

Application Type Renewal
Facility Type Municipal
Major / Minor Minor

**NPDES PERMIT FACT SHEET RE-DRAFT
INDIVIDUAL SEWAGE**

Application No. PA0081949
APS ID 1024494
Authorization ID 1445130

Applicant and Facility Information

Applicant Name	<u>Lancaster Area Sewer Authority</u>	Facility Name	<u>West Earl Water Resource Recovery Facility</u>
Applicant Address	<u>130 Centerville Road</u> <u>Lancaster, PA 17603</u>	Facility Address	<u>161 Locust Street</u> <u>Brownstown, PA 17540</u>
Applicant Contact	<u>Michael Kyle</u>	Facility Contact	<u>Michael Kyle</u>
Applicant Phone	<u>(717) 344-5832</u>	Facility Phone	<u>(717) 344-5832</u>
Client ID	<u>4718</u>	Site ID	<u>451804</u>
Ch 94 Load Status	<u>Not Overloaded</u>	Municipality	<u>West Earl Township</u>
Connection Status	<u>No Limitations</u>	County	<u>Lancaster</u>
Date Application Received	<u>June 27, 2023</u>	EPA Waived?	<u>No</u>
Date Application Accepted	<u>June 29, 2023</u>	If No, Reason	<u>Significant CB Discharge</u>
Purpose of Application	<u>NPDES Renewal.</u>		

Summary of Review

A draft NPDES permit was issued on March 5, 2024, and was published in the PA Bulletin on March 23, 2024. Comments were received from LASA on March 26, 2024, and from EPA on April 1, 2024, and are attached to this fact sheet.

In response to the comments, the Total Copper monitoring requirement will be removed from the draft permit. Based on the Toxics Management Spreadsheet, monitoring for Total Copper was not required, and should have been removed from the previous draft.

The Pretreatment Program implementation language has been added to Part C of the NPDES permit. This facility did not report the receipt of any discharge from significant industrial users, so the pretreatment language will not include the requirement to perform a headworks analysis.

The NPDES permit will be re-drafted with the changes to Total Copper monitoring and the pretreatment language. No other changes will be made to the permit.

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.

Approve	Deny	Signatures	Date
X		Benjamin R. Lockwood Benjamin R. Lockwood / Environmental Engineering Specialist	May 7, 2024
X		Maria D. Bebenek for Daniel W. Martin, P.E. / Environmental Engineer Manager	May 17, 2024

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the d2wraft permit, and reflect the most stringent limitations amongst technology, water quality and BPJ. Instantaneous Maximum (IMAX) limits are determined using multipliers of 2 (conventional pollutants) or 2.5 (toxic pollutants). Sample frequencies and types are derived from the "NPDES Permit Writer's Manual" (386-0400-001), SOPs and/or BPJ.

Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Average Monthly	Weekly Average	Instantaneous Minimum	Average Monthly	Weekly Average	Instant. Maximum		
Flow (MGD)	Report	Report Daily Max	XXX	XXX	XXX	XXX	Continuous	Measured
pH (S.U.)	XXX	XXX	6.0	XXX	XXX	9.0	1/day	Grab
DO	XXX	XXX	5.0	XXX	XXX	XXX	1/day	Grab
TRC	XXX	XXX	XXX	0.5	XXX	1.6	1/day	Grab
CBOD5	113	181	XXX	25.0	40.0	50	1/week	24-Hr Composite
BOD5 Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
TSS	136	204	XXX	30.0	45.0	60	1/week	24-Hr Composite
TSS Raw Sewage Influent	Report	Report Daily Max	XXX	Report	XXX	XXX	1/week	24-Hr Composite
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	2000 Geo Mean	XXX	10000	2/week	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	200 Geo Mean	XXX	1000	2/week	Grab
E. Coli (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report	1/quarter	Grab
UV Intensity (mW/cm ²)	XXX	XXX	Report	Report	XXX	XXX	1/day	Recorded
Ammonia	XXX	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Total Phosphorus	9.1	XXX	XXX	2.0	XXX	4	2/week	24-Hr Composite

Compliance Sampling Location: At discharge from facility
Other Comments: None

Proposed Effluent Limitations and Monitoring Requirements

The limitations and monitoring requirements specified below are proposed for the draft permit, to comply with Pennsylvania's Chesapeake Bay Tributary Strategy.

