

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

**NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE**

Application No. PA0060038
APS ID 774527
Authorization ID 1366845

Applicant and Facility Information

Applicant Name	<u>Julia Ribaldo Healthcare Group, LLC DBA Julia Ribaldo Extended Care Center DBA Saber Healthcare Group</u>	Facility Name	<u>Julia Ribaldo Extended Care Center</u>
Applicant Address	<u>1401 Golf Park Drive Lake Ariel, PA 18436-4231 Michael Coyne (Director, Facility Management and Corporate Director, EVS per GIF)</u>	Facility Address	<u>1404 Golf Park Drive Lake Ariel, PA 18436-4252</u>
Applicant Contact	<u>(570) 698-5647</u>	Facility Contact	<u>Michael Coyne</u>
Applicant Phone	<u>293798</u>	Facility Phone	<u>(570) 698-5647</u>
Client ID	<u>Not Overloaded</u>	Site ID	<u>250950</u>
Ch 94 Load Status	<u>Wayne</u>	Municipality	<u>Lake Township</u>
Connection Status	<u>Yes</u>	County	<u>Wayne</u>
Date Application Received	<u>August 26, 2021</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>October 4, 2022</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of NPDES Permit.</u>		

Summary of Review

This is a 0.0125 MGD non-municipal STP for a personal care/skilled nursing facility with captive treatment plant discharging to a small unnamed 0.031 square kilometer lake/impoundment (on Stock Farm Road Pond, but referenced as the "Leshner/Moore Pond" in old DEP file documents) on Unnamed Trib 05561 To Ariel Creek (HQ-CWF; Stream Code 5561) which traverses additional ponds before reaching Lake Wallenpaupack.

Background: See communications log for permitting history. See compliance section for assorted compliance issues. In addition:

- **Special Site-Specific Circumstances:**
 - The existing NPDES Permit has expired. The Department has been exercising enforcement discretion, but the facility is discharging without a valid NPDES permit.
 - The 2023 EPA Compliance Inspection Report indicated the permitted Tertiary Filtration System (two sand filters) has been out-of-service for decades and the permitted chemical additive flash mixing tank was gone. Such substantial treatment plant process changes represent Chapter 93.4c material changes to the permitted treatment process if they are not promptly replaced. The inoperative/missing treatment units would also have contributed to historic and ongoing compliance issues.
 - There is a separate WQM Permit Transfer Application for transfer of existing WQM permits (6494406; 6486403; and 6478405) to "BHG Aviv LLC" which was identified as facility owner in the WQM Permit Transfer Application. However, it is not clear if this party is the facility owner (conflicting information in the 2023 EPA Compliance Inspection Report and from DRBC that the owner may be "Saber Healthcare Group").

Approve	Deny	Signatures	Date
X		James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	October 24, 2024
X		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Acting Environmental Engineer Manager	10-29-24

Summary of Review

- **Revised Application:** Revised Application received via **On-Base Reference Nos. 71258** (uploaded 9/30/2022) and **71281** (uploaded 10/1/2022 with copy of mailing receipt and photocopy of check) and. Supplemental information received by e-mail (TN data; Act 14 proof of receipts). **This replacement NPDES Permit Renewal Application submittal was required by a 1/17/2019 Field Order and previously discussed in a 9/19/2018 Enforcement Conference (per the 1/16/2020 DEP Inspection Report). It replaced an earlier deficient application that could not be processed. A complete NPDES Permit Renewal Application submittal was required within fifteen days of the Field Order. The previous application was closed out in E-facts (APS No. 774527; Auth No. 1207580; Account No. 718754).**
- **Flows:** The facility discharged 0.011 MGD AADF (2020), 0.010 MGD AADF (2019), and 0.01073 MGD (2018) with April 2020 discharge being 0.012 MGD.
 - The Annual Average Daily Flows were previously estimated at 0.013 MGD flows in both 2015 and 2016, and 0.11 MGD in 2014. July 2016 had the highest monthly average flow of 0.015 MGD.
 - The application noted that the more recent effluent data came after removal of laundry flows from the STP wastestreams.
 - The 1/17/2019 DEP Inspection Report indicated the facility hoped the removal of laundry flow surges would reduce operational problems. The same report indicated the facility had also “scoped” courtyard I&I flows and repairs made.
- **Permittee Name Change/Clarification:** The Application clarified that the client permittee’s legal name is “Julia Ribauda Healthcare Group, LLC” (EIN Number is 27-5010778), not “Saber Healthcare Group” (which was not listed in the PA DOS corporate website as either a registered corporation or registered fictitious name as of 10/24/2024). They are the facility operator in financial control, indicated to be leasing the facility (which was indicated to be owned by BHG Aviv, LLC in the application).
 - **Saber Healthcare Group:** The 11/1/2012 NPDES Permit was issued to **Saber Healthcare Group (EIN No. 27-5010778) with mailing address of: 26691 Richmond Road Bedford Heights, OH 44146.** The EIN No. is for “Julia Ribauda Healthcare Group, LLC”, which means the permittee was doing business as (DBA) Saber Healthcare Group.
 - Saber Healthcare Group is not listed in the PA Department of State corporate website as either legal or fictitious name (as of 10/24/2024).
 - There is a separate Saber Healthcare Holdings LLC under DOS Entity No. 7120582, but no identified relationship.
 - There is an Ohio company (Saber Healthcare Group LLC) with D&B No. 078778013 (information in application document) but it was not identified as either owner or operator, and is not registered on the PADOS corporate webpage. Might be in the overall corporate family, given application e-mail giving their D&B number.
 - Previous NPDES Permittee was “Integrated Health Services at Penn Inc.”
 - The 2023 EPA Compliance Inspection Report indicated “Saber Healthcare” was the facility owner (not BHG Aviv LLC).
 - The 10/23/2024 DRBC (Kovach) E-mail indicated: “The docket remains the same. The current owner we have on record is Saber Healthcare Group”.
 - **Julia Ribauda Healthcare Group, LLC’s EIN Number is 27-5010778 per the GIF, and PADOS Entity No. 4018279 (created 2/28/2011 per DOS website):**
 - Present permittee/applicant.
 - Julia Ribauda Extended Care Center is a registered fictitious name with the owner being Julia Ribauda Healthcare Group, LLC. Created 3/25/2011.
 - **BHG Aviv LLC (EIN No. 36-4601432; PADOS Business Entity No. 3708184, created 2/13/2007):** This company was identified as the facility owner (not operator). It is in communications with the DRBC about a DRBC Docket update or termination but no transfer to this party (as of 10/23/2024 DRBC (Kovach) E-mail). The (no date visible) BHG Aviv LLC Letter to the DRBC indicated that: “Ownership from Integrated Health Services of Penn Inc. to BHG Aviv, LLC was legally completed on 09/17/2010”, but it is unclear when this letter was issued and whether the DRBC would transfer the docket to the facility owner as opposed to NPDES permittee (operator with financial control).
 - A copy of the communication with the DRBC was under the “Omega Healthcare Investors Inc.” letterhead (with illegible address and telephone numbers that appear to differ from the WQM Permit Transfer contact address). An application document also referenced the owner’s name as BHG Aviv, LLC c/o Omega Healthcare Investors, Inc.”. A 2016 Application E-mail had identified the contact information as: BHG Aviv LLC c/o Omega Healthcare Investors (parent company per 2016

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- e-mail) David Miltner, Senior Asset Manager, 200 International Circle, Suite 3500, Hunt Valley, MD 21030, 410-427-1770. "Omega Healthcare Investors Inc." is not listed on the PA Department of State business filings and is not a DEP Client under that name.
 - The WQM Permit Transfer Application contact person was identified as: Megan Ames, SVP Operations, 303 International Circle, Suite 200, Hunt Valley MD 21030.
 - Existing Part II WQM Permits (STP) were last issued to "Integrated Health Services at Penn, Inc." The Application contained an 8/22/1994 lease between "Integrated Health Services at Penn, Inc." and "Lake Ariel Associates".
 - BHG LLC is relying on Julia Ribaudo and its technical consultant (Farnham) to do any required DRBC Docket updating via letter per 9/27/2022 E-mail included in the Julia Ribaudo NPDES Permit Application
- **DRBC Docket No. D-95-4:** The 10/23/2024 DRBC (Kovach) E-mail indicated: "The docket remains the same. The current owner we have on record is Saber Healthcare Group". The application had contained 2016 e-mail correspondence about a proposed Docket transfer to BHG Aviv LLC (c/o Omega Healthcare Investors, Inc.). A DRBC Docket transfer/update might still be required. If the Docket has been transferred to Saber Healthcare Group, the full legal name and any fictitious name (plus EIN no.) is required to determine if this is either the NPDES or WQM permit applicant.
- **Sludge use and disposal description and location(s):** 1.389 dry tons of sludge estimated produced in 2020. Sludge was disposed at the Wyoming Valley Sewer Authority. They are also looking at land application options in the future via contractor (Koberlein, with PAG092213).

Special Conditions: Changes bolded.

