

Application Type Renewal
Facility Type Sewage
Major / Minor Major

NPDES PERMIT FACT SHEET ADDENDUM

Application No. PA0060097
APS ID 618006
Authorization ID 1369189

Applicant and Facility Information

| | |
|--|---|
| Applicant Name <u>PA American Water Co.</u> | Facility Name <u>Pocono Country Place STP</u> |
| Applicant Address <u>895 Wesley Drive</u> <u>Mechanicsburg, PA 17055</u> | Facility Address <u>1 Lakeview Access Road</u> <u>Tobyhanna, PA 18466-3094</u> |
| Applicant Contact <u>Jennifer Milakeve</u> | Facility Contact <u>David Altmiller</u> |
| Applicant Phone <u>(610) 233-6553</u> | Facility Phone <u>(570) 242-3274</u> |
| Client ID <u>87712</u> | Site ID <u>262345</u> |
| SIC Code <u>4952</u> | Municipality <u>Coolbaugh Township</u> |
| SIC Description <u>Trans. & Utilities - Sewerage Systems</u> | County <u>Monroe</u> |
| Date Published in PA Bulletin <u>December 24, 2022</u> | EPA Waived? <u>No</u> |
| Comment Period End Date <u>January 24, 2023</u> | If No, Reason <u>Major STP</u> |
| Purpose of Application <u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u> | |

Internal Review and Recommendations

This is a Redraft NPDES Permit for a 1.25 MGD Non-municipal Wastewater Treatment Plant (WWTP) for a residential development.

Changes to Draft NPDES Permit:

- **Part A.I.A, A.I.B, and Part C.II:** Part C.II CBOD5 Schedule of compliance deleted. New limits will be effective on PED.
- **Part A.I.D:** Footnote amended to: "If there is a sampleable point of concentrated flow. Sheet flow-only drainage areas are subject to Part C.VI.E.3" due to Inspection Report indicating pipe at (stormwater) Outfall No. 002 discharge point.
- **Part C.I.G:** New Notification of Responsible Operator condition deleted.
- **Part C.I.J:** New requirement for submittal of an annual Chapter 94 Municipal Wasteload Report.
- **Part C.III.C:** New sewage sludge management inventory report requirement (to be submitted with the annual Chapter 94 Report). See DEP Operators Webpage for spreadsheet incorporating the condition-referenced EPA methodology.
- **Part C.VI:** Added Item F (benchmarks) due to discharge to HQ watershed.

Internal Comments:

- New draft NPDES Permit due to age of prior 2022 NPDES Permit. (Permit action was delayed due to compliance issues elsewhere). No applicable non-municipal NPDES permit template update.
- No PFAS monitoring is being required in absence of any Industrial Users and no PFAS sampling data in NPDES Permit Renewal Application. This is a private STP (no industrial users), not a POTW subject to new IPP NPDES Permit template language.
- The 1/30/2024 Inspection Report & other Inspection Reports indicated several issues with bolded responses:

| Approve | Return | Deny | Signatures | Date |
|---------|--------|------|---|-----------------|
| X | | | James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer | August 29, 2024 |
| X | | | Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Acting Engineer Manager | 9-9-24 |

