



Application Type Renewal
Facility Type Industrial
Major / Minor Minor

**NPDES PERMIT FACT SHEET
INDIVIDUAL INDUSTRIAL WASTE (IW)
AND IW STORMWATER**

Application No. PA0044067
APS ID 1042926
Authorization ID 1361176

Applicant and Facility Information

Applicant Name	<u>Pennsylvania Fish And Boat Commission</u>	Facility Name	<u>Union City Aquatic Conservation Center</u>
Applicant Address	<u>1735 Shiloh Road Benner Spring Fish Research Station</u> <u>State College, PA 16801-8451</u>	Facility Address	<u>9450 Route 6</u> <u>Union City, PA 16438-9719</u>
Applicant Contact	<u>Mindy McClenahan</u>	Facility Contact	<u>Daniel Donato</u>
Applicant Phone	<u>(814) 353-2229</u>	Facility Phone	<u>(814) 664-2122</u>
Client ID	<u>135455</u>	Site ID	<u>247962</u>
SIC Code	<u>0273</u>	Municipality	<u>Union Township</u>
SIC Description	<u>Agriculture - Animal Aquaculture</u>	County	<u>Erie</u>
Date Application Received	<u>July 2, 2021</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>July 10, 2025</u>	If No, Reason	<u></u>
Purpose of Application	<u>This is an application for NPDES renewal.</u>		

Summary of Review

The application submitted by the applicant requests a renewal for the NPDES permit for the Union City Aquatic Conservation Center (UCACC). A draft of the Fact Sheet and a draft of the NPDES was sent to the applicant in August 2025.

Comments were received during the minimum 30-day comment review period ending on October 13, 2025.

Mindy McClenahan of the PA Fish and Boat Commission submitted comments on October 9, 2025.

DEP responses to the comments are below:

1. The name of the facility has been updated to Union City Aquatic Conservation Center
2. The RMI have been corrected
3. Outfalls 001 and 007 discharge effluent regularly. Modeling was completed by summing the average annual flow rates for the two outfalls. The average annual flow rate is (Outfall 001 @ 0.112 MGD + Outfall 007 @ 0.0072 MGD = 0.1192 MGD).

The enclosed table estimates the average annual flow for Outfall 001 based upon DMR from March 2017 to May 2025.

Outfall 007 was based upon a flow rate of 0.0072 MGD. The facility stated that flow is more controlled for the hatch house.

Approve	Deny	Signatures	Date
X		Nicholas Hong, P.E. / Environmental Engineer Nick Hong (via electronic signature)	November 1, 2025
X		Adam Olesnanik, P.E. / Environmental Engineer Manager Adam Olesnanik	November 5, 2025

Summary of Review

Instantaneous Maximum (IMAX) limits are determined using multiplier of 2.5 for toxic pollutants. Pollutants aluminum, iron, and manganese have been updated to include an average monthly (lbs/day) and an IMAX.

For Outfall 001, the mass loading was calculated as follows: $0.112 \text{ MGD} \times 8.34 \times \text{average monthly (mg/l)}$.

For Outfall 007, the mass loading was calculated as follows: $0.0072 \text{ MGD} \times 8.34 \times \text{average monthly (mg/l)}$.

4. Currently, Fish and Boat is not subject to annual fees for annual renewal of the NPDES permit.
5. The NPDES permit will include usage rates for the drugs in Part C of the NPDES permit.
6. In concurrence with the conference call on October 7 between Fish and Boat and PA DEP, a compliance schedule for the new drug usage rates will be included in the NPDES permit while the facility conducts fate and transport studies for the drugs.
7. Part C, Section III.A.3 states that the drug and chemical usage rates in the table become effective starting at four years after the permit effective date. Reasonable exceedances of the chemical usage rates during the study period is acceptable.

The following footnote was added for PFOS parameter monitoring.

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.

The NPDES has been re-drafted to address the facility's comments.

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.

Summary of Review



October 9, 2025

Nicholas Hong, P.E.
Environmental Engineer, Clean Water Program
Pennsylvania Department of Environmental Protection
Northcentral Regional Office
230 Chestnut Street
Meadville, PA 16335

Dear Mr. Hong:

The Pennsylvania Fish and Boat Commission (Commission) has reviewed the National Pollutant Discharge Elimination System (NPDES) re-draft permit for the Union City State Fish Hatchery (SFH). Please accept the following comments that are filed within the 30-day public comment period following the posting of the draft permit in the *Pennsylvania Bulletin* on September 13, 2025.

