pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

Southwest Regional Office
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0038181**
Facility Type	**Municipal**	APS ID	**1110734**
Major / Minor	**Major**	Authorization ID	**1479138**

NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE

Applicant and Facility Information

Applicant Name	**Municipal Authority of Westmoreland County**	Facility Name	**New Stanton STP**
Applicant Address	124 Park and Pool Road	Facility Address	157 Penn Valley Road
	New Stanton, PA 15672		Hunker, PA 15639-1227
Applicant Contact	Norman Stout	Facility Contact	Tim Keunzig
Applicant Phone	(724) 755-5800	Facility Phone	(724) 925-7280
Client ID	64197	Site ID	250808
Ch 94 Load Status	Not Overloaded	Municipality	Hempfield Township
Connection Status	Dept. Imposed Connection Prohibitions	County	Westmoreland
Date Application Received	April 2, 2024	EPA Waived?	No
Date Application Accepted		If No, Reason	Major Facility, Pretreatment
Purpose of Application	NPDES permit renewal application.		

Summary of Review

The Pa Department of Environmental Protection (PADEP/Department) received an NPDES permit renewal application from Gibson-Thomas Engineering Co, Inc (consultant) on April 2, 2024 on behalf of Municipal Authority of Westmoreland County (MAWC/permittee) for Permittee's New Stanton STP (facility). This is a major sewage facility with a design flow of 7.2 MGD that discharges into Sewickley Creek (WWF) in state watershed 19-D. The draft permit was sent to the permittee on July 31, 2024 and was published in the PA Bulletin on August 17, 2024. The permit is being redrafted to incorporate new information that wasn't available during the draft permit and to address comments received from the U.S. EPA and the permittee. This fact sheet will discuss only on the changes.

Changes in this redraft permit: Numeric limit of Total Copper changed to monitoring, CBOD5, NH3-N, and TRC limits less stringent compared to draft permit.

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
√		Reza H. Chowdhury, E.I.T. / Project Manager	September 17, 2024
X		Pravin Patel Pravin C. Patel, P.E. / Environmental Engineer Manager	09/24/2024

Discharge, Receiving Waters and Water Supply Information

Outfall No.	001	Design Flow (MGD)	7.2
Latitude	40º 12' 8"	Longitude	-79º 37' 43"
Quad Name	Smithton	Quad Code	1708
Wastewater Description:	Sewage Effluent		

Receiving Waters	Sewickley Creek (WWF)	Stream Code	37556
NHD Com ID	69913471	RMI	15.44
Drainage Area	102 mi^2	Yield (cfs/mi^2)	0.1
Q_{7-10} Flow (cfs)	**10.2**	Q_{7-10} Basis	Calculation
Elevation (ft)	911.46	Slope (ft/ft)	
Watershed No.	19-D	Chapter 93 Class.	WWF
Existing Use		Existing Use Qualifier	
Exceptions to Use	None	Exceptions to Criteria	None
Assessment Status	Impaired		
Cause(s) of Impairment	METALS, PH		
Source(s) of Impairment	ACID MINE DRAINAGE		
TMDL Status	Final	Name	Sewickley Creek Watershed

Background/Ambient Data		Data Source
pH (SU)	7.0	Default
Temperature (°C)	25	Default
Hardness (mg/L)	100	Default
Other:		

Nearest Downstream Public Water Supply Intake		Municipal Authority of Westmoreland County-McKeesport	
PWS Waters	Youghiogheny River	Flow at Intake (cfs)	510
PWS RMI	1.39	Distance from Outfall (mi)	31.19

Discussion on Streamflow:
The draft permit discussed utilization of two Q7-10 flows for TMS/WQM 7.0 modeling and for WETT analysis per previous permits. However, no supporting documents were found to support the use of two flows. Under this circumstance, the Department determined to use statewide default yield of 0.1 cfs/mi^2 to calculate the Q7-10 flow. The drainage area at discharge point is 102 mi^2 that resulted in a Q7-10 of 102*0.1 or 10.2 cfs. Default Q1-10:Q7-10 and Q30-10:Q7-10 of 0.64 and 1.36 will be used for modeling.