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- SSOs in the collection system (due to heavy rain and/or blockages). **SSOs are prohibited by NPDES Permit Part B.I.H. See NPDES Permit Part B.I.E (Proper Operation & Maintenance) and the WQM Permit(s) for applicable O&M requirements to prevent recurrences.**
- Near the location of the coordinates in the NPDES Permit PA0060097 for Outfall 002 there is a pipe and the area where it appears stormwater would flow into Dresser Run if there was a discharge. There was no discharge from Outfall 002 during today's inspection. No problems were observed at Outfall 002, downstream from it, at the confluence of where it appears stormwater would enter Dresser Run, or immediately downstream in Dresser Run from the confluence. **If there is an available sampleable point of concentration stormwater discharge, semi-annual stormwater sampling is required. The Part A footnote has been amended to: "If there is a sampleable point of concentrated flow. Sheet flow-only drainage areas are subject to Part C.VI.E.3".**
- It was reported to this inspector during the February 08, 2024 phone call that the channel monster is currently not operable. Per WQM Permit No. 4517403, issued November 21, 2017, which included the installation of the existing auto screen and some other headworks modifications, "The existing comminutor will replace the pass manual bar screen in the bypass channel". The facility currently has an operable auto screen as a primary screening device in the influent channel, with the inoperable channel monster and manual bar screen in the bypass channel. The Department requests that the permittee ensure that all permitted equipment is maintained in an operable condition. Please contact Amy Bellanca (NERO Clean Water Program Manager) at 570-826-2318 if you have any questions about possible WQM Permit modifications. **See NPDES Permit Part B.I.E (Proper Operation and Maintenance) requirements in addition to the existing WQM permit conditions. See Part A.I Additional Requirements Item 3 for bypass reporting requirements.**
- April 2024 Zinc exceedance reported. Blamed on hydraulic flow exceeding plant or unit design during a wet weather event (2.2 inches of rain; 2.883 MGD flow). **See NPDES Permit Part C High Flow Management Plan (HFMP) requirement. See NPDES Permit Part B.I.E (Proper Operation and Maintenance) requirements in addition to the existing WQM permit O&M conditions.**
- Request for Chapter 94 Annual Municipal Wasteload Report submittal requirement. **Added explicit requirement in Part C.I.J (in addition to existing Part B.I.C.4 language), and corresponding annual Sewage Sludge Management Inventory requirement to Part C.III.C.**

Received Public Comments:

EPA Public Comments: Received via 1/9/2023 E-mail and subsequent 4/5/2023 EPA E-mail informational question:

TMDL Requirements Fact Sheet Clarification: While we note the brief discussions of the TMDL pollutants of concern (Fe, Al, Mn) on pg 17 of the fact sheet, we would recommend including a narrative description of the TMDL requirements in the permit and describing how the permit is considered consistent with the assumptions and requirements of the TMDL. **The March 27, 2009 Lehigh River watershed TMDL (Aluminum, Manganese, Total Iron, pH) focused on the (downstream) Lehigh River reaches in Carbon County per the TMDL. The TMDL focused on mining-related contributions (with consideration given to several NPDES discharges substantially downstream of this facility's location or as general background sources). No Waste Load Allocations (lbs/day) were set forth for this facility.**

The basic TMDL-related permitting consideration is to ensure that facility discharges do not contribute to exceedances of the water quality standards or increases in watershed mass loadings (as previous facility discharges were considered part of background).

- Given that this facility does not accept any Industrial wastewater for treatment, the major concern is that excessive usage of chemical products (Aluminum or Iron-containing) for Total Phosphorus reduction might add to the loadings on the Lehigh River Watershed. Normally, any facility is expected to optimize usage of treatment chemicals to reduce costs.
 - The Reasonable Potential Analysis determined there was no Reasonable Potential for Iron, but required monitoring for Aluminum and Manganese.
 - Alum is used for phosphorus removal at present. It is a potential source of aluminum loadings.
 - Any significant future iron-based wastewater treatment chemical usage would trigger NPDES Permit Part A.III.C.2 (Planned Changes to Waste Stream) notification requirement. The

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Department would evaluate the proposed usage at that time. Antidegradation considerations would apply.

- In the absence of any Industrial User, the existing manganese loadings might originate in the local geology and water sources. If an IU proposed to connect to the Treatment Plant, an NPDES Permit Part A.III.C.2 notification would be required. The Department would evaluate potential for issues at that time. Antidegradation considerations would apply.
- If the watershed TMDL is subsequently modified in the future to set forth Waste Load Allocations for this facility, the Department would incorporate the WLAs into future permitting.
- This facility discharges to Dresser Run (HQ-CWF) that flows into East Branch Tobyhanna Creek (HQ-CWF) that flows into Tobyhanna Creek (HQ-CWF) that flows to Lehigh River (HQ-CWF). Antidegradation considerations apply due to the HQ watershed, with the expectation of no further degradation of the receiving stream because no increased loadings are expected on the receiving streams.