- **Part A.I.A footnotes:**
 - **"Sampling to include laundry discharge days if laundry is done at the facility. Part C.I.J sampling applies to these parameters"**. The facility ceased doing onsite laundry as an operational fix to address issues caused by laundry discharge flows during the last few years, but has made no commitment to continue this practice. Additional sampling pertains until out-of-service tertiary filtration and missing TP chemical addition Flash Mix Tank is replaced. Otherwise, Part A.I Additional Requirements Item 4 bypassing requirements would apply.
 - **"Any excess wastewater (laundry wastewater or other) shipped offsite for treatment/disposal shall be reported in the monthly DMR with date(s), volume(s), precipitation (inches), and destination"**. If they are shipping wastewater offsite for treatment, then it shall be documented in DMRs.
- **Part C.I.A through D:** Standard Sewage conditions (Stormwater prohibition; Necessary property rights; Residuals management; Planning).
- **Part C.I.E: New Chlorine Minimization condition (for when chlorine is used only).** UV disinfection is the approved method of disinfection with TRC detected in 2017 sampling.
- **Part C.I.F: New Notification of Responsible Operator condition.** 1/17/2019 DEP Inspection Report noted period of time without a certified operator with known violations. Unclear who is the Responsible Certified Operator at present.
- **Part C.I.G: New O&M condition** due to site-specific treatment plant issues.
- **Part C.I.H: New HFMP condition** due to historic overloading.
- **Part C.I.I:** Existing Changes to Stream/Effluent Condition retained.
- **Part C.I.J: New Tertiary Filtration and Chemical Treatment Flash Mix Tank condition** to require replacement of non-operable and/or missing treatment units.
- **Part C.I.K: New WQM Permit Transfer and Corporate Information** to clarify who must be the WQM permittee and clarification on permittee identity and relationship to "Saber Healthcare Group".
- **Part C.I.L: New Chapter 94 Monitoring/ Reporting requirements** have been added to this facility. This includes the addition of influent monitoring/reporting for BOD5.
- **Part C.II: New standard 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-

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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)	.0125
Latitude	41° 27' 3.47"	Longitude	-75° 21' 59.41"
Quad Name	Lakeville	Quad Code	0743 (3.22.1)
Wastewater Description: Sewage Effluent			
Receiving Waters	Pond Discharge on Unnamed Tributary to Ariel Creek (HQ-CWF)	Stream Code	5561
NHD Com ID	25930194	RMI	277.7-16.4-17.2-4.7-2.5 (DRBC Docket RMI)
Drainage Area	0.11 square mile (USGS PA Streamstats estimate)	Yield (cfs/mi²)	0.0220
Q7-10 Flow (cfs)	0.00242	Q7-10 Basis	See below.
Elevation (ft)	1500 Feet	Slope (ft/ft)	-
Watershed No.	1-C	Chapter 93 Class.	HQ-CWF
Existing Use	-	Existing Use Qualifier	-
Exceptions to Use	-	Exceptions to Criteria	-
Assessment Status	Attaining Use(s)		
Cause(s) of Impairment	-		
Source(s) of Impairment	-		
TMDL Status	Implemented and Attaining Goals	Name	Lake Wallenpaupack Watershed TMDLs (Nutrients/Total Phosphorus and mercury)
Background Data		Data Source	
pH (SU)	-		
Temperature (°F)	-		
Hardness (mg/L)	-		
Other	-		
Nearest Downstream Public Water Supply Intake	EASTON SUBURBAN WATER AUTH ID# 101943-001		
PWS Waters	Delaware River	Flow at Intake (cfs)	-
PWS RMI	-	Distance from Outfall (mi)	>40 miles

Changes Since Last Permit Issuance: DEP Inspector GPS-verified Outfall No. 001 coordinates are: 41° 27' 4" N by -75° 22' 1" W (due to application deficiencies) on 10/4/2022.

Other Comments:

Outfall Location: In a private pond/impoundment at the headwaters of the UNT (around 106 Stock Farm Road). No pond name in E-maps or USGS Topo maps, but a 1/5/1995 DEP Biologist (Kupsky) Memo called it the "Moore/Lesher Pond" and evaluated required TP limits. No Dam permit per E-maps. E-maps noted the receiving pond was 0.031 square miles in area, with channel then another water body (0.009 square miles in area), then third water body (0.007 square miles in area), then stream segment UNT), then Brooks Lake (0.037 square mile), then Ariel Creek segment (Stream Code 5553), then another 0.061 square mile water body, Ariel Creek segment, then Roaming Woods Lake (0.802 square miles) with eventual drainage to Lake Wallenpaupack/Wallenpaupack Creek.

- Application figure shows the point of discharge to the impoundment pond to be at the corner of the impoundment. The receiving pond is linked to a second pond by a small spillway. Flow from there proceeds through several

additional small ponds/wet areas, then Brook Lake, and then through Ariel Creek/Roamingwood Lake to Lake Wallenpaupack.

- DEP Inspection Reports (9/13/2018 and 9/17/2018) indicated previous DEP E-facts GPS outfall coordinates were inaccurate. The Outfall discharge line was determined to enter into the northern pond (left from perspective of Stock Farm Road) along storm drain and enters left pond to about 10 yards up from metal gate. The end of the pipe was submerged and covered by high weeds in that corner of the pond. The DEP Inspection Report noted that the receiving pond was privately owned, with received information indicating the discharge line was installed with the consent of a previous landowner.

Pond Description:

- **Original WPC Reports:**
 - Original WPC Report estimated pond at 400 feet long, 2 feet depth, 400,000 SF area with discharge at 41°, 27', 03" and -75°, 22', 00". Source of impoundment information was not identified. Impoundment volume estimated at 800,000 CF or 5.984 MG
 - Impoundment Drainage area of 0.17 Square Miles and 0.007 CFS Q7-10 Low flow at discharge point (using LFY derived from downstream (regulated) Lake Wallenpaupack discharge PA Bulletin No. 12 Gage 01431650 (2.0 CFS/47 square miles = 0.04225 CFS/square mile).
 - Detention Time of 356 days (assumed complete mix) estimated via Volume/Qt (Qt = 0.007 CFS plus 0.0019 CFS derived from NPDES permit basis flow). **NOTE:** The complete mix assumption was an assumption. The 2018 build-up of sludge at the outfall location is contrary evidence to this assumption as a slow build-up of solids could have been a contributing factor (aside from any sludge discharges).
 - Length from outfall to dam outlet: Estimated at 100 Feet. $V = L/t = 100 \text{ feet}/365 \text{ days} = 0.281 \text{ feet/day} = 0.000033 \text{ Ft/sec (FPS)}$.
- **Kupsky Memo:** The DEP Biologist printout indicated the pond was anoxic, with an 0.13 mg/l TP background concentration, estimated 36-day detention time, estimated 10-acre surface area (~435,000 SF), and mean 1-meter depth.
 - **E-maps:** 0.031 square kilometer area (NHD waterbody) with roughly rectangular shape (~0.05 miles (~260 feet) by ~0.2 miles (1040 feet) which equates to ~270,400 SF surface area). No dam identified by E-maps.
 - **USGS PA Streamstats:** Estimated 0.11 square mile drainage area at pond outlet.
- Discharge point location coordinates is at headwaters of UNT, with receiving pond discharging to a downstream pond, before flowing ~0.8 miles to Brooks Lake, and then another 0.22 miles to Ariel Creek, which flows into Lake Roamingwood and then into Lake Wallenpaupack
- **In the next NPDES permit term, it is recommended that the DEP Biologists evaluate the impact on the STP discharge on the receiving impoundment due to updated water quality modeling showing more stringent Ammonia-N limits might be required in the future.**

TMDL: 2005 Lake Wallenpaupack TMDL (TP and Mercury) with existing facility Waste Load Allocation (WLA) for Total Phosphorus, incorporated into the existing NPDES permit limit (0.5 mg/l average monthly; 1.0 mg/l IMAX). The TMDL separately addresses mercury contamination from air deposition, to which the facility is not expected to contribute.

Low Flow Yield (LFY): 0.0220 CFS/square mile LFY determined by USGS PStreamstats at Lake Roamingwood Discharge point (Q7-10 of 0.223 square miles for 10.1 square mile drainage area) for watershed LFY.

Available Surface Water Sampling Data: 09/20/2018 Water Samples: The Department Inspector took water samples of the receiving pond after solids accumulation was detected in the pond (in addition to other process samples).

