


Application Type Renewal
Facility Type Non-Municipal
Major / Minor Minor

**NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE**

Application No. PA0044270
APS ID 1011024
Authorization ID 1441934

Applicant and Facility Information

Applicant Name	<u>Laury MHC LLC (DBA Riverview Estates MHP)</u>	Facility Name	<u>Riverview Estates MHP (FKA Laury MHP FKA Keystone Mobile Home Park)</u>
Applicant Address	<u>5230 Keystone Road</u> <u>Laurys Station, PA 18059-1224</u>	Facility Address	<u>No address, off Aspen Street</u> <u>Laurys Station, PA 18059-1224</u>
Applicant Contact	<u>Ashlee Balkam</u>	Facility Contact	<u>Kenneth Fulford</u>
Applicant Phone	<u>(610) 262-4676</u>	Facility Phone	<u>(610) 216-0150</u>
Client ID	<u>64558</u>	Site ID	<u>245936</u>
Ch 94 Load Status	<u>Not Overloaded</u>	Municipality	<u>North Whitehall Township</u>
Connection Status	<u></u>	County	<u>Lehigh</u>
Date Application Received	<u>May 30, 2023</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>July 2, 2023</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>NPDES renewal</u>		

Summary of Review

This is a NPDES Permit renewal for a 0.0375 MGD STP for a Mobile Home Park (MHP). They had AADF flows of 0.0095 MGD (2020), 0.0106 MGD (2021) and 0.0125 MGD (2022), with the highest monthly average flow of 0.0196 MGD (February 2022). Estimated population of 375.

- **DBA:** The permittee is doing business as "Riverview Estates MHP". The permit had been transferred in 2020. The previous client was Keystone Mobile Home Park (Client ID: 1099)
- **Treatment Plant Location Directions:** No street address per application. From US Route 22 north on PA 145 to Laurys Station, turn right at park entrance onto Aspen Street, past Keystone Road, then past Evergreen Street to the intersection of Playground Road and Aspen Street. Turn right onto the gravel driveway, The treatment plant entrance is 300 feet south
- **Permit Application:**
 - **OnBase No. 109736 (NPDES Permit renewal application)**
 - **On-Base No. 113429 (Supplemental Information), uploaded 7/2/2023**
- **EIN Correction:** The July 2, 2023 Response indicated the previous application(s) and E-facts Client entry had an incorrect EIN Number(s). A Federal W-9 form "Request for Taxpayer Identification Number and Certification" form was provided with the **EIN# 47-2528282** for "Laury MHC, LLC" (the permittee) DBA Riverview Estates MHP. Previously provided incorrect EIN Nos. was 23-1531842 in Client E-facts (for Laury MHC, LLC), and 34-1927414 in the renewal GIF (with no existing client found under that EIN). There is also a slight variation in permittee name (Laury versus Laurys) in the permittee name. **Information sent to Client Verifiers for updating E-facts.** Related information:
 - 8/21/2020 NPDES Permit No. PA0044270-A1 was issued to: "Laurys MHC, LLC" at 8800 N. Bronx Avenue, 2nd Floor, Skokie IL 60077.
 - "Laury MHC, LLC" (PADOS Entity No. 6805884) is a Foreign (Delaware) LLC formed in 2018.

Approve	Deny	Signatures	Date
X		James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	September 5, 2024
X		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Acting Engineer Manager	9-9-24

Summary of Review

- “Riverview Estates MHP” (PA DOS Entity No. 6827001), formed in PA in 2019, is a registered fictitious name, with address: 8800 NORTH BRONX AVENUE 2ND FLOOR, SKOKIE, IL 60077, with Owner: Laury MHC, LLC, 8800 N Bronx Ave, Skokie IL 60077. This address matches the 8/1/2020 NPDES Permit Amendment No. PA0044270 address for “Laurys MHC, LLC”
- “DH Palm Cove LLC”: The W-9 Form First line included this additional name, which was not found on the PA DOS Corporate Webpage (accessed 7/21/2023). The W-9 Form Second Line was for Laury MHC, LLC.
- The W-9 Form Second Line (Laury MHC LLC) also included another EIN (83-2571715) with no client under that EIN in E-facts (accessed 7/21/2023).

