, the Department should correct the cover page of the Draft Permit to show the true authorized point of discharge.

Second, assuming Campbells Run is the correct actual receiving water for purposes of the Draft Permit, according to the Department's Fact Sheet, the change in the point of first use to Campbells Run is apparently based on an Instream Comprehensive Evaluation (ICE) performed by Biologist Supervisor Rick Spear in November 2012. Mr. Spear determined that while Campbells Run was impaired based on the 2012 data, it does have an aquatic life use.

Attachment 2 of the Department's Fact Sheet contains more information on the point of first use determination. This information includes emails between Mr. Spear and Jack Price in May 2024 in which Mr. Price requests updates to the point of first use determination for Campbells Run because "[t]he most recent stream survey at the time of the last renewal was performed by [Mr. Spear] in 2012, which is longer than the 10 year period for these analyses to be used in permitting decisions." Mr. Spear responds by providing a report from January 3, 2013, concluding that the point of first use is Campbells Run, and not Chartiers Creek, based on the November 20, 2012, data. Thus, the Department did not provide any more recent data for this Draft Permit than it considered for previous NPDES permit renewals; it simply relied on old data. The November 20, 2012, data summarized in a January 3, 2013, transmittal memo is outside the 10- year period used for permitting decisions. We do not believe it is appropriate to rely on twelve- and-a-half-year-old data to designate Campbells Run as the point of first use, particularly when doing so has such a profound effect on the effluent limitations. The Department should use current data to justify its conclusion that Campbells Run is the point of first use. This issue is critically important to resolve because it drives the new, more stringent effluent limits of the Draft Permit, which (unless justified) will impose significant new facility upgrade costs on the MATR's ratepayers.

DEP Response

To reiterate the information from the first draft permit, DEP has proposed a decision for this authorization on the following bases:

- That the permittee discharges directly to Campbells Run;
- That Campbells Run was found to have an aquatic life use in 2012;
- That the decision to set the point of compliance to Chartiers creek disregarded the finding of aquatic life;
- That the decision to disregard the finding of aquatic life was in error;
- That Campbells Run is a named perennial stream with a designated use of Warm Water Fishes, and therefore, the Department does not believe that another stream survey for Point of First Use determination is required;

Internal Review and Recommendations

25 Pa. Code Chapter 93.4(a) in quoted below states:

> "Except when otherwise specified in law or regulation, the uses set forth in Table 2 apply to all surface waters. These uses shall be protected in accordance with this chapter, Chapter 96 (relating to water quality standards implementation) and other applicable State and Federal laws and regulations."

Note: Table 2 includes the Warm Water Fishes designation.

25 Pa. Code Chapter 96.3(a) quoted below states:

> "Existing and designated surface water uses shall be protected."

It follows that the appropriate location for determination of water-quality based effluent limitations is therefore at the point of discharge. Please see the first draft permit and fact sheet for additional details which addressed this concern.

Applicant Comment 2: Monitoring Frequency •

Total Residual Chlorine, pH, and Dissolved Oxygen. Part A of the Draft Permit changed the monitoring frequency for Total Residual Chlorine (TRC) during the interim period (permit issuance through 36th month) and final period (37th month through permit expiration) and for pH and Dissolved Oxygen during the full permit term from once per weekday to once per day. It is costly and unnecessary to require sampling every day of the week; sampling during the weekdays provides sufficient information about the discharge without forcing MATR to incur excessive costs. Our monitoring data shows that the concentrations of TRC and Dissolved Oxygen and the pH of the discharge do not vary significantly over time. There is no need for daily monitoring. MATR requests that the monitoring frequency for TRC, pH, and Dissolved Oxygen be reduced from once per day to once per weekday, as the current permit requires.

