

Application Type Renewal
Facility Type Non-Municipal
Major / Minor Minor

**NPDES PERMIT FACT SHEET
INDIVIDUAL SEWAGE**

Application No. PA0063487
APS ID 946398
Authorization ID 1191616

Applicant and Facility Information

Applicant Name	<u>Northside Heights Mobile Home Estates, Inc.</u>	Facility Name	<u>Northside Heights Estates STP (AKA Schleicher Trailer Park)</u>
Applicant Address	<u>97 Sam Brooke Circle Lehighton, PA 18235-4226</u>	Facility Address	<u>100 Sam Brooke Circle Lehighton, PA 18235</u>
Applicant Contact	<u>Duane Schleicher</u>	Facility Contact	<u>Duane Schleicher</u>
Applicant Phone	<u>(570) 386-9222</u>	Facility Phone	<u>(570) 386-9222</u>
Client ID	<u>233963</u>	Site ID	<u>480878</u>
Ch 94 Load Status	<u>Not Overloaded</u>	Municipality	<u>East Penn Township</u>
Connection Status	<u>!</u>	County	<u>Carbon</u>
Date Application Received	<u>Original Application: July 10, 2017 Revised Application: May 25, 2022</u>	EPA Waived?	<u>Yes</u>
Date Application Accepted	<u>See Compliance Section</u>	If No, Reason	<u>-</u>
Purpose of Application	<u>NPDES permit renewal for a Sewage Treatment Plant</u>		

Summary of Review

This is an 0.100 MGD Nonmunicipal NPDES Permit Renewal application for MHP STP discharging to Unnamed Tributary No. 03874 To Lizard Creek (TSF; Natural Trout Reproduction).

Background:

- **Revised Application:** See On-Base No. 58565 for the May 25, 2022 Revised NPDES Permit Application.
- **Flows:** The facility was to be constructed in two phases, but only Phase I was constructed (resulting in the facility having half of its permitted hydraulic design capacity and organic design capacities, plus lack of design redundancy). See Treatment Plant Section for details. The existing 2017 DRBC Docket does not address installation of the (uninstalled) Phase II units.
 - The Annual Average Daily Flow was 0.038 MGD in 2021, 0.041 MGD in 2020, and 0.044 MGD in 2019. 0.048 MGD daily max flow in March 2021.
 - The Annual Average Daily Flow was 0.0385 MGD in 2016, 0.0376 MGD in 2015, and 0.0424 MGD in 2014. 0.051 MGD daily max flow in 2016.
 - See EDMR data for daily max flows. Some monthly flows were above 50% of the (reduced) hydraulic design capacity (0.050 MGD) and some max daily flows were above the original peak daily design flow (0.070 MGD) for only two operating extended aeration units).
- **Permittees:** Northside Heights Mobile Home Estates, Inc. (Department of State Entity No. 2670013) is the existing NPDES permittee. Mr. Duane Schleicher (owner) is the WQM Permittee.
- **Non-responsive Applicant:** The NPDES Permit terminated on 4/30/2022, after eleven granted extensions over 29 months for a complete and adequate response to the 10/25/2019 DEP Letter (and NOV requiring response to that letter). Rather than waste time waiting for overdue missing information, this Draft NPDES Permit has

Approve	Deny	Signatures	Date
X		James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	July 1, 2022
X		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Environmental Engineer Manager	July 29, 2022

Summary of Review

been written to require missing information by permit requirement (based on all available information), while the Department takes any required compliance action concurrently. The Department reserves the right to require future permit modification if future data indicates a need to further protect the waters of the Commonwealth and/or the public.

- See Compliance Section and Communication Log for the failure of the applicant to address application-requirements, 10/25/2019 DEP Letter requirements, and NOV requirements.
- A new application was required by the March 10, 2022 DEP Letter by May 25, 2022. The revised May 25, 2022 Application is still not adequate in terms of missing required application fee, missing required sampling data, missing High Flow Management Plan, etc. as required by previous DEP letter and the application form.

Sludge use and disposal description and location(s): 168.89 dry tons sent to LCA Pretreatment Plant per 5/22/2022 NPDES Permit Application. **NOTE**: 8/9/2021 DEP Inspection Report indicated 10,000-gallons of sludge storage capacity, with 54,000 gallons removed in the past year. This implies the 2021 estimate might not be dry tonnage.

Part C Special Conditions: Changes bolded

- **Parts C.I.A, B, C, D**: Stormwater prohibition; Necessary Property Rights; Residuals Management, Planning
- **Part C.I.E**: New Chlorine Minimization condition
- **Part C.I.F**: New responsible operator condition due to lack of updating of certified operator changes.
- **Part C.I.G**: New condition requiring new WQM Permit before construction/installation of Phase II facilities.
- **Part C.I.H**: New HFMP condition due to previous I&I issues and as-built plant only halfway constructed.
- **Part C.II**: New Schedule of Compliance (TRC and Ammonia-N)
- **Part C.III**: New Standard Solids conditions.

Public Participation

DEP will publish notice of the receipt of the NPDES permit application and a tentative decision to issue the individual NPDES permit in the *Pennsylvania Bulletin* in accordance with 25 Pa. Code § 92a.82. Upon publication in the *Pennsylvania Bulletin*, DEP will accept written comments from interested persons for a 30-day period (which may be extended for one additional 15-day period at DEP's discretion), which will be considered in making a final decision on the application. Any person may request or petition for a public hearing with respect to the application. A public hearing may be held if DEP determines that there is significant public interest in holding a hearing. If a hearing is held, notice of the hearing will be published in the *Pennsylvania Bulletin* at least 30 days prior to the hearing and in at least one newspaper of general circulation within the geographical area of the discharge.

Discharge, Receiving Waters and Water Supply Information			
Outfall No.	<u>001</u>	Design Flow (MGD)	<u>.100</u>
Latitude	<u>40° 45' 40.39"</u>	Longitude	<u>-75° 45' 35.90"</u>
Quad Name	<u>Nesquehoning</u>	Quad Code	<u>1239 (5.29.2)</u>
Wastewater Description: <u>Sewage Effluent</u>			
Receiving Waters	<u>Unnamed Tributary to Lizard Creek (TSF, MF)</u>	Stream Code	<u>3874</u>
NHD Com ID	<u>26288005</u>	RMI	<u>0.2 (DRBC Docket)</u>
Drainage Area	<u>2.14 square miles</u>	Yield (cfs/mi ²)	<u>0.1043</u>
Q ₇₋₁₀ Flow (cfs)	<u>0.224</u>	Q ₇₋₁₀ Basis	<u>USGS PA Streamstats at confluence with Lizard Creek.</u>
Elevation (ft)	<u>~560 Feet</u>	Slope (ft/ft)	<u>-</u>
Watershed No.	<u>2-B</u>	Chapter 93 Class.	<u>TSF, MF</u>
Existing Use	<u>-</u>	Existing Use Qualifier	<u>-</u>
Exceptions to Use	<u>-</u>	Exceptions to Criteria	<u>-</u>
Assessment Status	<u>Attaining Use(s)</u>		
Cause(s) of Impairment	<u>-</u>		
Source(s) of Impairment	<u>-</u>		
TMDL Status	<u>-</u>	Name	<u>-</u>
Background/Ambient Data: None available		Data Source	
pH (SU)	<u>-</u>		<u>-</u>
Temperature (°F)	<u>-</u>		<u>-</u>
Hardness (mg/L)	<u>-</u>		<u>-</u>
Other:	<u>-</u>		<u>-</u>
Nearest Downstream Public Water Supply Intake	<u>Northampton Borough Municipal Authority ID# 101942-001</u>		
PWS Waters	<u>Lehigh River</u>	Flow at Intake (cfs)	<u>-</u>
PWS RMI	<u>-</u>	Distance from Outfall (mi)	<u>~15 miles</u>

Changes Since Last Permit Issuance:

- **This is a Natural Trout Reproduction stream.**
- **Outfall coordinates updated 5/25/2022 per revised application.** No updated elevation.