Sludge use and disposal description and location(s): 6.483 dry tons disposed at LCA Pretreatment Plant.

Part C Special Conditions:

- Part C.I.A, B, C, D: Existing Stormwater prohibition; Necessary property rights; Residuals Management; Planning conditions
- Part C.I.E: Existing Chlorine minimization condition
- Part C.II: Existing Solids Management conditions

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.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	001	Design Flow (MGD)	.0375
Latitude	40° 43' 31.75"	Longitude	-75° 31' 34.38"
Quad Name	Cementon	Quad Code	1341 (6.21.1)
Wastewater Description: Sewage Effluent			
Receiving Waters	Lehigh River (TSF, MF)	Stream Code	3335
NHD Com ID	26297853	RMI	26.4 (from DRBC Docket)
Drainage Area	931 mi ²	Yield (cfs/mi ²)	0.2073
Q ₇₋₁₀ Flow (cfs)	193	Q ₇₋₁₀ Basis	USGS PA Streamstats
Elevation (ft)	303 (USGS Terrain Mapper)	Slope (ft/ft)	-
Watershed No.	2-C	Chapter 93 Class.	TSF, MF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Impaired		
Cause(s) of Impairment	METALS		
Source(s) of Impairment	ACID MINE DRAINAGE		
TMDL Status	-	Name	-
<u>Background/Ambient Data</u>		Data Source: Main St. Bridge (~6.7 miles upstream)	
		Sample ID: 2236353	
		Sequence Number: 88	
		Monitoring Point ID: 47993	
		Date Collected: 6/19/2018	
pH (SU)	7.27	See above	
Temperature (°C)	22.32	See above	
Hardness (mg/L)	40	See above	
Total Aluminum (ug/l)	91.400	See above	
Total Manganese (ug/l)	35.000	See above	
Total Iron (ug/l)	151.000	See above	
Total Zinc (ug/l)	45.000	See above	
<u>Nearest Downstream Public Water Supply Intake</u>		PWS ID: 3480057 (PADWIS intake shown on River per E-maps); 8 MGD pumping capacity.	
		System Name: NORTHAMPTON BORO MUNI	
PWS Waters	Lehigh River (at Spring Creek confluence)	Flow at Intake (cfs)	206
PWS RMI	24.76	Distance from Outfall (mi)	1.75 miles

Changes Since Last Permit Issuance: None known.

Comments:

- The Outfall is ~ 0.36 miles upstream of the confluence with Fells Creek (CWF; Stream# 3715; impaired by pathogens), which has several North Whitehall Township MS4 NPDES Permit No. PAI132276 outfalls.
- The DRBC docket estimated a 3,773:1 dilution factor.
- TMDL: The small MHP STP (domestic sewage only) facility is not expected to contribute to stream impairment for metals.

Treatment Facility Summary				
Treatment Facility Name: Laurys MHP LLC				
WQM Permit No.	Issuance Date	Scope		
3907404-T1	2/24/2020	Transfer of WQM permit		
3907404	6/25/2008	0.0375 MGD STP (Replacement of malfunctioning STP at same capacities).		
3973415	2/13/1979	Original STP permit for Keystone Mobile Home Park including, per Module 1: one (1) comminutor, one (1) flow equalization tank, two (2) aeration tanks, two (2) final settling tanks, one (1) chlorine contact tank, two (2) disinfection facilities (not identified on form), two (2) aerated sludge holding tanks, and one (1) post-aeration tank.		
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary	Extended Aeration	Hypochlorite	0.0375
Hydraulic Capacity (MGD)	Organic Capacity (lbs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposal
0.0375	50.7	Not Overloaded	Waste holding tanks	Offsite disposal

Changes Since Last Permit Issuance: None known.

