

Application Type Renewal
Facility Type Sewage
Major / Minor Major

NPDES PERMIT FACT SHEET ADDENDUM

Application No. PA0037150
APS ID 275717
Authorization ID 1380104

Applicant and Facility Information

| | | | |
|-------------------------------|---|------------------|--|
| Applicant Name | <u>Penn Township York County</u> | Facility Name | <u>Penn Township STP</u> |
| Applicant Address | <u>20 Wayne Avenue</u> <u>Hanover, PA 17331-3313</u> | Facility Address | <u>1020 Wilson Avenue</u> <u>Hanover, PA 17331-7961</u> |
| Applicant Contact | <u>Donna Sweeney</u> | Facility Contact | <u>Gene Lank</u> |
| Applicant Phone | <u>(717) 632-7366</u> | Facility Phone | <u>(717) 637-1561</u> |
| Client ID | <u>49887</u> | Site ID | <u>257976</u> |
| SIC Code | <u>4952</u> | Municipality | <u>Penn Township</u> |
| SIC Description | <u>Trans. & Utilities - Sewerage Systems</u> | County | <u>York</u> |
| Date Published in PA Bulletin | <u>October 12, 2024</u> | EPA Waived? | <u>No</u> |
| Comment Period End Date | <u>November 12, 2024</u> | If No, Reason | <u>Major Facility/Significant CB Discharger</u> |
| Purpose of Application | <u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u> | | |

Internal Review and Recommendations

The NPDES draft permit and supporting documents were emailed to the permittee on September 30, 2024. The permit was published in the PA Bulletin on October 12, 2024 for public comment; comments were received from the EPA and the Township's consultant, GHD.

On October 29, 2024, DEP received the following comments from Jennifer Fulton of the EPA:

1. Part A, subpart I.B. (page 7) does not contain footnotes to continue authorization of the 8,400 lbs. of offsets for the connection of 336 on-lot sewage disposal systems. Language discussing the on-lot disposal systems and offsets was included as a footnote in part A of the existing permit. Please add this language into the draft permit prior to reissuance unless PADEP does not intend to continue authorizing this condition.

DEP Response: The offset language was unintentionally left off of the draft permit and has been restored. In accordance with GHD Comment 12 below, the number offset-eligible systems is now proposed to increase from 336 systems to 385 systems (+49), to bring the total proposed offset to 9,625 lbs. The list of eligible properties is listed in the GHD response letter included at the end of this fact sheet.

2. Page 66 of the factsheet indicates that the WET tests set their TIWC value at 93%, which is inaccurate, and lists an incorrect dilution series corresponding to the 93% TIWC. Please revise page 66 of the factsheet so that it is consistent with the dilution series and TIWC value required by the existing permit (page 27): a dilution series of 23%, 46%, 92%, 96%, and 100% and a TIWC value of 92%.

| Approve | Return | Deny | Signatures | Date |
|---------|--------|------|---|-------------------|
| x | | | Aaron Baar Aaron Baar / Project Manager | December 26, 2024 |
| x | | | Maria D. Bebenek for Daniel W. Martin, P.E. / Environmental Engineer Manager | January 27, 2025 |
| x | | | Maria D. Bebenek Maria D. Bebenek, P.E. / Program Manager | January 27, 2025 |

Internal Review and Recommendations

DEP Response: The WET Evaluation performed recommended a new dilution series of 23%, 47%, 93%, 97% and 100% Effluent with a TIWC of 93%. This new dilution series and TIWC were inadvertently not updated in Part C, Section V(A)(3) of the draft permit. The updated draft now reflects the correct dilution series and TIWC.

3. Please remove section II of page 23, titled "Program Implementation Schedule," from the draft permit. The conditions at Part C.II "Program Implementation Schedule" are unnecessary as the language on the existing permit indicates that there is already a pretreatment program in place for Penn Township which is being implemented. Have there been updates to Penn Township's pretreatment program since the expiration of the existing NPDES permit that would warrant keeping the Section II language on a "Program Implementation Schedule"? EPA is unaware of any such programmatic updates.

DEP Response: The Program Implementation Schedule section has been removed as requested.

