

Application Type New/Renewal  
Wastewater Type Sewage  
Facility Type SRSTP

**NPDES PERMIT FACT SHEET  
INDIVIDUAL SFTF/SRSTP**

Application No. PA0085880  
APS ID 1046690  
Authorization ID 1371804

**Applicant, Facility and Project Information**

Applicant Name	<u>Ross &amp; Justine Neely</u>	Facility Name	<u>Neely Residence</u>
Applicant Address	<u>127 Lee Spring Road</u> <u>Blandon, PA 19510-9736</u>	Facility Address	<u>127 Lee Spring Road</u> <u>Blandon, PA 19510-9736</u>
Applicant Contact	<u>Ross &amp; Justine Neely</u>	Facility Contact	<u>Ross &amp; Justine Neely</u>
Applicant Phone	<u>(814) 221-6926 / rneely@gmail.com</u>	Facility Phone	<u>(814) 221-6926 / rneely@gmail.com</u>
Client ID	<u>365210</u>	Site ID	<u>237922</u>
SIC Code	<u>6514</u>	Municipality	<u>Ruscombmanor Township</u>
SIC Description	<u>Fin, Ins &amp; Real Est - Dwelling Operators, Except Apartments</u>	County	<u>Berks</u>
Date Application Received	<u>October 1, 2021</u>	WQM Required	<u>Already obtained</u>
Date Application Accepted	<u>October 7, 2021</u>	WQM App. No.	<u>0694409</u>
Project Description	<u>"Renewal" of a permit for an existing treatment facility after the previous permit expired</u>		

**Summary of Review**

The previous permit for this Single Residence Small Flow Treatment Plant (SRSTP) was issued on December 21, 2010 and expired on December 31, 2015. A renewal application was not received before the permit expired. New owners submitted a transfer application which was received on August 27, 2021. DEP informed them that it could not transfer an expired permit and they would need to submit a new permit application which they did. They stated in their application that they purchased the property in September 2019 but were unaware of the sewage discharge permits.

According to previous records, the sewage treatment system discharges treated sewage by gravity to a ditch on the property which then conveys to a road drainage swale which discharges to an unnamed tributary of Willow Creek.

Because the SRSTP design is not one of the designs in the DEP's Small Flow Treatment Manual, it was not eligible for coverage under DEP's general permit (PAG-04) for small flow treatment facilities.

The proposed limits are consistent with DEP's Standard Operating Procedures (SOP) for New and Reissuance Small Flow Treatment Facility Individual NPDES Permit Applications, dated May 17, 2019, and other SRSTP permits issued by DEP with two exceptions: 1) the permit limits for Ammonia were carried forward from the previous permit, and 2) the monitoring frequency of twice per year for all parameters except Total Residual Chlorine has been carried forward from the previous permit. 1) For Ammonia, the previous limits were based on DEP's guidance in place at the time for discharges to ditches and swales, commonly called "dry streams": Implementation Guidance for Evaluating Wastewater Discharges to Drainage Swales and Ditches, October 1985 and revised May 1987. The limits are Technology-Based Effluent Limits based on Best Professional Judgement and the system had been consistently meeting those limits...at least in the 1990's per records in the files. (DEP's WQM 7.0 model was run to be sure more stringent Water-Quality Based Effluent Limitations were not needed: the model defaulted to the existing permit limits.) 2) The monitoring frequency was not reduced because only one round of sampling results was available for review. No AMRs (or lab result sheets) were submitted for 2018, 2019, and 2020 to justify a reduction in monitoring frequency.

Approve	Deny	Signatures	Date
x		<i>Bonnie J. Boylan</i> Bonnie J. Boylan / Environmental Engineering Specialist	October 14, 2021
x		<i>Maria D. Bebenek, P.E., for Daniel W. Martin</i> Daniel W. Martin, P.E. / Environmental Engineer Manager	October 15, 2021

### Summary of Review

Note: the 2010 NPDES permit for this same SRSTP imposed Daily Maximum limits and Instantaneous Maximum (IMAX) limits with Grab sample types, but no Average limits. Previous to the 2010 permit, the 2000 NPDES permit included monthly average and IMAX limits...*as did the 1993 Fact Sheet but I don't have the limits tables for the 1994 final permit.* The SOP recommends Average limits and IMAX limits, and Grab sample types. DEP's Permit Writers Manual and the U.S. EPA also recommend average limits and maximum limits. The proposed draft permit uses Statistical Base Codes of Average (over the reporting period) and IMAX, and Grab sample types, which is standard practice for other SRSTP NPDES permits.

No eDMR registration is required for SRSTPs. AMRs alone are required for this facility, not Discharge Monitoring Reports (DMRs) or eDMRs, consistent with other SRSTPs. In order to report Ammonia sample results, **the standard AMR form was altered, as was done with the previous NPDES permit and with other SRSTPs in similar situations. If the permittee were to download the standard AMR form from DEP's website, they would also need to attach lab sample result sheets to their AMR showing the Ammonia sampling results. These instructions will be included in the permit cover letter.**

#### Compliance

Pump out records have been received. Recent sampling results were submitted with the application and do not exceed permit limits although there was no analysis conducted for Ammonia. The last DEP inspection by Operations staff occurred in August 2021.

#### Outstanding Violations

DEP's eFacts database shows one outstanding violation. Given that the homeowners are now operating without a valid NPDES permit, the NPDES permit should still be issued despite the outstanding violation for past AMRs that were not submitted. Clean Water Permits staff is coordinating with Clean Water Operations staff to allow the NPDES permit to be issued after the mandatory comment period.

#### Delaware River Basin Commission (DRBC)

Because the discharge occurs within the Delaware River water basin, the draft permit and fact sheet will be shared with the DRBC in accordance with State regulations and an interagency agreement.

