pennsylvania
DEPARTMENT OF ENVIRONMENTAL PROTECTION

NORTH EAST REGIONAL OFFICE
CLEAN WATER PROGRAM

Application Type	**Renewal**	Application No.	**PA0061131**
Facility Type	**Sewage**	APS ID	**545636**
Major / Minor	**Minor**	Authorization ID	**1157189**

NPDES PERMIT FACT SHEET ADDENDUM

Applicant and Facility Information

Applicant Name	**Dalton Sewer Authority Lackawanna County**	Facility Name	**Dalton Sewer Authority WWTP**
Applicant Address	PO Box 538	Facility Address	2047 Turnpike Road
	Dalton, PA 18414-0538		LaPlume, PA 18414
Applicant Contact	David Beckish	Facility Contact	David Beckish
Applicant Phone	(570) 563-1354	Facility Phone	(570) 563-1354
Client ID	75084	Site ID	250901
SIC Code	4952	Municipality	LaPlume Township
SIC Description	Trans. & Utilities - Sewerage Systems	County	Lackawanna
Date Published in PA Bulletin	10/7/2017 (original) Redraft: TBD	EPA Waived?	Yes
Comment Period End Date	4/30/2018 (extended per applicant requests) Redraft: TBD	If No, Reason	-
Purpose of Application	Application for a renewal of an NPDES permit for discharge of treated Sewage		

Internal Review and Recommendations

The Department is issuing this Redraft NPDES Permit for public comment.

Changes from Previous Draft NPDES Permit:

- **Part A Changes:**
  - **Monitoring & Reporting Requirements: Changes were made to address current EDMR reporting requirements (Instantaneous Minimum/Maximum limits for grab sampling; Semi-annual averages with daily max reporting; etc.). Daily Maximum values will be reported, but no additional sampling required.**
  - **Chesapeake Bay Monitoring: As a Phase 5 Chesapeake Bay facility, the Chesapeake Bay reporting requirements have been simplified per current standard Phase 5 requirements.**
  - **Summer Ammonia-N limits: Reverted to existing monthly average and IMAX limits per standard STP permitting requirements.**
  - **New Internal Monitor Point No. 101: The Department has modified the permit to clarify that influent sampling must be done at the facility headworks (newly defined Internal Monitor Point No. 101) to clarify sampling requirements and EDMR reporting.**
  - **Part A Minimum Monthly Average Reduction Reporting: Reporting of existing NPDES Permit Part A.I Additional Requirements 85% minimum monthly average reduction is now being required.**
- **Final Winter Ammonia-N and Revised TRC Limits Schedule of Compliance: Per Authority request, the**

Approve	Return	Deny	Signatures	Date
X			James D. Berger, P.E. / Environmental Engineer	October 16, 2019
X			Amy M. Bellanca, P.E. / Environmental Engineer Manager	
NA			NA for Redraft NPDES Permit issuance for public comments. Bharat Patel, P.E. / Environmental Program Manager	

Internal Review and Recommendations

Department has modified the Schedule of Compliance to include Winter Ammonia-N limits and to incorporate some of the Authority-proposed compliance milestones and date of final compliance to allow for the Authority to pursue substantial WWTP upgrades/work (mentioned in various Authority communications to possibly include WWTP replacement). The Chlorine Minimization condition will require the facility to minimize TRC in the effluent. Otherwise, the facility should attempt to meet the new limits to determine if operational changes will allow for compliance. Minor changes (such as installation of dechlorination chemical feed system) should also be investigated.

- **Final Copper Limits and Revised Part C.IV "WQBEL Toxics with TRE" Condition:**
  - **The Department has incorporated the Part C WQBEL Toxics with TRE Condition (replacing previous TRE Condition).**
  - **Per Authority request, the Department has modified the Copper TRE Schedule to to incorporate the Authority-proposed compliance milestones and date of final compliance to allow for the Authority to pursue WWTP upgrades.**

Public Comments on previous Draft NPDES Permit:

Authority Public Comments: The November 14, 2017 BCM Engineers (Authority consultant) Letter set forth the Dalton Sewer Authority's Public Comments summarized below (with responses bolded) on the 0.140 MGD Draft NPDES Permit, **with additional/related January 30, 2018 Meeting comments (Dave Beckish, Authority & Mike Brunamonti, BCM representing the Authority) and April 22 & 26, 2018 Public Comments (Mike Brunamonti, BCM)**. See below for a summary of Authority Public Comments and (bolded) DEP Responses (broken down into categories for convenience):

This is a minor sewage facility, with a small user base, and no industrial customers: **The Department does not disagree with the first two assertions and is unaware of any existing industrial customer discharging to the facility**.