On November 8, 2024, DEP received the following comments from Heather Myers with GHD:

1. Page 1 – Applicant and Facility Information: Applicant Contact should be updated to Donna Sweeney and the Facility Contact should be updated to Donna Sweeney. Phone numbers remain the same.

DEP Response: The contact information has been updated as requested.

2. Page 1 - The Connection Status in this section is noted as "Self-Imposed Connection Prohibition." The Township is not aware of a connection prohibition or the origin of this status, which also appeared in the Permit Fact Sheet prepared for the previous permit renewal. Please provide additional detail as to the reasoning for this status.

DEP Response: The referenced connection status is maintained by the Department's Planning Section. The stated connection prohibition did not factor into any of the proposed limits in the draft permit.

3. Page 4 – Treatment Facility Summary: Biosolids Treatment – Anaerobic Digestion is listed – the facility has no digesters. Please refer to the line drawing submitted with the permit application.

DEP Response: The Department relied on the Fact Sheet from the last renewal and the WQM permits issued since the last renewal to describe the treatment process. No records could be located that indicate that the digesters were to be taken offline. Please provide the Department with the WQM amendment authorizing the change so that we can update our records.

4. Page 4 - The Fact Sheet states that the Township WWTP is "located at 20 Wayne Ave, Hanover, PA." The WWTP is located at 1020 Wilson Avenue, Hanover, PA as noted on page1 of the Fact Sheet. Please correct this information.

DEP Response: The Department apologizes for the typo. No change is proposed in the draft permit.

5. Page 4- The Fact Sheet states that there are a total of 13 pump stations in the Township's collection system. There are currently nine (9) pump stations in the Township's collection system, with eight (8) pump stations by the end of 2025.

DEP Response: Please ensure that WQM permits for pumping stations are terminated/amended once they are taken offline. No change is proposed in the draft permit.

6. Page 4 - There are currently seven (7) industrial users of the Penn Township WWTP, as PCA was removed on 6/1/23. Correspondence was sent to EPA and DEP at that time notifying both agencies of this change.

Internal Review and Recommendations

DEP Response: This change was not communicated to the permit writer – thank you for the notification. No change is proposed in the draft permit.

7. Page 4 - At the bottom of this page, the Fact Sheet states that the Penn Township WWTP is an “extended aeration package treatment facility.” This statement is incorrect.

DEP Response: The Department apologizes for the typo. No change is proposed in the draft permit.

8. Page 4 - The final paragraph on page 4 notes the presence of 2 sludge digesters. This is incorrect as there are no sludge digesters at the facility. Please refer to the line drawing submitted with the permit application.

DEP Response: See GHD Comment 3 response above.

9. Draft NPDES Permit - The draft NPDES permit includes a revision to the permit limit for Dissolved Oxygen (D.O.), as the instantaneous minimum concentration has increased from 5.0 mg/L to 6.0 mg/L. The Township requests additional explanation for the development of this limit; specifically, why 6.0 mg/L was used as the D.O. Goal in the WQM 7.0 Modeling Specifications model instead of 5.0 mg/L. This proposed limit seems unnecessarily restrictive. The Permit Fact Sheet stated that a review of the Township’s DMR data from the past year indicated that the facility is capable of meeting the proposed limit. However, a more detailed review of the Township’s DMR data since 2020 (which captures the current permit term and timeframe since the completion of the most recent plant upgrades) revealed two instances of monthly minimum D.O. concentrations of 6.1 mg/L (July 2021, August 2022) and one instance of a monthly minimum D.O. concentration of 6.0 mg/L (July 2023), which raises concern about the ability to meet the proposed limit.

DEP Response: The model’s initial conditions included an initial D.O. concentration of 5.0 mg/L, not 6.0 mg/L - please reference the supporting document titled *Input Data WQM 7.0* that was previously provided with the draft permit. The entirety of the WQM model output has previously been provided to justify the proposed limit. As noted by GHD, no exceedance of the proposed 6.0 mg/L D.O. limit has occurred in the DMR data since at least 2020, so the Department is reasonably confident that the facility is already configured to meet the new D.O. limit.