Parameter	E-Maps Sample ID No. 2250375, Sequence No. 140 was taken just out from Outfall 001 in the middle of a large area of deposited sewage sludge per inspector*	E-Maps Sample ID No. 2250374, Sequence No. 139 was taken at outlet of the left side pond (this is the pond that Outfall 001 feeds into but is about 200 feet downstream of Outfall 001) per inspector.
pH	6.27 SU	7.27 SU
CBOD5	206 mg/l	5.30 mg/l
Total Hardness	44 mg/l	25 mg/l
Total Suspended Solids (TSS)	2308 mg/l	<5 mg/l

Total Dissolved Solids (TDS)	88 mg/l	68 mg/l
Sulfate	<5.00 mg/l	2.15 mg/l
Chloride	20.82 mg/l	14.74 mg/l
Total Phosphorus	129.504 mg/l	0.038 mg/l
Ammonia-N	26.08 mg/l	0.05 mg/l**
Nitrite-N	<0.04 mg/l	<0.04 mg/l
Nitrate-N	<0.04 mg/l	<0.04 mg/l
Total Nitrogen	89.06 mg/l	0.82 mg/l
Alkalinity	91.0 mg/l	21.4 mg/l
Fecal Coliform	75/100 ml	120/100 ml
Water Temperature	19.9 °C	18.0 °C
Oxygen – Field	6.27 mg/l	8.42 mg/l
Total Copper	169.000 ug/l	<4.00 ug/l
Total Lead	6.670 ug/l	<1.00
Total Zinc	686 ug/l	<5.00 ug/l
Total Aluminum	201,000.000 ug/l	87.400 ug/l
Total Manganese	129 ug/l	20.00 ug/l
Total Iron	5120 ug/l	333.0 ug/l
Total Arsenic	12.2 ug/l	<3.00 ug/l
Total Barium	128 ug/l	16.00 ug/l
Total Cadmium	0.462 ug/l	<0.200 ug/l
Total Chromium	7.700 ug/l	<4.00 ug/l
Total Cobalt	1.16 ug/l	<1.00 ug/l
Total Mercury	0.37 ug/l***	-
Total Nickel	7.840 ug/l	<4.00 ug/l
Total Silver	0.596 ug/l	<0.400 ug/

*Containing sludge particles. Solids build-up subsequently removed by corrective action.

**See Effluent Section for Ammonia-N Limits. EDMR indicated 16.4 mg/l monthly average Ammonia-N for September 2018 and 5.20 mg/l monthly average TSS (9/26/2018 facility self-sampling date). Fecal coliform exceedance reported at 285.1/100 ml GEO Mean. Existing NPDES permit only required monthly monitoring and monthly average reporting.

***TMDL indicates mercury source in watershed is from air-deposition.

Treatment Facility Summary				
Treatment Facility Name: Julia Ribaldo Extended Health Center				
WQM Permit No.	Issuance Date	Scope		
6486403-T1	1995	Application for transfer dated 3/27/1995 for transfer of Julia Ribaldo Health Service Center, Inc., with note that correct name of former permittee is "Lake Ariel Associates Ltd., t/a Julia Ribaldo Nursing Home" to "Integrated Health Services at Julia Ribaldo". No transferred permit located.		
6494406	3/16/1995	STP Modification for 120 bed nursing facility with concurrent 3/22/1995 DRBC Docket No. D-95-4. Permit issued to Integrated Health Services at Penn, Inc. Permit allowed for enlarging capacity of flow equalization tank including installation of duplex pumps, a flow control box, and aeration system; new chemical feed systems for soda ash, alum, and polymer; new package tertiary treatment system consisting of a flash mixer, flocculator, settling tank, dual sand filters, clear well and mud well; UV disinfection system to replace chlorination system; enlarging capacity of sludge holding tank including installation of an aeration system and a decant mechanism. Permit issued to "Integrated Health Services at Penn, Inc."		
6486403	10/7/1986	0.01250 MGD STP Modifications to <u>replace</u> old "physical-chemical treatment plant" with extended aeration/filtration package TP including an aeration tank, clarifier, sludge holding tank and related piping for sludge recirculation and wasting. Existing replaced units will be used for tertiary treatment. The existing physical/chemical units would be used as appropriate for tertiary treatment (including chemical feed pumps, flash mixing, flocculation, settling/clarification and filtration units). Chlorination facilities continue to be used. Permit issued to the "Julia Ribaldo Health Service Center, Inc."		
6478405	12/12/1978	Original 0.01250 MGD STP for 100 bed facility. Permit issued to "Julia Ribaldo Health Service Center, Inc."		
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary with Tertiary filtration*	Extended Aeration	Ultraviolet	0.0125
Hydraulic Capacity (MGD)	Organic Capacity (lbs/day)	Load Status	Biosolids Treatment	Biosolids Use/Disposal
0.0125	17	Not Overloaded	None	Landfill

*Long-term out-of-service sand filters and no flash mix tank per 2023 EPA Compliance Inspection Report. See EPA Inspection information below.

Changes Since Last Permit Issuance: See 2023 EPA Compliance Inspection Report comments below for current conditions:

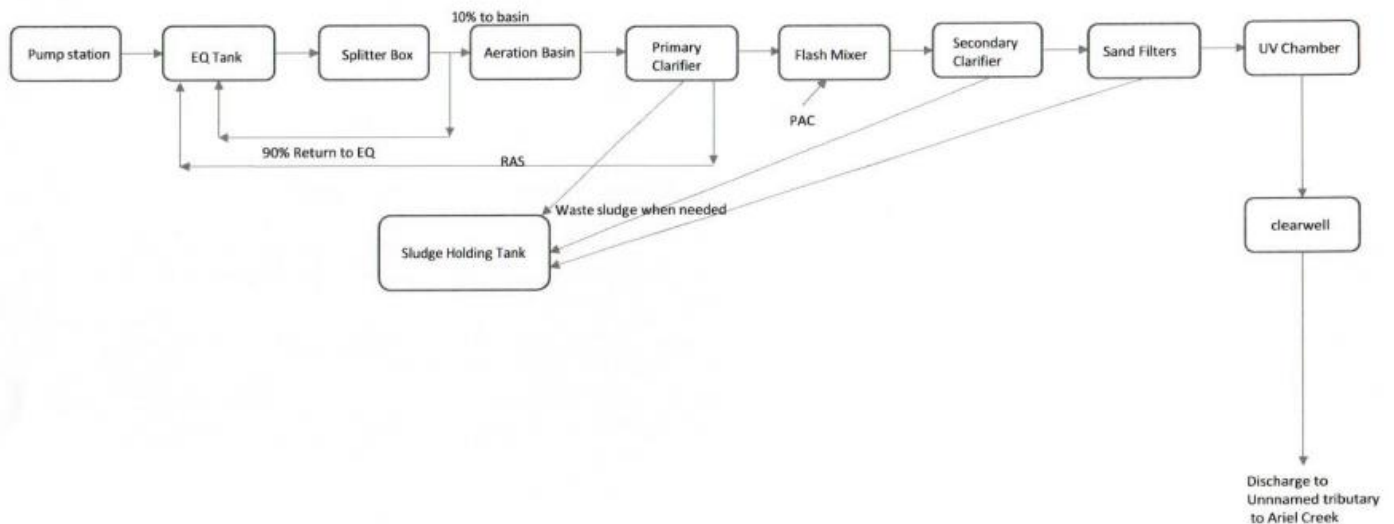
- Sodium bisulfate has been fed dry into the process for pH adjustment.
- Transfer applications for WQM permits (to BHG Aviv, LLC) under separate concurrent review:
 - WQM Permit No. 6494406 (transfer from "Integrated Health Services at Penn, Inc." to "BHG Aviv, LLC", EIN No. 36-4601432).
 - WQM Permit No. 6486403 (transfer from "Ribaldo Health Service Center" to "BHG Aviv, LLC", EIN No. 36-4601432).

- WQM Permit No. 6478405 (transfer from “Ribaud Health Service Center” to “BHG Aviv, LLC”, EIN No. 36-4601432).

Other Comments:

DEP Inspection Reports indicated the facility consists of: One (1) debris basket; First tank at end of air basin (influent EQ Tank receiving soda ash for alkalinity); splitter box; Aeration basin; Primary clarifier; Rapid mix tank (receiving Delpac liquid for TP control); Secondary clarifier; Sand filter; UV disinfection unit; post-air tank; and one waste sludge tank.

NPDES Permit Application process flow diagram:



DRBC Docket description: The 3/5/1995 DRBC Docket No. D-95-4 (issued to Integrated Health Services at Penn) indicate facility consists of one (1) comminutor with screening device, one equalization tank, one extended aeration tank, one final settling tank, a chemical additive system with mixing/flocculation tank, a sand filter, and chlorine disinfection system with the following changes: Existing secondary effluent pump station to be converted into influent pump station; comminutor to be relocated from EQ Tank to new influent pump station; EQ tank to be modified (installation of duplex submersible pumps, a flow control box, and an aeration system). The replacement tertiary treatment system includes a chemical addition system, flash mixer, flocculator, tertiary settling tanks and dual sand filters). Soda ash is added to EQ tank for pH control. Alum is added to flash mixer for phosphorus control. Polymer is added to increase settling. UV disinfection.

11/9/2023 EPA Compliance Inspection Report description: Wastewater from the nursing home flows via 2 four-inch PVC gravity lines to a pump station which contains 2 grinder type pumps. When floats are activated, wastewater flows to a 20,000-gallon equalization (EQ) tank, which also contains 2 grinder type pumps. A skimmer pump in the EQ tank doses DELPAC, a cationic aluminum chloride hydroxide sulfate coagulant. The system operates continuously 24 hours, 7 days/week. Once the EQ tanks floats are activated, wastewater is pumped from the EQ tank to the splitter box. The splitter box routes wastewater to the aeration tank and back to the EQ tank in about a 90/10 ratio. At the aeration tank, a dry polymer (Clarifloc NE-560) is added to aid in solids settling. The supernatant travels over a weir to a settling tank. From the settling tank, the solids are discharged to a waste sludge chamber and the supernatant is discharged to the ultraviolet light (UV) chamber for disinfection. After the UV chamber, the treated effluent is discharged to an unnamed tributary to Ariel Creek (Outfall 001).