Other Comments:

- At 0.100 MGD (0.1547 CFS), the facility discharge is 69% of the Q7-10 low flow.
- The facility cannot treat the 0.100 NPDES Permit Basis design flow because it failed to install Phase II units (including two aeration units).

Treatment Facility Summary				
Treatment Facility Name: Northeast Heights Estates STP a.k.a. Schleicher Duane Trailer Park STP				
WQM Permit No.	Issuance Date	Scope		
1396401	10/30/1996	Collection System and STP for a 96-unit Mobile Home Park. STP consists of one (1) pump station, bar screen, comminutor, ultimately four (4) equalization tank, aeration tanks, clarifiers, sludge holding tanks, chlorine contact tank, de-chlorination , and riprap outfall. Two phases of construction planned (0.050 MGD Phase I; 0.100 MGD Phase II). Collection system included 8,500 LF gravity main and one (1) pump station.		
Waste Type	Degree of Treatment	Process Type	Disinfection	Avg Annual Flow (MGD)
Sewage	Secondary	Extended Aeration	Sodium Hypochlorite	0.100 (NPDES Permit basis flow)
Hydraulic Capacity (MGD)*	Organic Capacity (lbs/day)*	Load Status	Biosolids Treatment	Biosolids Use/Disposal
0.050 (Phase I) 0.100 (Phase II)	100 (Phase I) 200 (Phase II)	See below.	None	Offsite disposal

*5/25/2022 NPDES Permit Application indicated as-built hydraulic design capacity and organic design capacity was unknown. Only Phase I construction previously completed. Due to changes in design standards, a new Part II WQM Permit would be required to construct/install the additional Phase II units.

Changes Since Last Permit Issuance:

- 2018 Inspection Report indicated new generator and dialing system onsite
- 2015 Inspection Report indicated Soda Ash feed system installed.

Other Comments:

5/22/2022 NPDES Permit Application indicated: one (1) equalization tank (34,000-gallons, receiving pump station flow, with internal comminutor shown on process diagram)), two (2) extended aeration tanks (25,000-gallons each), two (2) clarifiers, one (1) chlorine contact tank (2,000-gallons), with two (2) sludge holding tanks. Sodium hypochlorite is used for disinfection. No upgrades planned in next 5 years.

Design Capacities and Overloading:

- **Original 1996 WQM Permit included phased construction.** Phase I included two (2) extended aeration tanks (at 0.050 MGD capacity & 100 lbs BOD5/day). Phase II would have included another two (2) extended aeration tanks to achieve the 0.100 MGD hydraulic capacity.
 - The facility has installed two of four permitted aeration tanks (i.e. Phase I), therefore limited in existing treatment capacity as noted above. The peak flow capacity was estimated at 37,500 GPD per aeration tank in the WQM permit application (i.e. 0.070 MGD in Phase I for two installed units). EDMR indicates that the peak flow capacities were exceeded (>0.070 MGD flows) during daily max effluent discharges.
 - 12/13/2017 DRBC Docket No. D-1996-039-03 CP-3 applies. Docket did not address Phase II construction (additional extended aeration tanks). DRBC Docket also used outdated Outfall No. 001 coordinates.
- **This is a 96-unit mobile home park (MHP) per original permitting. The application indicated additional connections:**
 - 5/25/2022 Revised Application indicated population of **525**. At the DWFM Defaults for mobile home spaces (75 GPCD; 0.17 lbs BOD5/day/capita), this would equate to 39,375 GPD and 89.25 lbs BOD5/day loadings.
 - 5/25/2022 Revised Application's HFMP (dated May 20, 2022) indicated STP services **250 manufactured homes**.

- This 250-manufactured home figure presumably assumes future Phase II construction or expansion of service area discussed in a 2020 meeting unless they are tying multiple homes in the same unit lot. See Communications Log for details on previous discussion.
- The HFMP also recommended immediate repair/replacement pipe sections between Manholes MH-1 – MH-5 (including repairs to MH-1 pipe drop structure leaks), repair 25% of the manhole tops, and scheduling for complete evaluation of the balance of the system to determine the need for further repairs. The provided “HFMP” did not address actual STP operation during high flow conditions or whether I&I corrective action recommendations were implemented.

Influent Data from Application:

- **Original NPDES Permit Application:** Single reported influent BOD5 sample at 39.7 mg/l (24-hour sample) was very weak. This indicated I&I issues during sampling event.
- **5/22/2022 NPDES Permit Application:**
 - 179 mg/l BOD5
 - 220 mg/l TSS
 - 21.9 mg/l Ammonia-N
 - No CBOD5 influent data provided, but existing DRBC monitoring requirement.

Compliance History

DMR Data for Outfall 001 (from April 1, 2021 to March 31, 2022)

Parameter	MAR-22	FEB-22	JAN-22	DEC-21	NOV-21	OCT-21	SEP-21	AUG-21	JUL-21	JUN-21	MAY-21	APR-21
Flow (MGD) Average Monthly	0.048	0.052	0.040	0.031	0.034	0.032	0.043	0.037	0.036	0.032	0.044	0.035
Flow (MGD) Daily Maximum	0.061	0.077	0.053	0.050	0.056	0.055	0.073	0.095	0.050	0.051	0.039	0.056
pH (S.U.) Minimum	6.30	6.30	6.08	6.00	6.04	6.03	6.07	6.06	6.03	6.05	6.02	6.10
pH (S.U.) Maximum	6.58	6.68	6.66	6.86	6.94	6.96	6.59	6.61	6.57	6.59	6.75	6.54
DO (mg/L) Minimum	6.06	6.91	7.27	7.01	6.30	5.02	5.54	5.27	5.22	5.12	5.02	5.03
TRC (mg/L) Average Monthly	0.27	0.35	0.42	0.06	0.09	0.16	0.40	0.34	0.35	0.16	0.23	0.09
TRC (mg/L) Instantaneous Maximum	1.10	0.90	1.05	0.45	0.88	0.8	0.99	1.04	1.16	1.04	0.68	0.76
CBOD5 (mg/L) Average Monthly	5.3	5.30	5.52	< 3.46	< 3.25	< 2.85	< 3.0	< 3.0	< 3.32	< 4.4	5.15	4.3
TSS (mg/L) Average Monthly	< 7.0	7.0	10.25	< 16.8	10.5	5.0	< 6.25	< 3.0	< 4.0	< 15.0	14.25	10.2
Fecal Coliform (CFU/100 ml) Geometric Mean	< 2	< 2.51	2.51	3.71	E	E	13.94	< 14.98	35.17	37.08	17.32	< 21.69
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	< 2	5	5	44	E	E	28	< 2	510	630	90	40
Ammonia (mg/L) Average Monthly	< 0.02	< 0.08	< 0.02	< 0.15	0.21	0.17	0.24	0.24	0.22	0.35	1.93	0.70

*>0.050 MGD monthly average flows and >0.070 MGD peak daily flows (Phase 1 flows) and non-reporting bolded.