10. Draft NPDES Permit - The draft NPDES permit includes proposed permit limits for Total Residual Chlorine (TRC), even though the Township facility utilizes ultraviolet (UV) disinfection. The Township does not utilize chlorine for backup disinfection. The Township does utilize chlorine to clean the cloth filters located just prior to UV disinfection. The cloth filters are dosed with 15 gallons of liquid sodium hypochlorite every 1-2 months. Any rinsewater from the cleaning of the chlorine filters is sent back to the head of the plant for treatment. The reporting of any TRC concentrations resulting from this cleaning operation should be handled as required in Part VII.G. of the draft permit, not through a daily TRC limit. The need for a TRC limit was based on the review of three grab samples collected over 5 days in December 2022. The samples were analyzed in the Township laboratory using a Hach DR3900, EPA Method 8167. The maximum reported TRC concentration of 0.02 mg/L is equal to DEP’s Target QL for that parameter, which, for any other pollutant, would mean that the particular pollutant is not a pollutant of concern. Additionally, the Township received a pre-draft survey from PADEP in March 2024 which provided the Township with the opportunity to collect additional samples for parameters with potential permit limits. However, TRC was not included in the list of parameters being evaluated for potential limits.

DEP Response: The Department is amenable to modifying the permit to only monitor TRC in the effluent on days in which chlorine is used for cleaning or other purposes. As stated in the permit, DEP must be notified prior to initiating the use of all chlorine products, including, but not limited to the referenced but unidentified chlorine product used to clean the cloth filters and Endimal (Oxychlorine) for sulfide and odor reduction. Effluent TRC testing must be performed and reported for each day in which a chlorine product is used. Please be advised that if DEP determines that effluent TRC is causing adverse water quality impacts, DEP may reopen this

Internal Review and Recommendations

permit to apply new or more stringent effluent limitations and/or require implementation of control measures or operational practices to eliminate such impacts.

11. Draft NPDES Permit - In 2019 Penn Township installed a \$1.3 million UV Disinfection system to replace their existing chlorine disinfection system in order to protect Oil Creek. The Township is not aware of any other municipal WWTPs which utilize UV disinfection AND have TRC limits in their discharge permits. Furthermore, the Township IS aware of several municipal WWTPs with UV disinfection which have recently received NPDES renewals in which the applicability of a TRC limit was not evaluated or discussed during the renewal process. DEP's Standard Operating Procedure (SOP) No. BCW-PMT-033 Establishing Effluent Limitations for Individual Sewage Permits (Version 2.0, revised February 5, 2024) states, on page 2, "Where ultraviolet (UV) disinfection is used, TRC limits are not applicable." Please provide the current guidance or SOP which states that all sewage treatment facilities utilizing UV disinfection will still be evaluated for potential TRC limits in their NPDES permits.

DEP Response: All TRC tests conducted by the Township resulted in non-zero concentrations of TRC in the effluent, as self-reported on the Analysis Results Table Pollutant Group 1 of the application. The persistent existence of detectable effluent TRC of unknown origin represented reasonable potential to investigate the need for limits at this specific facility.

12. Other - Please see attached list of properties with retired on-lot sewage disposal systems that have been connected to the Township's sewer system. Most of these properties were connected as a result of the Township's recent Oak Hills/Hershey Heights sewer extension project. Please add the appropriate TN offsets for these 49 properties to the Township's NPDES permit.

DEP Response: The offsets have been added as requested. See also Comment 1 of EPA's response.

The removal of the proposed TRC limits represents a major amendment of the draft permit. As such, the permit has been redrafted for comments and publication in the PA Bulletin

As of December 26, 2024, there are no Clean Water open violations for this client.

Issuance of this revised draft permit is recommended.

225 Grandview Avenue, Suite 403
Camp Hill, Pennsylvania 17011
United States
www.ghd.com



Our ref: 12566999

November 08, 2024

Mr. Aaron Baar
Pennsylvania Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue
Harrisburg, PA 17110-8200

Re: Penn Township STP
Draft NPDES Permit No. PA0037150
Penn Township, York County

Dear Mr. Baar,

Penn Township (Township) is in receipt of the draft of NPDES Permit No. PA0037150 for the discharge from the Penn Township STP, located in Penn Township, York County. Notice of the draft NPDES Permit was published in the October 12, 2024, thereby resulting in comments on the draft permit due to DEP by November 11, 2024.