On page 1, the Commission recommends the name of the facility be changed to Union City Aquatic Conservation Center (UCACC) to better represent all aquatic production done at UCACC.

Throughout Part A, Sections I.A. through Sections I.G. on pages 2-14, the Commission recommends that the "River Mile Index (RMI)" be updated according to the table below:

<u>Page Number</u>	<u>Outfall</u>	<u>RMI Listed</u>	<u>Correct RMI</u>
4	002	1.22	1.55
6	003	1.22	1.52
8	004	1.22	1.48
10	005	1.22	1.43
12	006	1.22	1.28
14	007	1.22	1.24

In Part A, Section I.G. on pages 15, the Commission recommends that the "Mass Units (lbs/day)" be updated according to the table below due to calculation errors found in converting mg/L to lbs/day for Outfall 007:

<u>Parameter</u>	<u>Average Quarterly, lbs/day</u>	<u>Daily Maximum, lbs/day</u>
Aluminum, Total	1.2^ (not 0.06)	2.4^ (not 0.12)

^=mg/L concentration * 8.34 (water) * Flow (0.144 MGD)

In Part A, Section III.E. on page 26, the Commission requests removing the Annual Fee section, as the Commission is exempt from these fees.

In Part C, Section III.A.1., page 32, the Commission recommends the usage rate for Chloramine-T, be changed from 0.15 lbs./day to 3.0 lbs./day. This allows the Commission to effectively treat at

Union City NPDES Permit
October 9, 2025
Page 2

appropriate concentrations according to the FDA to help control parasites on fish. Treatments would only be a few days per year, so Chloramine-T will not be discharged on a regular basis. Water treated with Chloramine-T can be held in an empty pond for degradation to occur before discharging at UCACC. If holding of the treated water is not permitted, the Commission recommends a compliance schedule be added to Part C to allow time to develop a sampling plan to determine concentrations of Monochloramine, a residual of Chloramine-T, to help determine the concentrations of Chloramine-T in our effluent.

In Part C, Section III.A.1., page 32, the Commission recommends the usage rate for Formalin (Parasite-S), be changed from 0.085 lbs./day to 12.6 lbs./day. This allows the Commission to effectively treat at appropriate concentrations according to the FDA to help control parasites on fish. Treatments would only be a few days per year, so Formalin will not be discharged on a regular basis. Water treated with Formalin can be held in an empty pond for degradation to occur before discharging at UCACC. If holding of the treated water is not permitted, the Commission recommends a compliance schedule be added to Part C to allow time to develop a sampling plan to prove ≤ 0.02 mg/L Formaldehyde effluent concentrations (0.02 mg/L is the Formaldehyde method detection limit our lab currently uses).

In Part C, Section III.A.1., page 32, the Commission recommends the usage rate for Pennox 343, be changed from 0.01 lbs./day to 5.0 lbs./day. This allows the Commission to effectively tag the skeletal structure of fish so future progress/programs can be tracked. Treatments would only be a few days per year, so Pennox 343 will not be discharged on a regular basis. Water treated with Pennox 343 can be held in an empty pond for degradation to occur before discharging at UCACC. If holding of the treated water is not permitted, the Commission recommends a compliance schedule be added to Part C to allow time to develop a sampling plan to determine concentrations of oxytetracycline hydrochloride, the active ingredient in Pennox 343, to help determine the effluent concentrations of Pennox 343, if analysis is possible.

In Part C, Section IV.A.1., page 21, the Commission recommends the usage rate for Sodium Chloride, be changed from 11.1 lbs./day to 50 lbs./day. This allows the Commission to effectively treat at appropriate concentrations according to the FDA to help control parasites on fish. Treatments would only be a few days per year, so Sodium Chloride will not be discharged on a regular basis. If the requested daily maximum limit of Sodium Chloride cannot be increased, the Commission recommends a compliance schedule be added to Part C allowing time to develop a sampling plan to determine concentrations of either sodium or chloride to help determine the concentrations of Sodium Chloride in our effluent.

In Part C, Section III.A.1., page 32, the Commission recommends the usage rate for Terramycin 200, be changed from 0.01 lbs./day to 0.1 lbs./day. This allows the Commission to effectively tag the skeletal structure of the fish so future progress/programs can be tracked or effectively treat according to the FDA to help control parasites on fish. Treatments would only be a few days per year, so Terramycin 200 will not be discharged on a regular basis. Water treated with Terramycin 200, when not in feed, can be held in an empty pond for degradation to occur before discharging at UCACC. If holding of the treated water is not permitted, the Commission recommends a compliance schedule be added to Part C to allow time to develop a sampling plan to determine concentrations of oxytetracycline dihydrate, the active ingredient in Terramycin 200, to help determine the effluent concentrations of Terramycin 200, if analysis is possible.