Outfall 001, Effective Period: Permit Effective Date through Permit Expiration Date.

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day) ⁽¹⁾		Concentrations (mg/L)				Minimum ⁽²⁾ Measurement Frequency	Required Sample Type
	Monthly	Annual	Monthly	Monthly Average	Maximum	Instant. Maximum		
Ammonia--N	Report	Report	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Kjeldahl--N	Report	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Nitrate-Nitrite as N	Report	XXX	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Total Nitrogen	Report	Report	XXX	Report	XXX	XXX	1/month	Calculation
Total Phosphorus	Report	Report	XXX	Report	XXX	XXX	2/week	24-Hr Composite
Net Total Nitrogen ⁽³⁾	Report	8219	XXX	XXX	XXX	XXX	1/month	Calculation
Net Total Phosphorus ⁽³⁾	Report	1096	XXX	XXX	XXX	XXX	1/month	Calculation

Compliance Sampling Location: At discharge from facility

Other Comments: The permittee is authorized to use 8,800 lbs/year as Total Nitrogen (TN) Offsets toward compliance with the Annual Net TN mass load limitations (Cap Loads), in accordance with Part C of this permit. These Offsets may be applied throughout the Compliance Year or during the Truing Period. The application of offsets must be reported to DEP as described in Part C. The Offsets are authorized for the following pollutant load reduction activities: Connection of 308 on-lot sewage disposal systems (352 EDUs) to the public sewer system after January 1, 2003, in which 25 lbs/year of TN offsets are granted per EDU.

Lockwood, Benjamin

From: Brian Wilcox <BWilcox@lasa.org>
Sent: Tuesday, April 2, 2024 8:46 AM
To: Lockwood, Benjamin
Cc: Sarah Yando
Subject: RE: [External] FW: West Earl Water Resource Recovery Facility PA0081949 Draft NPDES Permit

Thank you, appreciate it.

BRIAN WILCOX
 Plant Operations Director
 Lancaster Area Sewer Authority
 717-344-5812 (desk) | 717-405-6031 (Mobile)



From: Lockwood, Benjamin <b.lockwood@pa.gov>
Sent: Tuesday, April 2, 2024 8:45 AM
To: Brian Wilcox <BWilcox@lasa.org>
Cc: Sarah Yando <SYando@lasa.org>
Subject: RE: [External] FW: West Earl Water Resource Recovery Facility PA0081949 Draft NPDES Permit

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Brian,

I took a look and this was an error. The TMS did not require monitoring, so the existing Total Copper monitoring requirement should be removed. This will be reflected in the final permit.

Thanks,
 Ben

Benjamin Lockwood | Environmental Engineering Specialist
 Department of Environmental Protection
 Southcentral Regional Office
 909 Elmerton Avenue | Hbg, PA 17110
 Phone: 717.705.4782 | Fax: 717.705.4760
www.depweb.state.pa.us

24-hour toll free Emergency Response number for SCRO: 1-800-541-2050.

Approve	Deny	Signatures	Date
X		Benjamin R. Lockwood Benjamin R. Lockwood / Environmental Engineering Specialist	May 7, 2024
X		Maria D. Bebenek for Daniel W. Martin, P.E. / Environmental Engineer Manager	May 17, 2024

From: Brian Wilcox <BWilcox@lasa.org>
Sent: Tuesday, March 26, 2024 3:11 PM
To: Lockwood, Benjamin <blockwood@pa.gov>
Cc: Sarah Yando <SYando@lasa.org>
Subject: [External] FW: West Earl Water Resource Recovery Facility PA0081949 Draft NPDES Permit

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Hi Ben,

We would like an explanation why the 1/month Copper monitoring requirement remains in the Permit. Based on the summary from Toxics Monitoring Spreadsheet calculations below, it appears that monitoring should not be required. Can you let us know? Thank you.