On behalf of Penn Township, GHD offers the following comments on the draft of NPDES Permit No. PA0037150:

Permit Fact Sheet:

1. Page 1 – Applicant and Facility Information:

- Applicant Contact should be updated to Donna Sweeney and the Facility Contact should be updated to Gene Lank. Phone numbers remain the same.
- The Connection Status in this section is noted as "Self-Imposed Connection Prohibition." The Township is not aware of a connection prohibition or the origin of this status, which also appeared in the Permit Fact Sheet prepared for the previous permit renewal. Please provide additional detail as to the reasoning for this status.

2. Page 4 – Treatment Facility Summary:

- Biosolids Treatment – Anaerobic Digestion is listed – the facility has no digesters. Please refer to the line drawing submitted with the permit application.
- The Fact Sheet states that the Township WWTP is "located at 20 Wayne Ave, Hanover, PA." The WWTP is located at 1020 Wilson Avenue, Hanover, PA as noted on page 1 of the Fact Sheet. Please correct this information.
- The Fact Sheet states that there are a total of 13 pump stations in the Township's collection system. There are currently nine (9) pump stations in the Township's collection system, with

another pump station scheduled for removal in 2025 so that there will be a total of eight (8) pump stations by the end of 2025.

- There are currently seven (7) industrial users of the Penn Township WWTP, as PCA was removed on 6/1/23. Correspondence was sent to EPA and DEP at that time notifying both agencies of this change.
- At the bottom of this page, the Fact Sheet states that the Penn Township WWTP is an "extended aeration package treatment facility." This statement is incorrect.
- The final paragraph on page 4 notes the presence of 2 sludge digesters. This is incorrect as there are no sludge digesters at the facility. Please refer to the line drawing submitted with the permit application.

Draft NPDES Permit:

1. The draft NPDES permit includes a revision to the permit limit for Dissolved Oxygen (D.O.), as the instantaneous minimum concentration has increased from 5.0 mg/L to 6.0 mg/L. The Township requests additional explanation for the development of this limit; specifically, why 6.0 mg/L was used as the D.O. Goal in the WQM 7.0 Modeling Specifications model instead of 5.0 mg/L. This proposed limit seems unnecessarily restrictive. The Permit Fact Sheet stated that a review of the Township's DMR data from the past year indicated that the facility is capable of meeting the proposed limit. However, a more detailed review of the Township's DMR data since 2020 (which captures the current permit term and timeframe since the completion of the most recent plant upgrades) revealed two instances of monthly minimum D.O. concentrations of 6.1 mg/L (July 2021, August 2022) and one instance of a monthly minimum D.O. concentration of 6.0 mg/L (July 2023), which raises concern about the ability to meet the proposed limit.
2. The draft NPDES permit includes proposed permit limits for Total Residual Chlorine (TRC), even though the Township facility utilizes ultraviolet (UV) disinfection. The Township does not utilize chlorine for backup disinfection. The Township does utilize chlorine to clean the cloth filters located just prior to UV disinfection. The cloth filters are dosed with 15 gallons of liquid sodium hypochlorite every 1-2 months. Any rinsewater from the cleaning of the chlorine filters is sent back to the head of the plant for treatment. The reporting of any TRC concentrations resulting from this cleaning operation should be handled as required in Part VII.G. of the draft permit, not through a daily TRC limit. The need for a TRC limit was based on the review of three grab samples collected over 5 days in December 2022. The samples were analyzed in the Township laboratory using a Hach DR3900, EPA Method 8167. The maximum reported TRC concentration of 0.02 mg/L is equal to DEP's Target QL for that parameter, which, for any other pollutant, would mean that the particular pollutant is not a pollutant of concern. Additionally, the Township received a pre-draft survey from PADEP in March 2024 which provided the Township with the opportunity to collect additional samples for parameters with potential permit limits. However, TRC was not included in the list of parameters being evaluated for potential limits.

In 2019 Penn Township installed a \$1.3 million UV Disinfection system to replace their existing chlorine disinfection system in order to protect Oil Creek. The Township is not aware of any other municipal WWTPs which utilize UV disinfection AND have TRC limits in their discharge permits. Furthermore, the Township IS aware of several municipal WWTPs with UV disinfection which have recently received NPDES renewals in which the applicability of a TRC limit was not evaluated or discussed during the renewal process. DEP's Standard Operating Procedure (SOP) No. BCW-PMT-033 Establishing Effluent Limitations for Individual Sewage Permits (Version 2.0, revised February 5, 2024) states, on page 2, "Where ultraviolet (UV) disinfection is used, TRC limits are not applicable." Please provide the current guidance or SOP which states that all sewage treatment facilities utilizing UV disinfection will still be evaluated for potential TRC limits in their NPDES permits.