#### 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.

#### History (for documentation)

The SRSTP was installed to replace a failing onlot system. The first NPDES permit and WQM permit were issued July 6, 1994. The permit application included a preliminary hydrogeologic report that was submitted March 29, 1994 and was reviewed by a DEP hydrogeologist.

**Discharge, Receiving Waters and Water Supply Information**

Outfall No.	<u>001</u>	Design Flow (MGD)	<u>.0005</u>
Latitude	<u>40° 26' 09"</u>	Longitude	<u>-75° 51' 19"</u>
Quad Name	_____	Quad Code	_____
Wastewater Description: <u>Sewage Effluent</u>			
Dry ditch to Unnamed Tributary to Willow Creek (CWF)			
Receiving Waters	<u>Creek (CWF)</u>	Stream Code	<u>01998 per 2010 permit</u>
NHD Com ID	_____	RMI	<u>1.14 per prev. permits</u>
Drainage Area	_____	Yield (cfs/mi <sup>2</sup> )	_____
Q <sub>7-10</sub> Flow (cfs)	_____	Q <sub>7-10</sub> Basis	_____
Elevation (ft)	_____	Slope (ft/ft)	_____
Watershed No.	<u>3-B</u>	Chapter 93 Class.	<u>CWF</u>
Existing Use	<u>-</u>	Existing Use Qualifier	<u>-</u>
Exceptions to Use	<u>-</u>	Exceptions to Criteria	<u>-</u>
Assessment Status	<u>Impaired for Recreational Use</u>		
Cause(s) of Impairment	<u>Pathogens</u>		
Source(s) of Impairment	<u>Unknown</u>		
TMDL Status	<u>None</u>	Name	_____

Secondary Waters:

UNT empties into Willow Creek, Stream Code 01986, at RMI 3.7 (CWF, also impaired for Recreational Use due to Pathogens, no TMDL) which empties into Maiden Creek (WWF).

Background/Ambient Data - None	Data Source - None
pH (SU)	_____
Temperature (°F)	_____
Hardness (mg/L)	_____
Other:	_____
Nearest Downstream Public Water Supply Intake	<u>Reading Area Water Authority</u>
PWS Waters	<u>Maiden Creek</u>
PWS RMI	Flow at Intake (cfs) _____ Distance from Outfall (mi) <u>Approx. 7 miles</u>

Other Comments:

the UNT 01998 is not a Class A Trout water; downstream Willow Creek is Class A Trout at 0- 0.97 RMI, approx 4 miles downstream from confluence with UNT to Willow Creek

UNT 01998 and Willow Creek are both classed as Trout Natural Reproduction waters.

<b>Compliance History</b>	
<b>Summary of AMRs:</b>	No recent AMRs on file.
<b>Summary of Inspections:</b>	<p>Last DEP inspection conducted on August 4, 2021: violation, for failure to submit monitoring reports. Also instructed to transfer NPDES permit to new owners.</p> <p>Administrative File Review on October 7, 2015: Issued a Violation for not submitting NPDES permit application by due date. Administrative Consent Order. Resolved.</p>

PREVIOUS PERMIT LIMITS, Outfall 001:

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Average Weekly	Minimum	Average Monthly	Daily Maximum	Instant. Maximum		
Flow (MGD)	XXX	Report Daily Max	XXX	XXX	XXX	XXX	2/year	Estimate
pH (S.U.)	XXX	XXX	6.0 Inst Min	XXX	XXX	9.0	1/month	Grab
DO	XXX	XXX	5.0 Inst Min	XXX	XXX	XXX	2/year	Grab
TRC	XXX	XXX	XXX	XXX	XXX	Report	1/month	Grab
CBOD5	XXX	XXX	XXX	XXX	10	20	2/year	Grab
TSS	XXX	XXX	XXX	XXX	10	20	2/year	Grab
Fecal Coliform (No./100 ml) Oct 1 - Apr 30	XXX	XXX	XXX	XXX	2000	XXX	2/year	Grab
Fecal Coliform (No./100 ml) May 1 - Sep 30	XXX	XXX	XXX	XXX	200	XXX	2/year	Grab
Ammonia Nov 1 - Apr 30	XXX	XXX	XXX	XXX	9.0	18	2/year	Grab
Ammonia May 1 - Oct 31	XXX	XXX	XXX	XXX	3.0	6	2/year	Grab

**Proposed Effluent Limitations and Monitoring Requirements**

The limitations and monitoring requirements specified below are proposed for the draft 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" (362-0400-001), SOPs and/or BPJ.

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

Parameter	Effluent Limitations						Monitoring Requirements	
	Mass Units (lbs/day)		Concentrations (mg/L)				Minimum Measurement Frequency	Required Sample Type
	Average Monthly	Daily Maximum	Instant. Minimum	Annual Average	Daily Maximum	Instant. Maximum		
Flow (MGD)	XXX	Report	XXX	XXX	XXX	XXX	2/year	Estimate
TRC	XXX	XXX	XXX	XXX	XXX	Report	1/month	Grab
CBOD5	XXX	XXX	XXX	10.0	XXX	20	2/year	Grab
TSS	XXX	XXX	XXX	10.0	XXX	20	2/year	Grab
Fecal Coliform (No./100 ml)	XXX	XXX	XXX	200	XXX	1000	2/year	Grab
Ammonia Nov 1 - Apr 30	XXX	XXX	XXX	9.0	XXX	18	2/year	Grab
Ammonia May 1 - Oct 31	XXX	XXX	XXX	3.0	XXX	6	2/year	Grab

Compliance Sampling Location: after treatment facility