

Application Type Renewal
Facility Type Sewage
Major / Minor Minor

NPDES PERMIT FACT SHEET ADDENDUM

Application No. PA0064157
APS ID 595749
Authorization ID 1445016

Applicant and Facility Information

Applicant Name	<u>New Ringgold Borough</u>	Facility Name	<u>New Ringgold Borough WWTP</u>
Applicant Address	<u>PO Box 188</u> <u>New Ringgold, PA 17960-0188</u>	Facility Address	<u>112 S. Railroad Street</u> <u>New Ringgold, PA 17960</u>
Applicant Contact	<u>Larry Padora</u>	Facility Contact	<u>Kenneth Fulford</u>
Applicant Phone	<u>(570) 943-3333</u>	Facility Phone	<u>(610) 216-0150</u>
Client ID	<u>158604</u>	Site ID	<u>551206</u>
SIC Code	<u>4952</u>	Municipality	<u>New Ringgold Borough</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Schuylkill</u>
Date Published in PA Bulletin	<u>April 6, 2024</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>May 6, 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 April 6, 2024. Comments were received on the draft permit from the permittee in a letter dated March 22, 2024. Additional comments were received in various communications and a meeting on May 9, 2024. Since the comments are all similar, a single response is given. Another permit must be drafted with a new comment period.


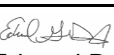
March 22, 2024 Council President Ryan Eckert & County Commissioner Lawrence Padora Comments:

We are reaching out in regards to permit draft PA0064157 New Ringgold Borough WWTP received March 19, 2024.

Approximately 18 years ago New Ringgold Borough was mandated to install a sewage facility or possibly face \$1,000 per day fines. At the time our sewage facility was built, it was built to accommodate The Borough of New Ringgold and a neighboring municipality. The facility was built to service 250 edu's and currently services 124 leaving the facility with 126 unused edu's.

Unfortunately, the neighboring municipality has not implemented a plan to engage with our facility leaving New Ringgold Borough with no other option to add additional usage to our facility. New Ringgold Borough is land locked and there is no place for development within our Borough limits.

In addition, the implementation of every day testing would place a financial hardship on New Ringgold Borough and our residents. Every day testing would increase testing costs which would need to be passed onto our residents who are currently experiencing exceptionally high inflation rates, increased costs of living, and everyday expenditures which are unfortunate when a majority of our community is on a fixed income.

Approve	Return	Deny	Signatures	Date
X			 Brian Burden, E.I.T. / Project Manager	April 9, 2025
X			 Edward Dudick, P.E. / Environmental Engineer Manager	April 9, 2025

Internal Review and Recommendations

On behalf of the Borough, we would like to request that our testing remain at a maximum of four days per week as previously approved. The Borough Sewage facility has four grinder pumps in place in addition to being gravity fed. We maintained compliance by securing testing through K.L. Fulford, Associates, INC and pay close attention to any spikes. In the event of a spike, we are pro-active in locating the source and are diligent in forcing an immediate disconnect.

April 17, 2024 State Senator Dave Argall & State Representative Jamie Barton Comments:

We were recently notified of Permit Draft PA0064157 for New Ringgold Borough, regarding daily testing of their Sewer Treatment Plant. Due to the nature of this permit draft, we are reaching out to share our desire to see the daily testing requirement waived.

The daily testing of the treatment plant would create a financial hardship for the Borough and residents, as the testing increasing from four days to seven days would increase testing costs. During these difficult economic times, the expense of increased testing requirements would place an extreme hardship on the Borough and residents of New Ringgold. This is an extremely small Borough, with 124 EDUs being served by the Treatment Plant. The Borough is diligent in maintaining the integrity of their facility, and this will not change going forward should continued four day testing be permissible.

Thanks for your attention to this matter. Please feel free to contact us should you need any additional information.

April 16, 2024 KL Fulford Associates, Inc. Comments:

We submit for your consideration this request regarding the proposed increase in field testing frequency from four to seven days per week, including weekends and holidays. We respectfully request that PA DEP extends the current permit site visit frequency of four days per week. We do not believe that increasing the number of site visits will affect plant performance or its environmental impact. The negligible effect this small municipal system has on its surrounding streams appears to be consistent with PA DEP, since all other parameters remain unchanged from the previous permit. The plant field data is consistent throughout each month, and there is hardly any variation in process control. Since only half of the Borough's EDUs are used, the plant is oversized and easily accommodates high flow events. We make sure to schedule our site visits to optimize plant performance and in anticipation of inclement weather events. We provide any extra coverage to the Borough gratis, as we feel their limited funds are required for other facets of plant operations, such as maintenance or sludge hauling services.