Other:

Please see attached list of properties with retired on-lot sewage disposal systems that have been connected to the Township's sewer system. Most of these properties were connected as a result of the Township's recent Oak Hills/Hershey Heights sewer extension project. Please add the appropriate TN offsets for these 49 properties to the Township's NPDES permit.

We trust this information is sufficient for the Department to proceed with its review of the renewal application. Please do not hesitate to contact me with any questions.

Regards



Heather Myers
Environmental Scientist

+1 717 585-6431
heather.myers@ghd.com

Copy to: Gene Lank, Penn Township
Todd Kline, Penn Township

PENN TOWNSHIP WWTP
NPDES PERMIT NO. PA0037150
RETIRED ON-LOT SEWAGE SYSTEMS
OCTOBER 2024

| Property Address | | Date of connection to Sewer | Date on Septic/Built |
|----------------------------|-------------------|--------------------------------|-------------------------|
| 951 BEAVER CREEK RD | HANOVER PA, 17331 | 12/14/2023 | 1995 |
| 961 BEAVER CREEK RD | HANOVER PA, 17331 | 12/21/2023 | 1984 |
| 1040 BEAVER CREEK RD | HANOVER PA, 17331 | 11/27/2023 | 1984 |
| 1065 BEAVER CREEK RD | HANOVER PA, 17331 | 9/24/2024 | 1977 |
| 1075 BEAVER CREEK RD | HANOVER PA, 17331 | 9/25/2024 | 1975 |
| 1142 BEAVER CREEK RD | HANOVER PA, 17331 | 10/26/2023 | 2018 |
| 2165 BROADWAY | HANOVER PA, 17331 | 10/19/2023 | 1920 |
| 2205 BROADWAY | HANOVER PA, 17331 | 4/24/2024 | 1970 |
| 2220 BROADWAY | HANOVER PA, 17331 | 1/2/2024 | 1967 |
| 2221 BROADWAY | HANOVER PA, 17331 | 11/20/2023 | 1974 |
| 2300 BROADWAY | HANOVER PA, 17331 | 12/20/2023 | 1994 |
| 5 PIGEON HILL PARK RD | HANOVER PA, 17331 | 1/31/2024 | 1986 |
| 40 OAK HILL DR | HANOVER PA, 17331 | 12/6/2023 | 1978 |
| 45 OAK HILL DR | HANOVER PA, 17331 | 12/6/2023 | 1972 |
| 50 OAK HILL DR | HANOVER PA, 17331 | 11/29/2023 | 1976 |
| 60 OAK HILL DR | HANOVER PA, 17331 | 11/14/2023 | 1973 |
| 70 OAK HILL DR | HANOVER PA, 17331 | 1/8/2024 | 1974 |
| 75 OAK HILL DR | HANOVER PA, 17331 | 11/16/2023 | 1975 |
| 91 OAK HILL DR | HANOVER PA, 17331 | 3/28/2024 | 1976 |
| 101 OAK HILL DR | HANOVER PA, 17331 | 4/16/2024 | 1974 |
| 114 OAK HILL DR | HANOVER PA, 17331 | 1/18/2024 | 1973 |
| 123 OAK HILL DR | HANOVER PA, 17331 | 1/18/2024 | 1970 |
| 205 OAK HILL CIR | HANOVER PA, 17331 | 4/18/2024 | 1977 |
| 210 OAK HILL CIR | HANOVER PA, 17331 | 4/23/2024 | 1974 |
| 220 OAK HILL CIR | HANOVER PA, 17331 | 2/15/2024 | 1974 |
| 221 OAK HILL CIR | HANOVER PA, 17331 | 4/23/2024 | 1973 |
| 230 OAK HILL CIR | HANOVER PA, 17331 | 10/26/2023 | 1985 |
| 831-833 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 11/6/2023 | 1962 |
| 843 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 9/25/2024 | 1956 |
| 849 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 2/15/2024 | 1970 |
| 853 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 11/16/2023 | 1951 |
| 859 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 11/1/2023 | 1950 |
| 865 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 10/31/2023 | 1947 |
| 869 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 10/31/2023 | 1957 |
| 870 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 10/13/2023 | 1958 |
| 871 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 11/1/2023 | 1959 |
| 875 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 1/30/2024 | 1950 |
| 886 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 10/10/2023 | 1957 |
| 890 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 4/4/2024 | 1954 |
| 892 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 5/1/2024 | 1954 |
| 894 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 4/29/2024 | 1973 |
| 896 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 9/23/2024 | 1948 |

