

Application Type Renewal
Facility Type Pesticides
Permit Type Individual

**NPDES PERMIT FACT SHEET
PESTICIDES**

Application No. PA0065412 & 5813807
APS ID 804339
Authorization ID 1220940

Applicant and Facility Information

Applicant Name	<u>Lakeside Outing Club Inc.</u>	Facility Name	<u>Page Lake</u>
Applicant Address	<u>227 E Shore Drive</u> <u>Susquehanna, PA 18847-7435</u>	Facility Address	<u>Lake Shore Drive (Page Lake)</u> <u>New Milford, PA 18834</u>
Applicant Contact	<u>Russell Pepe</u>	Facility Contact	<u>Russell Pepe</u>
Applicant Phone	<u>(570) 492-3100</u>	Facility Phone	<u>(570) 465-2186</u>
Client ID	<u>76295</u>	Site ID	<u>271229</u>
SIC Code	<u>0782</u>	Municipality	<u>New Milford Township</u>
SIC Description	<u>Agriculture - Lawn And Garden Services</u>	County	<u>Susquehanna</u>
Date Application Received	<u>March 12, 2018</u>	WQM Required	<u>No</u>
Date Application Accepted	<u>March 24, 2018</u>	EPA Waived	<u>No</u>
Purpose of Application	<u>Pesticide application to Page Lake.</u>		

Internal Review and Recommendations

This is an Individual Pesticides NPDES Permit Renewal for two existing treatment areas in Page Lake (HQ-CWF) on Salt Lick Creek (HQ-CWF: Stream #32005, all uses attained), The ~93 acre (average 8-foot deep) lake is formed by the Page Lake Dam (Dam ID# 58-005, Class B-1 High Hazard dam, operated by same client) with E-maps indicating Page Lake is an attaining lake. The application indicated this is a private lake and estimated the lake turns over 7 times per year. No identified overlap with any endangered species or habitat.

- Treatment Area 1 for Planktonus algae & filamentous plankton: ~93 acres area with 8 feet treatment depth, Entire lake (half at a time), copper sulfate treatments (up to 744 lbs treatment; 3 times per year), May through October upon detection of developing algae bloom by microscopic visual check. Some years had no need for treatment in this last permit term. **Planned max dosage of 1.0 lb/acre-foot (based upon label instructions) as compared previous NPDES Permit Part C limit of 0.68 lbs/acre-foot.**
 - Revised Application language: "We have found through several years of applications that 1 lb/acre foot adequately controls algae with no adverse side effects. The recommended amount in the Pennsylvania Management Handbook ranges from 0.68 to 1.36 lbs per acre foot. Apparently, we documented the wrong number in the permit and should read 1 lb/acre foot or 744 lbs. This has been corrected in the enclosed document".
 - See Antidegradation Analysis below.
- Treatment Area 2 (subset of Treatment Area 1) for water lily: Previously ~2 acre area around docks, treated by Rodeo, within the overall Treatment Area 1 (up to 2 quarts/acre; 4 times per year). **Reduced to 1 acre application area surface application in practice based on experience but larger area still allowed in case of need.** There is ~95% of lake areas that will not be treated as water lilies is considered to provide "excellent cover for the fish population". Planned max dosage of 2 quarts/acres.
- Permittee: Identified itself as Non-profit corporate owner of the lake. Committed to notification of potential water users of treated water. Not aware of any objections of treatment from potential users. Permittee indicated it was not

Approve	Deny	Signatures	Date
X		James D. Berger (signed) James D. Berger, P.E. / Environmental Engineer	October 19, 2021
X		Amy M. Bellanca (signed) Amy M. Bellanca, P.E. / Environmental Engineer Manager	10-27-21

Internal Review and Recommendations

a “large entity” subject to PDMP application requirement. Client indicated it conducts water monitoring for algae blooms, notifying the “installer”.

- **Chapter 91.38 Joint Permit No. 5813807:** They submitted a copy of the Joint Application Form in the application under the NPDES Permit number PA0065412. This number has been retained for the renewal (omitting the A-1 from the prior NPDES Permit Amendment).
- **Drawdown Permit#:** 24-15 (issued in 2015).

Anti-Degradation: Page Lake was classified as a HQ-CWF in 1979. Copper sulfate was previously approved in the original Individual IW NPDES Permit and Rodeo in the subsequent NPDES Permit Amendment. See previous NPDES Permit Fact Sheets for original antidegradation analysis.

- **Rodeo:** No additional degradation will occur from the proposed usage of Rodeo as no new, increased or additional loadings are proposed.
- **Copper Sulfate:** No additional degradation is anticipated from the higher dosage of copper sulfate (1 lb/acre-foot versus 0.68 lbs/acre-foot) in this intermittent usage (only when needed).
 - In practical terms, an insufficient dosage would only result in the need for additional dosages to kill off the algae/filamentous bacteria (leading only to additional applications and greater copper loadings than otherwise). The proposed usage rate is within the low end recommended by the 2017 EPA-approved Copper Sulfate Pesticide label (0.67 – 1.3 lbs/acre-foot, ~1/4th PPM – ½ PPM range). The EPA-approved Label notes that actual field dosage usage rates are affected by assorted factors that might require higher copper sulfate dosages, i.e. site-specific needs govern what is needed.
 - Existing permit conditions require the facility to review and comply with the most recent EPA-approved label requirements. The EPA-approved label set forth the treatment requirements to avoid additional negative impacts on the receiving lake. Copper sulfate is used to kill filamentous bacteria and algae in half of the lake, allowing the aquatic life to relocate to the other half, and then repeating the process to kill off the unwanted bacteria/algae (allowing aquatic life to relocate to the untreated parts of the lake). The additional copper sulfate will have not greater negative impact on the aquatic life.
 - The DEP Biologist (JR Holtsmaster) indicated the proposed usage levels will still comply with the Joint Permit conditions limiting copper usage.

Special Part C Conditions: NPDES Permit based most recent Individual Pesticide NPDES Permit Template.

- **Part C.I:** New standard PEST MANAGEMENT MEASURES conditions
- **Part C.II:** New standard CORRECTIVE ACTION REQUIREMENTS conditions
- **Part C.III:** New standard ADVERSE INCIDENT REPORTING
- **Part C.IV:** New standard REPORTABLE SPILLS AND LEAKS conditions
- **Part C.V:** New standard RECORDKEEPING REQUIREMENTS conditions
- **Part C.VI:** Existing Standard Condition defining pesticide, dosage, and targeted species for pesticide (Rodeo and previously approved copper sulfate fines). **Updated to reference updated Copper Sulfate usage rate.** Footnote references the Chapter 91.38 Joint Permit’s copper conditions.
- **Part C.VII:** Existing condition requiring the permittee to review and comply with the most recent EPA-approved pesticide label requirements prior to each usage. The label requirements supersedes the former Part C.IV condition (copper sulfate usage conditions).
- **Part C.VIII:** Existing Condition requiring compliance with Chapter 91.38 Joint Permit # 5813807.

Compliance History: No open violations by 10/15/2021 WMS Query (Open violations by client number):

Permit: PA0065412
Client ID: 76295
Client: All

Open Violations: 0

Internal Review and Recommendations

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