

Application Type Renewal
Facility Type Sewage
Major / Minor Minor

**NPDES PERMIT FACT SHEET
ADDENDUM**

Application No. PA0093165
APS ID 1068144
Authorization ID 1404374

Applicant and Facility Information

Applicant Name	<u>PA American Water Co.</u>	Facility Name	<u>PA American Water - Claysville STP</u>
Applicant Address	<u>852 Wesley Drive</u> <u>Mechanicsburg, PA 17055</u>	Facility Address	<u>891 Old National Pike</u> <u>Claysville, PA 15323-1265</u>
Applicant Contact	<u>Jim Runzer</u>	Facility Contact	<u>Michael Tedesco</u>
Applicant Phone	<u>(724) 550-1540</u>	Facility Phone	<u>(412)-418-6590</u>
Client ID	<u>87712</u>	Site ID	<u>246470</u>
SIC Code	<u>4952</u>	Municipality	<u>Donegal Township</u>
SIC Description	<u>Trans. & Utilities - Sewerage Systems</u>	County	<u>Washington</u>
Date Published in PA Bulletin	<u>January 27, 2024 (Attachment A)</u>	EPA Waived?	<u>Yes</u>
Comment Period End Date	<u>February 26, 2024</u>	If No, Reason	<u></u>
Purpose of Application	<u>Application for a renewal of an NPDES permit for discharge of treated Sewage</u>		

Internal Review and Recommendations

The Department of Environmental Protection (DEP) published notice of draft Authorization to Discharge under the National Discharge Elimination System (NPDES) discharge requirements for treated sewage for Claysville STP in the *Pennsylvania Bulletin* on January 27, 2024 [54 Pa.B.391]. A 30-day comment period was provided during which interested parties were directed to submit comments to DEP.

Comments were received from Jennifer Green with PA American Water. As a result of those comments, the following changes are being made:

- The permittee address on page 1 of the permit will be changed to 852 Wesley Drive Mechanicsburg, PA 17055
- The effluent discharge rate on page 4 of the permit will be changed to 0.16.
- A five-year compliance period is being added to the permit for Total Suspended Solids and Total Residual Chlorine

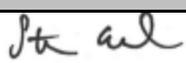
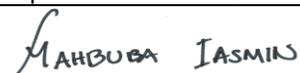
Adding a compliance period and reducing the TRC limits constitutes a major amendment. The permit is therefore being formally redrafted to facilitate a public comment period.

Draft permit issuance is recommended.

In response to the draft permit, Jennifer Green with PA American Water sent a formal letter dated February 14, 2024 (Attachment B). The letter contained comments regarding typographical errors in the draft permit and fact sheet and the reduction of the TRC and total suspended solids (TSS) limits.

1. The address on the draft permit is incorrect as the Company's headquarters have relocated since the issuance of the last permit. The correct address is 852 Wesley Drive Mechanicsburg, PA 17055.

DEP's Response: The address on page 1 of the permit has been changed.

Approve	Return	Deny	Signatures	Date
X			 Stephanie Conrad / Environmental Engineering Specialist	February 29, 2024
x			 Mahbuba Iasmin, Ph.D., P.E. / Environmental Engineering Manager	March 8, 2024

Internal Review and Recommendations

- Page four of the draft permit states the effluent limitations were determined using an effluent discharge rate of 0.122. The fact sheet correctly identifies the design rate of the facility at 0.16 MGD. We request the draft permit be updated to correct the clerical error.

DEP's Response: The flowrate documented on page four of the draft permit has been changed from 0.122 MGD to 0.16 MGD.

- Page 13 of the NPDES Fact Sheet includes a table for Mass Loading Limits to be imposed with the draft permit. The Mass Loading limits table does not match the Effluent Limitation table in Part A of the draft permit for TSS and CBOD. It is our understanding that the mass limits in Part A of the draft permit are correct.

DEP's Response: The mass loading limits on page 13 of the Draft Fact Sheet were inadvertently carried over from the previous permit. The mass loading limits in Part A I.A. of the draft permit are correct. No changes will be made to the draft fact sheet.

- The draft permit reduces the discharge limitation for total chlorine residual to 0.02 mg/L for both monthly concentration and daily maximum from 0.03 mg/L and 0.10 mg/L. PA American respectively requests that the current discharge limits of 0.03 mg/L monthly average and 0.10 mg/L daily maximum be carried over to the renewed permit.

DEP's Response: Claysville STP discharges to Dutch Fork, which is classified as a high-quality warm water fishery. DEP's *Water Quality Antidegradation Implementation Guidance* [Doc. No. 391-0300-002] (Antidegradation Policy) was published in 2003 and defines Antidegradation Best Available Technologies (ABACT). The policy states that disinfection should be accomplished using a method that leaves no detectable residual and that disinfection using ultra-violet light or other non-chlorine-based systems is encouraged and must be considered.