DMR Data for Outfall 001 (from September 1, 2019 to December 31, 2019)

Parameter	DEC-19	NOV-19	OCT-19	SEP-19
Flow (MGD) Average Monthly	0.043	0.044	0.044	0.032

**NPDES Permit Fact Sheet
Northside Heights Estates STP**

NPDES Permit No. PA0063487

Flow (MGD) Daily Maximum	0.064	0.080	0.058	0.046
pH (S.U.) Minimum	6.23	6.08	6.08	6.0
pH (S.U.) Maximum	6.76	6.87	7.20	6.63
DO (mg/L) Minimum	7.40	6.46	6.37	5.84
TRC (mg/L) Average Monthly	0.16	0.27	0.09	0.13
TRC (mg/L) Instantaneous Maximum	0.76	0.85	0.63	0.68
CBOD5 (mg/L) Average Monthly	< 2.0	2.3	2.14	< 2.0
TSS (mg/L) Average Monthly	2.25	6.0	3.0	5.75
Fecal Coliform (CFU/100 ml) Geometric Mean	1.78	1.78	1.58	1.78
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	10	10.0	10.0	10
Ammonia (mg/L) Average Monthly	< 0.10	1.78	< 0.10	0.30

DMR Data for Outfall 001 (from September 1, 2018 to August 31, 2019)

Parameter	AUG-19	JUL-19	JUN-19	MAY-19	APR-19	MAR-19	FEB-19	JAN-19	DEC-18	NOV-18	OCT-18	SEP-18
Flow (MGD) Average Monthly	0.036	0.044	0.046	0.054	0.046	0.045	0.046	0.047	0.047			
Flow (MGD) Daily Maximum	0.047	0.070	0.066	0.088	0.079	0.087	0.074	0.088	0.088			
pH (S.U.) Minimum	6.0	6.4	6.44	6.3	6.3	6.39	6.5	6.5	6.4			
pH (S.U.) Maximum	6.8	6.8	7.13	6.7	6.6	6.73	6.8	6.9	6.9			
DO (mg/L) Minimum	5.4	5.02	5.38	5.32	5.73	7.57	8.6	8.3	6.8			

**NPDES Permit Fact Sheet
Northside Heights Estates STP**

NPDES Permit No. PA0063487

TRC (mg/L) Average Monthly	0.21	0.08	0.02	0.10	0.26	0.47	0.49	0.4	0.49			
TRC (mg/L) Instantaneous Maximum	0.84	0.50	0.13	0.61	0.99	0.95	0.97	0.94	0.93			
CBOD5 (mg/L) Average Monthly	< 2.0	< 2	< 2.0	< 2.0	3.0	3.0	3.3	2.2	<2.0			
TSS (mg/L) Average Monthly	6.0	< 1.0	4.25	2.4	4.3	3.25	5.0	2.0	1.0			
Fecal Coliform (CFU/100 ml) Geometric Mean	9.75	29.75	1.78	2.09	4.95	1.78	1.78	<1	3.16			
Fecal Coliform (CFU/100 ml) Instantaneous Maximum	200	2700	10	40	60	10.0	10	<1	10			
Ammonia (mg/L) Average Monthly	< 0.10	< 0.1	< 0.10	< 0.10	< 0.1	< 0.13	0.10	0.10	0.10			

Compliance History

Effluent Violations for Outfall 001, from: October 1, 2018 To: March 31, 2022

Parameter	Date	SBC	DMR Value	Units	Limit Value	Units
Fecal Coliform	07/31/19	IMAX	2700	CFU/100 ml	1000	CFU/100 ml
TSS	3/31/2021	Monthly Average	46.75	mg/l	30	Mg/l
TSS	2/28/2021	Monthly Average	33.5	Mg/l	30	Mg/l

Summary of Inspections:

CLIENT	INSP PROGRAM	INSP ID	INSPECTED DATE	INSP TYPE	INSPECTION RESULT DESC	INSPECTOR ID	# OF VIOLATIONS
NORTHSIDE HEIGHTS ESTATES	WPCNP	3022355	03/15/2022	Administrative/File Review	No Violations Noted	00613405	0

**NPDES Permit Fact Sheet
Northside Heights Estates STP**

NPDES Permit No. PA0063487

NORTHSIDE HEIGHTS ESTATES	WPCNP	3319706	12/20/2021	Administrative/File Review	Violation(s) Noted	00703877	<u>1</u>
NORTHSIDE HEIGHTS ESTATES	WPCNP	2932105	08/09/2021	Compliance Evaluation	No Violations Noted	00613405	<u>0</u>
NORTHSIDE HEIGHTS ESTATES	WPCNP	3231076	07/31/2020	Compliance Evaluation	No Violations Noted	00613405	<u>0</u>
NORTHSIDE HEIGHTS ESTATES	WPCNP	2785819	04/22/2020	Compliance Evaluation	No Violations Noted	00613405	<u>0</u>
NORTHSIDE HEIGHTS ESTATES	WPCNP	3008788	03/10/2020	Routine/Partial Inspection	No Violations Noted	00613405	<u>0</u>
NORTHSIDE HEIGHTS ESTATES	WPCNP	3330826	08/13/2019	Routine/Partial Inspection	No Violations Noted	00613405	<u>0</u>
NORTHSIDE HEIGHTS ESTATES	WPCNP	3080999	09/04/2018	Administrative/File Review	Violation(s) Noted	00613405	<u>2</u>
SCHLEICHER DUANE	WPCNP	2138628	04/26/2017	Administrative/File Review	Violation(s) Noted	00613405	<u>1</u>
SCHLEICHER DUANE	WPCNP	2095762	10/19/2015	Follow-up Inspection	Violation(s) Noted	00613405	<u>1</u>
SCHLEICHER DUANE	WPCNP	2115947	10/16/2013	Routine/Partial Inspection	No Violations Noted	00613405	<u>0</u>
SCHLEICHER DUANE	WPCNP	2299292	10/16/2013	Routine/Complete Inspection	No Violations Noted	00613405	<u>0</u>
SCHLEICHER DUANE	WPCNP	2049012	06/12/2013	Routine/Partial Inspection	No Violations Noted	00613405	<u>0</u>
SCHLEICHER DUANE	WPCNP	2095760	12/24/2012	Routine/Partial Inspection	No Violations Noted	00613405	<u>0</u>
SCHLEICHER DUANE	WPCNP	2115950	09/07/2012	Routine/Partial Inspection	No Violations Noted	00613405	<u>0</u>
SCHLEICHER DUANE	WPCNP	2095751	07/26/2012	Routine/Partial Inspection	No Violations Noted	00613405	<u>0</u>
SCHLEICHER DUANE	WPCNP	2542475	07/18/2012	Compliance Evaluation	No Violations Noted	00613405	<u>0</u>
SCHLEICHER DUANE	WPCNP	2095755	07/18/2012	Follow-up Inspection	Violation(s) Noted	00613405	<u>1</u>
SCHLEICHER DUANE	WPCNP	2440202	07/09/2012	Complaint Inspection	No Violations Noted	00613405	<u>0</u>
SCHLEICHER DUANE	WPCNP	2209918	06/11/2012	Routine/Partial Inspection	No Violations Noted	00613405	<u>0</u>

