

Application Type Renewal
Facility Type Sewage
Major / Minor Minor

**NPDES PERMIT FACT SHEET
ADDENDUM**

Application No. PA0061671
APS ID 473070
Authorization ID 1247181

Applicant and Facility Information

Applicant Name	<u>Greenfield Township Sewer Authority Lackawanna County</u>	Facility Name	<u>Greenfield Township Sewer Authority WWTP</u>
Applicant Address	<u>PO Box 501 Carbondale, PA 18407-0501</u>	Facility Address	<u>111 Lakeview Avenue Greenfield Township, PA 18407-3738</u>
Applicant Contact	<u>Glenn Shifler</u>	Facility Contact	<u>Sarah Shifler</u>
Applicant Phone	<u>(570) 222-4889</u>	Facility Phone	<u>(215) 368-3375</u>
Client ID	<u>1096</u>	Site ID	<u>239909</u>
SIC Code	<u>4952</u>	Municipality	<u>Greenfield Township</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Lackawanna</u>
Date Published in PA Bulletin	<u>July 16, 2021</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>August 16, 2021</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>		

Internal Review and Recommendations

This Fact Sheet Addendum is for a 0.140 MGD Redraft NPDES Permit (POTW). Previous Open violations prevented final action on the June 28, 2021 Draft NPDES Permit. Age and other changes triggered need for Redraft NPDES permit issuance for public comments. See previous Fact Sheets for additional information on the facility and permit.

Permit Changes from previous Draft NPDES Permit:

- **Part A, B, and C:** Permit regenerated with current NPDES Permit Template.
- **Part A:**
 - New (quarterly) E Coli Monitoring as new standard monitoring requirement due to new Chapter 93 Water Quality Standard. (Chapter 92a.61).
 - Where there is an IMAX limit but no daily max limit, the daily max limit has been set to the IMAX limit. Any exceedance of the IMAX limit, of whatever duration, is an IMAX permit limit exceedance. This change ensures reporting of such exceedances.
- **Part C.IV:** Updated standard (WQBELs for Toxics Pollutants) language incorporated. Language was updated in accordance with the US EPA (statewide general comments) to clarify interim and final milestone dates. No change in final compliance date.

PUBLIC COMMENTS (responses bolded):

GTSA Public Comment (7/1/2021 Travis Long E-mail): In review of the draft NPDES permit, we are in agreement with all proposed requirements. The one request for clarification I respectfully ask is specific to the pg.28, WQBELs and requirements of IV.B (Site-Specific Data Collection Studies), C (Toxics Reduction Evaluation (TRE)), and D (Schedule and Final WQBEL Compliance Report). More specifically, are these studies still required in addition to the supplemental information previously submitted by EEMA? **All requirements apply. Per the 7/15/2021 DEP (Berger) E-mail response:**

Approve	Return	Deny	Signatures	Date
X			James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	August 29, 2022
X			Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Environmental Engineer Manager	8-30-22

Internal Review and Recommendations

- The Redraft Greenfield Township Sewer Authority NPDES Permit took all submitted information/analyses into account. The Part C.IV (WQBELs for Toxics) conditions in the Redraft NPDES Permit will be effective upon Final NPDES Permit action, including site-specific studies and TRE requirements.
- If the permittee believes it can meet the future WQBELs (when effective) without further work, they can state so in the public comments and request deletion of unneeded requirements (whole section or unneeded subsections) during the public comment period. If they want any relief from the future WQBELs, they have to make an adequate technical case by the Part C.IV schedule milestones (before the new limits become effective). After new limits become effective, antibacksliding prohibitions might prevent any relief.
- The DEP E-mail noted the new E Coli Water Quality Criteria and that quarterly monitoring will be required.

