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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

Upper Saucon Sewage Treatment  
Authority

Applicant Address

5500 Camp Meeting Road  
Center Valley, PA 18034-9444

Applicant Contact

Patrick Lambert

Applicant Phone

(610) 282-1171

Client ID

309424

SIC Code

4952

SIC Description

Trans. & Utilities - Sewerage Systems

Date Published in PA Bulletin

February 4, 2023

Comment Period End Date

March 6, 2023

Purpose of Application

Renewal of NPDES permit.

Facility Name

Upper Saucon Township WWWP

Facility Address

4774 Saucon Creek Road

Facility Contact

Center Valley, PA 18034

Facility Phone

Patrick Lambert

Site ID

(610) 282-1171

Municipality

Upper Saucon Township

County

Lehigh

EPA Waived?

No

If No, Reason

Major Facility

**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