Dutch Fork was classified as a High-Quality Stream as a result of a final rulemaking published in the *Pennsylvania Bulletin* on October 8, 1979 [9 Pa.B. 3051]. Claysville STP was built sometime after January 6, 1983. Because the High-Quality designation pre-dates the treatment facility, Claysville STP is subject to the ABACT limits in the Anti Degradation Policy. Part A.I.B. and A.I.C. have been added to the permit to create a fifty-nine-month compliance period. Part C. IV. has also been added to the permit which defines interim steps of the compliance period.

- The draft permit imposes reduced concentrations and loading limits for Total Suspended Solids. A review of historical data shows the facility will not be able to reliably meet the average weekly and average monthly concentrations of 10mg/L and 15mg/L, respectively, for Total Suspended Solids. PAWC offers the following compliance schedule to allow enough time for the necessary changes to take place:

Action	Time Line
Complete evaluation of available options for compliance and start project design	Within 12 months of NPDES permit issuance
Complete design and submit DEP construction permit applications	Within 24 months of NPDES permit issuance
Complete necessary improvements and compliance with permit limits	Within 24 months of receipt of necessary DEP construction permits

DEP's Response: Part A.I.B. and A.I.C. have been added to the permit to create a fifty-nine-month compliance period. Part C.IV. has also been added to the permit which defines interim steps of the compliance period.

ATTACHMENT A

PA Bulletin Post

NOTICES

DEPARTMENT OF ENVIRONMENTAL PROTECTION

Applications, Actions and Special Notices

[54 Pa.B. 391]
[Saturday, January 27, 2024]

APPLICATIONS

**THE PENNSYLVANIA CLEAN STREAMS LAW AND THE FEDERAL CLEAN WATER ACT
APPLICATIONS FOR NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)
PERMITS AND WATER QUALITY MANAGEMENT (WQM) PERMITS UNDER THE CLEAN
STREAMS LAW AND FEDERAL CLEAN
WATER ACT**

This notice provides information about persons who have applied to the Department of Environmental Protection (DEP) for a new, renewed, or amended NPDES or WQM permit, or a permit waiver for certain stormwater discharges, or have submitted a Notice of Intent (NOI) for coverage under a General Permit. The applications and NOIs concern, but are not limited to, effluent discharges from sewage treatment facilities and industrial facilities to surface waters or groundwater; stormwater discharges associated with industrial activity (industrial stormwater), construction activity (construction stormwater), and municipal separate storm sewer systems (MS4s); the application of pesticides; the operation of Concentrated Animal Feeding Operations (CAFOs); and the construction of sewage, industrial waste, and manure storage, collection and treatment facilities. This notice is provided in accordance with 25 Pa. Code Chapters 91 and 92a and 40 CFR Part 122, implementing The Clean Streams Law (35 P.S. §§ 691.1—691.1001) and the Federal Clean Water Act (33 U.S.C.A. §§ 1251—1376). More information on the types of NPDES and WQM permits that are available can be found on DEP's website (visit www.dep.pa.gov and select Businesses, Water, Bureau of Clean Water, Wastewater Management, and NPDES and WQM Permitting Programs).

<i>Section</i>	<i>Category</i>
I	Individual and General WQM Permit Applications/NOIs Received, General NPDES Permit NOIs Received, and All Transfer and Minor Amendment Applications/NOIs Received
II	Individual NPDES Permits—New, Renewal, and Major Amendment Applications and Draft Permits for Discharges Relating to Sewage, Industrial Waste, Industrial Stormwater, MS4s, Pesticides and CAFOs
III	Individual NPDES Permit Applications for Discharges of Stormwater Associated with Construction Activity

Section I identifies the following applications and NOIs that have been received by DEP:

- Individual and General WQM Permit Applications Received—DEP provides a 15-day public comment period for Individual WQM Permit Applications for new and reissued permits. There is no public comment period for General WQM Permit NOIs.
- General Chapter 92a NPDES Permit NOIs Received—There is no public comment period for General NPDES NOIs received.
- All Transfer and Minor Amendment Applications/NOIs Received—Transfer and Minor Amendment Applications/NOIs received for Individual and General WQM Permits and Individual and General NPDES Permits, excluding PAG-01 and PAG-02, are identified but do not have public comment periods. DEP provides a 15-day public comment period for Individual WQM Permit Applications for amendments.

Additional information on these applications and NOIs may be reviewed by generating the "Applications and NOIs without Comment Periods Report" or, for Individual WQM Permit Applications, the "Applications Received with Comment Periods Report" on DEP's website at www.dep.pa.gov/CWPublicNotice.

PA0093165, Sewage, SIC Code 4952, **PA American Water Co.**, 800 W Hershey Park Drive, Hershey, PA 17033-2400.
Facility Name: PA American Water—Claysville STP. This existing facility is located in Donegal Township, **Washington County**.

Description of Existing Activity: The application is for a renewal of an NPDES permit for an existing discharge of treated sewage.

The receiving stream(s), Dutch Fork (HQ-WWF), is located in State Water Plan watershed 20-E and is classified for High Quality Waters—Warm Water Fishes, aquatic life, water supply and recreation. The discharge is not expected to affect public water supplies.

The proposed effluent limits for Outfall 001 are based on a design flow of .122 MGD.—Limits.

