

Application Type Renewal  
Facility Type Sewage  
Major / Minor Minor

## NPDES PERMIT FACT SHEET ADDENDUM

Application No. PA0061352  
APS ID 600908  
Authorization ID 1483701

### Applicant and Facility Information

Applicant Name	<u>Delaware Water Gap Municipal Authority</u>	Facility Name	<u>Delaware Water Gap Municipal Authority WWTP</u>
Applicant Address	<u>PO Box 128</u> <u>Delaware Water Gap, PA 18327-0128</u>	Facility Address	<u>92 Broad Street</u> <u>Delaware Water Gap, PA 18327</u>
Applicant Contact	<u>Harry Darlington</u>	Facility Contact	<u>David Scholtz</u>
Applicant Phone	<u>-</u>	Facility Phone	<u>(570) 629-2981</u>
Client ID	<u>163121</u>	Site ID	<u>4603</u>
SIC Code	<u>4952</u>	Municipality	<u>Delaware Water Gap Borough</u>
SIC Description	<u>Trans. &amp; Utilities - Sewerage Systems</u>	County	<u>Monroe</u>
Date Published in PA Bulletin	<u>January 11, 2025</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>February 10, 2025</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of existing NPDES permit.</u>		

### Internal Review and Recommendations

Public notification of draft permit issuance was published in the PA Bulletin on January 11, 2025. Comments were received from EPA and the permittee's consultant. The comments and DEP responses are below. As a result of the major changes made to the permit, a second draft must be issued with a new public comment period.

#### EPA Comment:

"While the fact sheet indicates that the NDPEs Permit application and Chapter 94 report note that the permittee has a federally approved pretreatment program, this is not correct. EPA has not required this POTW to develop a pretreatment program. PADEP will need to remove the Part C.II. POTW Pretreatment Program Implementation permit condition. If PADEP has information about industrial user discharges causing passthrough or interference, EPA and PADEP would need to discuss those concerns. Prior to including such language in a permit, PADEP should first contact the EPA pretreatment team to discuss whether it is appropriate."



#### DEP Response:

The Part C.II condition is removed from the permit and the EPA waiver is now in effect. EPA will be copied on the next draft permit for informative purposes only.

#### Consultant Comment 1:

The PADEP recommendations are summarized below in italics along with our response to each recommendation or request.

*1. Total Lead: Limitations were recommended: 0.027 mg/L monthly average, 0.043 mg/L daily maximum, 0.069 mg/L IMAX. The sample result for Total Lead was "<0.5 mg/L" in the renewal application. It's recommended for*

Approve	Return	Deny	Signatures	Date
X			 Brian Burden, E.I.T. / Project Manager	February 12, 2025
X			 Edward Dudick, P.E. / Environmental Engineer Manager	February 12, 2025

**Internal Review and Recommendations**

*the permittee to double check the units (mg/L vs. µg/L) in the laboratory result sheets since Total Lead is generally tested using a method with much greater sensitivity in other NPDES sewage permit renewal applications. If the originally reported units are correct, then the permittee may conduct additional sampling at DEP's target QL during the draft permit public comment period. The updated results would then be remodeled using the TMS. An additional three Total Lead sampling results taken one week apart are required to remodel the discharge. If the originally reported units are correct and the permittee chooses not to resample the discharge for Total Lead, then the recommended limitations will come into effect three years after the permit effective date and a Toxics Reduction Evaluation will need to be conducted. Monitoring requirements are included in the permit until the limitations come into effect.*

Pennoni response: The originally reported result of "<0.5 mg/L" in the renewal application was incorrect. The correct result, as confirmed by the attached laboratory documentation (Appendix C), is "<0.5 µg/L" (micrograms per liter). This correction aligns with the sensitivity of the testing method and demonstrates that Total Lead levels are below the recommended limitations.

Since this error was solely due to a misreported unit and does not indicate a compliance issue, we respectfully request that the corrected value be incorporated into DEP's Toxics Management Spreadsheet (TMS). If the updated model demonstrates compliance with acceptable lead concentrations, we further request the removal of the recommended limitations, additional sampling requirements, and associated monitoring provisions for Total Lead from the draft permit.

**DEP Response:**

The discharge was remodeled using the correct reported value for Total Lead, <0.5 µg/L (see attached modeling). The TMS did not recommend limitations or monitoring requirements. All requirements for Total Lead are removed from the permit. The Part C.IV condition for Total Lead and Total Zinc is removed from the permit (see discussion on Total Zinc below).

**Consultant Comment 2:**


2. Total Zinc: Limitations were recommended: 0.66 mg/L monthly average, 1.04 mg/L daily maximum, 1.66 mg/L IMAX. The sample result for Total Lead was "42.2 mg/L" in the renewal application. As with Total Lead above, it's recommended for the permittee to double check the units (mg/L vs. µg/L) in the laboratory result sheets since Total Zinc sample results are generally orders of magnitude lower in domestic wastewater treatment plant discharges. If the originally reported units are correct, then the recommended limitations will come into effect three years after the permit effective date and a Toxics Reduction Evaluation will need to be conducted. Monitoring requirements are included in the permit until the limitations come into effect.

Pennoni response: Pennoni assumes that the recommendation meant to state "the sample result for Total Zinc was '42.2 mg/L.'" As with Lead above, the originally reported result of "42.2 mg/L" in the renewal application was incorrect. The correct result, as confirmed by the attached laboratory documentation (Appendix C), is "42.2 µg/L" (micrograms per liter). This correction aligns with the sensitivity of the testing method and demonstrates that Total Zinc levels are below the recommended limitations.

Since this error was solely due to a misreported unit and does not indicate a compliance issue, we respectfully request that the corrected value be incorporated into DEP's TMS. If the updated model demonstrates compliance with acceptable zinc concentrations, we further request the removal of the recommended limitations, additional sampling requirements, and associated monitoring provisions for Total Zinc from the draft permit.

**DEP Response:**

The discharge was remodeled using the correct reported value for Total Zinc, 42.2 µg/L. The TMS did not recommend limitations or monitoring requirements. All requirements for Total Zinc are removed from the permit. The Part C.IV condition for Total Lead and Total Zinc is removed from the permit.

Internal Review and Recommendations	
	TMS PA0061352 Revised.pdf