Total Iron and Antibacksliding Fact Sheet Clarification: EPA understands the basis for removing the Total Fe monitoring requirements in the permit, but as this creates a less stringent permit condition an antibacksliding analysis will need to be included in the fact sheet. Since Total Fe is a TMDL pollutant of concern, it is EPA's expectation that PADEP will continue to evaluate Total Fe discharge levels from permit application data in subsequent permit renewals to ensure consistency with the TMDL.

- Antibacksliding analysis was not required. Antibacksliding pertains to relaxation of existing permit limits (none for Iron), not monitoring requirements previously incorporated to gather data only. Antidegradation considerations would apply only if facility loadings increased on the HQ receiving stream.
- A Reasonable Potential Analysis (including consideration of TMDL requirements) and Antidegradation considerations will be addressed during each future NPDES Permit Renewal. NPDES Permit Part A.III.C.2 (Planned Changes to Waste Stream) notifications would trigger consideration of Antidegradation requirements in event of any iron-based wastewater treatment chemical usage.

Aluminum and Reasonable Potential Analysis Fact Sheet Clarification: We make a minor note that the Aluminum description in the table on pg 17 of the fact sheet may need to be revised. As written, "Existing monitoring requirement due to Reasonable potential..." makes it sound as though there is RP for Aluminum. It seems as though "Reasonable potential analysis" may have been intended. Based on the TSA it is clear that there was no RP determination for Aluminum. **The "Reasonable Potential Analysis" was being referenced, including the Toxic Management Spreadsheet (TMS) output recommendation for continued Aluminum monitoring, TMDL considerations, etc. This Fact Sheet Addendum provides the required written clarification.**

Part A.I.A, Part A.I.B, and Part C.II (CBOD5 Schedule of Compliance): Page 15 of the fact sheet states that application and eDMR data indicate the permittee is able to comply with the new, more stringent CBOD5 WQBEL, but PADEP is still giving the permittee 3 years to comply and/or to justify modification of final limits by site-specific data. In accordance with 40 CFR 122.47(a)(1), compliance schedules must require compliance as soon as possible. If the permittee is able to comply with the WQBEL now, a schedule for CBOD5 cannot be granted in the permit. It should also be noted that a schedule to comply with a WQBEL cannot be afforded solely to allow for site specific data collection. The permittee has the option to provide PADEP with data to revise the limit, but since these are not actions leading to compliance with the calculated WQBEL they cannot be the basis for the CBOD5 schedule. Based on the fact sheet discussion, the schedule for CBOD5 in Part A.I.A., Part A.I.B., and Part C.II should be removed from the permit (the schedule for ammonia-nitrogen appears appropriate based on the fact sheet documentation). **The CBOD5 interim limits and Part C.II (CBOD5 Schedule of Compliance) has been deleted from the permit. The new limits will be effective upon Permit Effective Date. In terms of available CBOD5 effluent data:**

New Limits:

| | | | |
|-------|---|--|---|
| CBOD5 | 74.6 lbs/d Report lbs/d 7.16 mg/l 14.32 mg/l 14.32 mg/l | Monthly Average Daily Max Monthly Average Daily Max IMAX | New WQBEL per updated modeling. Application and EDMR data indicated compliance with new limits. Application Data: 7.8 mg/l max, 3.8 mg/l Max Avg. Monthly Value, and 2.6 mg/l LTA (89 samples). EDMR Data: See below |
|-------|---|--|---|