Summary of Review

Union City NPDES Permit
October 9, 2025
Page 3

As always, the Commission appreciates the opportunity to provide comments on NPDES permits in the draft stage.

Sincerely,



Mindy L. McClenahan, Chemist 3
Fish Production Services

Cc: B. Niewinski
B. McHail
C. Yamashita
S. Ray
C. Andreoli

Summary of Review

Hong, Nicholas

From: McClenahan, Mindy
Sent: Thursday, October 30, 2025 11:20 AM
To: Hong, Nicholas
Cc: Olesnanik, Adam; McHail, Brian; Yamashita, Coja; Ray, Scott
Subject: RE: Comments on Union City NPDES Permit
Attachments: PA0044067 2nd draft NPDES Permit Union City.docx

Nick,

I have reviewed the attached 2nd draft NPDES permit for Union City. The only real concerns I have would be additional wording to allow increased usage rates of the chemicals during the study (while sampling for the chemical(s) being used). The current usage rates in the draft for some of the chemicals wouldn't even allow for treatment, or can that be submitted with the study sampling plan? Something along the lines of "The actual allowable maximum usage for the chemicals listed may exceed the limit in the table provided (1) the usage is reasonable and during the sampling for the Usage Rate Study." Just to show what we are thinking to make sure we are sampling for the study using the rates needed for the health of our fish/mussels.

Also, the numbers and adjustments made in Part A for 001 and 007 metals look good.

Since you mentioned this would be a 2nd draft, please proceed with issuing the 2nd draft NPDES permit at your convenience.

Thanks,
Mindy

Mindy McClenahan | Water Quality Unit Leader | Chemist 3
Pennsylvania Fish and Boat Commission | Fish Production Services
1735 Shiloh Road | State College, PA 16801
Office: 814.353.2229
fishandboat.com

From: Hong, Nicholas <nhong@pa.gov>
Sent: Thursday, October 30, 2025 8:02 AM
To: McClenahan, Mindy <mmcclenaha@pa.gov>
Cc: Olesnanik, Adam <aolesnanik@pa.gov>
Subject: RE: Comments on Union City NPDES Permit

Mindy.

Please be reminded to respond to our comments

Nick Hong, PE | Environmental Engineer
PA Department of Environmental Protection
Clean Water Programs
Southcentral Regional Office
909 Elmerton Avenue | Harrisburg, PA 17110
Phone: 717.705.4824 | Fax: 717.705.4760
www.dep.pa.gov

Summary of Review

**THE SOUTHCENTRAL REGIONAL OFFICE AFTER HOURS REPORTING & 24 HOUR EMERGENCY
RESPONSE NUMBER IS 1-800-541-2050**

From: McClenahan, Mindy <mmcclenaha@pa.gov>
Sent: Friday, October 24, 2025 10:47 AM
To: Hong, Nicholas <nhong@pa.gov>
Cc: Olesnanik, Adam <aolesnanik@pa.gov>
Subject: RE: Comments on Union City NPDES Permit

Mr. Hong,

I will get back to you soon. Sorry for the delay, but there are only two full time people in my department, and I had to be in the lab this week. I haven't been at my computer much this week.

Thanks,
Mindy

Mindy McClenahan | Water Quality Unit Leader | Chemist 3
Pennsylvania Fish and Boat Commission | Fish Production Services
1735 Shiloh Road | State College, PA 16801
Office: 814.353.2229
fishandboat.com

From: Hong, Nicholas <nhong@pa.gov>
Sent: Friday, October 24, 2025 6:36 AM
To: McClenahan, Mindy <mmcclenaha@pa.gov>
Cc: Olesnanik, Adam <aolesnanik@pa.gov>
Subject: RE: Comments on Union City NPDES Permit

Mindy.

Please be reminded to review the comments on the message.

We would like to send you the 2nd draft and publish in the bulletin as soon as possible.