Development of Effluent Limitations

Outfall No.	001	**Design Flow (MGD)**	7.2
Latitude	40º 12' 8.00"	**Longitude**	-79º 37' 43.00"
Wastewater Description:	Sewage Effluent		

Model input data

The following data will be used for modeling, as needed:

- Discharge pH 7.13 (90th percentile, July-Sep 2022-23, daily eDMR data)
- Discharge Temperature 17.9°C (Application data)
- Discharge Hardness 218 mg/l (Application data)
- Stream pH 7.0 (Default)
- Stream Temperature 25.0°C (Default)
- Stream Hardness 100 mg/l (Default)

The following two nodes were used in modeling:

Node 1: At the outfall 001 on Sewickley Creek (37556)
- Elevation: 912.86 ft (National Map-Advanced Viewer, 07/24/2024)
- Drainage Area: 102 mi^2 (StreamStat Version 3.0, 06/24/2024)
- River Mile Index: 15.44 (PA DEP eMapPA)
- Low Flow Yield: 0.1 cfs/mi^2
- Q_{7-10}: 10.2 cfs
- Discharge Flow: 7.2 MGD

Node 2: At confluence with UNT 37643 to Sewickley Creek
- Elevation: 900.56 ft (National Map-Advanced Viewer, 07/24/2024)
- Drainage Area: 113 mi^2 (StreamStat Version 3.0, 09/23/2024)
- River Mile Index: 12.81 (PA DEP eMapPA)
- Low Flow Yield: 0.1 cfs/mi^2
- Discharge Flow: 0.0 MGD

WQM 7.0 Model

NH_3-N

WQM 7.0 suggests NH3-N AML limit of 2.91 mg/l and 5.82 mg/l as IMAX during summer to protect water quality standards. The calculated mass-based AML is 174.74 lbs./day. These limits are more stringent than existing limits. A review of 12 months DMR data indicated that the facility is meeting the limits 100% of the time. The winter limits are calculated by multiplying the summer limits with a factor of 2.5. Since the permittee is meeting the proposed limits already, its not necessary to include that in the pre-draft survey. The more stringent limits will be effective from the effective date of the permit.

CBOD5:

WQM 7.0 suggests CBOD5 limit of 9.7 mg/l as AML which is more stringent than current permit. A review of the past 12 months DMR (May 2023 to April 2024) indicated the facility was meeting this limit 100% of the time. Since the facility is meeting the more stringent limits, it is not necessary to include this in the pre-draft survey. The more stringent limits will be effective from the effective date of the permit.

Toxics:

The toxic pollutants are modeled through TMS and output from the TMS is provided below. New Total Copper and Free Cyanide data were made available which refined the TMS model input for these two pollutants. Both pollutants are discussed below.

☑ ***Recommended WQBELs & Monitoring Requirements***

No. Samples/Month: 4

	Mass Limits		*Concentration Limits*						
Pollutants	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units	Governing WQBEL	WQBEL Basis	Comments
Total Antimony	Report	Report	Report	Report	Report	µg/L	10.7	THH	Discharge Conc > 10% WQBEL (no RP)
Total Arsenic	Report	Report	Report	Report	Report	µg/L	19.2	THH	Discharge Conc > 10% WQBEL (no RP)
Total Boron	Report	Report	Report	Report	Report	µg/L	3,065	CFC	Discharge Conc > 10% WQBEL (no RP)
Total Copper	Report	Report	Report	Report	Report	mg/L	0.025	AFC	Discharge Conc > 10% WQBEL (no RP)
Free Cyanide	Report	Report	Report	Report	Report	mg/L	0.008	THH	Discharge Conc > 25% WQBEL (no RP)
Dissolved Iron	Report	Report	Report	Report	Report	µg/L	575	THH	Discharge Conc > 10% WQBEL (no RP)
Total Zinc	Report	Report	Report	Report	Report	µg/L	198	AFC	Discharge Conc > 10% WQBEL (no RP)

Total Copper:

There was an error in the application data table that resulted in no RP for Total Copper. The permittee provided 53 individual data points on later date, samples of which were collected between February 2023 through January 2024 on weekly basis. The calculated median value is 0.006 mg/l (median was used due to the presence of suspected outlier in the data set, per SOP BCW-PMT-037). The TMS resulted in monitoring only requirement. The current permit has numeric limits. It is recommended that the numeric limit be replaced by monitoring requirements, which is consistent with CWA Section 402(0)(2)(B)(i).