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1/2020-2/2023 EDMR Data (CBOD5):

| MONITORING END DATE | CONC UNITS | CONC 2 VALUE | CONC 2 SBC | CONC 3 VALUE | CONC 3 SBC |
|---------------------|------------|--------------|-----------------|--------------|---------------|
| 01/31/2020 | mg/L | 2.5 | Average Monthly | 10.3 | Daily Maximum |
| 02/29/2020 | mg/L | 2.2 | Average Monthly | 3.84 | Daily Maximum |
| 03/31/2020 | mg/L | 2.5 | Average Monthly | 8.13 | Daily Maximum |
| 04/30/2020 | mg/L | 1.7 | Average Monthly | 3.57 | Daily Maximum |
| 05/31/2020 | mg/L | 2.4 | Average Monthly | 4.4 | Daily Maximum |
| 06/30/2020 | mg/L | 1.3 | Average Monthly | 1.97 | Daily Maximum |
| 07/31/2020 | mg/L | 1.7 | Average Monthly | 5.73 | Daily Maximum |
| 08/31/2020 | mg/L | 1.2 | Average Monthly | 2.88 | Daily Maximum |
| 09/30/2020 | mg/L | 2.3 | Average Monthly | 4.16 | Daily Maximum |
| 10/31/2020 | mg/L | 1.6 | Average Monthly | 3.29 | Daily Maximum |
| 11/30/2020 | mg/L | < 1.8 | Average Monthly | 7.11 | Daily Maximum |
| 12/31/2020 | mg/L | < 2.6 | Average Monthly | < 6.0 | Daily Maximum |
| 01/31/2021 | mg/L | 3.8 | Average Monthly | 6.56 | Daily Maximum |
| 02/28/2021 | mg/L | 3.6 | Average Monthly | 7.79 | Daily Maximum |
| 03/31/2021 | mg/L | 3.7 | Average Monthly | 4.9 | Daily Maximum |
| 04/30/2021 | mg/L | 2.8 | Average Monthly | 4 | Daily Maximum |
| 05/31/2021 | mg/L | 3.2 | Average Monthly | 4.88 | Daily Maximum |
| 06/30/2021 | mg/L | < 2.1 | Average Monthly | 4.34 | Daily Maximum |
| 07/31/2021 | mg/L | 1.8 | Average Monthly | 3.0 | Daily Maximum |
| 08/31/2021 | mg/L | 1.8 | Average Monthly | 2.52 | Daily Maximum |
| 09/30/2021 | mg/L | 1.4 | Average Monthly | 2.82 | Daily Maximum |
| 10/31/2021 | mg/L | 2.5 | Average Monthly | 4.91 | Daily Maximum |

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| | | | | | |
|------------|------|--------|-----------------|-------|---------------|
| 11/30/2021 | mg/L | 2.5 | Average Monthly | 5.1 | Daily Maximum |
| 12/31/2021 | mg/L | 2.4 | Average Monthly | 3.5 | Daily Maximum |
| 01/31/2022 | mg/L | 3.3 | Average Monthly | 6.1 | Daily Maximum |
| 02/28/2022 | mg/L | 6.69 | Average Monthly | 9.8 | Daily Maximum |
| 03/31/2022 | mg/L | 5.35 | Average Monthly | 8.72 | Daily Maximum |
| 04/30/2022 | mg/L | 6.45 | Average Monthly | 11.9 | Daily Maximum |
| 05/31/2022 | mg/L | 4.29 | Average Monthly | 6.61 | Daily Maximum |
| 06/30/2022 | mg/L | 3.35 | Average Monthly | 6.57 | Daily Maximum |
| 07/31/2022 | mg/L | 3.09 | Average Monthly | 5.45 | Daily Maximum |
| 08/31/2022 | mg/L | 2.77 | Average Monthly | 6.30 | Daily Maximum |
| 09/30/2022 | mg/L | 2.41 | Average Monthly | 3.10 | Daily Maximum |
| 10/31/2022 | mg/L | 1.70 | Average Monthly | 2.40 | Daily Maximum |
| 11/30/2022 | mg/L | < 3.55 | Average Monthly | < 6.0 | Daily Maximum |
| 12/31/2022 | mg/L | < 1.96 | Average Monthly | 4.0 | Daily Maximum |
| 01/31/2023 | mg/L | 1.92 | Average Monthly | 4.36 | Daily Maximum |
| 02/28/2023 | mg/L | 4.29 | Average Monthly | 5.18 | Daily Maximum |

