

Application Type Renewal
Facility Type Sewage
Major / Minor Minor

NPDES PERMIT FACT SHEET ADDENDUM

Application No. PA0061204
APS ID 797238
Authorization ID 1446840

Applicant and Facility Information

Applicant Name	<u>Aqua Pennsylvania Wastewater, Inc.</u>	Facility Name	<u>Lake Harmony WWTP</u>
Applicant Address	<u>762 W. Lancaster Avenue</u> <u>Bryn Mawr, PA 19010</u>	Facility Address	<u>123 Cross Hill Road</u> <u>Lake Harmony, PA 18624</u>
Applicant Contact	<u>Todd Duerr</u>	Facility Contact	<u>Robert Soltis</u>
Applicant Phone	<u>(610) 645-1122</u>	Facility Phone	<u>(570) 443-7099</u>
Client ID	<u>62614</u>	Site ID	<u>1801</u>
SIC Code	<u>4952</u>	Municipality	<u>Kidder Township</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Carbon</u>
Date Published in PA Bulletin	<u>March 30, 2024</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>April 30, 2024</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of NPDES permit.</u>		

Internal Review and Recommendations

Public notification of draft permit issuance was published in the PA Bulletin on March 30, 2024. Comments were received from the permittee's consultant in a letter dated April 26, 2024. A follow-up comment was also provided by the permittee's consultant in a letter dated September 30, 2024. The comments and DEP responses are below. Due to changes made to the permit, another draft permit will be issued with a new public comment period.


Comment 1:

"In reference to the proposed Copper and Lead limitations, and Zinc monitoring/reporting requirements, Aqua would like to provide additional sampling analyses for consideration. They are proposing ten (10) sample results (at least 1 week apart) for each parameter and meeting the Department's Target Quantitation Limits (QLs) to calculate a Long-Term Average Monthly Effluent Concentration. Based on the sampling schedule, laboratory results, and review by both Entech and Aqua, we are requesting until September 30, 2024, to provide additional information."

DEP Response:

The request to conduct additional sampling before final permit issuance was granted in an email dated May 1, 2024. Ten sample results were received for each parameter on September 30, 2024. DEP's TOXCONC spreadsheet was utilized to obtain long-term averages to input into the Toxics Management Spreadsheet (TMS).

- Total Copper: For the previous modeling, a maximum reported value of 0.132 mg/L was input into the TMS. Since the governing WQBEL is 0.012 mg/L, limitations were recommended. The long-term average of the 10 additional results calculated by the TOXCONC spreadsheet is 0.316 mg/L and the limitations will remain in the permit.
- Total Lead: The maximum analytical result for Total Lead in previous modeling was non-detect, however, the quantitation limitation (QL) utilized by the laboratory (3 µg/L) did not meet DEP's target QL of 1 µg/L and limitations

Approve	Return	Deny	Signatures	Date
X			 Brian Burden, E.I.T. / Project Manager	October 7, 2024
X			Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Acting Engineer Manager	10-29-24

Internal Review and Recommendations

were recommended. The long-term average of the 10 additional results calculated by the TOXCONC spreadsheet is 1.3 µg/L. Since the governing WQBEL for Total Lead is 4.1 µg/L, monitoring/reporting requirements were recommended by the TMS. The limitations in the first draft permit are removed and replaced with quarterly monitoring and reporting requirements.

- Total Zinc: For the previous modeling, a maximum reported value of 0.036 mg/L was input into the TMS. Since the governing WQBEL is 0.12 mg/L, monitoring/reporting requirements were recommended (max value was less than 50% of the WQBEL). The long-term average of the 10 additional results calculated by the TOXCONC spreadsheet is 0.094 mg/L. Since this value is greater than 50% of the WQBEL, limitations are recommended and replace the monitoring/reporting requirements in the first draft permit. It appears the permittee can meet the zinc limitations, therefore, they will come into effect upon final permit issuance.

Comment 2:

“Regarding the Corrosion Control Feasibility Study, per input from DEP’s Bethany Shrodo, this study is not applicable to this facility. Therefore, Aqua requests that this condition is removed from the NPDES Permit.”

DEP Response:

References to the Corrosion Control Feasibility Study are removed from Part C of the permit.




Comment 3:

“As demonstrated in the data provided, Aqua does not have the ability to achieve the Copper limitations as of the potential effective date of this permit. Therefore, Aqua is requesting the following revisions to the schedule to complete the required studies, submit a Final WQBEL Compliance Report to DEP, and complete actions to comply with the permit limitations:

Action	Due Date	Requested Due Date
Complete TRE Work Plan and Submit Work Plan if Requested by DEP	6 months after permit effective date	6 months after permit effective date
Complete TRE and Site-Specific Data Collection	18 months after permit effective date	18 months after work plan approval
Begin Implementing Actions Identified in the TRE to Reduce Pollutant Load (if applicable)	18 months after permit effective date	18 months after work plan approval
Submit Final WQBEL Compliance Report	24 months after permit effective date	18 months after TRE Approval
Complete Actions Identified in TRE and Comply with Final Permit Limit	36 months after permit effective date	18 months after WQBEL Approval

DEP Response:

DEP approval of the TRE Work Plan, TRE, and the WQBEL Compliance Report is not required. DEP may make additional requests for research, studies or clarifications if the permittee concludes that it cannot achieve final WQBELs. As per regulations, the final WQBELs must be implemented during the next permit term unless the permittee enters into a Consent Order & Agreement with DEP. Based on the relatively high copper concentrations in the additional samples provided, the final action due date will be adjusted to “48 months after permit effective date”. A requirement to submit a progress report for the TRE is now included “36 months after permit effective date”.

Internal Review and Recommendations		
 TMS PA0061204 Revised.pdf	 TOXCONC Input.pdf	 TOXCONC Output.pdf