Free Cyanide:

Due to the error in the application data table, Free Cyanide came out as no concern. The permittee provided 53 additional data on later date, samples of which were collected between February 2023 through January 2024 on weekly basis. The calculated median value is 0.0025 mg/l (median was used due to the presence of suspected outlier in the data set, per SOP BCW-PMT-037). The TMS resulted in monitoring only requirement. Existing monitoring will be continued.

Total Residual Chlorine (TRC):

TRC spreadsheet was utilized at new stream flow. The model resulted in an AML of 0.143 mg/l and IMAX of 0.467 mg/l. These limits are less stringent compared to the existing limits, which is justified through CWA Section 402(0)(2)(B)(i). The new limits will be effective from this permit term. The model output is provided in next page.

TRC_CALC

TRC EVALUATION

Input appropriate values in A3:A9 and D3:D9

10.2	= Q stream (cfs)	0.5	= CV Daily
7.2	= Q discharge (MGD)	0.5	= CV Hourly
30	= no. samples	1	= AFC_Partial Mix Factor
0.3	= Chlorine Demand of Stream	1	= CFC_Partial Mix Factor
0	= Chlorine Demand of Discharge	15	= AFC_Criteria Compliance Time (min)
0.5	= BAT/BPJ Value	720	= CFC_Criteria Compliance Time (min)
0	= % Factor of Safety (FOS)		=Decay Coefficient (K)

Source	Reference	AFC Calculations		Reference	CFC Calculations	
TRC	1.3.2.iii	WLA afc =	0.311	1.3.2.iii	WLA cfc =	0.296
PENTOXSD TRG	5.1a	LTAMULT afc =	0.373	5.1c	LTAMULT cfc =	0.581
PENTOXSD TRG	5.1b	LTA_afc=	0.116	5.1d	LTA_cfc =	0.172

Source		Effluent Limit Calculations		
PENTOXSD TRG	5.1f	AML MULT =	1.231	
PENTOXSD TRG	5.1g	AVG MON LIMIT (mg/l) =	0.143	AFC
		INST MAX LIMIT (mg/l) =	0.467	

WLA afc	(.019/e(-k*AFC_tc)) + [(AFC_Yc*Qs*.019/Qd*e(-k*AFC_tc))...
	...+ Xd + (AFC_Yc*Qs*Xs/Qd)]*(1-FOS/100)
LTAMULT afc	EXP((0.5*LN(cvh^2+1))-2.326*LN(cvh^2+1)^0.5)
LTA_afc	wla_afc*LTAMULT_afc
WLA_cfc	(.011/e(-k*CFC_tc) + [(CFC_Yc*Qs*.011/Qd*e(-k*CFC_tc))...
	...+ Xd + (CFC_Yc*Qs*Xs/Qd)]*(1-FOS/100)
LTAMULT_cfc	EXP((0.5*LN(cvd^2/no_samples+1))-2.326*LN(cvd^2/no_samples+1)^0.5)
LTA_cfc	wla_cfc*LTAMULT_cfc
AML MULT	EXP(2.326*LN((cvd^2/no_samples+1)^0.5)-0.5*LN(cvd^2/no_samples+1))
AVG MON LIMIT	MIN(BAT_BPJ,MIN(LTA_afc,LTA_cfc)*AML_MULT)
INST MAX LIMIT	1.5*((av_mon_limit/AML_MULT)/LTAMULT_afc)

Whole Effluent Toxicity (WET)

The TIWC in current permit is 47% whereas all tests were performed at 45% TIWC. A discussion with the permittee indicated that this was due to an oversight to inform the lab with the updated TIWC, as previous permit had 45% TIWC. The permittee reached out to lab and the lab responded that they are unable to run the statistics on 47% since the dilution series used for the tests didn't have 47%. The next higher dilution was 74%, results of which shouldn't be used since its much higher than 47%. Under this circumstance the Department decided to accept the 45% TIWC and WETT spreadsheet is reevaluated at 45% TIWC and a flow of 10.2 cfs. The WETT output is provided below:

WET Summary and Evaluation

Facility Name	New Stanton STP
Permit No.	PA0038181
Design Flow (MGD)	7.2
Q_{7-10} Flow (cfs)	10.2
PMF_a	0.441
PMF_c	1

		Test Results (Pass/Fail)			
		Test Date	Test Date	Test Date	Test Date
Species	**Endpoint**	6/30/20	5/24/21	5/10/22	5/9/23
Pimephales	Survival	PASS	PASS	PASS	PASS

		Test Results (Pass/Fail)			
		Test Date	Test Date	Test Date	Test Date
Species	**Endpoint**	6/30/20	5/25/21	5/10/22	5/9/23
Pimephales	Growth	PASS	PASS	PASS	PASS

		Test Results (Pass/Fail)			
		Test Date	Test Date	Test Date	Test Date
Species	**Endpoint**	5/20/20	5/24/21	5/10/22	6/5/23
Ceriodaphnia	Reproduction	PASS	PASS	PASS	PASS

		Test Results (Pass/Fail)			
		Test Date	Test Date	Test Date	Test Date
Species	**Endpoint**	5/24/20	5/24/21	5/10/22	6/5/23
Ceriodaphnia	Survival	PASS	PASS	PASS	PASS

Reasonable Potential? NO

Permit Recommendations

Test Type	**Chronic**
TIWC	**52** % Effluent
Dilution Series	**13, 26, 52, 76, 100** % Effluent
Permit Limit	**None**
Permit Limit Species	

The TIWC series and RP results remained the same, compared to the draft permit, and the dilution series is updated to reflect the reduced stream flow. There were two failures during last permit term, in 2020 and 2023. The permittee spoke with the lab and the lab indicated that there was no obvious cause for the failures and that anomalies can happen when working with live organisms. It is advised that the permittee should observe the WETT results closely and investigate the cause for any fail results during this permit term.

Development of an Operations and Maintenance (O&M) Plan:

The draft permit Part C.F required to develop an O&M plan addressing key wastewater process. This special condition is required where there are O&M concerns. This facility is well-maintained and operated, therefore, the proposed condition will be removed from re-draft.

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	Weekly Average	Daily Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	1/day	Metered
pH (S.U.)	XXX	XXX	6.0	XXX	9.0	XXX	1/day	Grab
Dissolved Oxygen	XXX	XXX	5.0	XXX	XXX	XXX	1/day	Grab
Total Residual Chlorine (TRC)	XXX	XXX	XXX	0.14	XXX	0.47	1/day	Grab
Carbonaceous Biochemical Oxygen Demand (CBOD5)	582.47	873.7	XXX	9.7	14.55 Wkly Avg	19.4	1/day	24-Hr Composite
Biochemical Oxygen Demand (BOD5) Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/day	24-Hr Composite
Total Suspended Solids Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/day	24-Hr Composite
Total Suspended Solids	1800.0	2700.0	XXX	30.0	45.0 Wkly Avg	60	1/day	24-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	1/day	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	1/day	Grab
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/month	Grab
Ultraviolet light transmittance (%)	XXX	XXX	Report	XXX	XXX	XXX	1/day	Measured
Total Nitrogen	XXX	XXX	XXX	Report Avg Qrty	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)	Required
	Average Monthly	Weekly Average	Daily Minimum	Average Monthly	Daily Maximum	Instant. Maximum	Measurement Frequency	Sample Type
Ammonia-Nitrogen Nov 1 - Apr 30	437.15	XXX	XXX	7.28	XXX	14.55	1/day	24-Hr Composite
Ammonia-Nitrogen May 1 - Oct 31	174.74	XXX	XXX	2.91	XXX	5.82	1/day	24-Hr Composite
Total Phosphorus	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Aluminum, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Antimony, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Arsenic, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Boron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Copper, Total	XXX	XXX	XXX	Report	Report	XXX	1/month	24-Hr Composite
Cyanide, Free	XXX	XXX	XXX	Report	Report	XXX	1/month	24-Hr Composite
Iron, Dissolved	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Iron, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Manganese, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
Zinc, Total	XXX	XXX	XXX	XXX	Report	XXX	1/quarter	24-Hr Composite
PFOA (ug/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
PFOS (ug/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
PFBS (ug/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab
HFPO-DA (ug/L)	XXX	XXX	XXX	XXX	Report	XXX	1/year	Grab