WET Test-related:

- A WET Analysis Spreadsheet was provided for the 2022 WET tests, but not the previous years. We understand that 2019 tests were considered invalid and note that the summary pass/fail information was provided in the fact sheet. Please provide EPA with the WET Analysis Spreadsheets for the rest of the WET tests that were conducted, so that EPA can complete its review. **The Department forwarded available WET Test documentation (provided by PAWC) in response to this comment per Communications Log). EPA subsequently reviewed the PAWC-provided information and provided 4/5/2023 E-mail Feedback below.**
- **4/5/2023 EPA E-mail Feedback and Question:** EPA noted it had reviewed the WET tests and only noted one thing, that the 2016 test was conducted by Eurofins QC. EPA indicated it was not sure if PADEP is again accepting WET test results from this lab, and if so when that recommenced. Do you happen to know? Even if the 2016 Eurofins WET data is not considered, there still seem to be ample tests to evaluate RP.
 - **The 2016 WET Test information, supplied by PAWC and forwarded to EPA, is not considered valid.**
 - **The Region's understanding is that Eurofins QC is out-of-business and no further WET Test is being submitted to DEP by them.**
 - **See updated table and conclusion (below) that deleted the invalid 2016 WET Test (with no other changes to previous Fact Sheet WET Test section required).**

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NOEC/LC50 Data Analysis

| Test Date | Ceriodaphnia Results (% Effluent) | | | Pimephales Results (% Effluent) | | | Pass? * |
|-------------------------|-----------------------------------|-------------------|------|---------------------------------|-------------|------|---------|
| | NOEC Survival | NOEC Reproduction | LC50 | NOEC Survival | NOEC Growth | LC50 | |
| 10/2, 10/4, 10/6/2017 | 100 | 100 | >100 | 100 | 100 | >100 | Pass |
| 10/8, 10/10, 10/11/2018 | 100 | 100 | >100 | 100 | 100 | >100 | Pass |
| 2/17, 2/19 2/20/2020 | 100 | 100 | >100 | 100 | 100 | >100 | Pass |
| 11/9, 11/2020 | 100 | 100 | >100 | 100 | 100 | >100 | Pass |
| 9/29, 9/30, 10/1/2021 | 100 | 100 | >100 | 100 | 100 | >100 | Pass |
| 10/10, 11/2022 | 100 | 100 | >100 | 100 | 100 | >100 | Pass |

* A "passing" result is that which is greater than or equal to the TIWC value.

Is there reasonable potential for an excursion above water quality standards based on the results of these tests? **No.**

Future Industrial Contributors and/or hauled-in Wastewater: The PA American Water Company is a Privately Owned Treatment Works and its status creates implications for regulation of contributions from its users under the NPDES permitting framework. The fact sheet indicates the WWTP services the Pocono County Place Development (about 3,000 homes), and that there are no industrial contributions or hauled-in wastewater to the treatment works. While we acknowledge these statements, PADEP should continue to evaluate any change in users that could necessitate changes to the NPDES permit in future. We offer the following for your information and consideration:

- As provided under 40 CFR 122.3(g), discharges into Privately Owned Treatment Works are not (as discharges into POTWs are) excluded from NPDES requirements; however, PADEP has some discretion with regards to how the users are covered. This may include, but is not limited to, issuing separate or joint NPDES permits to industrial discharges to the system that have applicable BAT/BCT/BPT/NSPS standards, or discharges not subject to an ELG that have the potential to cause the Privately Owned Treatment Plant to be in noncompliance with its NPDES permit limits or cause issues with proper operation of the plant. 40 CFR 122.44(m) contains the requirements for conditions in a permit related to privately owned treatment works, and we would like to share the link to EPA's 1987 memo that discusses Permit Implications of Privatization: <https://www3.epa.gov/npdes/pubs/owm0397.pdf>. Based on the information provided for EPA's review of the draft permit, it is EPA's understanding that the PA American Water Company does not receive contributions from any dischargers subject to BAT/BCT/BPT/NSPS standards or hauled in wastes.
 - 40 CFR 122.3(g) (Exclusions from NPDES Permits): "Discharges into a privately owned treatment works, except as the Director may otherwise require under § 122.44(m)" (i.e. NPDES permits are not required otherwise). Underlining added.
 - 40 CFR 122.44(m) (Establishing limitations, standards, and other permit conditions: Privately Owned Treatment Works): "For a privately owned treatment works, any conditions expressly applicable to any user, as a limited co-permittee, that may be necessary in the permit issued to the treatment works to ensure compliance with applicable requirements under this part. Alternatively, the Director may issue separate permits to the treatment works and to its users, or may require a separate permit application from any user. The Director's decision to issue a permit with no conditions applicable to any user, to impose conditions on one or more users, to issue separate permits, or to require separate applications, and the basis for that decision, shall be stated in the fact sheet for the draft permit for the treatment works". Underlining added.
 - In the absence of any industrial user and/or hauled-in wastewater contribution, the referenced requirements are moot for this non-municipal sewage treatment facility. Existing applicable NPDES Permit conditions include:
 - Part A.III.C.2 (Planned Changes to Waste Streams) notification requirements
 - Part B.I.D (General Pretreatment Requirements)
- Establishing limitations, standards, and other Permit Conditions: In accordance with 40 CFR § 122.21(g)(3), a permittee must identify each user of the treatment works. EPA recommends that PADEP add a condition to the

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permit that requires PA American Water Company to periodically conduct a user survey to identify discharges to its system, including any with applicable ELGs, and report survey findings. This survey should include any hauled waste received from industrial sources. If the permittee were to notify PADEP that it will receive new or increased discharges from an industrial contributor, this notification may require PADEP to reevaluate any necessary changes to the permit including the incorporation of appropriate user limits necessary to meet CWA requirements. In such a scenario, PADEP would also need to provide notice of the new permit to the users pursuant to 40 CFR 124.10(c)(1)(v). **In the absence of any industrial user and/or hauled-in wastewater, the referenced requirements are moot for this facility. Existing permit requirements address the EPA concerns about the need for PAWC customer survey:**

- **This is Major Sewage Facility. The already existing Major NPDES Permit Renewal Application requirements require identification of industrial users and hauled-in wastewater every five (5) years for this major 1.25 MGD Sewage facility, along with extensive Pollutant Group Table sampling requirements.**
- **The existing NPDES Permit Part A.III.C.2 (Planned Changes to Waste Streams) notification requirements would pertain to any future Industrial User waste stream and/or receipt of hauled-in wastewater being directed to this Treatment Plant. The Department would evaluate the waste stream and any need for NPDES Permit Amendment at that time. Standard NPDES permit public notice requirements would pertain to any Department permit action.**
- **As there are no industrial users for this facility, the cited 40 CFR 124.10(c)(1)(v) regulation is moot for this permit action:**
 - “Methods (applicable to State programs, see 40 CFR 123.25 (NPDES), 145.11 (UIC), 233.26 (404), and 271.14 (RCRA)). Public notice of activities described in paragraph (a)(1) of this section shall be given by the following methods:
 - By mailing a copy of a notice to the following persons (any person otherwise entitled to receive notice under this paragraph may waive his or her rights to receive notice for any classes and categories of permits);
 - For NPDES permits only, any user identified in the permit application of a privately owned treatment works

PAWC Pocono Country Place Public Comments: Submitted on 1/23/2023 via DEP On-Base No. 84090. Responses are bolded.