**NPDES Permit Fact Sheet
Northside Heights Estates STP**

NPDES Permit No. PA0063487

SCHLEICHER DUANE	WPCNP	2082621	05/21/2012	Routine/Partial Inspection	No Violations Noted	00613405	0
SCHLEICHER DUANE	WPCNP	2082620	05/09/2012	Routine/Partial Inspection	No Violations Noted	00613405	0
SCHLEICHER DUANE	WPCNP	2430849	05/04/2012	Routine/Complete Inspection	No Violations Noted	00613405	0
SCHLEICHER DUANE	WPCNP	2127700	04/26/2012	Incident- Response to Accident or Event	No Violations Noted	00613405	0
SCHLEICHER DUANE	WPCNP	2602722	04/23/2012	Compliance Evaluation	No Violations Noted	00613405	0
SCHLEICHER DUANE	WPCNP	2150203	03/05/2012	Follow-up Inspection	No Violations Noted	00613405	0
SCHLEICHER DUANE	WPCNP	2050363	01/27/2012	Administrative/File Review	Violation(s) Noted	00613405	1
SCHLEICHER DUANE	WPCNP	2082646	01/11/2012	Routine/Complete Inspection	No Violations Noted	00613405	0

Open Violations by Client: The 5/25/2022 WMS query (Open violations by client number) indicated two (2) open violations:

CLIENT	INSP PROGRAM	INSP ID	VIOLATION ID	VIOLATION DATE	VIOLATION CODE	VIOLATION
NORTHSIDE HEIGHTS ESTATES	WPC NPDES	3080999	894337	07/31/2020	92A.41(A)8	NPDES - Failure to provide information or records required by the permit or otherwise needed to determine compliance
NORTHSIDE HEIGHTS ESTATES	WPC NPDES	3080999	894338	07/31/2020	92A.44	NPDES - Violation of effluent limits in Part A of permit

Other Comments:

- **Discharging without a NPDES Permit:** The 5/10/2022 DEP Letter required a new NPDES Permit Application and noted permit had terminated on April 30, 2022 (after 11 extensions over a 29-month period), i.e. they are now discharging without an NPDES Permit.
- **7/31/2020 NOV:** Failure to provide required information (required response to 10/25/2019 DEP Letter), Fecal Coliform violation, late DMR submittals
- **3/15/2022 DEP Inspection Report:** The operator in charge is Michael Sullivan. Client ID-353022 Expires- 9/30/22 (not the E-facts listed operator). E-facts has not been subsequently updated. The comminutor was offline, because it was causing backpressure and clogging multiple times daily per onsite personnel. They are using the bar screen only (cleaned weekly). Emergency generator still offline.

- 8/9/2021 DEP Inspection Report: operator-in-charge information was incorrect. An Operator-in-charge flow needed to be submitted. Report noted I&I study was conducted and a manhole with higher flows needed repair. The onsite generator was still offline. A new DO meter has been in use since 9/15/2020.
- EDMR:
 - Indicated “E”, no sampling, for Fecal Coliforms within the last 12 months. The 1/22/2013 NPDES Permit required weekly Fecal Coliform sampling.
 - Max Daily flows exceeded the WQM permit application-identified peak daily flow for two extended aeration tanks (0.075 MGD) for assorted months, plus exceedance of 0.050 MGD Phase I hydraulic capacity for one month.
- Connections Question: The “2020 HFMP” indicated more connected mobile homes (“almost 250”) than originally permitted for (96 lots with design calculations noting flow from 96 trailers). Unclear if they have connected more homes and/or are assuming a future expansion of the MHP. Such an expansion was mentioned in a 2020 meeting. The existing STP is not sized for additional connections and missing permitted design redundancy due to uninstalled units.
- **Revised NPDES Permit Application Issues: The 5/22/2022 Revised NPDES Permit Application was incomplete (not addressing application requirements; not addressing 10/25/2019 DEP Letter-required information as required by the 7/31/2020 NOV and 5/10/2022 DEP Letter). Given the history of this facility (as documented in this section and the Communications Log), it was determined that a Draft NPDES Permit be issued to address the major issues due to previous applicant failure to provide requested basic information despite multiple requests. Issues included:**
 - NPDES Permit Checklist (Minor Sewage Facilities):
 - **Item 1 (Application fee): No application fee was included in the electronic submittal. They also identified an incorrect fee (\$1000) for this MISF2 facility. The 5/10/2022 DEP Letter identified the correct application fee amount of \$2,000. Application remains incomplete.**
 - Item 12 (Plan for managing Peak Flows/HFMP): The 10/25/2019 DEP Letter requested a HFMP/plan for managing peak flows.
 - The submitted document included a partial investigation of the sewage conveyance system, but did not indicate if the investigation recommendations for sewage conveyance system repairs had been implemented.
 - **No actual HFMP or SOP for managing peak wet weather flows at the STP was found.**
 - NPDES Permit Application Form (Minor Sewage):
 - Treatment Plant Design Capacities and Flows: They indicated the Hydraulic Design Capacity and Organic Design Capacity was **unknown**. NOTE: They only built two of the originally permitted four (4) extended aeration tanks. The original WQM permitted design capacities are no more than 50% of original design capacity at most. No upgrades are planned for the next 5 years.
 - Treatment Plant Process Information:
 - Process Flow Diagram: The provided process flow diagram did not identify influent/effluent sampling points per application instructions.
 - Wastewater Treatment Chemicals: Omitted reference to DEP Inspection Report-identified usage of de-chlorination tablets (used before effluent weir per Inspection Report) and soda ash used for pH adjustment in the lift stations. This information was explicitly requested in the 10/25/2019 DEP Letter.
 - Sewage Sludge/Biosolids Management Section: They estimated they removed 168.89 dry tons for LCA Pretreatment Plant in the previous year, which seems somewhat excessive. They had indicated 54,000 gallons/year disposed per an Inspection Report for a previous year, which would equate to a lower dry tonnage. They might have failed to convert from wet weight to dry weight.
 - Influent Testing Information Section: Required Total Nitrogen, Total Phosphorus, and TDS were not sampled for. No mass loading information was provided. The 10/25/2019 Letter also asked for any DRBC-required sampling data (CBOD5), but it was not provided. Original application included 1 sample result for BOD5, TSS, TN, TP, and TDS (without any mass loading identified).
 - Effluent Testing Information Section: They did not complete the min/max column for Total N, Total P, TKN or Nitrate-Nitrite. They did not sample for TDS, Chloride, Bromide, Sulfate, Oil & Grease as required. They did not identify the type of composite sample for CBOD5, TSS, or Ammonia (24-hour, 8-hour or other). They did not provide 2-years of data as required by form and 10/25/2019 DEP Letter, and did

