

Application Type Renewal  
Facility Type Industrial  
Major / Minor Minor

**NPDES PERMIT FACT SHEET  
ADDENDUM**

Application No. PA0062758  
APS ID 1147468  
Authorization ID 1544260

**Applicant and Facility Information**

Applicant Name	<u>Aqua Pennsylvania, Inc.</u>	Facility Name	<u>Shenandoah WTP</u>
Applicant Address	<u>204 E. Sunbury Street</u> <u>Shamokin, PA 17872-4826</u>	Facility Address	<u>424 Raven Run Road</u> <u>Shenandoah, PA 17946</u>
Applicant Contact	<u>John Klinger</u>	Facility Contact	<u>Jeremy Nicodemus</u>
Applicant Phone	<u>(570) 648-5783</u>	Facility Phone	<u>(570) 380-3971</u>
Client ID	<u>364560</u>	Site ID	<u>588704</u>
SIC Code	<u>4941</u>	Municipality	<u>West Mahanoy Township</u>
SIC Description	<u>Trans. &amp; Utilities - Water Supply</u>	County	<u>Schuylkill</u>
Date Published in PA Bulletin	<u>December 13, 2025</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>January 12, 2026</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>Renewal of NPDES permit.</u>		

**Internal Review and Recommendations**

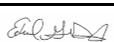
Public notification of draft permit issuance was published in the PA Bulletin on December 13, 2025. Comments were received from the permittee via email dated January 9, 2026. The comments and DEP responses are below. Due to changes made to the permit resulting from the comments received, another draft permit will be issued with a new public comment period. The previously issued permit expires on August 31, 2026.

**Comment 1: Draft Permit, Part A – Effluent Limitations, Monitoring, Recordkeeping and Reporting Requirements, pages 3-4**

Regarding Acrylamide, Cadmium and Lead – for all three parameters, the Fact Sheet acknowledges that all three parameters are “consistently reported as non-detect” when analyzing either at a “sufficiently sensitive quantitation limit (QL)” (cadmium and lead) or at the “laboratory’s lowest available QL” (acrylamide). The Fact Sheet then further states for cadmium and lead that “no limitations or monitoring requirements were recommended” and for acrylamide that “current guidance suggests this pollutant is not present in the discharge.” However, the Fact Sheet then states “to help ensure (acrylamide/cadmium/lead) isn’t a pollutant of concern in the discharge, quarterly monitoring/reporting requirements are included in this renewal.” These monitoring requirements conflict with current DEP policy and SOPs. Aqua Shenandoah has already demonstrated that all three parameters are not pollutants of concern by consistently reporting non-detect concentrations during the last permit cycle. As a result, we kindly request that the monitoring requirements for acrylamide, cadmium, and lead be removed from the final NPDES permit.

**Response:**

Recent sampling results for these pollutants after the NPDES permit was transferred to Aqua (April 2024) were generally non-detect at or below the target QL and the limitations were able to be removed from the permit in accordance with antibacksliding regulations.

Approve	Return	Deny	Signatures	Date
X			 Brian Burden, E.I.T. / Project Manager	February 26, 2026
X			 Edward Dudick, P.E. / Environmental Engineer Manager	February 27, 2026

**Internal Review and Recommendations**

Results submitted before the permit transfer in 2024 often used quantitation limits (QLs) that were above DEP's recommended QLs. The Department's SOPs don't provide specific guidance on this scenario where limitations were previously established and recent sampling results by a new entity appear to indicate limitations aren't needed in the permit. The best professional judgement decision to continue monitoring the parameters at a quarterly frequency to ensure Total Lead, Total Cadmium, and Acrylamide aren't pollutants of concern in the discharge during this permit term is continued in the next draft permit. It's recommended for the permittee to have samples for these parameters analyzed at the lowest available QL. The need for continued monitoring requirements for these parameters will be reevaluated during the next NPDES permit renewal.

**Comment 2: Draft Permit - Chemical Additives, pg. 22:**

Aqua acknowledges this language also existed in the previous permit. We seek confirmation from the Department that it is not necessary to submit a blank Chemical Additives DMR supplemental form each month since no chemical additives are used.

**Response:**

It's confirmed the permittee doesn't need to submit a blank Chemical Additives DMR supplemental form for months where no chemical additives were used. Clarification is added to Part C.II.C.

**Comment 3: Draft Permit - Sedimentation Basin Cleaning, pg. 23:**

Aqua kindly requests this language be removed as there are no sedimentation basins at the plant.

**Response:**

The language is removed from the permit.

**Comment 4: Draft Permit - PFAS Reduction Plan, pg. 23:**

Page 4 of the Fact Sheet states that the requirement for a PFAS Reduction Plan is triggered by the detection of PFAS parameters in the facility's effluent. While the renewal application did report detected concentrations of several PFAS parameters as summarized in the Fact Sheet, the concentrations were all "J-values." In other words, the contract laboratory provided an estimated PFAS result since the analyses measured between the Reporting Limit and Method Detection Limit. Therefore, the J-value results in the NPDES permit application are considered to be non-detect. It is also notable that all J-values results are less than DEP's Target QL for each PFAS parameter.

The Aqua Shenandoah plant does not presently nor historically use or store products or materials containing PFAS compounds. Please see the raw source water (i.e. incoming water treatment plant water) sample results attached to this letter. While the PFAS results in this laboratory report are also non-detected J-values, it can suggest that the potential presence of PFAS in the outfall could be attributed to the potential presence of PFAS in the watershed, not from the Shenandoah WTP. For all the above reasons above clarifying that WTP influent and NPDES effluent PFAS results are non-detect, we kindly request that this section be removed from the final permit.

**Response:**

After reviewing the submitted laboratory sheets, it's confirmed that results for PFOA, PFOS, PFBS, and HFPO-DA were all non-detect at QLs lower than DEP's target QLs. The PFAS Reduction Plan Part C condition is removed from the permit. The values reported in the permit renewal application were estimated concentrations below the QLs.