Nick Hong, PE | Environmental Engineer
PA Department of Environmental Protection
Clean Water Programs
Southcentral Regional Office
909 Elmerton Avenue | Harrisburg, PA 17110
Phone: 717.705.4824 | Fax: 717.705.4760
www.dep.pa.gov

**THE SOUTHCENTRAL REGIONAL OFFICE AFTER HOURS REPORTING & 24 HOUR EMERGENCY
RESPONSE NUMBER IS 1-800-541-2050**

From: Hong, Nicholas
Sent: Wednesday, October 22, 2025 4:53 AM
To: McClenahan, Mindy <mmcclenaha@pa.gov>

Summary of Review

Cc: Olesnanik, Adam <a.olesnanik@pa.gov>

Subject: RE: Comments on Union City NPDES Permit

Mindy.

Please confirm the average annual flow rates and the mass loading for Outfalls 001 and 007 is acceptable to Fish and Boat.

Outfalls 001 and 007 discharge effluent regularly.

Modeling was completed by summing the average annual flow rates for the two outfalls. The average annual flow rate is (Outfall 001 @ 0.112 MGD + Outfall 007 @ 0.0072 MGD = 0.1192 MGD).

The enclosed table estimates the average annual flow for Outfall 001 based upon DMR from March 2017 to May 2025.

Outfall was based upon a flow rate of 0.0072 MGD. The facility stated that flow is more controlled for the hatch house.

Instantaneous Maximum (IMAX) limits are determined using multiplier of 2.5 for toxic pollutants. Pollutants aluminum, iron, and manganese have been updated to include an average monthly (lbs/day) and an IMAX.

For Outfall 001, the mass loading was calculated as follows: 0.112 MGD x 8.34 x average monthly (mg/l).

For Outfall 007, the mass loading was calculated as follows: 0.0072 MGD x 8.34 x average monthly (mg/l).

A draft of the NPDES permit is attached. See pages 3 and 15 for aluminum, iron, and manganese mass loadings.

We would like to correct errors and address comment prior to re-publishing in the PA Bulletin.

Summary of Review

Date	Monitoring Period End Date	Outfall	DMR Value	Units	Statistical Base Code
03/01/2017	03/31/2017	001	0.1584	MGD	Average Monthly
04/01/2017	04/30/2017	001	0.1692	MGD	Average Monthly
05/01/2017	05/31/2017	001	0.2952	MGD	Average Monthly
06/01/2017	06/30/2017	001	0.1656	MGD	Average Monthly
07/01/2017	07/31/2017	001	0.2304	MGD	Average Monthly
08/01/2017	08/31/2017	001	0.1944	MGD	Average Monthly
09/01/2017	09/30/2017	001	0.1242	MGD	Average Monthly
10/01/2017	10/31/2017	001	0.0372	MGD	Average Monthly
03/01/2018	03/31/2018	001	0.0936	MGD	Average Monthly
04/01/2018	04/30/2018	001	0.1382	MGD	Average Monthly
05/01/2018	05/31/2018	001	0.1656	MGD	Average Monthly
06/01/2018	06/30/2018	001	0.1728	MGD	Average Monthly
07/01/2018	07/31/2018	001	0.1656	MGD	Average Monthly
08/01/2018	08/31/2018	001	0.1206	MGD	Average Monthly
09/01/2018	09/30/2018	001	0.0918	MGD	Average Monthly
10/01/2018	10/31/2018	001	0.06	MGD	Average Monthly
03/01/2019	03/31/2019	001	0.0576	MGD	Average Monthly
04/01/2019	04/30/2019	001	0.072	MGD	Average Monthly
05/01/2019	05/31/2019	001	0.0288	MGD	Average Monthly
06/01/2019	06/30/2019	001	0.0576	MGD	Average Monthly
09/01/2019	09/30/2019	001	0.1296	MGD	Average Monthly
10/01/2019	10/31/2019	001	0.144	MGD	Average Monthly
11/01/2019	11/30/2019	001	0.1152	MGD	Average Monthly
12/01/2019	12/31/2019	001	0.0864	MGD	Average Monthly
01/01/2020	01/31/2020	001	0.0936	MGD	Average Monthly
02/01/2020	02/29/2020	001	0.0648	MGD	Average Monthly
03/01/2020	03/31/2020	001	0.036	MGD	Average Monthly
04/01/2020	04/30/2020	001	0.072	MGD	Average Monthly
05/01/2020	05/31/2020	001	0.1008	MGD	Average Monthly
06/01/2020	06/30/2020	001	0.1008	MGD	Average Monthly
07/01/2020	07/31/2020	001	0.08	MGD	Average Monthly
08/01/2020	08/31/2020	001	0.0864	MGD	Average Monthly
09/01/2020	09/30/2020	001	0.1008	MGD	Average Monthly
10/01/2020	10/31/2020	001	0.1152	MGD	Average Monthly
11/01/2020	11/30/2020	001	0.126	MGD	Average Monthly
12/01/2020	12/31/2020	001	0.1008	MGD	Average Monthly
01/01/2021	01/31/2021	001	0.108	MGD	Average Monthly
02/01/2021	02/28/2021	001	0.108	MGD	Average Monthly
03/01/2021	03/31/2021	001	0.108	MGD	Average Monthly
04/01/2021	04/30/2021	001	0.144	MGD	Average Monthly
05/01/2021	05/31/2021	001	0.0864	MGD	Average Monthly
06/01/2021	06/30/2021	001	0.1152	MGD	Average Monthly
07/01/2021	07/31/2021	001	0.1296	MGD	Average Monthly
08/01/2021	08/31/2021	001	0.1296	MGD	Average Monthly
09/01/2021	09/30/2021	001	0.072	MGD	Average Monthly
10/01/2021	10/31/2021	001	0.072	MGD	Average Monthly
11/01/2021	11/30/2021	001	0.0864	MGD	Average Monthly
12/01/2021	12/31/2021	001	0.1008	MGD	Average Monthly