not account for all samples (daily samples, weekly samples). The 10 – 12 sample results do not reflect existing permit requirements for daily and weekly sampling (i.e. 104 weekly and 712 daily samples should have been collected per permit), and resulting number of samples in a 2-year period. They did not provide DRBC Docket No. D-1996-039 CP-3-required sampling data that should have been available for TN, TP, Nitrate-Nitrite (monthly monitoring), and TDS (quarterly monitoring). They did not provide any copper, lead or zinc data. Original application included additional parameters' average concentrations (Chloride, Bromide, Sulfate, Oil & Grease, Copper, Lead, and Zinc) but unidentified ND concentrations for Oil & Grease, Total Copper, Total Lead.

- Compliance History Review: They indicated no violation of any DEP regulation, permit, order or schedule of compliance, despite 5/10/2022 DEP Letter noting NPDES Permit termination for failure to provide required application information (i.e. discharging without a permit) and two open 2020 violations per compliance check.

Development of Effluent Limitations

Outfall No. <u>001</u>	Design Flow (MGD) <u>.100</u>
Latitude <u>40° 45' 42.00"</u>	Longitude <u>-75° 45' 35.00"</u>
Wastewater Description: <u>Sewage Effluent</u>	

Permit Limits and/or Monitoring Requirements: Changes bolded

Parameter	Limit (mg/l unless otherwise specified)	SBC	Model/Basis
CBOD5	Report lb/d Report lb/d 25.0 50.0 50.0	Monthly Average Daily Max Monthly Average Daily Max IMAX	Existing WQBEL limit supported by updated water quality modeling. Daily Max limit set equal to existing IMAX limit as any exceedance is a violation (of whatever duration). <u>Application data:</u> 25 mg/l max and 3.11 mg/l average (8 samples) <u>2022 Application data:</u> 25 mg/l max and 3.80 mg/l average (12 samples)
TSS	Report lb/d Report lb/d 30.0 60.0 60.0	Monthly Average Daily Max Monthly Average Daily Max IMAX	Existing Technology limit (Chapter 92a.47) . Daily Max limit set equal to existing IMAX limit as any exceedance is a violation (of whatever duration). <u>Application data:</u> 30 mg/l max and 3.31 mg/l average (11 samples) <u>2022 Application data:</u> 30 mg/l max and 14.31 mg/l average (12 samples)
pH	6.0 – 9.0 SU	IMIN - IMAX	Existing Technology limit (Chapter 92a.47) <u>Application data:</u> 6.34 – 7.0 SU (12 samples) <u>2022 Application data:</u> 6.0 - 9.0 SU (12 samples)
Total Residual Chlorine (TRC) - Final	0.22 0.78	Monthly Average IMAX	New WQBEL (more stringent than TBEL) per TRC Spreadsheet <u>Application data:</u> 1.2 mg/l max and 0.175 mg/l average (10 samples) <u>2022 Application data:</u> 1.2 mg/l max and 0.23 mg/l average (12 samples)
Total Residual Chlorine (TRC) - Interim	0.50 1.20	Monthly Average IMAX	Existing TBEL limits. Significant digit added. See above.
Fecal Coliform (5/1 – 9/30)	200/100 ml 1,000/100 ml	Geo Mean IMAX	Existing Technology limit (Chapter 92a.47). <u>Application data:</u> 2000/100 ml and 1.98/100 ml average (10 samples) <u>2022 Application data:</u> 2000/100 ml max and 14.17/100 ml average (10 samples)
Fecal Coliform (10/1 – 4/30)	2,000/100 ml 10,000 ml/100 ml	Geo Mean IMAX	See above
E Coli	Report	IMAX	New quarterly monitoring requirement for this size of STP.
Ammonia-Nitrogen (May 1 - Oct 31) Final Limits – 4th year	Report lb/d Report lb/d 4.18 8.36 8.36	Monthly Average Daily Max Monthly Average Daily Max IMAX	New WQBELs from updated water quality modeling incorporating revised Ammonia-N WQS. Daily Max limit set equal to IMAX limit as any exceedance is a violation (of whatever duration).

			Application data: 15.9 mg/l max and 0.136 mg/l average (10 samples) 2022 Application data: 15.9 mg/l max and 0.15 mg/l average (12 samples)
Ammonia-Nitrogen (Nov 1 - Apr 30) Final Limits – 4th year	Report lb/d Report lb/d 12.54 25.08 25.08	Monthly Average Daily Max Monthly Average Daily Max IMAX	See above (with winter multiplier)
Ammonia-Nitrogen (May 1 - Oct 31) Interim Limits – 3 years	Report lb/d Report lb/d 5.3 10.6 10.6	Monthly Average Daily Max Monthly Average Daily Max IMAX	Interim limits. Daily Max limit set equal to existing IMAX limit as any exceedance is a violation (of whatever duration).
Ammonia-Nitrogen (Nov 1 - Apr 30) Interim Limits – 3 years	Report lb/d Report lb/d 15.9 31.8 31.8	Monthly Average Daily Max Monthly Average Daily Max IMAX	See above
Total Phosphorus	Report lb/d Report lb/d Report Report	Monthly Average Daily Max Monthly Average Daily Max	DRBC requirement being incorporated per Chapter 92a.12 and Chapter 92a.61 Application data: Unidentified max and 3.32 mg/l average (11 samples) 2022 Application data: Unidentified mg/l max and 3.89 mg/l average (3 samples)
Nitrate-Nitrite as N	Report lb/d Report lb/d Report Report	Monthly Average Daily Max Monthly Average Daily Max	DRBC requirement being incorporated per Chapter 92a.12 and Chapter 92a.61 Application data: Unidentified Max and 1.86 mg/l average (3 samples) 2022 Application data: Unidentified mg/l max and 29.28 mg/l average (12 samples)
Total Nitrogen (Nitrate-Nitrite-N + TKN measured in same sample)	Report lb/d Report lb/d Report Report	Monthly Average Daily Max Monthly Average Daily Max	DRBC requirement being incorporated per Chapter 92a.12 and Chapter 92a.61 Application data: 31.9 mg/l average (11 samples) 2022 Application data: Unidentified mg/l max and 27.3 mg/l average (3 samples). NOTE: See Nitrate-Nitrite as N average, which would indicate a higher TN value than reported.
Total Kjeldahl Nitrogen (TKN)	Report lb/d Report lb/d Report Report	Monthly Average Daily Max Monthly Average Daily Max	See above Application data: Unidentified mg/l max and 1.86 mg/l average (3 samples) 2022 Application data: Unidentified mg/l max and 1.98 mg/l average (3 samples)
Dissolved Oxygen (DO)	5.0	IMIN	Existing WQBEL supported by updated water quality modeling. Application data: 5.0 mg/l minimum, 6.05 mg/l average (12 samples) 2022 Application data: 5.0 mg/l minimum and 5.99 mg/l average (12 samples)
Total Dissolved Solids (TDS)	Report lb/d Report lb/d 1000.0 2000.0 2000.0	Monthly Average Daily Max Monthly Average Daily Max IMAX	DRBC requirement being incorporated per Chapter 92a.12 (with IMAX multiplier) and Chapter 92a.61. Daily Max limit set equal to existing IMAX limit as any exceedance is a violation (of whatever duration).