Total Iron: Pennsylvania American Water supports removing monitoring requirements for Total Iron in the updated permit as suggested by PA DEP. PA DEP’s Standard Operating Procedure (SOP) for Clean Water Program Establishing Water Quality-Based Effluent Limitations (WQBELs) and Permit Conditions for Toxic Pollutants in NPDES Permits for Existing Dischargers allows for relaxation or elimination of WQBEL’s when the exception is documented in the fact sheet. **Noted.**

Total Antimony, Total Boron, Free Cyanide: Monitoring is required for these parameters citing reasonable potential analysis. The Toxic Management Spreadsheet Output provided in the Fact Sheet states no reasonable potential exists. The basis for including monitoring requirements in the permit is not clear in the Fact Sheet. Therefore, Pennsylvania American Water respectfully requests the monitoring requirements be removed from the permit. **The Department cannot concur with this request. The Reasonable Potential Analysis includes, but is not limited to, the Toxic Management Spreadsheet (TMS) determination of Reasonable Potential. The constituent concentrations exceeded the threshold for monitoring requirements as set forth in the original Fact Sheet’s TMS output (below). Chapter 92a.61 grants the Department broad authority to require monitoring as appropriate. As part of the Part C.IV (Selenium WQBELs for Toxic Pollutants) process, PAWC has the option of refining the water quality modeling to determine if relief from monthly monitoring requirements is feasible.**

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☒ Recommended WQBELs & Monitoring Requirements

No. Samples/Month: 4

| Pollutants | Mass Limits | | Concentration Limits | | | | Governing WQBEL | WQBEL Basis | Comments |
|-----------------|---------------|---------------|----------------------|--------|--------|-------|-----------------|-------------|------------------------------------|
| | AML (lbs/day) | MDL (lbs/day) | AML | MDL | IMAX | Units | | | |
| Total Aluminum | Report | Report | Report | Report | Report | µg/L | 750 | AFC | Discharge Conc > 10% WQBEL (no RP) |
| Total Antimony | Report | Report | Report | Report | Report | µg/L | 6.45 | THH | Discharge Conc > 10% WQBEL (no RP) |
| Total Boron | Report | Report | Report | Report | Report | µg/L | 1,842 | CFC | Discharge Conc > 10% WQBEL (no RP) |
| Total Copper | 0.11 | 0.16 | 10.7 | 15.6 | 15.6 | µg/L | 10.7 | CFC | Discharge Conc ≥ 50% WQBEL (RP) |
| Free Cyanide | Report | Report | Report | Report | Report | µg/L | 4.61 | THH | Discharge Conc > 25% WQBEL (no RP) |
| Total Manganese | Report | Report | Report | Report | Report | µg/L | 1,151 | THH | Discharge Conc > 10% WQBEL (no RP) |
| Total Selenium | 0.06 | 0.093 | 5.74 | 8.96 | 14.4 | µg/L | 5.74 | CFC | Discharge Conc ≥ 50% WQBEL (RP) |
| Total Zinc | 1.25 | 1.44 | 120 | 138 | 138 | µg/L | 120 | AFC | Discharge Conc ≥ 50% WQBEL (RP) |

Part C.I.G: New Notification of Responsible Operator condition due to unclarity about site chain of command during emergencies per the PPC Plan. – The PPC plan contains general information regarding the chain of command and refers to the ERP for more details. The ERP was submitted to the Department with the technical deficiency response on July 9, 2022. In addition, the available operator report is submitted annually and updated as required. Pennsylvania American Water respectfully requests this requirement be removed from the NPDES Permit as the facility is in compliance with certified operator regulations. **The Department has verified the PPC Plan and its ERP (Emergency Response Plan) attachment identified the responsible operator, and has deleted this condition.**

Compliance History: Nine (9) open violations by client number per 8/20/2024 WMS Query (Open Violations by Client Number).