Copper-related Comments: The Water Supply is likely most significant source of copper. The Authority will be working with the water company to determine if it is feasible to reduce copper coming from the water system:

- **The Department lacks information regarding potential copper source(s) but regards the water supply system as a potential source, subject to potential corrosion control as a standard source reduction strategy that should be evaluated by the Authority.**
- **The Part C condition lists out other options that the Authority can investigate.**

Is there a technology-based treatment standard for copper at minor sewage treatment plants: **Not in Pennsylvania. The DEP Northeast Regional Office's understanding was that the US EPA is no longer developing ELGs (Effluent Limitation Guidelines a.k.a. technology-based effluent limits) for the sewage treatment plant industry. The Authority is free to investigate whether there are such standards elsewhere and bring any findings to the attention of the Department.**

- **The Authority has indicated it does not have any indirect dischargers (industrial users) which might be subject to Federal Effluent Limitation Guidelines (TBELs).**
- **The NPDES regulations would require the more stringent of an applicable TBEL and applicable WQBEL be incorporated in the NPDES Permit:**
  - **A more stringent WQBEL would supersede a less stringent (hypothetical) TBEL. There would be no relief from the WQBEL requirement.**
  - **A more stringent (hypothetical) TBEL would supersede a less stringent WQBEL (i.e. a TBEL might result in a more stringent permit limit).**

Other Watershed Issues: The Authority believes that the Department should consider water quality management and pollution control in the watershed as a whole, the state of scientific and technical knowledge, and immediate and long-range economic impacts in issuing permits. The Authority notes that it had already "recognized a need for wastewater treatment plant improvements and began considering steps that need to be taken to identify and implement the necessary improvements". Ackerly Creek is impaired upstream due to other sources. It is not listed as impaired due to metals:

- **Watershed Management as a Whole: Overall watershed considerations were looked at during permitting:**
  - **The National Pollutant Discharge Elimination System (NPDES) permit is focused upon the specific facility and its discharge, but addresses overall watershed considerations during**

Internal Review and Recommendations

permitting. The Authority's NPDES Permit already incorporated permit limits (fecal coliforms and Total Suspended Solids) that will protect the stream from other known causes of impairment (pathogens and siltation). Other NPDES Permits have been issued to other dischargers (MS4 NPDES stormwater dischargers; other Treatment Plants) within the watershed.

- **The Department is not aware of any statutory or regulatory basis for ignoring existing water quality criteria/standards due to other known cause(s) of stream impairment.**
- **The Authority is free to further investigate the overall Watershed and present its findings to the Department. The Authority can provide site-specific stream data to refine the water quality modeling. If the Authority has any other information regarding potential sources of impairment, contact the DEP Complaint Line Number (570-826-2511) with all available information.**

- **State of Scientific and Technical Knowledge: The Department water quality criteria (regulations) and permitting/technical guidance policies are scientifically-based.**
  - **The Authority is free to provide public comment and input on the water quality criteria (which are periodically reviewed) for consideration in the context of (future) regulatory updates. The Department permitting must comply with the existing regulations.**
  - **The Authority is free to comment on the DEP's publicly available Standard Operating Procedures and technical guidance documents (available via the Department website). The Department routinely updates its scientifically-based policies and modeling programs whenever it becomes aware of technical flaws. At this time, no such flaw has been identified by the Authority.**
- **Receiving Stream is not listed as impaired due to metals: Known causes for stream impairment can mask other contributing causes of impairment (including synergistic/cumulative impacts). Exceedances of scientifically-calculated Water Quality-Based Effluent Limitations (WQBELs) would contribute to ongoing stream impairment regardless of other stream issues.**
- **Economics and WWTP Upgrades: The NPDES Permit includes a Schedule of Compliance to allow the Authority to evaluate its feasible options (with potential costs), to explore potential funding options, and to evaluate long-term Authority needs. The 2018 Chapter 94 Report and previous Authority communications indicate the Authority is already evaluating WWTP upgrade projects (separate from metal issues) including new potential customers) for other reasons. See related public comments below.**

Authority Comments regarding DEP Water Quality Modeling:

The Department water quality models are uncalibrated models with a number of variables and assumptions: **The DEP Water Quality Models (WQM Model 7.0; PENTOXSD; TRC Spreadsheet) are scientifically-based water quality models that use standard default input values for applicable variables in the absence of better site-specific data (open to refinement by site-specific input values when available) to protect the waters of the Commonwealth and public health, safety, & welfare. The Department incorporates best available site-specific information into the modeling. The water quality models and related Technical Guidance documents are available via the DEP website.**

- **The Authority is welcome to provide site-specific information to further calibrate the modeling. See the Part C condition includes provisions for the gathering and submittal of new information prior to the effective date of the new permit limits. The Department also previously referenced the Major Sewage NPDES Application Instruction forms in meetings as another source of information on how to refine the Department's water quality modeling.**
- **The Authority has not provided any technical argument that the DEP water quality models are not scientifically valid. No new site-specific data has been provided to further calibrate the modeling.**

Q7-10 Low Flow Basis used in permitting is low compared to Streamgage near Montdale, PA (higher Q7-10 flow). The Authority noted the USGS PAStreamstats-predicted low-flow values & "ground water yield" (contributing to stream flows during dry/low flow conditions) a.k.a. "Low Flow Yield" (0.0127 CFS/square mile) seemed very low in comparison to USGS Gage 01533950 (South Branch Tunkhannock Creek Near Montdale, located in Scott Township, Lackawanna County) with a Low Flow Yield (LFY) of 0.0238 CFS/square mile (source of LFY not identified, 12.60 square mile drainage area; Elevation 1090.00 Feet; Latitude 41°34'29", Longitude 75°38'32"). The Authority states the facility and gage are both located in the SB Tunkhannock Creek relatively near each other, with similar drainage areas. The Authority believes it is reasonable for the Department to use Montdale gage data in water quality modeling. **In the absence of site-specific information, the Department must rely upon best available information. To date, the Authority has not shown that the USGS PAStreamstats (available on the USGS website) resulted in incorrect Q7-10 low flows and/or incorrect drainage areas (or otherwise relied on incorrect data or flawed scientifically-developed regression calculations). The USGS**

Internal Review and Recommendations

PAStreamstats program uses all available data (including the Authority-cited gage) and scientifically-derived empirical equations to address how variable watershed characteristics impact low flows at specific locations. The Authority-identified gage location has different watershed characteristics than the Authority discharge location (Outfall No. 001).

- **Background Terminology Clarifications for Authority Consideration:**
  - **Q7-10 Low Flow (Cubic Feet per Second): The Q7-10 flow defined in Chapter 96.1 as "The actual or estimated lowest 7 consecutive-day average flow that occurs once in 10 years for a stream with unregulated flow, or the estimated minimum flow for a stream with regulated flow" (regulation here refers to stream regulation by dam or other means). The Q7-10 low flow is used to address the Chapter 96.3 (Water quality protection requirements).**
  - **LFY (CFS/square mile): The Low Flow Yield (LFY) is a method of estimating Q7-10 low flows by dividing a known Q7-10 low flow at the site or other location, divided by drainage area square milage. The LFY (CFS/square miles of drainage area) is also a standard input value in Department water quality modeling (PENTOXSD, WQM Model 7.0, and TRC Spreadsheet) to allow for estimation of low flows downstream of the outfall discharge location.**
  - **USGS PAStreamstats: This is a publicly available (internet accessible) resource developed by the United States Geological Survey (USGS) that calculates the Q7-10 (and other information) for selected stream locations in Pennsylvania. In the absence of a stream gage on Ackerly Creek, the USGS PAStreamstats program is the best source of information as it incorporates available PA stream gage data, USGS-determined watershed characteristics, and scientifically-derived USGS empirical equations to reproducibly calculate the Q7-10 low flow and other stream information. Its outputs includes the Q7-10 best value derived from available information scientifically.**
    - **Additional Informational sources: Best information regarding USGS PAStreamstats is found on the USGS website and by its usage at the locations of interest. The Department previously provided USGS PAStreamstats printouts per Authority request.**
    - **Standard Error: All modeling has inherent limitations in terms of accuracy and precision, which are reflected in model-identified error ranges. The model output provides the "best result" that is incorporated into Department water quality modeling. The Authority did not provide any site-specific technical rationale for assuming a less protective Q7-10/LFY value than the PAStreamstats output best value.**
- **Practical Consequences:**
  - **Winter Ammonia-N Limits: A change in Q7-10 or LFY would not change the limit. The Winter Ammonia-N monthly average limit was originally proposed in the 1985 Water Pollution Control Report, using a higher Low Flow Yield assumption (based on outdated information).**
  - **Total Residual Chlorine (TRC) Limit: The previous TRC Limit was a Regional POTW Technology-Based Effluent Limit (TBEL) that was invalidated by Chapter 92a.48. The TRC Spreadsheet calculated the Water Quality-Based Effluent Limit scientifically. Regulations requiring the NPDES permit to include the more stringent of the TBEL and WQBEL. The Authority is free to provide other site-specific information to refine the water quality modeling prior to the permit limits' effective date.**
  - **Copper Limits: New limits would still be required at the Authority-proposed LFY. The Copper LTAMEC was calculated to be 0.0194516 mg/l (19.4 ug/l) with application data indicating a daily max value of 24 ug/l. The hypothetical copper WQBEL of 24 ug/l monthly average (using Authority-proposed LFY) would require permit limits.**
- **USGS PAStreamstats Results versus Authority-cited Gage Location:The Authority wanted the Department to use a historic stream gage (not previously used in facility permitting) to conduct water quality modeling: USGS Gage 01533950 (South Branch Tunkhannock Creek Near Montdale, located in Scott Township, Lackawanna County) with a Low Flow Yield (LFY) of 0.0238 CFS/square mile (source of LFY not identified, 12.60 square mile drainage area; Elevation 1090.00 Feet; Latitude 41°34'29", Longitude 75°38'32").**
  - **PAStreamstats incorporated the Gage/watershed data and gave the same results at the Gage location (i.e. calibrating PAStreamstats to the Authority-cited gage data). The Authority-referenced gage also only had flow monitoring data from the period of 9/1/1960 through 9/29/1978.**
  - **In terms of direct comparison of watersheds, there are significant differences between the WWTP**