June 2022 GTSA (JHA Engineers) Report: Several points have been noted for informational purposes:

- NPDES revised draft permit conditions have been received, and we await receipt of final permit issuance and implementation thereof: **Due to age of previous draft NPDES Permit, a Redraft NPDES Permit is being issued for public comment.**
- PENNVEST Project Closed Out with PENNVEST: **Noted. The project involved assorted repairs and upgrades to the existing Treatment Plant.**
- Pump Stations: Report noted pump stations Part II WQM permit was pending: **WQM Permit No. 3521401 (replacement of two existing offsite pump stations) was issued August 4, 2022.**
- Exceedance due to Filamentous Algae Issues: The report noted TSS exceedance due to Filamentous Algae and corrective actions. **This is an O&M issue that does not impact permit action in the absence of an open violation.**
- Consent Order & Agreement: CO&A and been amended and executed. **Noted. The finalized CO&A was dated 7/29/2022.**
- Downstream Beaver Dam: The Report indicated that a downstream beaver dam (on private property) had led to odor complaints, not tied to plant performance or safety issues. The PA FBC has been invited to the Treatment Plant to verify it is not source of problem. **Noted.**

October 1, 2021: GTSA (JHA (Travis Long)) E-mail indicating GTSA's Engineer stated the Department requires a QL of 0.02 mg/L, and offering to summarize available data. **The Department Target Quantitation Limit for Copper is 4.0 ug/l. Per the 10/1/2021 DEP (Berger) Response E-mail:**

- **Per the EPA Sufficiently Sensitive Rule, any insensitive ND results (ND above the DEP Target QL) must be treated as the constituent being present at the insensitive ND level. The DEP Target QLs were developed with the assistance of the Bureau of Laboratories, with their webpage having a list of certified labs and what the certified labs can analyze for.**
- **As discussed in the Greenfield Township Sewer Authority Redraft NPDES Permit Fact Sheet Addendum, insensitive ND levels rendered the Metal Translator Study invalid for several reasons. GTSA risks the same problem in a new Metal Translator study if you do not meet DEP Target QLs.**

GTSA Public Comment (GTSA July Engineer 2021 Report): The Department received the July 28, 2021 Engineer Report (Edward Gillette, EEMA) which noted the Redraft NPDES Permit issuance and made several comments applicable to the Redraft. The Department is therefore responding to several of the Report's technical items as additional GTSA public comments to ensure no GTSA public comment is overlooked.

- Fully refurbished plant in service: **Noted.**
- GTSA is working on the final Penn Vest application: **Noted.**
- Copper Study:
 - Copper sampling continuing, with Lead, Phosphorus and Zinc added: **Noted. The Department recommends all analysis meets DEP Target QLs. Insensitive Non-Detect Levels invalidated the previous Copper Metal translator study.**
 - Effluent total hardness must be above 200 mg/l: **The Department presumes this is the consultant's estimate of Total Hardness required to render existing copper effluent concentrations non-toxic (as Total Hardness impacts copper toxicity per the Chapter 93 Water Quality Criteria). Site-specific data had indicated an effluent 139 mg/l Total Hardness used in the updated Reasonable Potential Analysis. Effluent Total Hardness is a parameter largely dependent on raw sewage influent quality and outside normal facility process control. See the Part C (WQBELs for Toxics) section for facility options.**

Internal Review and Recommendations

- Doing better with upgraded plant: **Noted. It was unclear if this referred specifically to metal effluent concentrations and/or Total Hardness. No data was provided to update the Department's Reasonable Potential Analysis.**
- The proposed metal limits are not technically achievable: **No supporting technical case was provided for Department review to show the proposed metal limits are not technically achievable. The Part C (WQBELs for Toxics) sets forth the requirements for making such a case and related permit process. Other facilities have successfully reduced copper concentrations in their effluent.**

Compliance History Update: No open violation per August 29, 2022 WMS Query (open violation by client number). CO&A has been signed.

Permit: PA0061671
Client ID: 1096
Client: All

Open Violations: 0
No data was found using the criteria entered. Please revise your choices and try again.