			<p>Application data: Unidentified mg/l max and 392 mg/l average (8 samples)</p> <p>2022 Application data: No data provided (DRBC Docket requirement)</p>
CBOD5 Minimum Reduction	85%	Minimum Monthly Average	<p>DRBC requirement being incorporated per Chapter 92a.12 and Chapter 92a.61</p> <p>Application data: No data provided.</p> <p>2022 Application data: No data provided (DRBC Docket requirement)</p>
Lead			<p>Monitoring per Reasonable Potential Analysis and EPA Sufficiently Sensitive Rule.</p> <p>Application data: Unidentified max concentration, ND (QL unidentified) average (3 samples)</p> <p>2022 Application data: No data provided</p>
Copper	Report lb/d Report lb/d Report Report	Monthly Average Daily Max Monthly Average Daily Max	<p>Monitoring per Reasonable Potential Analysis (using provided average concentration).</p> <p>Application data: Unidentified ug/l max and 9 ug/l average (3 samples)</p> <p>2022 Application data: No data provided</p>
Zinc	Report lb/d Report lb/d Report Report	Monthly Average Daily Max Monthly Average Daily Max	<p>Monitoring per Reasonable Potential Analysis (using provided average concentration).</p> <p>Application data: Unidentified max concentration; 42 ug/l average (3 samples)</p> <p>2022 Application data: No data provided</p>
Chloride, Bromide and Sulfate	Report lb/d Report lb/d Report Report	Annual Average Daily Max Annual Average Daily Max	<p>New Annual monitoring requirement due to missing application information.</p> <p>Application data:</p> <p>Chlorides: Unidentified max concentration; 29.7 mg/l average (3 samples)</p> <p>Bromide: Unidentified max concentration; 0.45 mg/l average (3 samples)</p> <p>Sulfate: Unidentified max concentration; 35.2 mg/l average (3 samples)</p> <p>2022 Application data: No data provided</p>
Oil & Grease	Report lb/d Report lb/d Report Report	Annual Average Daily Max Annual Average Daily Max	<p>New Annual monitoring requirement due to missing application information.</p> <p>Application data: Unidentified max concentration, ND (QL unidentified) average (3 samples)</p> <p>2022 Application data: No data provided</p>

Comments:

- Limits updated to reflect EDMR requirements (IMIN/IMAX for grab samples; #/100 ml fecal coliform units), significant digits, and monthly average monitoring for monthly average limits (TDS).
- Daily Max limits based on existing IMAX limits or Reasonable Potential Analysis. Daily Max & Monthly Average Mass loading reporting now required (no additional sampling required)
- **Internal Monitoring Point/Outfall No. 101 (Raw Sewage Influent) created (based on Outfall No. 001 coordinates) to allow for DRBC required influent monitoring and reporting for CBOD5 minimum monthly average reduction.**

- Due to missing required application data (2 years of monitoring data would require 104 samples for weekly sampling and 712 for daily samples; missing required application data including identification of maximum concentrations), additional monitoring requirements and/or permit limits were triggered.

Reasonable Potential Analysis: Inputting the provided average values for copper and zinc triggered monitoring requirements. Failure to identify the lead "ND" level was treated as the constituent being present per the EPA Sufficiently Sensitive Rule at levels requiring monitoring (without modeling based at unknown ND concentrations).

Recommended WQBELs & Monitoring Requirements

No. Samples/Month:

Pollutants	Mass Limits		Concentration Limits				Governing WQBEL	WQBEL Basis	Comments
	AML (lbs/day)	MDL (lbs/day)	AML	MDL	IMAX	Units			
Total Copper	Report	Report	Report	Report	Report	µg/L	22.6	AFC	Discharge Conc > 10% WQBEL (no RP)
Total Zinc	Report	Report	Report	Report	Report	µg/L	193	AFC	Discharge Conc > 10% WQBEL (no RP)

TRC EVALUATION					
Input appropriate values in A3:A9 and D3:D9			Northside Heights MHP STP		
0.234	= Q stream (cfs)		0.5	= CV Daily	
0.1	= Q discharge (MGD)		0.5	= CV Hourly	
30	= no. samples		1	= AFC_Partial Mix Factor	
0.3	= Chlorine Demand of Stream		1	= CFC_Partial Mix Factor	
0	= Chlorine Demand of Discharge		15	= AFC_Criteria Compliance Time (min)	
0.5	= BAT/BPJ Value		720	= CFC_Criteria Compliance Time (min)	
0	= % Factor of Safety (FOS)			= Decay Coefficient (K)	
Source	Reference	AFC Calculations		Reference	CFC Calculations
TRC	1.3.2.iii	WLA afc = 0.502		1.3.2.iii	WLA cfc = 0.481
PENTOXSD TRG	5.1a	LTAMULT afc = 0.373		5.1c	LTAMULT cfc = 0.581
PENTOXSD TRG	5.1b	LTA_afc = 0.187		5.1d	LTA_cfc = 0.280
Source	Effluent Limit Calculations				
PENTOXSD TRG	5.1f	AML MULT = 1.231			
PENTOXSD TRG	5.1g	AVG MON LIMIT (mg/l) = 0.230		AFC	
		INST MAX LIMIT (mg/l) = 0.752			

WQM 7.0 Effluent Limits

<u>SWP Basin</u>		<u>Stream Code</u>		<u>Stream Name</u>			
02B		3874		Trib 03874 to Lizard Creek			
RMI	Name	Permit Number	Disc Flow (mgd)	Parameter	Effl. Limit 30-day Ave. (mg/L)	Effl. Limit Maximum (mg/L)	Effl. Limit Minimum (mg/L)
1.637	Northside Hghts	PA0063487	0.100	CBOD5	25		
				NH3-N	4.18	8.36	
				Dissolved Oxygen			5



NorthsideHgtWQM
7.PNG



NorthsideHgtTMSP
DF.pdf

Development of Effluent Limitations

Outfall No.	<u>101</u>	Design Flow (MGD)	<u>0.100 MGD</u>
Latitude	<u>40° 45' 42.00"</u>	Longitude	<u>-75° 45' 35.00"</u>
Wastewater Description:	<u>Raw Sewage Influent</u>		

This internal monitoring point has been created using Outfall No. 001 coordinates to allow for reporting of Raw Sewage Influent CBOD5 loadings (concurrent with effluent sampling) per DRBC Docket requirements incorporated into this permit per Chapter 92a.12.