On behalf of the Borough, we request that PA DEP exercise their discretion on the recommendation to increase field testing frequency. We believe that this increase would create an undue financial burden for the Borough. Given the current economic climate, we would argue that the Borough will endure an even greater financial hardship now than five years ago. Many residents live on a fixed income and have been unable or unwilling to pay their sewer fees. The Borough council does their best to recoup these losses, but the limited remedies available to them are difficult to enact. We have been operating the facility at a loss with the current number of scheduled site visits. We would not be able to absorb the cost of seven-day coverage. We implore PA DEP to reconsider implementing this requirement.

Additional Comments / Considerations from May 9, 2024 Meeting Fact Sheet:

"East Brunswick Township adopted a Comprehensive Plan on February 5, 2009. It is indicated in this Comprehensive Plan that East Brunswick Township desires to secure public sewer services from New Ringgold Borough in the future via an Inter-municipal Agreement. The Borough of New Ringgold initially constructed additional capacity into its WWTP for this purpose. The Borough of New Ringgold has been awaiting a request to consider how much capacity, if any, of the Borough WWTP "reserve capacity" should be provided for East Brunswick Township, specifically the McKeanburg area. It is the Borough's

Internal Review and Recommendations

understanding that no such Act 537 Plan Update has been initiated at this time. The Borough has been carrying the burden of this excess capacity since 2006. Alternatively, the Borough may offer its excess capacity to outside developers to ease the burden of rising operations and maintenance costs to its own customers.

New Ringgold Borough is operating its WWTP plant at approximately 25% of its hydraulic capacity (.0099/.04); 19% of its organic capacity (14.88/80), while carrying the burden of unused capacity and O&M costs primarily for East Brunswick Township.

The current inflation rate across the country has had an impact on the delinquency rate of its customers and O&M costs.

NRB is still paying on its PennVest loan when the sewer system was constructed. Paid 18 years; 12 years remaining: \$3,300/mo.

In 2021, the Borough obtained funding through the PA Small Water and Sewer Program of the Commonwealth Financing Authority for the following items: the replacement of the influent sampler and tubing to the contact tank, the replacement of the existing blowers with two new SutorBilt 3M-LJC Blowers, the replacement of the weir box in the chlorine contact tank, the replacement of 19 aeration SS drop tubes, the removal of the air lift piping in the chlorine contact tank, the installation of a new sewage pump, the removal and installation of 2- SS weir troughs at the Bellview Pump, and repairs to the WWTP chained fence. Total construction cost of the project was \$41,931.51 The project was substantially completed on August 15, 2022. Borough match of \$6,289.73 (15%).

The Borough submitted a grant application in December 2022 under the Covid-19 ARPA PA Small Water and Sewer Program. The project involves the removal of existing galvanized grating over the existing concrete tanks at the WWTP and the installation of new aluminum bar grating over the concrete tanks. The existing grating has been there since 2004 when the WWTP was built and has reached the end of its useful life. The proposed aluminum grating will allow the Borough to continue to operate the WWTP in a safe environment. The Grant was awarded to the Borough in the amount of \$30,636 with a Borough match of \$5,407. Project to be completed in 2024.”

February 3, 2025 Letter from Borough:

I am writing on behalf of the Council member of New Ringgold Borough in response to your email dated January 24th, 2025 regarding the meeting held May 2024 between yourself and borough council members and Engineer Matthew Pelecheck, System Design Engineering.

It is Council members recollections that the June 2019 letter was briefly reviewed, Borough Council members noted that no action to obtain refinancing under previous administration or meter purchases had been made to the best of their knowledge,

The understanding of New Ringgold Borough Council members was that the current testing requirements would remain as they were while both the Borough and DEP researched records back to the origination of the New Ringgold Sewer Plant.

With both entities doing research, the intent was to determine why the plant was built twice the size it needed to be and if it is noted in the original permit that DEP required New Ringgold Borough to build the plant to add the neighboring community McKeansburg located in East Brunswick Township into the plant?

As of this time, council members have found several documents but have been unsuccessful in locating the original permit issued by DEP. Council is again, asking for your assistance in this matter.

We have stressed the significance of the financial burden seven day testing will place on our Borough. The plant is built to handle twice the load it handles and we have not had any problems as evidenced in letters presented from our Sanitation consultants and testing experts KL Fulford Associates on several occasions as well as letters of support from State representatives Knowles and Barton, and Senator Dave Argall.

To require our Borough of 123 residents to take on this expense would be devastating to our Borough and our

Internal Review and Recommendations

residents. If our testing is required to go to everyday, the increased cost estimated by KL Fulford Associates is \$700.00 per month. When calculated per resident, the fee just for testing, each resident is paying almost \$22 per month.