| FACILITY | INSP PROGRAM | PROGRAM SPECIFIC ID | VIOLATION ID | VIOLATION DATE | VIOLATION CODE | VIOLATION |
|--|-----------------------------------|---------------------|--------------|----------------|----------------|--|
| PA AMERICAN COATESVILLE | Safe Drinking Water | 1150106 | 8188594 | 04/25/2024 | C4A | FAILURE TO OPERATE AND MAINTAIN THE WATER SYSTEM |
| EH ALDRICH WTP | Storage Tanks | 63-19545 | 8195298 | 06/19/2024 | 245.615 | Failure to maintain required records for aboveground storage tank facilities |
| COATESVILLE STP | WPC NPDES | PA0026859 | 8187943 | 05/20/2024 | CSL201 | CSL - Unauthorized, unpermitted discharge of sewage to waters of the Commonwealth |
| COATESVILLE STP | WPC NPDES | PA0026859 | 8187944 | 05/20/2024 | CSL611 | CSL - Failure to comply with terms and conditions of a WQM permit |
| DUQUESNE STP | WPC NPDES | PA0026981 | 8190924 | 06/12/2024 | 92A.44 | NPDES - Violation of effluent limits in Part A of permit |
| DUQUESNE STP | WPC NPDES | PA0026981 | 8190925 | 06/12/2024 | FLOW DEVICE | NPDES - 92A.61(D)ND Failure to monitor flow as required by the NPDES permit- No Flow Measurement Device |
| DUQUESNE STP | WPC NPDES | PA0026981 | 8190926 | 06/12/2024 | 92A.41(A)10B | NPDES - Failure to utilize approved analytical methods |
| DUQUESNE STP | WPC NPDES | PA0026981 | 8190927 | 06/12/2024 | 92A.41(A)5 | NPDES - Failure to properly operate and maintain all facilities which are installed or used by the permittee to achieve compliance |
| UPPER POTTSBORO SEWERS TO POTTSBORO BORO STP | WPC State Water Pollution Control | WQG02460510 | 8156718 | 08/21/2023 | 92A.47(C) | NPDES - Illegal discharge to waters of the Commonwealth from a sanitary sewer overflow (SSO) |

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Communications Log:

12/7/2022: Draft NPDES Permit issued.

1/9/2023: EPA public comments received.

1/9/2023: DEP (Berger) E-mail forwarding EPA public comments to PAWC Pocono Country Place, including request for WET Test copies.

1/9/2023: EPA (Dana Hales) E-mail that stated she could confirm EPA had the WET Analysis Spreadsheets for 2019 – 2022. While the spreadsheet wasn't included, there was also a summary lab report for the 2018 WET test but no WET Analysis Spreadsheet. Since the 2019 tests were considered invalid due to temperature issues, and the fact sheet summarized the 2016, 2017, and 2018 WET tests as well we would still request that the WET Analysis Spreadsheets for these three years be submitted to us for review.

1/9/2023: DEP (Berger) E-mail forwarding amended EPA request (for WET Test spreadsheets) to PAWC Pocono Country Place.

1/11/2023: PAWC (Jennifer Milakeve) E-mail receipt of amended EPA request.

1/14/2023: PAWC (Jennifer Milakeve) E-mail forwarding WETT results from 2016, 2017 and 2018 to Department.

1/17/2023: DEP (Berger) E-mail forwarding WET Test information to EPA.

2/27/2023: PAWC (Jennifer Milakeve) E-mail asking for status of permit.

3/3/2023: DEP (Berger) E-mail indicating public comments were under review.

4/5/2023: EPA (Dana Hales) E-mail noting that 2016 WET Test information was provided by PAWC. "I have reviewed the WET tests and only noted one thing, that the 2016 test was conducted by Eurofins QC. I'm not sure if PADEP is again accepting WET test results from this lab, and if so when that recommenced. Do you happen to know? Even if the 2016 Eurofins WET data is not considered, there still seem to be ample tests to evaluate RP".

4/11/2023: DEP (Berger) E-mail responded to 4/5/2023 EPA E-mail. Eurofins QC is out-of-business per DEP Biologist, so no Eurofins QC WET tests will ever be submitted.

4/14/2023: DEP (Berger) E-mail notifying PAWC that the CBOD5 schedule of compliance would be deleted from Final NPDES Permit.

4/15/2023: PAWC Jennifer Milakeve) E-mail receipt of 4/14/2023 DEP E-mail.