Summary of Review

01/01/2022	01/31/2022	001	0.1008	MGD	Average Monthly
02/01/2022	02/28/2022	001	0.1008	MGD	Average Monthly
03/01/2022	03/31/2022	001	0.1008	MGD	Average Monthly
04/01/2022	04/30/2022	001	0.1008	MGD	Average Monthly
05/01/2022	05/31/2022	001	0.1008	MGD	Average Monthly
06/01/2022	06/30/2022	001	0.1008	MGD	Average Monthly
07/01/2022	07/31/2022	001	0.1008	MGD	Average Monthly
08/01/2022	08/31/2022	001	0.1008	MGD	Average Monthly
09/01/2022	09/30/2022	001	0.1008	MGD	Average Monthly
10/01/2022	10/31/2022	001	0.1008	MGD	Average Monthly
11/01/2022	11/30/2022	001	0.1008	MGD	Average Monthly
12/01/2022	12/31/2022	001	0.1008	MGD	Average Monthly
01/01/2023	01/31/2023	001	0.1008	MGD	Average Monthly
02/01/2023	02/28/2023	001	0.1008	MGD	Average Monthly
03/01/2023	03/31/2023	001	0.126	MGD	Average Monthly
04/01/2023	04/30/2023	001	0.1512	MGD	Average Monthly
05/01/2023	05/31/2023	001	0.1008	MGD	Average Monthly
06/01/2023	06/30/2023	001	0.1008	MGD	Average Monthly
07/01/2023	07/31/2023	001	0.1008	MGD	Average Monthly
08/01/2023	08/31/2023	001	0.1008	MGD	Average Monthly
09/01/2023	09/30/2023	001	0.1008	MGD	Average Monthly
10/01/2023	10/31/2023	001	0.1008	MGD	Average Monthly
11/01/2023	11/30/2023	001	0.1224	MGD	Average Monthly
12/01/2023	12/31/2023	001	0.1224	MGD	Average Monthly
01/01/2024	01/31/2024	001	0.1116	MGD	Average Monthly
02/01/2024	02/29/2024	001	0.1224	MGD	Average Monthly
03/01/2024	03/31/2024	001	0.1224	MGD	Average Monthly
04/01/2024	04/30/2024	001	0.1224	MGD	Average Monthly
05/01/2024	05/31/2024	001	0.1296	MGD	Average Monthly
06/01/2024	06/30/2024	001	0.1296	MGD	Average Monthly
07/01/2024	07/31/2024	001	0.1368	MGD	Average Monthly
08/01/2024	08/31/2024	001	0.1152	MGD	Average Monthly
09/01/2024	09/30/2024	001	0.1152	MGD	Average Monthly
10/01/2024	10/31/2024	001	0.1152	MGD	Average Monthly
11/01/2024	11/30/2024	001	0.0936	MGD	Average Monthly
12/01/2024	12/31/2024	001	0.0936	MGD	Average Monthly
01/01/2025	01/31/2025	001	0.1224	MGD	Average Monthly
02/01/2025	02/28/2025	001	0.1224	MGD	Average Monthly
03/01/2025	03/31/2025	001	0.1224	MGD	Average Monthly
04/01/2025	04/30/2025	001	0.108	MGD	Average Monthly
05/01/2025	05/31/2025	001	0.108	MGD	Average Monthly
		Average	0.112		
		Max	0.295		