Copper, Free Cyanide, Chlorodibromomethane, and Chloroform. Part A of the Draft Permit requires weekly monitoring for Copper, Free Cyanide, Chlorodibromomethane, and Chloroform during both the interim period and final period. Weekly monitoring of Copper, Free Cyanide, Chlorodibromomethane, and Chloroform is excessive and unnecessary during the interim period because the final effluent limits become effective 37 months after the Permit Effective Date. Collecting weekly data during the interim period will not change the final effluent limitations and, in effect, becomes merely sampling for the sake of sampling. MATR requests that the sampling frequency for Copper, Free Cyanide, Chlorodibromomethane, and Chloroform during the interim period be reduced from weekly to quarterly.

DEP Response

DEP finds the request to reduce monitoring frequencies to be reasonable. For TRC, pH, and Dissolved Oxygen there are no violations of effluent limitations in the past ten years. Therefore, monitoring for these three parameters will be changed to 1/weekday.

For Copper, Free Cyanide, Chlorodibromomethane and Chloroform, a 1/month monitoring frequency during the interim period is proposed, with a 2/month monitoring frequency during the final period to establish a monthly average. Additional monitoring during the interim period may be conducted as necessary to verify the performance of new systems and procedures. Please see the attached table of proposed effluent limitations.

Applicant Comment 3: Total Residual Chlorine

The Draft Permit reduces the average monthly and instantaneous maximum (IMAX) concentration limits for TRC from 0.5 mg/l and 1.3 mg/l to 0.011 mg/l and 0.037 mg/l, respectively, presumably because of the change in the receiving water. As stated above, the Department should use current data to justify its conclusion that Campbells Run is the point of first use before it establishes effluent limits on that basis.

Internal Review and Recommendations

To meet such stringent limits, MATR would have to add further dechlorination steps to the system or, alternatively, install UV disinfection in the chlorine tank. Installing a UV disinfection system would cost at least $500,000. Even after the three-year compliance schedule included in the Draft Permit, it is unlikely that the treatment system would be able to maintain TRC at 0.011 mg/l because of the volume of flow at the plant. MATR therefore requests that the concentration limits for TRC remain at 0.5 mg/l and 1.3 mg/l.

DEP Response

Campbells Run remains the Point of First Use and the receiving stream of the direct discharge as discussed in response to Comment 1. New chlorine limitations are based on modelling performed for the receiving stream. Therefore, the new limits will remain in the permit.

Applicant Comment 4: Dichlorobromomethane

The Fact Sheet for the Draft Permit states that "Dichlorobromomethane (DCBM) has been a recurring issue caused by insufficient pH control provided by manual addition of Soda Ash powder." Fact Sheet, Page 7. That is incorrect; pH at the Facility is within the correct range and pH control has not been insufficient.

Additionally, MATR is concerned with the Department's correlation between pH and DCBM. Treated effluent from the plant flows out of the clarifiers and travels down a drain through a pipe with a roughly 25-foot drop before discharging. MATR currently samples the treated effluent before the drop in which the treated effluent is mixed. Because DCBM volatilizes, MATR believes that the concentration of DCBM decreases after being agitated, but before discharge. MATR plans to conduct additional sampling in the clarifiers, in the drain, and at the physical point of discharge to the stream to better determine the concentration of DCBM in the treated effluent that reaches Campbells Run. MATR therefore asks the Department not to issue the Final Permit until sampling and additional analysis is complete.

DEP Response

While pH was within the range required by the NPDES Permit, non-compliance reports the Authority submitted to DEP have identified problems with Soda Ash and pH control as the contributing factor in five effluent violations. A list of non-compliance with effluent limitations for DCBM is included below. Please submit revised reports to Operations Staff if comments to DEP on these effluent violations were not factual and correct.