Compliance Sampling Location: At Outfall 001
Other Comments: None

Tools and References Used to Develop Permit	
☒	WQM for Windows Model (see Attachment)
☒	Toxics Management Spreadsheet (see Attachment)
☒	TRC Model Spreadsheet (see Attachment)
☐	Temperature Model Spreadsheet (see Attachment)
☐	Water Quality Toxics Management Strategy, 361-0100-003, 4/06.
☐	Technical Guidance for the Development and Specification of Effluent Limitations, 386-0400-001, 10/97.
☐	Policy for Permitting Surface Water Diversions, 386-2000-019, 3/98.
☐	Policy for Conducting Technical Reviews of Minor NPDES Renewal Applications, 386-2000-018, 11/96.
☐	Technology-Based Control Requirements for Water Treatment Plant Wastes, 386-2183-001, 10/97.
☐	Technical Guidance for Development of NPDES Permit Requirements Steam Electric Industry, 386-2183-002, 12/97.
☐	Pennsylvania CSO Policy, 386-2000-002, 9/08.
☐	Water Quality Antidegradation Implementation Guidance, 391-0300-002, 11/03.
☐	Implementation Guidance Evaluation & Process Thermal Discharge (316(a)) Federal Water Pollution Act, 386-2000-008, 4/97.
☐	Determining Water Quality-Based Effluent Limits, 386-2000-004, 12/97.
☐	Implementation Guidance Design Conditions, 386-2000-007, 9/97.
☐	Technical Reference Guide (TRG) WQM 7.0 for Windows, Wasteload Allocation Program for Dissolved Oxygen and Ammonia Nitrogen, Version 1.0, 386-2000-016, 6/2004.
☐	Interim Method for the Sampling and Analysis of Osmotic Pressure on Streams, Brines, and Industrial Discharges, 386-2000-012, 10/1997.
☐	Implementation Guidance for Section 95.6 Management of Point Source Phosphorus Discharges to Lakes, Ponds, and Impoundments, 386-2000-009, 3/99.
☐	Technical Reference Guide (TRG) PENTOXSD for Windows, PA Single Discharge Wasteload Allocation Program for Toxics, Version 2.0, 386-2000-015, 5/2004.
☐	Implementation Guidance for Section 93.7 Ammonia Criteria, 386-2000-022, 11/97.
☐	Policy and Procedure for Evaluating Wastewater Discharges to Intermittent and Ephemeral Streams, Drainage Channels and Swales, and Storm Sewers, 386-2000-013, 4/2008.
☐	Implementation Guidance Total Residual Chlorine (TRC) Regulation, 386-2000-011, 11/1994.
☐	Implementation Guidance for Temperature Criteria, 386-2000-001, 4/09.
☐	Implementation Guidance for Section 95.9 Phosphorus Discharges to Free Flowing Streams, 386-2000-021, 10/97.
☐	Implementation Guidance for Application of Section 93.5(e) for Potable Water Supply Protection Total Dissolved Solids, Nitrite-Nitrate, Non-Priority Pollutant Phenolics and Fluorides, 386-2000-020, 10/97.
☐	Field Data Collection and Evaluation Protocol for Determining Stream and Point Source Discharge Design Hardness, 386-2000-005, 3/99.
☐	Implementation Guidance for the Determination and Use of Background/Ambient Water Quality in the Determination of Wasteload Allocations and NPDES Effluent Limitations for Toxic Substances, 386-2000-010, 3/1999.
☐	Design Stream Flows, 386-2000-003, 9/98.
☐	Field Data Collection and Evaluation Protocol for Deriving Daily and Hourly Discharge Coefficients of Variation (CV) and Other Discharge Characteristics, 386-2000-006, 10/98.
☐	Evaluations of Phosphorus Discharges to Lakes, Ponds and Impoundments, 386-3200-001, 6/97.
☐	Pennsylvania's Chesapeake Bay Tributary Strategy Implementation Plan for NPDES Permitting, 4/07.
☐	SOP:
☐	Other:

An Equal Opportunity Employer
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"Regional Water Wastewater Service"

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Greensburg, PA 15601

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mawc@mawc.org

August 16, 2024

Reza Chowdhury
PA DEP Clean Water Program
2 East Main Street
Norristown, PA 19401

Re: New Stanton STP (PA0038181)
Draft NPDES Permit Comments

Mr. Chowdhury:

MAWC has reviewed the draft NDPES permit for New Stanton STP and would like to provide the following comments:

Page 3

- The Total Mercury result for 3-8-23 was mistakenly transcribed as 0.02 ug/L. However, the actual value is 0.002 ug/L (see attached lab report). The maximum value for Total Mercury for the 8 sample results was therefore 0.0055 ug/L. This is only 8.1% of the Governing WQBEL, so monitoring does not need to be included in the effluent limitations table.

Pages 22 – 23

- What is the basis for adding a requirement to develop a written operations and maintenance (O&M) plan that includes the seven components listed in the draft permit? MAWC owns and operates 10 other wastewater treatment plants, 4 of which are categorized as majors, and none of them include this requirement in the permit.

If you have any questions or would like to discuss these comments, please contact me at kwarheit@mawc.org or 724-454-0233.

Sincerely,

Katelyn Warheit

Katelyn Warheit
Environmental Compliance Superintendent
Municipal Authority of Westmoreland County

Chowdhury, Reza

From:	Fulton, Jennifer <Fulton.Jennifer@epa.gov>
Sent:	Tuesday, September 3, 2024 7:51 AM
To:	Chowdhury, Reza
Cc:	Iasmin, Mahbuba; Furjanic, Sean; Schumack, Maria; Ottinger, Elizabeth; Hales, Dana; Camperson, Joseph
Subject:	[External] New Stanton STP, PA0038181

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Reza,

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:

Municipal Authority of Westmoreland County
New Stanton STP
NPDES Number: PA0038181
EPA Received: August 2, 2024
30-day response due date: September 1, 2024

This is a major municipal NPDES Permit which discharges into Sewickley Creek. EPA has chosen to perform a limited review of the draft permit based on the wasteload allocation (WLA) requirements of the Sewickley Creek Watershed Total Maximum Daily Load (TMDL), Whole Effluent Toxicity (WET), Pretreatment requirements, and PFAS-parameters. EPA has completed its review and offers the following comments.

1. The fact sheet explains the WET analysis and discharge modeling utilize different 7Q10 flows. It is unclear why the low flow values were modified for WET, but not for the rest of the water quality modeling and EPA would like to better understand the rationale for this decision. If PADEP believes this approach is still appropriate, the EPA would recommend that the justification be explained in the fact sheet.

2. There is some confusion surrounding the WET dilution series and Target In-Stream Waste Concentration (TIWC) used to evaluate WET data. The current permit has a TIWC of 47%. The laboratory analysis for WET from 2019 -2023 used a TIWC of 45%. The WET Analysis Spreadsheet in the draft fact sheet indicates that the data was analyzed using 47% for Pimephales promelas (for 2020-2023) and 45% for Ceriodaphnia dubia (for 2020-2023), which isn't consistent with the lab reports. Does PADEP know why the permittee used 45% instead of the 47% for WET analysis?

3. The fact sheet states "there were two tests failures in 2020 and 2023, retests of which passed." A retest was conducted per the PADEP SOP for the two WET failures. However, multiple failures at the facility raises concerns of possible toxicity at the plant that may require investigation. Did PADEP discuss these results with the permittee? If additional WET test failures are noted in the next permit cycle, it may be appropriate to consider whether more frequent WET testing and/or limits are necessary in the following permit reissuance.

Please address the above and provide 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 if you have any questions.

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