- **Observation 2:** Facility representatives stated during the inspection that this process flow diagram is outdated with portions of the plant no longer in operation. The portions of the plant no longer in operation included: the sand filters (Photos DSCN3956, DSCN3957), secondary clarifier (Photo DSCN3949), and flash mixing tank (Photo DSCN3948) as noted in the diagram. Facility representatives mentioned that Farnham and Associates, the Facility’s engineering company, is responsible for updating the process flow diagram and fact sheet.
- **Observation 3:** The EPA Inspection Team noticed that there was algal & solids built up at the trough and weir of the clarifier (Photos DSCN3943 – DSCN3944). The treated effluent appeared clear with a well settled sludge blanket on the bottom.

- The EPA Inspection Team walked to the settling tank from the clarifier. In the past, this area was utilized as a secondary clarifier and flash mixing tank. Presently, it contains no mixing or chemical dosing and is utilized for solids settling before UV disinfection. During the inspection, the EPA Inspection Team observed how the settled solids transferred to the wasted sludge reservoir. A manual sump pump transfers the sludge to a wasted sludge reservoir. Once the sump pump turned on, it appeared that it stirred the settled sludge up to the surface, turning the liquid cloudy (Photo DSCN3952). The increase in turbidity may affect UV-disinfection in the next step of the treatment train.
- The EPA Inspection Team observed the sand filters that have been inoperable for years (Photos DSCN3956 – DSCN3957). EPA asked Facility Representatives if the filters had ever been cleaned out after the final use. Facility representatives replied that it was once pumped out and taken apart, however the sand filters have been out of operation in the same location for at least 30 years. It is unclear if there is a plan to remove them from the treatment process or restore them back to proper operable conditions. The Facility stated that it would be costly to disconnect them from the treatment system.
- **Observation 4:** The programmable logic controller (PLC) screen did not display power readouts of the UV chamber at the time of inspection (Photo DSCN3970). It was unclear how long it has been out of operation or if it would be fixed. Facility representatives stated that it normally operates at 2.0 mW/cm².
- The EPA Inspection Team travelled to the location offsite designated by coordinates on the Permit as the location for Outfall 001, but were not able to locate nor access the outfall due to the outfall's location on private property and a lack of outfall signage (Photos DSCN3971 – DSCN3972).

Compliance History

DMR Data for Outfall 001 (from September 1, 2023 to August 31, 2024)

Parameter	AUG-24	JUL-24	JUN-24	MAY-24	APR-24	MAR-24	FEB-24	JAN-24	DEC-23	NOV-23	OCT-23	SEP-23
Flow (MGD) Average Monthly	0.00552 1	0.00635 8	0.00957 7	0.00757 1	0.00640 6	0.01010 6	0.00633 6	0.00747 1	8640	0.0060	0.0053	0.0045
Flow (MGD) Daily Maximum	0.01060 0	0.00929 6	0.01170 0	0.00846 5	0.01146 1	0.01196 1	0.00933 2	0.00964 3	9227	0.0121	0.0063	0.0063
pH (S.U.) Minimum	6.8	7.1	6.9	6.9	6.9	6.7	7.1	7.5	7.09	6.8	7.0	6.7
pH (S.U.) Maximum	8.0	7.9	7.8	7.8	7.9	7.6	8.0	8.1	7.78	7.7	7.5	7.8
DO (mg/L) Minimum	7.6	7.8	8.3	7.8	8.3	8.0	8.1	9.1	7.99	7.5	7.4	7.2
CBOD5 (mg/L) Average Monthly	< 3.00	< 3.00	< 3.00	< 3.00	< 3.00	6.16	< 3.00	< 3.00	< 3.00	< 2.0	< 2.0	< 2.0
TSS (mg/L) Average Monthly	6.73	< 16.7	< 2.60	< 2.50	< 7.35	11.9	< 2.58	3.98	8.17	< 4.0	< 4.0	< 4.0
Fecal Coliform (CFU/100 ml) Geometric Mean	416	86.2	90.6	< 1	18.3	103.5	129.6	> 2419.8	< 1	79	124	44
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	416	86.2	90.6	< 1	18.3	103.5	129.6	> 2419.8	< 1	79	124	44
Ammonia (mg/L) Average Monthly	8.29	1.91	< 0.200	0.467	0.491	0.405	0.234	< 0.200	< 0.200	0.45	< 0.10	< 0.10
Total Phosphorus (mg/L) Average Monthly	0.350	0.475	0.236	0.432	1.46	0.660	1.44	1.45	0.432	1.52	2.41	2.62

DMR Data for Outfall 001 (from July 1, 2021 to June 30, 2022)

Parameter	JUN-22	MAY-22	APR-22	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21
Flow (MGD) Average Monthly	0.0086	0.0077	0.0053	0.0065	0.0070	0.0061	0.0049	0.0054	0.0049	0.0053	0.0047	0.0040

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Flow (MGD) Daily Maximum	0.0153	0.0127	0.0093	0.0097	0.0085	0.0088	0.0114	0.0095	0.0107	0.0145	0.0107	0.0065
pH (S.U.) Minimum	6.7	6.6	6.7	6.2	6.6	6.4	6.5	6.1	6.6	6.2	6.6	6.4
pH (S.U.) Maximum	8.0	7.3	7.9	7.4	7.4	7.1	7.1	7.4	7.6	7.6	7.8	8.7
DO (mg/L) Minimum	7.4	7.9	7.8	8.5	8.0	8.0	8.0	8.0	8.0	7.7	7.1	7.7
CBOD5 (mg/L) Average Monthly	2.3	2.0	2.0	2.5	2.4	2.1	2.6	2.2	2.2	2.0	2.8	2.0
TSS (mg/L) Average Monthly	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	5.6	4.0
Fecal Coliform (CFU/100 ml) Geometric Mean	4	240	2000	132	41	176	323	128	1	6	1	1
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	4	240	2000	132	41	176	323	128	1	6	1	1
Ammonia (mg/L) Average Monthly	0.1	1.6	0.1	0.1	0.1	0.3	0.1	0.1	0.1	0.1	0.1	0.1
Total Phosphorus (mg/L) Average Monthly	0.13	0.13	0.11	0.10	0.13	0.13	0.12	0.14	0.82	0.81	0.41	0.23

DMR Data for Outfall 001 (from July 1, 2020 to June 30, 2021)

Parameter	JUN-21	MAY-21	APR-21	MAR-21	FEB-21	JAN-21	DEC-20	NOV-20	OCT-20	SEP-20	AUG-20	JUL-20
Flow (MGD) Average Monthly	0.0052	0.0048	0.0057	0.0046	0.0063	0.0064	0.0040	0.0035	0.0039	0.0034	0.0041	0.0054
Flow (MGD) Daily Maximum	0.0083	0.0112	0.0099	0.0081	0.0155	0.0155	0.0066	0.0051	0.0077	0.0065	0.0122	0.0113
pH (S.U.) Minimum	6.4	6.6	6.8	6.4	7.0	7.5	7.0	6.9	6.3	7.2	7.0	7.4
pH (S.U.) Maximum	8.0	7.8	7.9	8.4	8.7	8.4	7.8	7.3	7.6	7.9	8.8	8.8
DO (mg/L) Minimum	5.4	8.6	8.4	8.4	9.2	9.8	9.8	9.4	8.4	8.1	7.0	8.0
CBOD5 (mg/L) Average Monthly	2.0	2.0	2.0	2.0	2.0	2.1	2.0	2.0	2.0	2.0	2.0	2.0

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TSS (mg/L) Average Monthly	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0	4.0
Fecal Coliform (CFU/100 ml) Geometric Mean	1	1	25	1	1	58	31	212	41	41	1	1
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	1	1	25	1	1	3400	31	212	41	41	1	1
Ammonia (mg/L) Average Monthly	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1	0.1
Total Phosphorus (mg/L) Average Monthly	0.13	0.39	0.1	0.11	0.15	0.11	0.1	0.1	0.10	0.1	0.10	0.12

Compliance History

Effluent Violations for Outfall 001, from: October 1, 2023 To: August 31, 2024

Parameter	Date	SBC	DMR Value	Units	Limit Value	Units
Fecal Coliform	08/31/24	Geo Mean	416	CFU/100 ml	200	CFU/100 ml
Fecal Coliform	01/31/24	Geo Mean	> 2419.8	CFU/100 ml	2000	CFU/100 ml
Fecal Coliform	01/31/24	IMAX	> 2419.8	CFU/100 ml	10000	CFU/100 ml
Ammonia	08/31/24	Avg Mo	8.29	mg/L	3.0	mg/L
Total Phosphorus	11/30/23	Avg Mo	1.52	mg/L	.5	mg/L
Total Phosphorus	01/31/24	Avg Mo	1.45	mg/L	.5	mg/L
Total Phosphorus	02/29/24	Avg Mo	1.44	mg/L	.5	mg/L
Total Phosphorus	03/31/24	Avg Mo	0.660	mg/L	.5	mg/L
Total Phosphorus	10/31/23	Avg Mo	2.41	mg/L	.5	mg/L
Total Phosphorus	04/30/24	Avg Mo	1.46	mg/L	.5	mg/L

Effluent Violations for Outfall 001, from: August 1, 2020 To: June 30, 2021

Parameter	Date	SBC	DMR Value	Units	Limit Value	Units
DO	06/30/21	Min	5.4	mg/L	7.0	mg/L
Fecal Coliform	05/31/22	Geo Mean	240	CFU/100 ml	200	CFU/100 ml
Total Phosphorus	09/30/21	Avg Mo	0.81	mg/L	.5	mg/L
Total Phosphorus	10/31/21	Avg Mo	0.82	mg/L	.5	mg/L

Summary of Inspections: See also below regarding the 11/9/2023 EPA Compliance Inspection Report.