Communication Log:

- **7/24/2017:** Incomplete application. Called applicant (Ms. Ellasar) on 7/24/2017. She said that her consultant would be working on response. Told her that the complete application was due on 8/4.
- **8/1/2017: Additional information received 8/1/2017.**
 - Client ID updated in E-facts to be consistent with previous NPDES Permit, after confirmation telephone call with applicant.
 - General Information Form: Need to complete all sections. Client updated per above.
 - NPDES Permit: No WQM permit identified, missing design capacities, missing required effluent data (2 years)
- **10/25/2019:** Technical Deficiency Letter issued. Thirty day response time. Applicant subsequently requested meeting to discuss Technical Deficiency Letter.
- **1/10/2020:** DEP E-mail scheduling applicant-requested meeting on Technical Deficiency Letter with the applicant and its technical consultant.
- **1/10/2020:** Northside (Schliecher) E-mail asking what was meant by technical consultant.
- **1/13/2020:** DEP E-mail (Berger) noting a technical consultant can be a certified operator or consulting engineer.
- **2/25/2020:** Meeting scheduled per request of applicant to discuss the 10/25/2019 Technical Deficiency Letter.
 - **Participants:**
 - **Applicant:** Duane Schleicher and Craig LaBarre (certified operator). Mr. Schleicher noted Barry Isett Co. was his engineer, but not present.
 - **DEP:** Amy Bellanca, Pat Musinski, Kelsey Glavich, and James Berger
 - **Potential New Connections:** Mr. Schleicher noted that there might be new connections within the next 5-year NPDES permit term.
 - **Campground:** He has a ~30-acre campground planned across the street. He might want to connect its flows to his STP. He mentioned he was thinking of other development also.
 - **West Penn Township:** The Township has something like 17-18 residences that might need connection (bad soils preventing on-lot systems and sewer problem). They have brought up the idea of connecting to his 0.100 MGD STP. They might have made a township meeting motion on the idea. Nothing in writing from Township so far, so they are relying on what they have heard. The Department does not know what Public Utilities Commission (PUC) requirements might or might not pertain.
 - **Act 537 Planning:** Planning is required for new connections. They should send in the Planning notification and could call to talk directly with the Planning Section about potential connections. It was unknown if the original STP Planning accounted for a campground connection, but a West Penn connection would require new Act 537 approval. West Penn would be paying for their own Planning. Mr. Schleicher should also talk to his engineer about Planning requirements. They do not need planning if the STP expansion (to 0.100 MGD) does not cover new connections (like for addressing peak flows).
 - **Part II WQM Permit:** The facility only built half (0.050 MGD) of the previously permitted 0.100 MGD STP design.
 - The Department noted that construction of the second phase would require a new Part II WQM permit (originally approved equipment not available, etc.). A PA Professional Engineer has to sign and seal the Part II WQM permit application. If they were planning to hook in new connections, then a Planning approval letter would also be required.
 - If they want to expand to permitted capacity to 0.100 MGD, they need to contact the DRBC to get preliminary feedback. The last Draft DRBC Docket did not mention the additional Phase II units. The DRBC can impose new limits/monitoring requirements with plant upgrades (that must be incorporated into the NPDES permit). If they impose BDT (Best Demonstrated Technology) limits, that can require major STP changes. It is worthwhile for the facility to find out potential DRBC requirements. DRBC can provide preliminary feedback without a formal Docket update process.
 - The Department would want to get the DRBC feedback to determine what limits should be in the NPDES permit. New limits might be effective after STP is expanded.
 - **High Flows:** They are getting monthly average flows in the 0.044 MGD range. The flows spike on weekends. They have checked for I&I into the collection system. They think some customers also run a lot of water at times. Mr. Schleicher noted that the residents might shift to families (with consequently greater flows from same units).
 - **Existing NPDES Permit:** Administratively extended.

- **Future:** They will talk with their engineer and DRBC and get back to the Department with a reasonable schedule for submitting a complete and adequate permit application response to the Technical Deficiency Letter by next Friday (**March 6**). They did not have questions on what the Technical Deficiency Letter was asking for.
- **3/6/2020:** Schliecher voice-mail asking for call back on project.
- **3/6/2020:** Called Mr. Schliecher. He appeared to indicate that Northside is not committing to a STP expansion to 0.100 MGD (NPDES Permit basis flow, STP rated/DRBC-docketed for 0.050 MGD) at this time. He will have Craig LaBarre write "the letter". Told him an NPDES Permit amendment might be required (DRBC docket requirements) if he pursues expanding the STP in the 5-year permit term.
- **4/15/2020:** DEP Reminder E-mail sent regarding unsubmitted response to Technical Deficiency Letter. Gave them until **4/30/2020** for submittal.
- **4/16/2020:** Northside (Bambi Ellasar) E-mail stating: "As soon as I can get back into the office, I will discuss Mr. Schliecher's plans with him and things you discussed. When you met with him, I was on vacation and came back to all of the Covid 19 issues."
- **6/11/2020:** Second DEP Reminder E-mail regarding unsubmitted response to Technical Deficiency Letter. Gave them until **6/30/2020** for submittal.
- **6/24/2020:** Certified Operator (LaBarre) E-mail asking to be removed from any correspondence regarding the NPDES Permit Renewal Application (including Technical Deficiency Letter).
- **8/12/2020:** DEP NOV issued, partly to address failure to respond to technical deficiency letter. **NOV required submittal of complete and adequate response to the Technical Deficiency Letter within 15 days (i.e. by 8/27/2021).**
- **9/28/2020:** Northside (Ms. Ellasar) E-mail indicating that a technical consultant would be providing required information.
- **9/28/2020:** Northside (Ms. Ellasar) E-mail forwarding 9/17/2020 Northside letter (LaBarre) responding to 8/12/2020 NOV regarding DMR reporting.
- **11/19/2020:** DEP (Berger) E-mail reminder that application update not received to date (response to 9/28/2020 E-mail), requiring submittal by **12/1/2020** (along with any GIF updating for new technical consultant). Told them to talk to DEP M&C regarding any compliance issues.
- **11/24/2020:** Northside (Ms. Ellasar) e-mail noting 11/19/2020 DEP E-mail had been forwarded to their technical consultant Barry Isett & Co.
- **11/25/2020:** Technical Consultant (Bob Cox of Barry Isett & Co., 610-509-4770) voice mail indicating need for more time and request to discuss requirements.
- **11/25/2020:** Called technical consultant back. He indicated that the client had not provided information to their assigned engineer. He needed more time. I told him he could send in an e-mail request for more time (with identification of what would then be submitted), but the facility had already received an NOV for not responding to the October 2019 Technical Deficiency Letter and previous reminders. He needs to send in three copies of the revised application addressing all application requirements and technical deficiency letter issues (including HFMP requirement due to apparent I&I per weak influent). I told him my understanding is that the facility is not planning on expanding the facility in the NPDES permit term. I noted the facility's certified operator (Craig LaBarre, Portland Contractors) might be a source of facility information. Told him to use US Mail to submit due to present COVID-19 Office restrictions. I told him I had no idea what another delay would mean in terms of compliance issues.
- **11/29/2020:** Northside (Bambi Ellassar) letter request for more time.
- **12/2/2020:** DEP (Berger) E-mail stating: Per your November 29, 2020 Letter request, the Department is granting the requested extension per attached letter for the complete and technically adequate response to the October 25, 2019 DEP Technical Deficiency Letter for the Northside Heights Estate MHP STP NPDES Permit Renewal Application No. PA0063487 (East Penn Township, Carbon County). **Due date: 2/28/2021**
- **2/26/2021:** Northside (Cox) E-mail stating: Please accept our request for a bit more time due to lack of weather assistance and some Covid issues.
- **3/1/2021:** DEP (Berger) E-mail stating:
 - The Department hereby grants the requested extension to **March 31, 2021** for the complete and technically adequate response to the October 25, 2019 DEP Technical Deficiency Letter for the Northside Heights Estate MHP STP NPDES Permit Renewal Application No. PA0063487 (East Penn Township, Carbon County). See the October letter for what is required.
 - This extension was granted on the assurance that you (the Engineer) are presently investigating site I&I issues (impacting the STP) per your forwarded memo/letter language: " We have made progress – identifying sections of lines with serious inflow issues, and manhole risers that need attention. With the weekend rain that is anticipated we can perform some last checks of the lines and manholes." Please