Internal Review and Recommendations

Outfall #001 location watershed and the watershed conditions at the USGS Gage as set forth in the USGS Geological Survey Scientific Investigations Report 2006-5130 "Low-Flow, Base-Flow, and Mean-Flow Regression Equations for Pennsylvania Streams", by Marla H. Stuckey. Variations important for Low Flow Yield/groundwater yield include, but are not limited to:

- **Rainfall: Outfall #001 drainage area was estimated to have 40 inches basinwide mean annual precipitation, but the old USGS Gage location was estimated to have a 42.3-inch Mean annual precipitation. Differences in rainfall impact stream low flows.**
- **Urban area: Outfall #001 drainage area was estimated to have a 29% urban drainage area versus the old USGS Gage location with an estimated 2.1% urban drainage area. All else being equal, the greater urban area means less rainwater infiltration, reducing groundwater available to receiving streams (resulting in lower Q7-10 flows) during low flow conditions.**

Copper Water Quality Criteria Uncertainty with site-specific water quality criteria evaluations elsewhere in PA resulting in less stringent criteria:

- **Water Quality Criterion Uncertainty: The statewide Chapter 93.8c WQ criteria/standards are fundamental to the protection of the waters of the Commonwealth and were applied in NPDES Permitting.**
  - **The referenced "uncertainty" can be clarified by the Authority during the TRE Process. The Copper Water Quality Standard/Criteria are found in Chapter 93.8 Table 5. The criterion is expressed in a hardness-based equation (CaCO3) that can be refined by either supplying discharge/stream hardness data (measured in ml CaCO3) and/or a metal translator study (Chapter 16.24) to the difference between dissolved copper and total copper concentrations. The Authority retains its options to further calibrate the site-specific water quality modeling.**
  - **The copper effluent data included a sample above the Copper Daily Max WQBEL (based on the Acute Fish Criteria). New Permit limits are generally required when concentrations are 50% or higher of the monthly average WQBEL (which are generally less than the Daily Max WQBEL).**
  - **The Authority has the option to making any technical/regulatory argument regarding the "uncertainty" of the existing statewide Chapter 93.8 copper water quality criteria to the DEP Division of Water Quality Standards for consideration in the next updating of the PA water quality standards. Section 303(c)(1) of The Clean Water Act (33 U.S.C.A. § 1313) requires that states periodically, but at least once every three years, review and revise as necessary, their water quality standards. The NPDES Permit must be compliant with the existing Water Quality Criteria.**
- **Site-Specific Water Quality Criterions Elsewhere in PA: The Department does not agree with the Authority assumption about site-specific copper water quality criteria evaluations elsewhere in PA.**
  - **Site-specific criteria are site-specific. What is acceptable at one location is not valid at a different location within the same stream, let alone another a different watershed. The Department is not aware of any site-specific copper water quality criterion for Ackerly Creek.**
  - **The US EPA no longer accepts the simplified Copper Water Effects Ratio (WER) methodology used in most previous site-specific copper water quality criteria studies. The US EPA does accept the Biotic-Ligand Model (BLM) instead. This would render even a site-specific WER Study of dubious value.**
  - **The Authority is free to propose development of site-specific water quality criteria for copper. See Chapter 94.8a(i) and 94.8d for the requirements involved. The burden of proof falls on the Authority if it wants to develop a site-specific water quality criterion. The US EPA and DEP would review any proposed study plan, with prior approval required by the regulations. There is no guarantee that any site-specific criterion would be less stringent.**