FACILITY NAME	INSP PROGRAM	INSP ID	INSPECTED DATE	INSP TYPE	INSPECTION RESULT DESC	# OF VIOLATIONS
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2558291	03/01/2024	Follow-up Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2869132	12/12/2023	Routine/Partial Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2776456	01/04/2023	Compliance Evaluation	Violation(s) Noted	2
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2795030	10/04/2022	Follow-up Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	3319685	12/20/2021	Administrative/File Review	Violation(s) Noted	1
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2547691	06/16/2020	Follow-up Inspection	Violation(s) Noted	1
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2617999	05/04/2020	Routine/Partial Inspection	Violation(s) Noted	2

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JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2831306	03/23/2020	Compliance Evaluation	Violation(s) Noted	1
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2620511	02/18/2020	Follow-up Inspection	Violation(s) Noted	1
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	3028718	01/16/2020	Administrative/File Review	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	3045639	09/24/2019	Administrative/File Review	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2776505	04/10/2019	Complaint Inspection	Violation(s) Noted	1
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	3013789	01/17/2019	Administrative/File Review	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2779685	11/29/2018	Complaint Inspection	Violation(s) Noted	1
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2582879	10/22/2018	Follow-up Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	3734015	09/20/2018	Compliance Evaluation	Violation(s) Noted	2
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2569269	09/17/2018	Follow-up Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2381486	09/13/2018	Compliance Evaluation	De minimus Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2595962	09/13/2018	Follow-up Inspection	Violation(s) Noted	1

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JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2510951	08/02/2018	Routine/Partial Inspection	Violation(s) Noted	1
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	3707130	07/24/2017	Complaint Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2776498	05/16/2017	Complaint Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2937264	04/14/2017	Routine/Partial Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2809295	03/07/2017	Follow-up Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2201719	02/16/2017	Administrative/File Review	Violation(s) Noted	1
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	3482104	01/30/2017	Administrative/File Review	Violation(s) Noted	1
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2534738	12/28/2016	Compliance Evaluation	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2562745	12/27/2016	Follow-up Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2998475	11/07/2016	Administrative/File Review	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	3435235	06/03/2016	Routine/Partial Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2990694	12/15/2015	Routine/Partial Inspection	Violation(s) Noted	3

JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2547690	04/30/2015	Follow-up Inspection	No Violations Noted	0
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2791812	03/31/2014	Administrative/File Review	Violation(s) Noted	3
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPCNP	2337937	09/03/2013	Routine/Partial Inspection	Violation(s) Noted	1

Other Comments:

- **11/9/2023 EPA Clean Water Act Compliance Inspection Report:** See Treatment Plant section for EPA observations regarding as-operated Treatment Plant observations and comments. Several existing/potential compliance issues were noted during this technical review:
 - **Long-term Out-of-service Sand Filters and no flash mix tank:** The NPDES Permit Application Section 11 (WWTP Process description including process schematic) and Section 20 (Process SOPs) daily plant check indicated both sand filters and flash mixing tank were in operation.
 - The described conditions are contrary to NPDES Permit Part B.I.E (Proper Operations & Maintenance).
 - The WQM permitted Treatment Plant is not being operated in accordance with existing WQM Permits (out-of-service sand filters, secondary clarifier, and flash mixing tank units). The secondary clarifier was reportedly operating solely as a settling tank. While there is a separate WQM Permit Transfer application (from BHG Aviv LLC), there is no WQM permit amendment to either change the approved design/operation or to restore the out-of-service units back to service.
 - Failure to operate the permitted tertiary sand filters and flash mix tank is a material change in the project between sewage facilities planning and NPDES permitting, triggering Chapter 93.4.c(c) requirements for a new SEJ/Act 537 Planning (if the units are not returned to service) due to expected additional loadings on the receiving High Quality stream (from the as-built Treatment Plant as documented by the compliance history). The burden would fall on the NPDES permittee in that event (in addition to any separate burden on a separate Treatment Plant owner for a WQM permit amendment).
 - The 2012 NPDES Permit Part A.III.C.1 (Planned Changes to Physical Facilities) notification requirements would have pertained to any plan to drop tertiary filtration or flash mixing from the permitted Treatment Plant.
 - The 2012 NPDES Permit Part A.I Additional Requirements Item 3 bypass provisions may apply to bypassing of required tertiary filtration by the out-of-service sand filters: “The permittee shall monitor the sewage effluent discharge(s) for the effluent parameters identified in the Part A limitations table(s) during all bypass events at the facility, using the sample types that are specified in the limitations table(s). Where the required sample type is “composite”, the permittee must commence sample collection within one hour of the start of the bypass, wherever possible. The results shall be reported on the Daily Effluent Monitoring supplemental form (3800-FM-BPNPSM0435) and be incorporated into the calculations used to report self-monitoring data on Discharge Monitoring Reports (DMRs)”.
 - **Facility Ownership Question:** Per the EPA Compliance Inspection Report: “Saber Healthcare” was indicated to be the owner of the nursing home in the, and the party that hired the technical consultant Farnham & Associates to maintain the facility records and maintenance, with Farnham & Associates hiring Ken Fulford as the licensed wastewater operator. The DRBC also indicated: “The current owner we have on record is Saber Healthcare Group”. **Julia Ribauda Healthcare Group, LLC (DBA Julia Ribauda Extended Care Center AKA Saber Healthcare Group) EIN No. 27-5010778) is the current NPDES Permit Applicant (and previous NPDES Permittee under the name of Saber Healthcare Group in a previous NPDES Permit term).**
 - This information conflicts with the concurrent WQM Permit Transfer Application which indicates that “BHG Aviv LLC” is the owner. If the EPA information is correct, BHG Aviv LLC may not be qualified to be a future WQM permittee for the site (as neither owner nor operator).

- A corporate chart is required to explain the relationship of the NPDES and WQM permit applicants to each other and this facility, and all parties under the general name of "Saber Healthcare".
- **Necessary Property Rights:** The EPA Compliance Inspection Report noted that the Outfall No. 001 location could not be accessed due to the location on private property and lack of outfall signage. The NPDES/WQM permittee(s) are required to have all necessary property rights and to allow DEP/EPA access to the entire plant, including the outfall location. The permittee may need to demonstrate that they have the required property rights to allow Department access to the outfall location.
- **WQM Permit Transfer Applications:** Concurrent separate WQM Permit Transfer Application received for transfer to different client/permittee (BHG Aviv LLC). However, it is not clear what is the relationship of this business entity to this facility or its ability to comply with existing WQM permit obligations.
- **Notices of Violation & Administrative Order:**
 - 3/1/2024 NOV: Exceedances of permit limits (DO, Fecal Coliform, pH, Total Phosphorus, Fecal Coliform, Ammonia-N), discharge without a valid NPDES Permit.
 - 2/2/2023: Administrative Order regarding missing annual fee payment.
 - 1/23/2023: Missing annual fee payment
 - 8/2/2018: 2nd NOV for failure to submit late renewal application
 - 6/3/2017 NOV: Permit limit exceedances (Phosphorus, Fecal Coliform, CBOD5, Fecal Coliform, Total Suspended Solids), supplemental DMR forms not properly completed, late DMRs
 - 12/15/2015 NOV: Unsubmitted Available Operator Report (AOR)
 - 5/29/2012 NOV with 3/30/2017 CACP issued:
- **Noncompliance:** Permit Application blamed previous pattern of noncompliance with existing permit limits on laundry wash discharges. They indicated such discharged ceased, but see recent violations above and out-of-service treatment units.
- **Late Application:** See Communications Log for general history of application.
 - Previous Application (replaced by this application): Late Application (due 5/4/2017). Permit expired 10/31/2017. 11/27/2017 Application Incompleteness letter. Technical Consultant asked for more time to respond. Incomplete Response arrived 1/29/2018. 2/14/2018 Application Incompleteness/Technical Deficiency Letter issued. Letter required clarification about permittee/owner/operator identify, schedule of compliance due to ongoing pattern of permit limit exceedances (TSS, Ammonia-N, Fecal Coliform, Total Phosphorus); need for HFMP and comments on plan to use Vac truck; Incomplete Act 14 notice documentation; need for more information on as-built/as-operated facility, missing and incorrect effluent data (and asked about non-sewage wastewater ala boiler blowdown, etc.).
 - Due within 15 days of 1/17/2019 Field Order. Received 8/26/2021. Incomplete. Revised application received 9/30/2022 and 10/1/2022. Determined to be complete on 10/4/2022 (with remainder of issues to be addressed in technical review).
- **Previous Hydraulic Overloading/Antidegradation considerations triggered by increased flows/loadings:** The previous NPDES Application's identified 2015/2016 annual average daily flows of 0.013 MGD exceed the 0.0125 MGD hydraulic capacity of the STP.
 - Facility subsequently disconnected roof gutters away from STP in 2017 and courtyard piping sealing repaired with hydraulic cement, with discontinuance of previous onsite laundry washing. NPDES Permit Renewal Application has made no commitment to continue doing laundry offsite.
 - Replaced Application noted they had disconnected roof gutters from STP (existing Permits have standard stormwater prohibitions); repaired a collection basin inlet pipe (poorly sealed) to eliminate I&I; replaced and lowered EQ Tank floats to better utilize 20,000 gallons EQ Tank during stormwater surges.
 - During a 1/29/2018 Telephone Call, the technical consultant (Mr. Farnham) indicate the facility has: adjusted influent weir setting, and changing EQ Tank pumps to grinder pumps in order to correct I&I issues and address solids build-up. He noted increased STP visits by site maintenance staff and himself. He believes DMRs indicate resolution of I&I problems after October 2017.