As noted council has located numerous documents but not the original permit and at this time we would like to request a copy of the original permit issued to The Borough of New Ringgold (2002) and to request an additional meeting date be set up with you to discuss this matter further.

Response:

The daily requirement is applicable to all sewage facilities with design flows greater than 0.0005 MGD as recommended by DEP's *Technical Guidance for the Development and Specification of Effluent Limitations and Other Permit Conditions in NPDES Permits* (doc no. 362-0400-001). Throughout the state, permit writers have been implementing the daily monitoring requirements for these parameters in all new and renewed NPDES permits. Based on eDMR results and inspection reports for the facility, it's agreed that the facility is well maintained and generally discharges effluent that's within the permit limitations for the facility. The daily monitoring requirements are not being imposed due to poor WWTP performance. The recommended daily monitoring frequencies for this facility and other WWTPs help to maximize treatment of the wastewater and help to ensure receiving waters are protected.

In some special cases the implementation of the daily monitoring requirements was delayed for one permit term to allow for permittees to prepare and adjust for these requirements, as was the case with the New Ringgold Borough WWTP during the previous renewal. A letter was sent to the borough, Senator David Argall, and Representative Jerry Knowles on June 10, 2019 from DEP Secretary Patrick McDonnell that discussed the daily sampling requirements. The letter approved 4/week sampling for the previous permit term with the understanding that daily sampling requirements would come into effect this permit term. The letter also suggested for the permittee to investigate refinancing existing debt loads to purchase meters and/or implement other options. In a letter dated February 3, 2025, the borough indicated that no action to obtain refinancing or to purchase meters had been made.

It's understood that the daily effluent monitoring requirements for Dissolved Oxygen, Total Residual Chlorine, and pH will cost more to implement than the 4/week monitoring requirement. To help with the costs of additional testing, DEP allows permittees to conduct sampling and evaluation without the presence of a treatment plant operator. If standard operating procedures (SOPs) are kept on-site that detail the sampling / analyzing procedures for those pollutants and the pollutants are analyzed using an EPA-approved method, the borough can opt to perform the additional analyses using someone other than their operator. It's recommended for the permittee to continue to pursue grants and other funding sources as described in the May 9, 2024 meeting fact sheet as well.

Several comments suggest that the WWTP was built with additional capacity to accommodate additional flows from East Brunswick Township. There are currently no East Brunswick Township EDUs connected to the system. After looking through DEP's files, the following information was found:

1. In 2006, construction of the New Ringgold Borough WWTP was completed. Prior to that, residents of the borough utilized on-lot sewage facilities which posed health risks to the residents (including several cases of hepatitis). Most of the on-lot systems failed to meet DEP design standards and many were located on soils poorly suited for on-lot disposal. Funding for the construction of the WWTP was provided with a \$1,500,000 grant and approximately \$900,000 through a low-interest loan.
2. WQM permit 5403406 (issued January 23, 2004) approved the construction of the 0.04 MGD WWTP. The Act 537 Plan Update was approved by DEP on June 15, 2001. Supporting calculations from the WQM permit application indicate the WWTP was designed for 122 Equivalent Dwelling Units (EDUs), with each EDU defined as contributing 265 gallons per day. A reserve of 30 EDUs was to be provided for future use. The permit application made no mention of connections from neighboring East Brunswick Township.

Several comments suggest that only half of the available EDUs are currently discharging to the collection system. Information in DEP's files suggests 152 EDUs were planned for during construction of the WWTP. The permittee indicated 124 EDUs are currently being served by the WWTP. It's not uncommon for EDU flow assumptions (in this case 265 gallons/day) to be higher than actual flows from the EDU, which may help explain the excess reserve capacity.

Internal Review and Recommendations

The comments discuss a 2009 Comprehensive Plan where East Brunswick Township planned to secure public sewer services from New Ringgold Borough in the future via an Inter-municipal Agreement, and that the borough initially constructed additional capacity into its WWTP for this purpose. It's agreed that additional capacity was built into the WWTP for future connections, however, the treatment plant was designed and built before the Comprehensive Plan was developed. It's recommended for the borough to continue to seek additional customers to connect to the system.

In summary, no changes are made to the permit as a result of the comments received. DEP cannot deviate from the daily monitoring requirements described the June 10, 2019 letter from Secretary McDonnell. The letter allowed a full permit term of 4/week sampling for those specific parameters, which was an offer not given to most similar-sized WWTPs at that time.

As requested, a copy of the 2002 NPDES permit will be sent to the permittee with the 2nd draft permit documents.