Copper sulfate (an algicide) is routinely authorized that results in copper concentrations that exceed the water quality criteria:
Seasonal Algae remediation is irrelevant to NPDES Permitting of a Sewage Treatment Plant. The comment refers to the intermittent (once or twice per year), short-term (over a period of a few days) usage of copper sulfate to kill off an existing algae bloom that itself endangers aquatic life (with provisions made to allow for aquatic life to escape the area of application rather than being killed). The Authority has not demonstrated that there is any need for the use of copper (a toxic metal to aquatic) to control algae blooms in the receiving stream. Unneeded application of an algicide would be regarded as pollution of the waters of the Commonwealth. In addition:

Internal Review and Recommendations

- **Copper Sulfate: Its usage is strictly regulated by EPA Pesticide regulations and NPDES Permitting for a correction of an existing environmental problem.**
- **Copper WQBEL: The WQBEL represents the effluent discharge concentration (equivalent to dosage) that would degrades aquatic life in the receiving stream. Any exceedance would negatively impact aquatic life.**

WWTP Improvements will include features to maximize copper precipitation and settling in sludge. Advanced treatment for copper is not feasible:

- **Authority-identified Options: The Department concurs that maximizing copper precipitation and solids settlement is an available method to remove copper from the facility effluent.**
- **Premature Concerns: In the absence of a completed and adequate feasibility study and implementation of Authority-identified source reduction/treatment options, the Department cannot concur that either advanced treatment is required for the facility and/or that no treatment option is feasible. The Authority has not shown that it cannot come into compliance with the copper WQBELs.**
    - **The Authority has separately indicated that it is looking at other options including source reduction and treatment options, and/or investigate a site-specific water quality criterion.**
    - **Additional options exist as noted discussed above, in the Part C conditions, and available DEP technical guidance.**
    - **The WWTP treatment technology "state-of-the-art" changes over time. The Authority is expected to investigate whether there are any new technology options available prior to the new permit limit effective date (54th month of the permit term).**
- **Chapter 94.5 Extension Option: See the regulatory requirements, the Part C.IV condition and DEP SOP ID No. BCW-PMT-037 (Establishing Water Quality-Based Effluent Limitations (WQBELs) and Permit Conditions for Toxic Pollutants for Existing Dischargers) Section III.B (General Procedures for WQBELs Deemed Infeasible by Permittee) for additional information on the process. The burden of proof would fall on the Authority, with US EPA review of the request due to antibacksliding considerations. See Chapter 92a.51 (Schedule of Compliance) requirements for compliance schedules exceeding the 5-year permit term. In addition, the extension would only delay the effective date of the new limit, compliance would still be required in the next NPDES Permit Term.**

Economic Burden and CSL Citation: The Authority indicated its belief that the copper WQBELs "would impose a significant burden upon the Authority and impede implementation of a feasible project". The Authority states: "We are requesting the Department evaluate the above comments and consider taking a more measured approach in reviewing this permit renewal application". The Authority cited Clean Streams Law Article I Section 5 states in part that the Department shall consider water quality and pollution control in the watershed as a whole; the state of scientific and technical knowledge; the immediate and long-range economic impact upon the Commonwealth and its citizens: **The Department understands this comment to be regarding potential compliance costs to the Authority as being overly burdensome.**