Open Violations by Client No.: The 10/23/2024 WMS Query indicated three (3) open violations.

FACILITY	INSP PROGRAM	PROGRAM SPECIFIC ID	INSP ID	VIOLATION ID	VIOLATION DATE	VIOLATION CODE	VIOLATION
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPC NPDES	PA0060038	2990694	875338	01/16/2020	92A.41(A)10B	NPDES - Failure to utilize approved analytical methods
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPC NPDES	PA0060038	2990694	875339	01/16/2020	92A.75(A)	NPDES - Failure to submit NPDES renewal application at least 180 days prior to expiration or later approved date
JULIA RIBAUDO EXTENDED HEALTH CENTER SABER HEALTHCARE GROUP	WPC NPDES	PA0060038	2990694	875340	01/16/2020	CSL611A	CSL - Failure to comply with a DEP-issued enforcement order

Development of Effluent Limitations

Outfall No. 001
Latitude 41° 27' 4.0"
Wastewater Description: Sewage Effluent

Design Flow (MGD) .0125
Longitude -75° 22' 1.0"

Permit Limits and/or Monitoring Requirements: Changes bolded.

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
CBOD5	1.0 lb/d 2.0 lb/d 10.0 20.0 20.0	Monthly Average Daily Max Monthly Average Daily Max IMAX	Existing WQBEL supported by updated water quality modeling. Daily max limit set to IMAX limit. Mass limits added. Application data: 5.0 mg/l max and 2.0 mg/l average (24 samples)
BOD5 (Raw Sewage Influent)	Report lb/d Report Report	Monthly Average Monthly Average Daily Max	New monitoring requirement due to new Chapter 94 Reporting requirements (and Chapter 92a.61). Application data: None
TSS	3.1 lb/d 6.2 lb/d 30.0 60.0 60.0	Monthly Average Daily Max Monthly Average Daily Max IMAX	Existing Technology limit (Chapter 92a.47). Daily max limit set to IMAX limit. Reverting to SEJ Mass limits to prevent degradation to stream. Application data: 13.2 mg/l max and 4.55 mg/l average (24 samples)
pH	6.0 – 9.0 SU	Inst. Min - IMAX	Existing Technology limit (Chapter 92a.47) Application data: 6.10 – 9.43 SU range (711 samples)
Dissolved Oxygen (DO)	7.0	Inst. Min	Existing WQBEL supported by updated water quality modeling Application data: None provided.
Fecal Coliform (5-1 to 9/30)	200/100 ml 1,000/100 ml	Geo Mean IMAX	Existing Technology limit (Chapter 92a.47) Application data: 3400/100 ml max and 159/100 ml average (24 samples)
Fecal Coliform (10-1 to 4/30)	2,000/100 ml 10,000/100 ml	Geo Mean IMAX	See above.
E Coli	Report/100 ml	IMAX	New monitoring requirement due to new Chapter 93 E Coli WQS.
Total Residual Chlorine (TRC)	Report 0.02	Monthly Average IMAX	Facility is using UV Disinfection. Chlorine Minimization condition-related limits for emergency disinfection or other chlorine usage purposes only. DEP sampling indicated TRC residuals. As a HQ watershed, non-detect (<0.02 mg/l) is the Antidegradation requirement. Application data: None provided.
Ammonia-Nitrogen (May 1 - Oct 31)	0.3 lb/d 0.6 lb/d	Monthly Average Daily Max	Revised WQBELs based on updated water quality modeling (based upon statewide

	1.67 3.34 3.34	Monthly Average Daily Max IMAX	Chapter 93 Water Quality Standards since SEJ does not allow for reduction of water quality to below the statewide standards). New limits effective on PED as Application and EDMR information indicates compliance is achievable upfront. See Antidegradation section below. Daily max limit set to IMAX limit. Previous summer limits were 3.0 mg/l monthly average; 6.0 mg/l IMAX). Previous winter limits were 9.0 mg/l monthly average; 18.0 mg/l IMAX). Daily max limits set equal to IMAX limits, with mass load as calculated. Application data: 1.46 mg/l max and 0.19 mg/l average (24 samples). See EDMR data in Compliance section.
Ammonia-Nitrogen (Nov 1 - Apr 30)	0.9 lb/d 1.8 lb/d 5.01 10.02 10.02	Monthly Average Daily Max Monthly Average Daily Max IMAX	See above.
Total Phosphorus	0.05 lb/d 0.10 lb/d 0.50 1.00 1.00	Monthly Average Daily Max Monthly Average Daily Max IMAX	Existing WQBEL (Lake Wallenpaupack TMDL WLA). Daily max limit set to IMAX limit. Adding in mass load reporting. Added significant digit. Application data: 0.39 mg/l max and 0.132 mg/l average (23 samples). EDMR data shows exceedances.
Total Nitrogen (Nitrate-Nitrite-N + TKN measured in same sample)	Report lb/d Report lb/d Report Report	Annual Average Daily Max Annual Average Daily Max	Monitoring required (Chapter 92a.61). Application data: None provided.
Total Dissolved Solids (TDS)	Report lb/d Report lb/d Report Report	Annual Average Daily Max Annual Average Daily Max	See above. (Chapter 92a.61 plus DRBC constituent of interest and site historic operational issues resulting in solids build-up in receiving pond) Application data: None provided
MBAS	Report lb/d Report lb/d Report Report	Annual Average Daily Max Annual Average Daily Max	Monitoring to gather information (Chapter 92a.61). Application data: 0.05 mg/l minimum, <2.50 mg/l Max, 0.06 mg/l average (20 samples).

Comments:

- Daily Max limit based on IMAX limits. DEP sampling indicated IMAX exceedances occurred but were not reported (IMAX not on DMR form). Any exceedance of an IMAX limit, of whatever duration, is a violation of the IMAX limit.
- Updated to current standard monitoring frequencies.
- Updated to 24-hour composite sampling due to previous impacts on HQ receiving stream/pond (solids build-up) and need to eliminate biasing from 8-hour composite sampling. The facility has previously done 24-hour composite sampling per 10/15/2018 Farnham E-mail.
- Mass load reporting added (no additional sampling required, only calculation).

- Federal ELG (Technology-Based Effluent Limits): The EPA SIC/ELG Crosswalk indicated the potential applicability of the 40 CFR Hospital ELG to skilled nursing homes/personal care homes. The 8/19/1983 DEP Planning Memo okayed increased loading (from 100 to 150 Nursing Home beds) on existing 12,500 GPD STP in accordance with Act 537 requirements (and no need to increase existing STP capacity). The 40 CFR 460.12 ELGs (calculated below) for 150 hospital beds were superseded by more stringent existing Antidegradation WQBELs:
 - BOD5 Technology ELG limits:
 - 90.4 lbs BOD5 max (per 1000 hospital beds): 13.54 lbs BOD5
 - 74.0 lbs monthly average (per 1000 hospital beds): 11.1 lbs BOD5
 - TSS Technology ELG Limits:
 - 122.4 lbs max (per 1000 hospital beds): 18.36 lbs TSS
 - 74.5 lbs monthly average (per 1000 hospital beds): 11.175 lbs TSS
 - pH ELG Limits: Within the range from 6.0 to 9.0 SU (same as existing permit limits).

Water Quality Modeling: 6/16/1986 Water Quality Modeling (WPC Report) updated (with more accurate data and addressing updated Ammonia-N Water Quality Criteria) and showed more stringent Ammonia-N limits are required. The Outfall discharges to a corner of a small (semi-rectangular) pond on the outlet side. The pond outlet is located the middle of the pond side (something like 200 feet distance as estimated by the DEP Inspector when sampling there), which then discharges to a lower pond and several other ponds prior to reaching Lake Wallenpaupack. The discharge flow would have to follow the pond edge to reach the pond outlet.