Other Comments:

Facility description: One (1) Comminutor/bar screen, one (1) EQ Tank, two (2) Extended Aeration Tanks (each with three (3) tanks in series), two (2) clarifiers, one (1) Tertiary Clarifier, one (1) Chlorine Contact Tank, one (1) De-chlorination Tank, and two (2) Waste Holding Tanks. They use Trichloro-S-Trainzinetriene for disinfection, sodium bisulfite for de-chlorination, and soda ash for pH adjustment. No changes planned.

Compliance History

DMR Data for Outfall 001 (from May 1, 2022 to April 30, 2023)

Parameter	APR-23	MAR-23	FEB-23	JAN-23	DEC-22	NOV-22	OCT-22	SEP-22	AUG-22	JUL-22	JUN-22	MAY-22
Flow (MGD) Average Monthly	0.0144	0.0152	0.0198	0.0176	0.0160	0.0117	0.0078	0.0069	0.0096	0.0115	0.0105	0.0135
Flow (MGD) Daily Maximum	0.0389	0.0321	0.0290	0.0305	0.0271	0.0219	0.0124	0.0126	0.0182	0.0450	0.0163	0.0518
pH (S.U.) Instantaneous Minimum	6.5	6.9	6.5	6.5	6.4	6.6	6.1	6.2	6.4	6.5	6.4	6.6
pH (S.U.) Instantaneous Maximum	7.4	7.5	7.5	7.3	7.4	7.9	7.7	7.9	7.9	8.2	7.5	8.0
DO (mg/L) Instantaneous Minimum	8.7	7.8	8.7	9.1	9.6	8.7	8.2	7.2	7.0	6.9	7.6	7.2
TRC (mg/L) Average Monthly	0.20	0.22	0.28	0.28	0.18	0.23	0.24	0.18	0.27	0.21	0.18	0.25
TRC (mg/L) Instantaneous Maximum	0.47	0.58	0.50	0.62	0.50	0.86	0.96	0.38	0.48	0.59	0.39	0.97
CBOD5 (mg/L) Average Monthly	< 3.3	11.9	< 2.3	< 2.3	< 2.0	2.0	2.0	3.0	3.7	2.1	3.6	2.3
CBOD5 (mg/L) Raw Sewage Influent Average Monthly	188	211	140	151	166	160	107	148	122	194	148	160
CBOD5 % Removal (%) Minimum Monthly Average	98.1	94.6	98.4	98.5	99	98.7	98.0	97.6	96.6	98.9	96.8	98.6
TSS (mg/L) Average Monthly	< 4.0	< 6.8	< 4.3	< 4.0	< 4.0	4.0	4.0	4.0	5.5	4.0	4.0	4.0
Total Dissolved Solids (mg/L) Average Quarterly		323.0			502.0			525.0			476.0	
Fecal Coliform (No./100 ml) Geometric Mean	< 1	< 1	< 1	< 1	< 1	1	1	< 1	1	1	1	1

NPDES Permit Fact Sheet
Laurys MHP LLC DBA Riverview Estates MHP

NPDES Permit No. PA0044270

Fecal Coliform (No./100 ml) Instantaneous Maximum	< 1	< 1	< 1	< 1	1	1	1	< 1	1	1	1	1
Nitrate-Nitrite (mg/L) Average Monthly	5.0	4.2	13.4	10.9	< 20.2	23.0	37.8	30.5	9.9	28.8	6.0	17.8
Total Nitrogen (mg/L) Average Monthly	12.9	15.5	15.0	13.0	< 21.3	24.7	39.2	31.6	12.0	31.6	9.2	19.4
Ammonia (mg/L) Average Monthly	5.3	13.1	1.6	0.7	0.3	0.5	0.6	0.4	0.5	0.8	0.5	0.2
TKN (mg/L) Average Monthly	8.0	11.3	1.6	2.1	1.2	1.7	1.4	1.1	2.1	2.8	3.2	1.6
Total Phosphorus (mg/L) Average Monthly	0.77	1.77	3.30	2.42	4.65	6.22	8.14	6.51	6.34	9.42	6.46	3.46