Regarding the intent to modify the physical location of the sampling for DCBM. Please be advised the new more representative location will require the same composite sampling procedure. Additionally, the Domestic Wastewater Facilities Manual 45.3 states “All outfalls shall be designed so that a sample of the effluent can be obtained at a point after the final treatment process and before discharge to or mixing with the receiving waters.” If substantial construction is necessary to achieve sampling the proposed physical sampling location, a WQM permit may be needed. Please be aware that the proposed additional monitoring must be reported in DMRs when performed at the effluent monitoring point for Outfall 001. Monitoring at any point between the final treatment process and the discharge point is reported on the monitoring point for Outfall 001. Please see 40 CFR 122.41(l)(4)(ii):

> *“If the permittee monitors any pollutant more frequently than required by the permit using test procedures approved under 40 CFR Part 136, or another method required for an industry-specific waste stream under 40 CFR subchapters N or O, the results of such monitoring shall be included in the calculation and reporting of the data submitted in the DMR or sludge reporting form specified by the Director.”*

Internal Review and Recommendations

NC ID	Event Start Date	Parameter	Reported Value		Permit Limit	Unit	Corrective Action	External Comments
209829	01/01/2024	Dichloro-bromo-methane	4.5	>	1.144	ug/L	See attached comments	PH. was low , increased PH. by adding soada *(sic)* ash .
202105	10/01/2023	Dichloro-bromo-methane	5.76	>	1.144	ug/L	Hired consultant for assistance	
153493	10/01/2021	Dichloro-bromo-methane	2.12	>	1.144	ug/L	Added supplemental alkalinity	was unable to add soda ash due to a supply problem.
149822	07/01/2021	Dichloro-bromo-methane	1.76	>	1.144	ug/L	Added supplemental alkalinity	also try to lower the air at the head of the aeration basins .
136403	01/01/2021	Dichloro-bromo-methane	1.15	>	1.144	ug/L	See attached comments	going to try to keep the PH up at 7.3 and decrease the air at the head of the plant.
126792	10/01/2020	Dichloro-bromo-methane	5.94	>	1.144	ug/L		
117084	04/01/2020	Dichloro-bromo-methane	7.67	>	1.144	ug/L	Increased chemical feed	was having a problem keeping the PH. up in the aeration basins reason unknown, increased the amount of soda ash to the aeration basins to try to get the PH. around 7.0 to 7.3 so to be back in compliance for the next quarterly sample.

Applicant Comment 5: Ammonia-Nitrogen and Cyanide

The Draft Permit includes effluent limitations for Ammonia-Nitrogen and Cyanide for the first time, presumably due to the change in the receiving waters to Campbells Run. As articulated above, the Department should use current data to justify its conclusion that Campbells Run is the point of first use before it establishes effluent limits on that basis.

Also, the three-year compliance schedule in the Draft Permit during which MATR must complete a study, construct, and implement treatment is too short given the work and potential plant upgrades that need to be accomplished. MATR requests that the compliance schedule be extended to four years to ensure that the Facility can plan and budget for the steps needed to meet the new limits, assuming the Department can establish Campbells Run is the appropriate point of first use.

Internal Review and Recommendations

DEP Response

Ammonia-Nitrogen limitations are now developed for new and reissued permits per the SOP for Effluent Limits Development. Ammonia-Nitrogen and Cyanide limitations are based on modelling performed for the receiving stream. Please see the response to Comment 1. The request to extend the interim period to four years is reasonable given the nature of the proposed changes to the effluent limitations. A schedule of compliance is included with this permit to establish final effluent limitations at the beginning of fifth year after the permit effective date.

Applicant Comment 6: Facility Contact.

The Facility Contact is currently listed on the Fact Sheet and in the transmittal letter as Frank Manslow. Frank Manslow left MATR in 2016. The Facility Contact should be listed as Neil Klingman, Compliance Coordinator.

DEP Response

DEP acknowledges this request and has revised documentation accordingly.

Applicant Comment 7: Applicant Name.

The Applicant Name is currently listed on the Fact Sheet, in the Draft Permit, in the transmittal letter, and in the public notice as the Robinson Township Municipal Authority. The Applicant Name and the Permittee Name should be corrected to the Municipal Authority of the Township of Robinson.

DEP Response

DEP acknowledges this request and has revised permitting documentation accordingly.