BRIAN WILCOX
Plant Operations Director
Lancaster Area Sewer Authority
717-344-5812 (Desk) | 717-405-6031 (Mobile)



From: Lockwood, Benjamin <blockwood@pa.gov>
Sent: Tuesday, March 5, 2024 3:47 PM
To: Mike Kyle <MKyle@lasa.org>
Cc: Kunkel, Summer <sukunkel@pa.gov>; EP, NPDES Permits <RA-EPNPDES_PERMITS@pa.gov>; Kline, David <david.kline@arrowwaterservices.com>; R3 WD PA Permits@epa.gov
Subject: West Earl Water Resource Recovery Facility PA0081949 Draft NPDES Permit

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Mr. Kyle,

In response to the receipt of your NPDES permit application, the Department of Environmental Protection (DEP) has made a tentative decision to issue the permit. Attached to this email is the draft NPDES permit document, a fact sheet explaining the basis for DEP's tentative decision, a public notice for posting, and a cover letter to accompany the draft permit. DEP will take comments on this proposed action for 30 days following publication of the draft permit in the PA Bulletin. Please contact me at this email address or at the number below to confirm your receipt of the draft permit.

Sincerely,
Benjamin Lockwood

Benjamin Lockwood | Environmental Engineering Specialist
Department of Environmental Protection
Southcentral Regional Office
909 Elmerton Avenue | Hbg, PA 17110
Phone: 717.705.4782 | Fax: 717.705.4760
www.depweb.state.pa.us

24-hour toll free Emergency Response number for SCRO: 1-800-541-2050.

Lockwood, Benjamin

From: Fulton, Jennifer <Fulton.Jennifer@epa.gov>
Sent: Monday, April 1, 2024 1:11 PM
To: Lockwood, Benjamin
Cc: Furjanic, Sean; Schumack, Maria; Bebenek, Maria; Martin, Daniel; Moncavage, Carissa (she/her/hers); Hales, Dana; Shuart, Ryan; Sanchez Gonzalez, Natalie
Subject: [External] PA0081949 West Earl Resource Recovery Facility
Attachments: PT_PA_Permit Language_PFAS.docx

Follow Up Flag: Follow up
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Dear Ben,

According to our Memorandum of Agreement, the Environmental Protection Agency (EPA) Region III has received the draft National Pollutant Discharge Elimination System (NPDES) permit for:

Permittee name: Lancaster Area Sewer Authority

Facility name: West Earl Water Resource Recovery Facility

NPDES Number: PA0081949

EPA Received: 3/7/2024

30-day response due date: 4/6/2024

This is a minor permit that discharges to the Conestoga River and is a significant Chesapeake Bay discharger. EPA has performed a limited review of the draft permit based on the wasteload allocation (WLA) requirements of the approved Chesapeake Bay TMDL, and the pretreatment program implementation requirements. EPA has completed its review and offers the following comment(s):

There is currently no language for the implementation of the pretreatment program proposed at part C of the draft permit. The Pretreatment Program implementation language (attached) must be included in the permit, since this facility is owned by the Lancaster Area Sewer Authority, which is a municipal sewage treatment plant with an approved program. Please also clarify whether the West Earl Water resource recovery facility

receives any discharge from significant industrial users. If it does, then the pretreatment language at part C must include a requirement to perform a headworks analysis 1 year post the permit issuance date. This would not be the case if the West Earl facility was not receiving discharges from significant industrial users. Please clarify which of these scenarios best describes the nature of the discharge sent to West Earl's influent.

Please address the above and provide us with any changes to the draft permit and/or fact sheet, if necessary. Please contact Natalie Sanchez Gonzalez on my staff via telephone at 215-814-2078 or via electronic mail at sanchez-gonzalez.natalie@epa.gov.

Thank you,
Jen Fulton



Jennifer Fulton (she/her)
Acting Chief, Clean Water Branch
US EPA Mid-Atlantic Region
Phone 304-234-0248
Email fulton.jennifer@epa.gov