- **This concern is premature as the Authority has not yet investigated feasible options or costs at this time. The Authority has indicated that it was already considering potential Treatment plant modifications/replacement options, which is part of the rationale for the modified schedule of compliance. The Authority can also explore funding options (including grants) within the schedule of compliance period.**
- **No specific statutory or regulatory argument was provided for why the Authority-referenced CSL language would negate existing statutory or regulatory requirements for protection of the waters of the Commonwealth or public health, welfare, and safety. In terms of Clean Streams Law (CSL) requirements:**
    - **CSL Law and WQ Criteria and NPDES Permitting: The Department took the state of scientific and technical knowledge plus overall watershed considerations into account when it developed the Chapter 93 water quality criteria for copper and other DEP regulations. The public (including the Authority) had opportunity to comment during the development of PA regulations.**
    - **Other CSL Requirements and PA Constitutional Requirements: Besides other Cleans Streams Law language requiring protection of the waters of the Commonwealth, the Clean Streams Law does not override the PA Constitution: "The people have a right to clean air, pure water, and to the preservation of the natural, scenic, historic and esthetic values of the environment. Pennsylvania's public natural resources are the common property of all the people, including generations yet to come. As trustee of these resources, the Commonwealth shall conserve and maintain them for the benefit of all the people."**
- **See related comments.**

Internal Review and Recommendations

Authority-proposed 54-month Schedule(s) of Compliance for Copper, Winter Ammonia-N, and TRC Permit Limits: **See NPDES Permit Part C.II (Schedule of Compliance – Ammonia-N and TRC) and Part C.IV ((Water Quality-Based Effluent Limitations For Toxic Pollutants - Copper) for the revised schedules schedule(s) of compliance.**

- **The Department has added the Authority requested final date of compliance due to Authority statements about overall WWTP upgrades or replacement.**
- **Various Authority-identified interim compliance milestones were added to the Schedules of Compliance per request.**
- **The Part C.IV schedule has been substantially modified due to new standard Part C.IV toxics process milestone process/options.**
- **The compliance milestone dates represent the "latest" possible date for compliance. The Department encourages earlier compliance when feasible. If compliance is achieved earlier, then later milestones will not be needed.**

PENTOXSD Modeling Input Data Question: The Authority asked why the PENTOXSD modeling data used a 10,000 ug/l input value rather than the 19.45 ug/l copper Long Term Average Effluent Concentration to derive the Water Quality-Based Effluent Limits (WQBELs) of 17.0 ug/l Average Monthly; 26.0 ug/l Daily Maximum, and 34.0 ug/l IMAX Copper). **This is a common Department practice. The Department used the Long Term Average Monthly Effluent Concentration (derived from TOXCONC statistical analysis which included one effluent sample with 24 ug/l copper and a LTA greater than the average monthly effluent limit) as the input value in its initial PENTOXSD modeling run per DEP standard operating procedures, but the PENTOXSD output provided a daily maximum limit based on non-applicable assumptions (i.e. that the receiving stream was high quality subject to additional anti-deg limitations). This resulted in a more stringent copper daily max limit than applicable to the facility (not discharging to a HQ/EV stream). The Department reran the PENTOXSD modeling with an artificially high (impossible) copper effluent concentration to generate a daily maximum limit suitable for a facility discharging to a non-HQ/non-EV stream. The monthly average limit was identical for both modeling runs. The IMAX limit was derived from the monthly average limit via standard multiplier.**

Compliance History: See attached FS Attachments (EDMR and Violations).

Communication Log Addition:

January 2018 Meeting: See above for Department responses to Authority questions and public comments.

Follow-up to January 2018 Meeting: Within 90 days (~4/30), the Authority will provide any proposed interim compliance dates and any additional technical facts. The Department will then issue a Re-draft NPDES permit for public comment. Interim compliance dates (with deliverables) are required for more time (4.5 years for copper) or to address any proposed WWTP modification/replacement. At present, the Authority has not made up its mind on whether to upgrade or replace the STP.

- The Department will provide requested USGS printout about watershed (site location versus Authority-referenced gage) per Authority request. **NOTE: This information was subsequently provided to the Authority per request.**
- The Authority will provide updated Chapter 94 Report information with the 2017 Chapter 94 Report (due in March), and will make sure information is correct, and include any referenced old document as an attachment. **NOTE: The 2017/2018 Chapter 94 Reports omitted incorrect obsolete facility description information contained in previous Reports.**
- The Authority will provide an Excel table comparing corrected to reported (effluent) flow data to the DEP Inspector. The Authority indicated the actual flows were generally less than reported flows. The Department noted that in the absence of violations, reduced flows would not likely result in the need for updated mass loading information, etc. **NOTE: The Authority subsequently submitted the referenced information.**