Applicant Comment 8: Interim Period

Interim Period. Additionally, MATR wanted to note that Part A of the Draft Permit incorrectly characterizes the timing of the interim period. Part A, Section I.A should read as follows: "The permittee is authorized to discharge during the period from Permit Effective Date through Three Years After Permit Effective Date." Similarly, Part A, Section LB should read as follows: "The permittee is authorized to discharge during the period from Three Years After Permit Effective Date through Permit Expiration Date." As requested above, if the compliance schedule is extended to four years, Part A of the Permit should reflect this change accordingly.

DEP Response

The request for a four-year compliance schedule is reasonable given the proposed changes to effluent limitations. The final effluent limitations will go into effect at the beginning of fifth year after the permit effective date.

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" (386-0400-001), 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	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Recorded
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/weekday	Grab
DO	XXX	XXX	4.0 Inst Min	XXX	XXX	XXX	1/weekday	Grab
CBOD5	208.0	312.0	XXX	25.0	37.5	50	2/week	24-Hr Composite
BOD5 Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	2/week	24-Hr Composite
TSS	250.0	375.0	XXX	30.0	45.0	60	2/week	24-Hr Composite
TSS Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	2/week	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	2/week	Grab
E. Coli (No./100 ml)	XXX	XXX	XXX	Report	XXX	XXX	1/month	Grab
Total Nitrogen	Report	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Total Phosphorus	Report	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Total Aluminum (µg/L)	Report Avg Qrtly	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite
Total Boron (µg/L)	Report Avg Qrtly	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hour Composite
Total Cadmium (µg/L)	Report Avg Qrtly	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite

Outfall 001, Continued (from 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	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Dissolved Iron (µg/L)	Report Avg Qrtly	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite
Total Iron (µg/L)	Report Avg Qrtly	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite
Total Lead (µg/L)	Report Avg Qrtly	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite
Total Manganese (µg/L)	Report Avg Qrtly	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite
Total Zinc (µg/L)	Report Avg Qrtly	XXX	XXX	Report Avg Qrtly	XXX	XXX	1/quarter	24-Hr Composite
Dichlorobromo-methane (µg/L)	0.01	0.014	XXX	1.14	1.73	2.85	2/month	24-Hr Composite
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: 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" (386-0400-001), SOPs and/or BPJ.

Outfall 001, Effective Period: Permit Effective Date through 48 months after Permit Effective 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		
TRC	XXX	XXX	XXX	0.5	XXX	1.3	1/weekday	Grab
Ammonia-Nitrogen	Report	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Total Copper (µg/L)	Report	XXX	XXX	Report	XXX	XXX	1/month	24-Hr Composite
Free Cyanide (µg/L)	Report	XXX	XXX	Report	XXX	XXX	1/month	24-Hr Composite
Chlorodibromo-methane (µg/L)	Report	XXX	XXX	Report	XXX	XXX	1/month	24-Hr Composite
Chloroform (µg/L)	Report	XXX	XXX	Report	XXX	XXX	1/month	24-Hr Composite

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" (386-0400-001), SOPs and/or BPJ.

Outfall 001, Effective Period: Beginning of 49th Month After Permit Effective Date through Permit Expiration.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) (1)		Concentrations (mg/L)				Minimum (2) Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Minimum	Average Monthly	Weekly Average	Instant. Maximum		
TRC	XXX	XXX	XXX	0.011	XXX	0.037	1/weekday	Grab
Ammonia-Nitrogen Nov 1 - Apr 30	25.10	37.61	XXX	3.01	4.51	6.02	2/week	24-Hr Composite
Ammonia-Nitrogen May 1 - Oct 31	16.26	24.35	XXX	1.95	2.92	3.9	2/week	24-Hr Composite
Total Copper (µg/L)	0.18	0.27	XXX	21.1	32.8	52.9	2/month	24-Hr Composite
Free Cyanide (µg/L)	0.034	0.056	XXX	4.07	6.74	10.2	2/month	24-Hr Composite
Chlorodibromo-methane (µg/L)	0.008	0.013	XXX	0.96	1.59	2.4	2/month	24-Hr Composite
Chloroform (µg/L)	0.048	0.073	XXX	5.8	8.72	14.5	2/month	24-Hr Composite

Compliance Sampling Location: Outfall 001