

a

Application Type Renewal
Facility Type Sewage
Major / Minor Major

NPDES PERMIT FACT SHEET ADDENDUM

Application No. PA0053147
APS ID 832443
Authorization ID 1327056

Applicant and Facility Information

Applicant Name	<u>Upper Saucon Sewage Treatment Authority</u>	Facility Name	<u>Upper Saucon Township WWWW</u>
Applicant Address	<u>5500 Camp Meeting Road</u> <u>Center Valley, PA 18034-9444</u>	Facility Address	<u>4774 Saucon Creek Road</u> <u>Center Valley, PA 18034</u>
Applicant Contact	<u>Patrick Lambert</u>	Facility Contact	<u>Patrick Lambert</u>
Applicant Phone	<u>(610) 282-1171</u>	Facility Phone	<u>(610) 282-1171</u>
Client ID	<u>309424</u>	Site ID	<u>270952</u>
SIC Code	<u>4952</u>	Municipality	<u>Upper Saucon Township</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Lehigh</u>
Date Published in PA Bulletin	<u>February 4, 2023</u>	EPA Waived?	<u>No</u>
Comment Period End Date	<u>March 6, 2023</u>	If No, Reason	<u>Major Facility</u>
Purpose of Application	<u>Renewal of NPDES permit.</u>		

Internal Review and Recommendations

Public notification of draft permit issuance was published in the PA Bulletin on February 4, 2023. Three comments were received from the U.S. EPA in an email, dated February 21, 2023. The comments and responses are below. Another draft permit will be issued with a new public comment period.

EPA Comment 1


Total Copper monitoring is required in the draft permit. The Toxics Management Spreadsheet (TMS) did not evaluate RP for Copper with consideration of the Water Effects Ratio (WER), which is being afforded in this permit cycle. The fact sheet needs to evaluate and document whether the existing monitoring requirements are appropriate or whether WQBELs are necessary based on an RP assessment that considers the copper WER. PADEP indicated it would provide this revised assessment.

Response

The 2.53 criteria modifier for Total Copper from the site-specific studies was included in the attached TMS model run. RP was not established and monitoring/reporting requirements for Total Copper will remain in the final permit.

EPA Comment 2

The TMS indicates there is no RP for Bis(2-Ethylhexyl)Phthalate. According to the limited effluent data available in the fact sheet, it appears that the facility can currently meet the 0.0022 ug/l limit. PADEP indicated it will review the available discharge data to determine whether the facility can consistently meet the WQBEL. If the facility can comply with the WQBEL now, the compliance schedule would not be appropriate and would need to be removed from the permit. 40 CFR 122.47(a) states that, "the permit may, *when appropriate*, specify a schedule of compliance leading to compliance with CWA and regulations." (*emphasis added*).

Approve	Return	Deny	Signatures	Date
X			 Brian Burden, E.I.T. / Project Manager	December 2, 2024
X			Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Acting Environmental Engineer Manager	12-27-24

Internal Review and Recommendations

Response

Since 2021, Bis(2-Ethylhexyl)Phthalate was reported in detectable concentrations for 7 months in eDMR. The average of those values was 0.0037 mg/L. It doesn't appear the permittee can meet the more stringent limitations (0.0022 mg/L monthly average) and the compliance schedule will remain in the final permit.

EPA Comment 3

A WETT failure in August 2018 was documented and discussed in the fact sheet. The failure reported in 2018 did not have a re-test conducted within the permit designated 45-day window for re-testing. We acknowledge that the subsequent WET test was directed by PADEP Enforcement, but it was conducted 3-4 months after the failure. While that follow up test passed, it does not appear that this test can be considered a re-test. Unless the permittee was able to indicate that the August 2018 WET test was invalid, or that the permittee addressed the cause of the toxicity, it seems that RP was identified and EPA believes that WQBELs should be imposed in the permit consistent with 40 CFR 122.44(d)(1)(iv).

Response

The re-test was not conducted within the 45-day window; however, the re-test was completed within a timeframe where the WWTP effluent was not expected to change substantially in quality. DEP guidance recommends reviewing the last *four* consecutive WET tests to determine if reasonable potential exists. Currently, the permittee has passed their last *six* consecutive WET tests: 8/2023, 9/2022, 9/2021, 8/2020, 8/2019 & 12/2018. The WET conditions in the permit remain the same as the previous draft permit with no limitations.



TMS PA0053147
WER.pdf