PENN TOWNSHIP WWTP
NPDES PERMIT NO. PA0037150
RETIRED ON-LOT SEWAGE SYSTEMS
OCTOBER 2024

| Property Address | | Date of connection to Sewer | Date on Septic/Built |
|------------------------|-------------------|--------------------------------|-------------------------|
| 899 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 2/9/2024 | 1953 |
| 900 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 5/30/2024 | 1949 |
| 905 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 11/16/2023 | 1947 |
| 910 HERSHEY HEIGHTS RD | HANOVER PA, 17331 | 11/8/2023 | 1947 |
| 1076 BECKMILL RD | HANOVER PA, 17331 | 4/10/2024 | 1961 |
| 820 WESTMINSTER RD | HANOVER PA, 17331 | 3/12/2024 | 1940 |
| 1167 BAIR RD | HANOVER PA, 17331 | 3/27/2024 | 1967 |

Baar, Aaron

From: Fulton, Jennifer <Fulton.Jennifer@epa.gov>
Sent: Tuesday, October 29, 2024 3:43 PM
To: Baar, Aaron
Cc: Furjanic, Sean; Schumack, Maria; Bebenek, Maria; Martin, Daniel; Ottinger, Elizabeth; Hales, Dana; Sanchez Gonzalez, Natalie
Subject: [External] PA0037150 Penn Township STP

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](#).

Aron,

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:

Permittee name: Penn Township

Facility name: Penn Township STP

NPDES Number: PA0037150

EPA Received: 10/2/24

30-day response due date: 11/1/24

This is a major permit that discharges to Oil Creek, is affected by the Oil Creek Watershed TMDL, and is a significant Chesapeake Bay discharger. EPA has performed a limited review of the draft permit based on the wasteload allocation (WLA) requirements of the approved Chesapeake Bay and Oil Creek Watershed TMDLs, the pretreatment program implementation requirements, PFAS Analyte sampling requirements, and the Whole Effluent Toxicity (WET) test evaluation and results. EPA has completed its review and offers the following comment(s):

1. Part A, subpart I.B. (page 7) does not contain footnotes to continue authorization of the 8,400 lbs. of offsets for the connection of 336 on-lot sewage disposal systems. Language discussing the on-lot disposal systems and offsets was included as a footnote in part A of the existing permit. Please add this language into the draft permit prior to reissuance unless PADEP does not intend to continue authorizing this condition.

2. Page 66 of the factsheet indicates that the WET tests set their TIWC value at 93%, which is inaccurate, and lists an incorrect dilution series corresponding to the 93% TIWC. Please revise page 66 of the factsheet so that it is consistent with the dilution series and TIWC value required by the existing permit (page 27): a dilution series of 23%, 46%, 92%, 96%, and 100% and a TIWC value of 92%.

3. Please remove section II of page 23, titled "Program Implementation Schedule," from the draft permit. The conditions at Part C.II "Program Implementation Schedule" are unnecessary as the language on the existing permit indicates that there is already a pretreatment program in place for Penn Township which is being implemented. Have there been updates to Penn Township's pretreatment program since the expiration of the existing NPDES permit that would warrant keeping the Section II language on a "Program Implementation Schedule"? EPA is unaware of any such programmatic updates.

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary. Please contact Natalie Sanchez-Gonzalez on my staff via telephone at 215-814-2078 or via electronic mail at sanchez-gonzalez.natalie@epa.gov.

Thank you,
Jen Fulton



Jennifer Fulton (she/her)

Chief, Clean Water Branch
US EPA Mid-Atlantic Region

Phone 304-234-0248

Email fulton.jennifer@epa.gov