note that normal collection/conveyance system O&M work does not require permitting, but an explanation of any scheduled or completed O&M work would be helpful for permitting and compliance purposes.

- **4/16/2021:** Northside (Cox) E-mail stating:
 - Please allow a few more days for submission.
 - Compiling data and will submit early next week.
- **5/18/2021:** DEP (Berger) E-mail stating:
 - What is the status of the revised Northside Heights MHP NPDES Permit application No. PA0063487 (revised to address the 10/25/2019 DEP Technical Deficiency Letter issues)?
 - I have not received it as of May 14, 2021.
- **5/19/2021:** Northside (Cox) E-mail stating:
 - Please allow us a few more days.
 - I have been very busy and need to finish this and send it out.
- **5/19/2021:** DEP (Berger) E-mail stating: An extension is hereby granted for submittal of the complete and technically adequate response to the October 25, 2019 DEP Technical Deficiency Letter for Northside Heights Estate MHP STP NPDES Permit Renewal Application No. PA0063487 (East Penn Township, Carbon County) by **May 28, 2021.**
- **6/1/2021:** Northside (Cox) E-mail stating: I'm still waiting for a few things from the plant operator. Please bear with me.
- **6/9/2021:** DEP (Berger) E-mail stating:
 - What is the status of the overdue revised NPDES Permit Renewal Application and response to the 10/25/2019 DEP Technical Deficiency Letter?
 - Also, explain whether you meant the certified operator or your client by the word "operator" in your 6/1/2021 E-mail reference
- **6/23/2021:** Northside (Cox) E-mail stating:
 - The owner has isolated the location(s) of the inflow/infiltration of most of the excess ground water and is planning on repairs in the immediate future.
 - We are just in receipt of scanned copies of the DMR's from the plant certified operator as the plant owner was unable to log onto the PADEP system for some reason.
 - **We will be digesting all and plan on a submission of all info immediately after the 4th Holiday.**
 - Thank you for your patience in this matter.
- **7/7/2021:** Northside (Cox) E-mail stating: "Still working on re-app. Please bear w us a bit more."
- **7/14/2021:** DEP (Berger) E-mail stating: "What is the (new) target date for the submittal?"
- **7/15/2021:** Northside (Cox) E-mail stating: "Can we set Aug 2"
- **7/15/2021:** DEP (Berger) E-mail stating: "Yes. Will expect complete response on **8/2/2021.**"
- **8/3/2021:** Northside (Cox) E-mail stating: I expect soon to be making a submission. Please bear w us.
- **8/13/2021:** DEP E-mail requiring complete and technically adequate to 10/2019 Technical Deficiency Letter by **8/20/2021.** Existing NPDES Permit Part B.I.D (Duty to Provide Information) section cited.
- **9/29/2021:** DEP E-mail requiring complete and technically adequate to 10/2019 Technical Deficiency Letter. Existing NPDES Permit Part B.I.D (Duty to Provide Information) section cited. **Due date: 10/15/2021**
- **3/4/2022:** DEP E-mail requiring complete and technically adequate to 10/2019 Technical Deficiency Letter by **March 15, 2022.** Applicant directed to NE M&C directly if unable to comply with existing permit and regulatory requirements.
- **3/4/2022:** Northside Heights (Ms. Samantha Dech, Office Management) called back. She indicated previous site contact (Ms. Elsasser) left in August. She had not been aware of any outstanding requirements. She requested a copy of the Technical Deficiency Letter.
- **3/4/2022:** DEP (Berger) e-mail forwarding the 9/29/2021 DEP E-mail (with copy of tech def letter and permit status e-mails). E-mail noted the NPDES permitting process does not require a technical consultant or Certified Operator prepare the submittal, although that is an option. E-mail noted a previous consultant had been working on a response, but nothing had been submitted. E-mail noted response expected by **March 15.**
- **3/9/2022:** Ms. Lavona Schleicher e-mail asking for extension to **end of April.**
- **3/22/2022:** Extension to **April 30, 2022** granted by DEP Permits Chief (Amy Bellanca) as documented in internal e-mail.
- **5/10/2022:** Significant Incompleteness Letter/Permit Expiration Letter issued.
- **5/11/2022:** Ms. Samantha Dech Voice-mail asking for extension and indicating a 4/29/2022 extension request had been sent in.
- **5/11/2022:** DEP (Amy Bellanca) E-mail response to Voice Mail-request for extension. "We do not have a record of receiving an email requesting another extension on April 29, 2022. Northside Heights has previously been afforded 11 extensions over a period of 29 months. Your request for an additional extension is denied. DEP

encourages you to submit the information necessary to make you application complete within 15 days of the May 10, 2022 Expiration of Permit letter to remedy this situation”.

- **5/18/2022**: Facility’s certified operator (Craig LaBarre) called DEP Permits Chief and indicated he had been asked to respond to the DEP letter. He asked for copies of the DEP letters.
- **5/18/2022**: DEP (Berger) e-mail to Mr. LaBarre with copy of 10/19/2019 DEP Letter and 5/10/2022 DEP Letter per his request.
- **5/25/2022**: Revised NPDES Permit Application received (On-Base No. 58565). Prepared by Barry Isett & Associates.