First Pond Reach (pond modeling):

- NPDES Permit Discharge: 0.0125 MGD or 0.01933 CFS
- Outfall Elevation: 1500 Feet per application
- Pond Outlet Elevation: Due to location of outfall at corner of pond on same side as pond discharge, the slope is minimal and assumed at 1499.9 Feet for modeling purposes.
- Pond drainage area: 0.11 square miles per USGS PA Streamstats
- Watershed LFY: 0.0220 CFS/square mile based on Ariel Creek downstream of Roamingwood Lake.
- Q7-10 Low Flow: 0.00242 CFS (LFY method) or 0.0156 MGD
- Surface Area of Pond: 0.031 square kilometers (NHD waterbody data in E-maps) or 333,560 SF.
- Estimated average pond depth: 2 feet per original modeling.
- Total pond volume: 667,120 CF (or 4.99 MG)
- QT = Total Flow (discharge plus natural drainage): 0.02175 CFS or 0.0140 MGD
- Detention Time (Pond Volume/Total Flow): 4.99 MG/0.0140 MGD = 356 days (assuming complete mix scenario for the purposes of estimating in-pond stream velocity)
- Length from Outfall to pond spillway outlet: 100 feet per original modeling.
- Calculated Velocity (assuming complete mix) in First Pond (L/Detention Time): 100 feet/356 days = 0.2808 feet/day = 0.00003251 feet/second. However, could not enter into WQM Model 7.1 due to error message.

NOTE: The original complete mix assumption was only an assumption. The 2018 build-up of sludge at the outfall location is contrary evidence to this assumption as a slow build-up of solids could have been a contributing factor (aside from any sludge discharges).

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)
0.57	Ribauda STP	PA0060038	0.0125

Parameter	Effluent Limit 30 Day Average (mg/L)	Effluent Limit Maximum (mg/L)	Effluent Limit Minimum (mg/L)
CBOD5	10		
NH3-N	1.67	3.34	
Dissolved Oxygen			7

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JuliaRibaudaWQM
odel.pdf

Reasonable Potential Analysis: The pond sampling data indicates the need to monitor for Aluminum, Manganese, and Total Iron during this permit term. The facility uses alum to treat phosphorus, and is a likely source. In the absence of any effluent sampling data for these constituents, monitoring will be required in this permit term to gather data and establish a base line.

Antidegradation: No new, additional or increased discharge loading are proposed in this application if Treatment Plant is restored to the originally permitted treatment process (with tertiary filtration and engineered TP treatment chemical addition flash mixing tank). **Corrective actions** being undertaken to come into compliance with the existing permit limits (including enforceable narrative TBEL prohibiting build-up of solids in the receiving stream/impoundment) will prevent additional degradation not allowed by the existing SEJ coverage.

- **SEJ Limits History:** See expanded Communications Log and Table 1 below for the SEJ limit history based on available files. The original SEJ limits were developed in 1978 and original NPDES Permitting (see below). Subsequently, the facility went through Planning to increase from a 100-bed facility to a 150-bed facility, not increasing the 0.0125 MGD NPDES Permit basis discharge flow but increasing the loadings (mass and concentration) to account for the additional beds/incidental visitors & staff and then-current BAT (Best Available Technology) treatment standards (some less stringent than previous SEJ limits/NPDES permitting). No other SEJ updating was apparently done at that time since it was thought the existing STP could handle the additional

loadings. **This permit has been updated to add previous SEJ mass limits and TRC limits back into the permit.**

- **Existing Impacts:** The technical review has determined that the facility has had two (2) known impacts on the receiving High Quality stream/pond:
 - **Ammonia-N:** Updated water quality modeling (see output above) based upon on the revised 2021 Chapter 93 Ammonia-N water quality standard and the current scientifically-based water quality modeling (WQM Model 7.1), indicate that more stringent Ammonia-N limits would be needed to protect the waters of the Commonwealth than the 1986 BAT standards/existing Ammonia-N limits. **SEJ only allows for reduction of HQ watershed water quality standards to the state-wide Chapter 93 Water Quality Criteria.**
 - **Total Suspended Solids (TSS):** There has been a build-up of solids at the Outfall location (at the southwestern corner of the HQ-CWF receiving pond with the pond discharging from the southern end, contrary to the existing enforceable Narrative Technology-Based Effluent Limit prohibiting build-up. Part of the source was due to historic solids washout problems in the STP (being addressed by removal of laundry flows/loadings and other corrective actions and removal of accumulated solids). However, the 2023 EPA Compliance Inspection Report indicated that the Sand filters have been out-of-service long-term, with no plans to restore them to operation. the outfall location is. Original NPDES water quality modeling/permitting assumed a complete mix scenario (with a very low flow that would encourage solids settling), but discharge is also to a potentially stagnant area that would contribute to the build-up of settling solids over a period of decades.
 - **MBAS:** The Department files included foam complaints on the pond. The facility has eliminated onsite laundry activities and supplied MBAS sampling data (0.06 mg/l average and 0.05 mg/l minimum, from 20 samples). The <2.50 mg/l MBAS maximum must be treated as the constituent being present at the insensitive ND concentration per the EPA Sufficiently Sensitive Rule. The existing Part A.I Additional Requirements Part A.I enforceable narrative TBEL prohibits visible changes to the receiving stream as well. MBAS monitoring has been added to gather information in this permit term.

Table 1 (Historic SEJ Permit Limits and Application Data)

Constituent	1978 SEJ Limits (100-bed facility)	1/4/1984 NPDES Permit	6/2/1989 NPDES Permit	2012 NPDES Permit	Application Data
BOD5	10 mg/l (7-day average)	1.04 lb/day (monthly average) 10.0/20.0 mg/l (monthly average & IMAX)	-	-	-
CBOD5	-	-	1.0 lbs/day (monthly average) 10.0/20.0 mg/l (monthly average & IMAX)	10.0/20.0 mg/l (monthly average & IMAX)	5.0 mg/l max and 2.0 mg/l average (24 samples)
TSS	10 mg/l (7-day average)	1.04 lb/day (monthly average) 10.0/20.0 mg/l (monthly average & IMAX)	3.1 lbs/day (monthly average) 30.0/60.0 mg/l (monthly average & IMAX)	30.0/60.0 mg/l** (monthly average & IMAX)	13.2 mg/l max and 4.55 mg/l average (24 samples)
TP	0.5 mg/l (7-day average)	0.05 lb/day (monthly average)	0.1 lb/day (monthly average)	0.5/1.0 mg/l (monthly average & IMAX)	0.39 mg/l max and 0.132 mg/l average (23 samples).

		0.50/1.0 mg/l (monthly average & IMAX)	1.0/2.0 mg/l* (monthly average & IMAX)		
Ammonia (Summer)	1.0 mg/l max	0.05 lb/day (monthly average) 0.50/1.0 mg/l (monthly average & IMAX)	0.3 lb/day (monthly average) 3.0/6.0 mg/l (monthly average & IMAX (based on multiplier)	3.0/6.0 mg/l (monthly average & IMAX)	1.46 mg/l max and 0.19 mg/l average (24 samples)
Ammonia (Winter)	3.0 mg/l max	0.15 lb/day (monthly average) 1.50/3.0 mg/l (monthly average & IMAX)	0.9 lb/day (monthly average) 9.0/18.0 mg/l (monthly average & IMAX)	9.0/18.0 mg/l (monthly average & IMAX)	See above.
Dissolved Oxygen	6.0 mg/l minimum	7.0 mg/l minimum	7.0 mg/l minimum	7.0 mg/l minimum	No data
TRC	-	0.0 mg/l	Monitor Only	None (UV disinfection)	No data
pH	-	6.0 – 9.0 SU range	6.0 – 9.0 SU range	6.0 – 9.0 SU range	6.10 – 9.43 SU range (711 samples)
Fecal Coliform (Summer)	-	200/100 ml (GEO Mean) and not more than 1000/100 ml in >10% of samples tested during swimming season.	200/100 ml (GEO Mean)	200 CFU/100 ml (GEO Mean) & 1000 CFU/100 ml IMAX	3400/100 ml max and 159/100 ml average (24 samples)
Fecal Coliform (Winter)	-	-	2,000/100 ml (GEO Mean)	2,000 CFU /100 ml (GEO Mean) & 10,000 CFU/100 ml IMAX	See above

*Superseded by Lake Wallenpaupak TMDL (Nutrients and Mercury) WLA-based limits.

**Not consistent with current ABACT limits (10 mg/l TSS) for this size of STP.

Communications Log and Permitting History: This log includes the replaced application and previous permitting history for informational purposes (permittee identity; antidegradation with discharge being directed to impoundment at headwater of UNT). Please note this log does not include all communications (due to separate compliance and/or management communications or meetings that this reviewer was not copied).