Parameters	Mass Units (lbs/day)		Concentrations (mg/L)			
	Average Monthly Report	Weekly Average Report	Minimum XXX	Average Monthly XXX	Weekly Average IMAV XXX	Weekly IMAV XXX
Flow (MGD)	Report	Report	XXX	XXX	XXX	XXX
pH (S.U.)	XXX	XXX	Daily Max 6.0 Inst Min	XXX	XXX	9.0
Dissolved Oxygen	XXX	XXX	5.0 Inst Min	XXX	XXX	XXX
Total Residual Chlorine (TRC)	XXX	XXX	XXX	0.03	XXX	0.10
Carbonaceous Biochemical Oxygen Demand (CBOD ₅)	13	20	XXX	10.0	15.0	20
Biochemical Oxygen Demand (BOD ₅) Raw Sewage Influent	Report	Report	XXX	Report	XXX	XXX
Total Suspended Solids Raw Sewage Influent	13 Report	20 Report	XXX	10.0 Report	15.0 XXX	20 XXX
Fecal Coliform (No./100 ml) Nov 1 - Apr 30 May 1 - Oct 31	XXX XXX	XXX XXX	XXX	2,000 Geo Mean 200 Geo Mean	XXX XXX	10,000 400
Ammonia-Nitrogen Nov 1 - Apr 30 May 1 - Oct 31	5.0 2.0	8.0 3.0	XXX	4.0 1.5	6.0 2.0	8 3
Total Phosphorus	2.5	4.0	XXX	2.0	3.0	4
<i>E. Coli</i> (No./100 ml)	XXX	XXX	XXX	XXX	XXX	Report
Total Nitrogen	XXX	XXX	XXX	Report	XXX	XXX

Daily Max

You may make an appointment to review the DEP files on this case by calling the File Review Coordinator at 412-442-4000.

The EPA Waiver is in effect.

Southwest Regional Office

ATTACHMENT B

February 14, 2024 Comment Letter



Jennifer Green
Manager, Wastewater Compliance
400 Hanover Street
Birdsboro, PA 19508
Jennifer.green01@amwater.com
(C) 610-233-6553

February 14, 2024

Stephanie Conrad
Environmental Engineering Specialist
Clean Water Program
Pennsylvania Department of Environmental Protection

Re: Draft NPDES Permit – Sewage
PA American Water – Claysville STP
Application No. PA0093165
Authorization ID No. 1404374
Donegal Township, Washington County

Dear Ms. Conrad:

On January 12, 2024, Pennsylvania American Water received a copy of the draft NPDES permit for the Claysville STP. We have thoroughly reviewed the draft permit and offer the following comments for your consideration.

1. The address on the draft permit is incorrect as the Company's headquarters have relocated since the issuance of the last permit. The correct address is:

Pennsylvania American Water
852 Wesly Drive
Mechanicsburg, PA 17055

2. Part A, supplemental information on page 4 of the draft permit states the effluent limitations were determined using an effluent discharge rate of 0.122 MGD. The fact sheet correctly identifies the design rate of the facility at 0.16 MGD. We request the draft permit be updated to correct the clerical error.
3. Page 13 of the NPDES Fact Sheet includes a table for Mass Loading Limits to be imposed with the draft permit. The Mass Loading Limits table does not match the Effluent Limitations table in Part A of the draft permit for TSS and CBOD. It is our understanding the mass limits in Part A of the draft permit are correct and that the limitations in the fact sheet are a clerical error. If our understanding is not correct, we request the Effluent Limitations table in Part A of the permit be updated to correctly match the mass limitations in the fact sheet.

- The draft permit reduces the discharge limitation for total chlorine residual to 0.02 mg/L for both monthly concentration and daily maximum from 0.03 mg/L and 0.10 mg/L, respectively. The Claysville STP currently uses sodium bisulfite for dechlorination prior to discharge which is known to cause decreased dissolved oxygen levels when fed in excess of the chlorine demand. Historically, the TRC discharge concentrations are 0.03 mg/L for both daily maximum and monthly average. In order to meet the stringent TRC limits, the sodium bisulfite dosage will need to be increased which may have unintended consequences based on changing chlorine demands in the plant effluent.

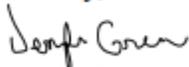
PA American Water respectfully requests that the current discharge limits of 0.03 mg/L monthly average and 0.10 mg/L daily maximum be carried over to the renewed permit. If this request is denied, PA American Water will require additional time outlined in a compliance schedule to evaluate alternative options for the disinfection/dechlorination process.

- The draft permit imposes reduced concentrations and loading limits for Total Suspended Solids. A review of historical data shows the facility will not be able to reliably meet the average weekly and average monthly concentrations of 10 mg/L and 15 mg/L, respectively for Total Suspended Solids. PAWC offers the following compliance schedule to allow enough time for the necessary changes to take place:

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Pennsylvania American Water appreciates the Department's consideration of the above comments. If you need any additional information or clarity on the comments above, feel free to reach out to me directly at 610-233-6553.

Sincerely,



Jennifer Green
 Manager, Wastewater Compliance