Compliance History

Inspection History:

CLIENT	INSP PROGRAM	INSP ID	INSPECTED DATE	INSP TYPE	INSPECTION RESULT DESC	# OF VIOLATIONS
LAURYS MHC LLC	WPCNP	3319653	12/28/2023	Administrative/File Review	Violation(s) Noted	1
LAURYS MHC LLC	WPCNP	3322494	07/31/2023	Routine/Partial Inspection	No Violations Noted	0
LAURYS MHC LLC	WPCNP	3709143	01/03/2023	Routine/Partial Inspection	No Violations Noted	0
LAURYS MHC LLC	WPCNP	3146451	08/04/2022	Administrative/File Review	Violation(s) Noted	1
LAURYS MHC LLC	WPCNP	3594144	02/16/2022	Routine/Partial Inspection	No Violations Noted	0
LAURYS MHC LLC	WPCNP	3375265	02/03/2022	Administrative/File Review	Violation(s) Noted	1
LAURYS MHC LLC	WPCNP	3481829	12/20/2021	Administrative/File Review	Violation(s) Noted	1

NPDES Permit Fact Sheet
Laurys MHP LLC DBA Riverview Estates MHP

NPDES Permit No. PA0044270

LAURYS MHC LLC	WPCNP	3194543	05/20/2021	Compliance Evaluation	No Violations Noted	0
LAURYS MHC LLC	WPCNP	3401983	02/03/2021	Routine/Partial Inspection	No Violations Noted	0
LAURYS MHC LLC	WPCNP	3700340	06/01/2020	Administrative/File Review	Violation(s) Noted	1
LAURYS MHC LLC	WPCNP	3038435	02/03/2020	Administrative/File Review	No Violations Noted	0

Comments:

12/28/2023 Notice of Violation for failure to pay Chapter 302 Operator Certification Service Fee.

4/8/2022 and 3/3/2020 Administrative Orders for payment of annual fee. Previous 2/3/2022, 2/3/2021, and 2/2/2020 NOVs for failure to pay annual fee.

Compliance History: There are three open violations (2 Safe Drinking Water; 1 Clean Water) per the 9/5/2024 WMS query (Open Violations by Client Number):

CLIENT	PF KIND	INSP PROGRAM	PROGRAM SPECIFIC ID	VIOLATION ID	VIOLATION DATE	VIOLATION CODE	VIOLATION
LAURYS MHC LLC	Community	Safe Drinking Water	3390018	8172972	12/19/2023	E1A	FAILURE OF AN OWNER TO SUBMIT ANNUAL OPERATOR CERTIFICATION SYSTEM FEE
LAURYS MHC LLC	Community	Safe Drinking Water	3390018	8195049	07/24/2024	D2I	FAILURE TO COMPLY WITH UNINTERRUPTED SYSTEM SERVICE PLAN REQUIREMENTS
LAURYS MHC LLC	Sewage Non-Publicly Owned (Non-Muni)	WPC NPDES	PA0044270	980569	01/03/2023	302.202	Operator Certification - Failure to submit annual system fee

Development of Effluent Limitations

Outfall No. 001
Latitude 40° 43' 33.00"
Wastewater Description: Sewage Effluent

Design Flow (MGD) .0375
Longitude -75° 31' 36.00"

Permit Limits/Monitoring: Changes bolded.