Prior History (to clarify history of existing limits):

1973: The entire Wallenpaupack Creek basin was designated as a conservation area along with a final rulemaking that was published at 3 PaB 787 (April 11, 1973) and became effective within the next 15 days following publication. This 1973 final rule listed the Lake Wallenpaupack Dam as the point that separated the WWF in the downstream portion and the CWF in the upstream portion. (Ariel Creek & tributaries are in the upstream portion.)

6/6/1978: SEJ approval memo issued for project (STP for 100 bed nursing home). BAT requirements.

6/22/1978: DEP letter to technical consultant with the following WQBELs: **10 mg/l BOD5 (7-day average), 10 mg/l TSS (7-day average), 0.5 mg/l TP (7-day average), 1.0 mg/l max summer and 3.0 max winter Ammonia-N limit; 6.0 mg/l minimum DO limit.**

9/19/1978: Water Pollution Control Report recommended the following WQBELs: 10 mg/l BOD5, 10 mg/l TSS, 1.0 mg/l Summer Ammonia-N/3.0 mg/l Winter Ammonia-N, monthly average limits and 6.0 mg/l minimum DO limit.

12/12/1978: WQM Permit No. 6478405 issued for new STP.

1979: The current protected uses of High Quality and Exceptional Value were established. The policy for conservation areas prior to 1979 was very similar to the current HQ category of waters (i.e. required maintenance of existing water quality **and SEJ provisions were available for permitted activities**), which is the reason why those streams were all converted to HQ in the 1979 rulemaking. As such, the most appropriate date to use when determining whether or not a facility would qualify for antidegradation grandfathering in Wallenpaupack Creek basin is April 1973. Following the 1979 rule, Wallenpaupack Creek basin remains the same as it is today. Above the dam is HQ-CWF and below the dam is HQ-WWF.

8/6/1980: Technical consultant letter indicating the effluent sewer line had to be relocated due to inability to get easements. Route changes for sewer to follow the right-of-way of LR 63144 (Golf Park Drive) to approved Outfall location. Attached figure showed changed route with turn-onto Stock Farm Road, then turn to Pond, terminating near Southwestern corner of upper pond).

8/19/1983: DEP Planning Memo okay for increased loading (from 100 to 150 Nursing Home beds) on existing 12,500 GPD STP in accordance with Act 537 requirements (and no need to increase existing STP capacity).

10/25/1983: Water Pollution Control (WPC) Report for NPDES permitting to allow 0.0125 MGD discharge to HQ-CWF watershed UNT to Ariel Creek through impoundment/pond.

11/9/1983: NPDES Permit issued with the following limits: 10 mg/l BOD5 monthly average; 10 mg/l TSS monthly average; **0.50 mg/l summer Ammonia-N and 1.50 mg/l winter Ammonia-N monthly average;** 0.5 mg/l TP monthly average; 7.0 mg/l DO minimum; 200 MPN Fecal Coliform; zero chlorine residual; pH in 6.0 – 9.0 SU range).

6/24/1986: WPC Report Re-evaluation for Julia Ribauda (NPDES Permit No. PA0060038) with recommendation for revised (some less stringent) permit limits: 30 mg/l TSS monthly average; 3 mg/l summer/9 mg/l winter Ammonia-N monthly average; 1.0 mg/l TP monthly average.

10/7/1986: WQM Permit No. 6486403 issued to "Julia Ribauda Health Service Center, Inc." for STP modifications.

6/2/1989: NPDES Permit issued with relaxed limits (30 mg/l TSS monthly average; 3.0 mg/l summer and 9.0 mg/l winter monthly average Ammonia-N limits; 1.0 mg/l monthly average TP limits; 7.0 mg/l DO limits; monitor only Chlorine limits).

NOTE: TP limits later superseded by Lake Wallenpaupack TMDL limits)

3/16/1995: WQM Permit No. 6494406 issued to "Integrated Health Services at Penn, Inc." for the Julia Ribauda Nursing Home for STP modifications including flow equalization tank, chemical feed systems, package tertiary treatment system, UV disinfection, and enlargement of existing sludge holding tank, and new blowers.

3/22/1995: DRBC Docket No. D-95-4 issued for the Julia Ribauda Nursing home's 12,500 GPD STP (servicing a 120 bed facility)

2006: NPDES Permit issued to Brighton at Julia Ribauda. Previous NPDES Permittee was "Integrated Health Services at Penn Inc."

10/4/2012: Last NPDES Permit issued to Saber Health Group, effective 11/1/2012. The 2/28/2012 Application for NPDES or WQM Permit Transfer Form identified the Saber Health Care Group EIN Number as 275010778.

3/30/2017: Consent Assessment of Civil Penalty issued.

7/21/2017: NOV issued due to late application

10/31/2017: Expiration date of NPDES Permit.

11/9/2017: Partial NPDES Permit renewal application received

11/20/2017: NPDES Permit renewal application fee received
11/27/2017: Renewal Application Incompleteness Letter (30-day response time given)
12/22/2017: Farnham E-mail for more time to respond. (Farnham e-mailed to Phil Amico and Phil forwarded it to me)
12/27/2017: Berger E-mail granting extension to 1/29/2018 for a complete and technically adequate response to the
11/27/2017: Application Incompleteness letter
1/4/2018: Farnham E-mail noting that he had scheduled a file review for the facility, and was looking at DRBC docket status/transfer
1/29/2018: revised NPDES Permit Renewal Application received.
2/14/2018: Requested replacement application check
2/14/2018: DEP Application Incompleteness/Technical Deficiency Letter (response due in 30 days)
3/20/2018: Farnham E-mail asking for 90-day extension.
3/20/2018: Berger E-mail asking for what reason are they asking for a 90 day extension, and asking for list of what they plan to do and submit.
6/20/2018: Berger E-mail reminder
8/2/2018: Second NOV regarding late application and assorted exceedances (Ammonia-N, TSS, Fecal Coliform, Total Phosphorus) and late DMR submittals.
9/19/2018: Berger E-mail reminder that referenced 9/19/2018 DEP Enforcement Meeting (did not attend but heard they committed to a revised NPDES Permit application response by 10/31/2018). E-mail also asked that the application be updated due to issues discussed at that meeting.
9/20/2018: Resent 9/19/2018 E-mail to Ms. Lisa Levan (Saber)
9/20/2018: Berger E-mail asking for updated GIF if client contact information has changed.
1/13/2018: Farnham E-mail regarding Julia Ribaud WWTP status. Ken Fulford was identified as the new certified operator for the facility. It noted the facility was going to process site laundry at another Saber facility. Operational actions were noted.
1/14/2019: Berger E-mail noting no response to 2/14/2018 DEP Letter and requiring immediate response.
1/17/2019: Field Order issued requiring complete NPDES Permit Renewal application within 15 days of the date of the order.
2/14/2019: Farnham E-mail regarding status and questions about NPDES Permit Renewal application. **E-mail noted there is now a site "storm mode procedure" in place. Response also noted "Julia Ribaud Healthcare Group LLC" is in fact the operator with financial control per corporate directive. An NPDES/WQM Permit Transfer Application would be supplied with the revised Application.**
2/27/2019: Berger E-mail response to 2/14/2019 Farnham E-mail questions. It noted any DRBC Docket updating can be done separately from the NPDES Permit application, and noted changes to STP would require an NPDES Permit Part A.III.C.1 (Planned changes to Physical facilities) notification due to questions about potential usage of tank trucks onsite.
3/4/2019: Farnham E-mail thanks for 2/27/2019 response and noting his need to get this application completed and sent in.
8/26/2021: NPDES Permit Application returned.

Present Application:

8/26/2021: Replacement NPDES Permit Application received.
9/17/2021: DEP Incompleteness Letter issued.
8/19/2022: Farnham E-mail apparently asking for an indefinite extension (no target date for submittal) with some questions on application requirements.
8/23/2022: DEP (DEP OCC) E-mail responding to Mr. Farnham's questions and extension request.
9/1/2022: Telephone call to discuss outstanding submission requirements (Amy Bellanca, Permits Chief)
9/21/2022: Deadline given to 9/30/2022 for submission (Amy Bellanca, Permits Chief)
9/30/2022: Incomplete revised Application received via **On-Base 71258**. Missing Act 14 notice proof of receipt, with application check mailed separately. Signed form copies received from Mr. Coyne via E-mail.
10/1/2022: **On-Base# 71281 included payment form.**
10/1/2023: **Michael Coyne E-mail with additional documentation.**
10/3/2022: Additional E-mailed application documents. Proof of receipt for Act 14 notices received via Applicant (Farnham).
10/4/2022: DEP Permits Chief, in communication with Mr. Coyne about permit application fees, indicated Mr. Coyne had told us to communicate directly with him, and not with his consultant (Farnham).
10/11/2022: Applicant (Farnham) E-mail forwarding TN sampling results and payment information. **NOTE:** Wrong amount. Check was returned by management and correct fee received later.
10/19/2022: DEP Letter transmitting application copy (On-Base Ref No. 71258 documents) to the DRBC as application was ambiguous whether DRBC received an application copy or only letter notification of the revised NPDES permit application. Application copy included concurrent but separate WQM permit transfer application forms for BHG Aviv LLC.