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
CBOD ₅	Report (lbs/d) 25.0 50.0 50.0	Monthly Average Monthly Average Daily Max IMAX	Existing Technology limit (Chapter 92a.47) supported by water quality modeling. <u>Application data:</u> 20.9 mg/l max and 2.9 mg/l average (48 samples)
TSS	Report (lbs/d) 30.0 60.0 60.0	Monthly Average Monthly Average Daily Max IMAX	Existing Technology limit (Chapter 92a.47) <u>Application data:</u> 9.6 mg/l max and 4.3 mg/l average (48 samples)
pH	6.0 – 9.0 SU	Inst. Min - IMAX	Existing Technology limit (Chapter 92a.47) <u>Application data:</u> 6.0 – 8.2 SU (730 samples)
DO	5.0	Inst. Min	Existing WQBEL limit <u>Application data:</u> No data on form. See EDMR data.
Fecal Coliform (5/1 – 9/30)	200/100 ml 1,000/100 ml	Geo Mean IMAX	Existing Technology limit (Chapter 92a.47) <u>Application data:</u> 15/100 ml max and 1/100 ml average (48 samples)
Fecal Coliform (10/1 – 4/30)	2,000/100 ml 10,000 ml/100 ml	Geo Mean IMAX	See above
E Coli	Report/100 ml	IMAX	New annual monitoring requirement due to Chapter 93 WQS. (Chapter 92a.61)
Total Residual Chlorine	0.50 1.17	Average Monthly IMAX	Existing TBEL (Chapter 92a.47) <u>Application data:</u> 0.97 mg/l max, 0.21 mg/l average (730 samples)
Ammonia-Nitrogen	Report (lbs/d) 20.0 40.0 40.0	Monthly Average Monthly Average Daily Max IMAX	Existing year-round WQBEL (DRBC requirement) <u>Application data:</u> 4.59 mg/l max and 0.49 mg/l average (48 samples)
Total Phosphorus	Report (lbs/d) Report Report	Monthly Average Monthly Average Daily Max	Existing monitoring requirement <u>Application data:</u> 10.60 mg/l max and 5.77 mg/l average (24 samples)
Total Nitrogen (TKN + Nitrate-N + Nitrite-N measured in same sample)	Report (lbs/d) Report Report	Monthly Average Monthly Average Daily Max	Existing monitoring requirement (DRBC and Chapter 92a.61). <u>Application data:</u> 48.0 mg/l max and 26.1 mg/l average (24 samples)
TKN	Report (lbs/d) Report Report	Monthly Average Monthly Average Daily Max	Existing monitoring requirement (DRBC and Chapter 92a.61) <u>Application data:</u> 11.3 mg/l max and 2.0 mg/l average (24 samples)
Nitrate- Nitrite-N	Report (lbs/d) Report Report	Monthly Average Monthly Average Daily Max	Existing monitoring requirement (DRBC and Chapter 92a.61) <u>Application data:</u>

			Nitrate-Nitrite: 46.4 mg/l Nitrate-Nitrite max and 24.0 mg/l average (24 samples) NO3: 46.4 mg/l max and 24.0 mg/l average (24 samples) per application table. Not clear if which they are reporting
TDS	Report (lbs/d) 1000.0 2000.0 2000.0	Quarterly Average Quarterly Average Daily Max IMAX	Existing WQBEL. (DRBC requirement) Application data: No data. See EDMR data.
CBOD5 Raw Sewage Influent	Report (lbs/d) Report Report	Monthly Average Monthly Average Daily Max	Existing monitoring requirement Application data: None. See EDMR data
CBOD5 Minimum Reduction	85%	Monthly Average	Existing DRBC requirement. Application data: None. See EDMR data.

Comments:

- Mass loading reporting added. No additional sampling required.
- Daily max limits based on existing IMAX limits. (Any exceedance of the IMAX limit, of whatever duration, is an exceedance).
- 24-hour composite sampling now required to avoid 8-hour composite biasing.
- 2023 Draft DRBC Docket was consistent with existing NPDES permit limits/monitoring requirements.
- **WQM Model 7.1.1 Output:**

Analysis Results WQM 7.0

Hydrodynamics

NH3-N Allocations

D.O. Allocations

D.O. Simulation

Effluent Limitations

RMI

Discharge Name

Permit Number

Disc Flow (mgd)

26.40

Laurys MHC

PA0044270

0.0375

Parameter	Effluent Limit 30 Day Average (mg/L)	Effluent Limit Maximum (mg/L)	Effluent Limit Minimum (mg/L)
CBOD5	25		
NH3-N	20	40	
Dissolved Oxygen			5

Record: 1 of 1

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